



## **Penrith and Eden Refugee Network**

# **Adult Safeguarding and Protection Policy**

**October 2025**

**Date for review: October 2026**

This policy has been drafted in line with best practice.

### **Introduction**

Penrith and Eden Refugee Network (PERN) is committed to safeguarding adults in line with national legislation and relevant national and local guidelines. We will safeguard adults by ensuring that our activities are delivered in a way that keeps all adults safe from harm.

PERN recognises the specific vulnerabilities that are particular to asylum seekers and refugees. These include vulnerabilities due to limited understanding of written and spoken English, insecurity of present and future legal rights to remain in the UK, isolation from family and friends, and those resulting from past or present abuse and bereavement. Asylum seekers and refugees can be at increased risk of exploitation by sexual traffickers and those seeking to radicalise.

PERN is committed to creating a culture of zero-tolerance of harm to vulnerable adults, which necessitates:

- recognising adults who may be at risk and the circumstances which may increase risk;
- knowing how adult abuse, exploitation, neglect and radicalisation manifests itself;
- being willing to report safeguarding concerns.

This extends to recognising and reporting harm experienced anywhere, including within our activities, within other organised community or voluntary activities, in the community, in the person's own home and in any care setting.

PERN is committed to best safeguarding practice and to upholding the rights of all adults to live a life free from harm from abuse, exploitation and neglect.

## Scope

Adult safeguarding policy and practice applies to all individuals involved in PERN including trustees, directors, staff, freelancers and volunteers (collectively referred to as workers) who are part of the PERN community and its activities.

## Purpose

The purpose of this policy is to demonstrate the commitment of PERN to safeguarding adults and to ensure that everyone involved in the organisation is aware of:

- the legislation, policy and procedures for safeguarding adults
- their role and responsibility for safeguarding adults
- what to do or who to speak to if they have a concern relating to the welfare or wellbeing of an adult associated with the organisation.

The Local Authority has the lead role in relation to adult safeguarding but all organisations have a part to play in safeguarding adults.

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.

The aims of adult safeguarding are to:

- stop abuse or neglect wherever possible
- prevent harm and reduce the risk of abuse or neglect to adults, especially those with support needs
- safeguard adults in a way that supports them in making choices and having control about how they want to live
- promote an approach that concentrates on improving life for the adults concerned.

## Legal Framework

This Adult Safeguarding Policy is compliant with United Nations directives on the rights of disabled people and commitments to the rights of older people. It is covered by:

- the Human Rights Act 1998
- the Data Protection Act 2018
- General Data Protection Regulations 2018 The practices and procedures within this policy are based on the relevant legislation and government guidance.
- the Care Act 2014 - Care and Support Statutory Guidance (especially chapter 14).

## Policy Statement

PERN believes everyone has the right to live free from abuse, neglect and fear, regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.

We are committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution. All reports of abuse will be treated seriously.

We acknowledge that safeguarding is everybody's responsibility and are committed to preventing abuse and neglect through safeguarding the welfare of all adults involved.

We recognise that health, wellbeing, ability, disability and need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, to communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

We recognise that there is a legal framework within which organisations need to work to safeguard adults who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding adult legislation and with local statutory safeguarding procedures.

Actions taken by PERN will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the adult concerned.

At PERN there is zero tolerance of the abuse of adults.

## The six safeguarding principles

The Care Act 2014 sets out the following principles that should underpin the safeguarding of adults. PERN commits to following these principles:

- **Empowerment:** people are supported and encouraged to make their own decisions and informed consent.
- **Prevention:** it is better to act before harm occurs.
- **Proportionality:** the least intrusive response appropriate to the risk presented.
- **Protection:** support and representation for those in greatest need.
- **Partnership:** services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- **Accountability:** Accountability and transparency in delivering safeguarding.

## Commitments

In order to implement this policy PERN will ensure that:

- Everyone involved with PERN is aware of the safeguarding adult procedures and knows what to do and who to contact if they have a concern relating to the welfare or wellbeing of an adult.
- Any concern that an adult is not safe is taken seriously, responded to promptly, and followed up in line with PERN procedures.
- The wellbeing of those at risk of harm will be put first and the adult actively supported to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to.
- Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored in line with our Data Protection Policy.
- PERN acts in accordance with best practice advice, for example, from National Governing Bodies.
- PERN will cooperate with the Police and the relevant Local Authorities in taking action to safeguard an adult.
- All staff, freelancers and volunteers have completed and are up to date with safeguarding training.
- PERN uses safe recruitment practices and continually assesses the suitability of volunteers and staff to prevent the employment/deployment of unsuitable individuals in this organisation.
- PERN shares information about anyone found to be a risk to adults with the appropriate bodies. For example: Disclosure and Barring Service, Services, Police, Local Authority/Social Services.
- This policy is reviewed no less than every three years, earlier if there are changes in relevant legislation and/or government guidance as required by the Local Safeguarding Board and/or National Governing Bodies or as a result of any significant change or event.

## Implementation

PERN is committed to maintaining its capability to implement this policy and procedures. In order to do so the following will be in place:

- A clear line of accountability within the organisation for the safety and welfare of all adults.
- Access to relevant legal and professional advice.
- Safeguarding adult procedures that deal effectively with any concerns of abuse or neglect, including those caused through poor practice.
- A designated Safeguarding Lead and Deputy
- Codes of Conduct for Directors, staff, freelancers and volunteers that specify zero tolerance of abuse in any form.

- Risk assessments that specifically include safeguarding of adults where relevant.

## Designated Leads

### Nominated adult protection lead:

Name: Ali Ross, Trustee

Email: [ali@parhelia.org.uk](mailto:ali@parhelia.org.uk) Phone: 07769 554715

### Deputy adult protection lead:

Name: Sarah Wilson

Email: [sarahw@pern.org.uk](mailto:sarahw@pern.org.uk) Phone: 07950 106559

We are committed to reviewing our policy and good practice every three years.

## Safeguarding Adults Procedures

### Roles

Safeguarding is everyone's business.

All staff, freelancers, volunteers and contractors have a responsibility to maintain appropriate standards of behaviour and to report lapses in these standards by others. Volunteers and staff should raise concerns of abuse to their supervisor or activity leader who will follow-up the matter with Sarah Wilson, Director of PERN. There is a form for reporting incidents of any concern available in the Volunteer Area of the PERN website, or by request from [hello@pern.org.uk](mailto:hello@pern.org.uk).

In all serious cases involving safeguarding issues, Sarah Wilson must be contacted as soon as possible, even if the incident takes place when she is not present.

If Sarah Wilson is part of the cause of your concern, then you should report the matter to the Designated Safeguarding lead, Ali Ross or any Trustee. Any safeguarding concerns that are raised should be documented as soon as possible afterwards and recorded on the on-line Safeguarding Incident Report log.

PERN Trustees will monitor the implementation of the policy. The Director of PERN is responsible for follow-up and reporting of safeguarding issues, including where appropriate to the Local Authority Adult Safeguarding Hub or SERCO. Serious concerns involving the conduct of a member of staff, volunteer or contractor must be referred immediately to the PERN Director. All safeguarding records will be kept in a secure location by the PERN Director.

All PERN freelancers, staff and trustees will be given a copy of this Appendix 2 - detail on adult safeguarding and protection and must confirm they have read and understood it. The Designated Safeguarding Lead and Deputy will complete training in safeguarding to level 2.

Other freelancers and staff will complete training as relevant to their role and responsibilities.

PERN works to ensure everyone in PERN is aware of safeguarding. All PERN volunteers are given a copy of the PERN Safeguarding Statement and offered the opportunity to ask questions. Volunteer and staff induction events include discussion on safeguarding.

## **Disclosures**

Disclosure is the process by which adults start to share their experiences of abuse with others. This can take place over a long period of time – it is a journey, not one act or action.

**Members of staff, freelancers or volunteers receiving an allegation of abuse from an adult should:**

- Allow them to speak without interruption.
- Listen carefully to what they are saying even if it sounds fanciful, do not dismiss, trivialise, or exaggerate the issue.
- Not make suggestions, coach, or lead the person in any way. Avoid interrogating or asking detailed or probing questions.
- Remain calm and do not show shock or disbelief.
- Reassure them that they have done the right thing in telling you.
- Tell the person that the information will be treated seriously.
- Never promise to keep a secret. Explain that you have a responsibility for their safety and therefore must tell somebody in authority. Let them know that there are others who can help them and that they are not alone.
- Ask them how they would like PERN to respond to their safeguarding situation, understanding the choices they are making.
- Tell them what you will do next.
- Immediately after the disclosure, record in writing what was said using the adult's own words as soon as possible – note date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated. Pass this on to the Safeguarding Lead who will contact the relevant agency.
- Following a conversation with the Safeguarding Lead you may be asked if appropriate to have a further conversation with the adult to let them know what has been decided and what further action will be taken.

## **Keeping a record of your concerns**

Volunteers or freelancers/staff who receive a disclosure must make notes. The Director of PERN may issue the Form below to help gather a full record so there is good information for follow-up and any reporting to the Local Authority Safeguarding Hub or SERCO.

## **Other Concerns**

Any member of staff, freelancer or volunteer who has not received a disclosure but has a concern about an adult should record their worries as soon as possible and have a confidential conversation with the Safeguarding Lead.

The Safeguarding Lead will then decide on the course of action, contacting the relevant authorities if this is deemed the right thing to do and is what the adult wants.

## **Whistleblowing**

We acknowledge a member of staff, contractor or volunteer may witness an incident, action or event involving another PERN worker that may give them cause for concern. We are committed to the safety and security of all adult participants at all times and, equally, we are committed to the safety and security of all PERN workers. Therefore, given the risks and sensitivities associated with reporting concerns,

- All workers are required to share any concerns in regard to any practices that compromise the safety of adults to the designated safeguarding representative as soon as possible.
- Any worker that discloses a concern will be assured confidentiality as far as practically possible, without jeopardising any investigations by external authorities or our own investigation
- Any worker expressing a concern for their safety following a disclosure will be given all necessary support to enable them to continue in their role safely.

## **Online abuse**

PERN will take all reasonable precautions to ensure e-Safety. Sarah Wilson acts as first point of contact for any complaint regarding cyber bullying in relation to PERN's social media, website and other web presence. All other areas of online abuse should be dealt with in line with the procedures above.

## Safeguarding Incident Report Form **\*\*CONFIDENTIAL\*\***

Your Full Name:

Your Role:

Date form filled in:

Event/Activity if relevant:

Full Name of adult you are concerned about:

Are you reporting your own concerns or passing on those of somebody else? Give details:
Brief description of what has prompted the concerns. Include dates, times etc. of any specific incidents:
Any physical, behavioural or indirect signs?
Have you spoken to the person? If so, what was said?
Have you spoken to a carer, if relevant? If so, what was said?
Has anybody been alleged to be the abuser? If so, give details:
Have you consulted anybody else? Give details:
To whom was it reported and date of reporting?
Are there further actions you would like to be taken?

Signed:

Name and position:

Date and time:

Signed:

Name and position:

Date and time:

## Definitions of abuse

### Definitions of abuse and neglect

Abuse is a violation of an individual's human and civil rights by another person or persons. The Care Act guidance provides the following definition of adult safeguarding:

*Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances.*

There are eight types of abuse and neglect as defined by the statutory guidance outlined below (and further information is available within the statutory guidance):

#### 1. Physical abuse including:

- assault
- hitting
- slapping
- pushing
- misuse of medication
- restraint
- inappropriate physical sanction

#### 2. Domestic violence including:

- psychological
- physical
- sexual
- financial
- emotional abuse
- so called 'honour'-based violence

#### 3. Sexual abuse including:

- rape
- indecent exposure
- sexual harassment
- inappropriate looking or touching
- sexual teasing or innuendo
- sexual photography
- subjection to pornography or witnessing sexual acts
- sexual assault
- sexual acts to which the adult has not consented or was pressured into consenting

#### **4. Psychological abuse including:**

- emotional abuse
- threats of harm or abandonment
- deprivation of contact
- humiliation
- blaming
- controlling
- intimidation
- coercion
- harassment
- verbal abuse
- cyber bullying
- isolation
- unreasonable and unjustified withdrawal of services or supportive networks

#### **5. 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
- the misuse or misappropriation of property, possessions, or benefits

#### **6. Modern slavery encompasses:**

- slavery
- human trafficking
- forced labour and domestic servitude

#### **7. 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

#### **8. Self-neglect**

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

## **Understanding who may abuse or neglect adults**

In the same way that it should never be assumed that an adult is not able to be abused, it should also never be assumed that a person is not able to abuse or neglect someone else.

Most cases of abuse and neglect are perpetrated by people that the victim knows, often in a position of power or trust. Anyone can perpetrate abuse or neglect, including:

- spouses/partners
- other family members
- neighbours
- friends
- acquaintances
- local residents
- people who deliberately exploit adults they perceive as vulnerable to abuse
- paid staff, or professionals and volunteers, including carers
- strangers

Abuse can take place in any relationship and there are many contexts in which abuse might take place; e.g. Institutional abuse, Domestic Abuse, Forced Marriage, Human Trafficking, Modern Slavery, Sexual Exploitation, County Lines, Radicalisation, Hate Crime, Mate Crime, Cyber bullying, Scams. Some of these are named specifically within legislations.

## **Signs and Indicators of Abuse and Neglect**

An adult may confide that they are experiencing abuse inside or outside of the organisation's setting. Similarly, others may suspect that this is the case.

There are many signs and indicators that may suggest someone is being abused or neglected - or is otherwise at risk. There may be other explanations, but they should not be ignored. The signs and symptoms include but are not limited to:

- unexplained bruises or injuries – or lack of medical attention when an injury is present
- person has belongings or money going missing
- person is not attending / no longer enjoying their sessions. You may notice that a participant has been missing from sessions and is not responding to reminders
- change in appearance or deterioration of hygiene
- a change in the behaviour or confidence of a person. For example, a participant may be looking quiet and withdrawn when their brother comes to collect them from sessions in contrast to their personal assistant whom they greet with a smile
- self-harm
- a fear of a particular group of people or individual
- a parent/carer/friend always speaks for the person and doesn't allow them to make their own choices
- they may tell you / another person they are being abused – i.e. a disclosure.

# Anti Radicalisation and Extremism

## Spotting signs of radicalisation

Everyone is different and it is not possible to use a check-list to tell if a person is being radicalised. The following might be signs

- Accessing extremist content online.
- Justifying the use of violence to solve societal issues.
- Dressing or using symbols associated with extremist or terrorist organisations.

## Extremism

Extremism is the vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Extremism becomes terrorism when there is a belief in using violence to further the cause.

## Reporting

If you know the person concerned well, try talking to them about what you've noticed if you feel comfortable doing so. Be aware this conversation may not be welcome and the person may become angry or defensive. If your concerns persist, please raise them with your activity leader who will notify the Director of PERN.

The Director of PERN or their nominated person will ask for further information about the concerns and make a decision which could be: that there are no grounds for further action, to monitor the situation, to seek further guidance from experts, or to contact Prevent and refer the matter. Prevent is a national programme that aims to stop people becoming terrorists or supporting terrorism.

PERN does not have a statutory duty to refer (unless the concern is about a child under 18 in which case the PERN Child Safeguarding procedure should be followed) but the earlier that advice is sought, the sooner it may be possible to stop someone becoming a danger to themselves or others.

If there is immediate danger dial 999.

## Further Advice and Follow-up

You can report suspicious activity to the police on 0800 789 321.

ACT (Action Counters Terrorism) Early Support Line 0800 0113764 [www.actearly.uk](http://www.actearly.uk)

## Modern Slavery

### What is it?

Modern slavery takes many forms and is almost always motivated by profit. It includes sexual exploitation, labour exploitation, domestic servitude and exploitation into criminal activity such as county lines drug support and cannabis cultivation. It also encompasses 'trafficking', the arrangement of someone's travel with a view to their exploitation.

### Spotting Signs of Modern Slavery

You may be a victim or may be in contact with a victim of modern slavery without realising it. The following signs should trigger further inquiries and support.

- Being unkempt, uneasy or malnourished.
- Not being sure of their address.
- Not having a debit or credit card or access to money.
- Untreated injuries.
- Someone else speaking for them.
- Being picked up and dropped off in unusual ways.

If you feel you are a victim of modern slavery talk to someone trusted about what is happening to you. If you encounter someone who is a potential victim encourage them to talk about it and take actions to protect themselves.

### Reporting

Anyone who has concerns about, encounters or is a potential victim of modern slavery should raise this with their activity leader who will notify the Director of PERN.

The Director of PERN, or nominated person, will seek advice and if appropriate refer the matter to a First Responder who is trained to identify victims of modern slavery. First Responders are trained to gather more information from the victim and explain what happens next. The case may be passed to the police as the person may be a victim of crime. The victim has no obligation to cooperate with the police.

The usual First Responders for PERN are the Salvation Army via their national 24/7 helpline 08000 80803733. The Police and Migrant Help are also First Responders.

Anyone can report modern slavery to the modern slavery confidential helpline 0800 0121 700 or online at [https://www.modernslaveryhelpline.org/report, which is](https://www.modernslaveryhelpline.org/report,whichis) run by the UK charity Unseen.

Support for victims of modern slavery is co-ordinated through the National Referral Mechanism (NRM) which is the process set up by the UK Government to identify and support victims of trafficking and modern slavery in the UK. Only designated First Responders can make such referrals.

When there is immediate danger to the victim, inform the police by calling 999.

## **Asylum Seekers and Modern Slavery**

Many asylum seekers arrive in the UK with the assistance of people smugglers. If an asylum seeker paid a people smuggler and is now free from their control this is not matter for the NRM. However, if a person is still under the control of another once in the UK, or was a victim of modern slavery prior to arriving in the UK and their money and actions are still under such control, they are potential victims of modern slavery and should contact a First Responder.

### **Further Information on Modern Slavery**

**[www.unseenuk.org](http://www.unseenuk.org)**

[www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-fo-rms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales](http://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-fo-rms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales)

## **Ways that abuse might be brought to your attention**

Abuse might be brought to your attention by:

- an adult making a direct disclosure about him or herself
- an adult making a direct disclosure about another adult
- an adult offering information that is worrying but not a direct disclosure
- a member of staff or volunteer being concerned about an adult's appearance or behaviour or about the behaviour of another adult towards them
- a carer, friend or family member making a disclosure about abuse that an adult is suffering or at risk of suffering
- a carer, friend or family member offering information about an adult that is worrying but not a direct disclosure.

## **Code of Conduct**

All PERN workers, including the director and the board of trustees, paid staff, contractors and volunteers, must adhere to the following code of conduct:

- Treat all people with respect and dignity, and understand their right to personal privacy.
- Behave appropriately and use appropriate language at all times.
- Avoid favouritism, and treat everyone fairly and without prejudice or discrimination.
- Be available to listen to the concerns of people and refer them to other sources of help where appropriate.
- Encourage people to feel comfortable enough to point out attitudes and behaviours they do not like.
- Show understanding when dealing with sensitive issues and recognise that caution is required when discussing such issues.

- Never consume alcohol while caring for people at risk at work.
- Always act within professional boundaries; ensure all contact with people at risk is essential to the project / event / activity / you are working on.
- Plan activities with vulnerable adults which involve more than one person being present wherever possible, or ensure that other adults are within sight or hearing if you can't do this, in order to protect yourself (e.g. an open door).

## APPENDIX

### PERN Safeguarding Statement

Available Here:  [PERN Safeguarding Statement.pdf](#)