

SORTED &amp; SUPPORTED BY KIRSTI COX ADVOCACY CIC

# Safeguarding Adults Policy and Procedure

<b>Version</b>	1.0
<b>Date adopted</b>	March 2026
<b>Adopted by</b>	Board of Directors
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<b>Policy owner</b>	Kirsti Cox, Director and Designated Safeguarding Lead
<b>CIC number</b>	16950066

## 1. Purpose

Sorted & Supported by Kirsti Cox Advocacy CIC (S&S) is committed to the wellbeing of every person we work with, and to upholding every individual's right to live a life free from abuse, neglect and exploitation. This is central to how we operate.

This policy sets out S&S's approach to safeguarding adults and the procedure that any person working for or with S&S, including the director, any future employees, contractors and volunteers, should follow if they are concerned that an adult may be experiencing or at risk of abuse or neglect.

S&S works with people who are often facing complex, high-pressure circumstances: older adults living alone, unpaid carers, people with disabilities or long-term health conditions, and individuals facing financial hardship or housing instability. Safeguarding is not a peripheral concern for this organisation. It is a core responsibility.

## 2. Scope

This policy applies to any adult who has care and support needs, or the appearance of care and support needs, and who is experiencing or at risk of abuse or neglect, and who is unable to protect themselves as a result.

Care and support needs may arise from physical or mental disability, sensory or cognitive impairments, long-term health conditions, frailty due to age, learning disabilities, or substance misuse. These individuals may face increased difficulty expressing their views and greater vulnerability to abuse.

This policy applies equally to all adults at risk, regardless of gender, ethnicity, disability, sexuality, religion, age or any other characteristic, and to their carers.

It applies to all activity carried out under the S&S and Money Mentor trading names.

## 3. Context and legal framework

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about working to prevent and stop both the risks and experience of abuse, while ensuring that the adult's wellbeing is central to any decision made. This requires recognising that adults sometimes have complex personal circumstances and may be ambivalent or unclear about their situation.

The Care Act 2014 places adult safeguarding on a statutory footing. Under Section 42, Local Authorities have a duty to make enquiries when they are made aware of a concern about any adult who:

- has care and support needs (whether or not the Local Authority is meeting those needs), or is a carer for someone who does;
- is experiencing or is at risk of abuse or neglect; and
- is unable to protect themselves from that risk or experience as a result of their care and support needs.

S&S operates within the Brighton & Hove and wider Sussex safeguarding framework. The most current Pan Sussex Safeguarding Adults thresholds guidance is available via the Brighton & Hove Safeguarding Adults Board.

The six safeguarding principles from the Sussex Safeguarding Adults Policy and Procedures inform our approach:

- Empowerment: people supported to make their own decisions and give informed consent
- Prevention: action taken before harm occurs where possible
- Proportionality: the least intrusive response appropriate to the risk presented
- Protection: support and representation for those in greatest need
- Partnership: working with communities and other organisations to prevent, detect and report neglect and abuse
- Accountability: transparency in delivering safeguarding

This policy is also informed by Making Safeguarding Personal (MSP), which prioritises engaging with the person about the outcomes they want, rather than simply processing a concern. Safeguarding is done with people, not to them.

## 4. Governing legislation

This policy is underpinned by:

- Care Act 2014
- Mental Capacity Act 2005
- Human Rights Act 1998
- Data Protection Act 2018 and UK GDPR
- Sexual Offences Act 2003
- Health and Social Care Act 2008
- Modern Slavery Act 2015

## 5. Policy statement

The safety and wellbeing of adults with care and support needs is the first priority at S&S. The nature of our work means we frequently visit clients in their own homes and work alongside statutory and voluntary sector services. This places us in a position where we may be among the first to identify a concern.

S&S is committed to:

- Operating a culture where safeguarding concerns are taken seriously and raised without fear
- Ensuring that anyone working for or with S&S understands this policy and knows what to do if they have a concern
- Placing the adult's views, wishes and desired outcomes at the centre of any safeguarding response
- Working alongside, not instead of, statutory services and partner organisations
- Recognising that a client's circumstances may sometimes raise concerns about children or other adults in their household, and responding to those wider concerns with the same seriousness
- Reporting safeguarding incidents and any patterns to the full board of directors at least annually
- Reviewing this policy annually

## 6. Roles and responsibilities

### Director and Designated Safeguarding Lead: Kirsti Cox

Kirsti Cox holds overall responsibility for safeguarding within S&S. As the organisation's Designated Safeguarding Lead (DSL), Kirsti is responsible for:

- Developing, implementing and reviewing this policy
- Ensuring that anyone working for or with S&S is aware of this policy and trained appropriately
- Leading the response to any safeguarding concern, including making referrals to Adult Social Care where necessary
- Keeping records of all safeguarding concerns and actions taken
- Reporting safeguarding matters to the full board of directors

### All directors

All three directors (Kirsti Cox, David Cox and Daisy Cresswell) share collective responsibility for ensuring this policy is properly adopted, resourced and reviewed. The board reviews safeguarding matters at least annually. Any director who is not the DSL should direct all concerns to the DSL in the first instance.

### Future employees, contractors and volunteers

Any future person working for or with S&S in any capacity has a duty to:

- Be aware of this policy and follow it
- Recognise signs of abuse or neglect and report concerns immediately
- Respond appropriately to disclosures
- Never make promises of confidentiality to a person disclosing abuse
- Complete any safeguarding training required for their role

## 7. Training and DBS

At the time of adoption of this policy (March 2026), Kirsti Cox is currently undertaking safeguarding training at Level 1 and 2. The target is to complete this and hold a recognised certificate by June 2026, which will be recorded with the board. Further training towards Level 3 will follow through the Brighton & Hove Learning Gateway.

All future employees or volunteers working directly with adults at risk will be required to hold appropriate safeguarding training before working unsupervised with clients.

Safeguarding training is reviewed at least every two years and the renewal date is recorded alongside the certificate.

All individuals working directly with adults at risk are required to hold a current enhanced Disclosure and Barring Service (DBS) check. Kirsti Cox holds an enhanced DBS issued December 2025. This is a condition of working for or with S&S, and records are maintained by the organisation.

## 8. Types of abuse

Abuse can take many forms. The Care Act 2014 identifies the following categories, all of which are taken seriously within this policy:

Physical abuse: the use of force that results in pain, injury or a change in a person's natural physical state.

Domestic abuse: controlling, coercive or threatening behaviour, violence or abuse by an intimate partner or family member.

Sexual abuse: direct or indirect involvement in sexual activity without valid consent.

Psychological or emotional abuse: threats, humiliation, coercion, isolation, harassment, verbal abuse or cyberbullying.

Financial or material abuse: theft, fraud, scamming or coercion in relation to financial affairs. This is of particular relevance to the clients S&S works with, many of whom are older, live alone, and may be targeted by financial exploitation.

Neglect and acts of omission: ignoring medical or care needs, withholding necessities, or failing to provide access to services.

Self-neglect: inability to maintain an acceptable standard of self-care, with the potential for serious consequences to health and wellbeing.

Discriminatory abuse: abuse based on protected characteristics including age, disability, gender, race, religion or sexuality.

Organisational abuse: neglect or poor practice within an institution or care setting, or in relation to care provided in someone's home.

Modern slavery: human trafficking, forced labour, domestic servitude, or sexual exploitation.

## 9. Safeguarding procedure

If you have a concern about an adult at risk, follow these steps:

### Step 1: Immediate danger

If the individual is in immediate danger, contact the emergency services on 999. Do not delay.

### Step 2: Handle the disclosure sensitively

- Treat what the person is telling you seriously
- Ask open questions to understand the situation: "Tell me what happened." Do not interrogate
- Reassure the person that they are not to blame and that they were right to tell you
- Do not promise confidentiality or secrecy. Be honest that you will need to speak with others
- Where appropriate, ask the person what outcome they would like
- Do not confront any alleged abuser

### Step 3: Record

Record the information as soon as possible after the concern arises. Use facts, not opinions. Include:

- What you observed or were told, and when
- The person's own words where possible
- Any immediate action taken
- The person's views and desired outcome

Records should be stored securely. Until a formal Data Protection and Confidentiality Policy is in place (target: December 2026), records must be kept in a password-protected location accessible only to directors.

### Step 4: Report to the Designated Safeguarding Lead

Report your concern to Kirsti Cox (DSL) as soon as possible on 07900 190 285 or [hello@kirsticoxadvocacy.com](mailto:hello@kirsticoxadvocacy.com).

If the concern involves Kirsti Cox directly, contact a fellow director: David Cox or Daisy Cresswell, who will take responsibility for the referral.

If no director is reachable and the risk is urgent, contact Adult Social Care (Access Point) directly.

### Step 5: Agree a plan of action

The DSL will discuss the situation and agree a plan. The adult's preferred outcomes should inform the plan wherever possible.

### Step 6: Keep the adult informed

Where safe to do so, keep the adult informed of any action being taken or planned. Their dignity and autonomy matter throughout the process.

### Step 7: Refer to Adult Social Care if necessary

If the concern meets the threshold for statutory action, the DSL will make a referral to Brighton & Hove Adult Social Care (Access Point). See Section 15 for contact details.

All concerns and referrals are recorded and monitored by the DSL.

## 10. Consent, confidentiality and capacity

S&S takes confidentiality seriously. Client information is not shared without consent, except where there is a safeguarding concern that overrides that duty. In those circumstances, information will be shared with relevant statutory bodies.

Where an adult does not wish a concern to be escalated, S&S will consider their wishes carefully. However, where it is judged that the individual is unable to protect themselves, a referral may be made regardless. This decision will be documented with clear reasoning.

Where an adult may lack capacity to make a decision, S&S will act in their best interests in line with the Mental Capacity Act 2005.

S&S never promises confidentiality in a safeguarding situation. Individuals should be informed from the outset that information may need to be shared.

## 11. Appropriate conduct and professional boundaries

Maintaining clear professional boundaries protects both clients and the people working with them. When working with adults at risk, the following principles apply:

- Physical contact should be appropriate to the context and professional relationship. Any contact made by a client should be responded to sensitively
- Do not lend or borrow money from clients
- Do not give or receive gifts beyond small tokens of appreciation (a card, flowers, chocolates)
- Do not visit clients in your own home
- Use professional contact details when communicating with clients. Do not share personal phone numbers unless this has been agreed and documented
- Do not form personal relationships with clients that go beyond the professional context

If you become aware of concerns about another person working in a position of trust who may have caused harm to an adult, this must be raised with the DSL immediately. S&S has a duty to report such concerns to the Local Authority and, where appropriate, to the Local Authority Designated Officer (LADO).

S&S supports a culture of openness. Concerns may also be raised directly with any director. A formal Whistleblowing Policy is in development (target: December 2026).

## 12. Allegations against someone working for S&S

If a concern is raised about a person working for or with S&S who may have harmed an adult, the following applies:

- The concern must be reported to the DSL immediately
- If the concern involves the DSL, it should be reported to another director
- The DSL will consider whether a referral to Adult Social Care or to the Local Authority Designated Officer (LADO) is required
- The matter will be recorded and monitored

S&S is committed to taking all such concerns seriously and to acting promptly and proportionately.

## 13. Wellbeing of the person raising a concern

Raising a safeguarding concern can be distressing. Any person who has raised a concern should be given the opportunity to discuss the experience and access appropriate support. The DSL is responsible for following up with the individual after a safeguarding incident to offer that support.

As S&S currently operates with one practitioner, there is no line manager or senior colleague for Kirsti Cox to debrief with after a difficult safeguarding situation. This is a known risk. Kirsti will identify a named peer support contact from within her professional network and record that name with the board by June 2026. Until that contact is named, Kirsti will use the SOLLA member network or the Brighton & Hove Safeguarding Adults Board as a point of professional reflection after any significant concern.

## 14. Geographic scope and Money Mentor

This policy covers all activity carried out under both the Sorted & Supported and Money Mentor trading names. The contact details in Section 15 are for Brighton & Hove, where the majority of S&S's work takes place.

Where work is carried out under the Money Mentor trading name with clients based outside Brighton & Hove, the same safeguarding procedure applies. The referral route in Step 7 should be directed to the relevant local authority Adult Social Care team for the area where the client lives, rather than Brighton & Hove. The DSL will identify the correct local contact at the point of concern if this situation arises.

## 15. Useful contacts

<b>Brighton &amp; Hove Adult Social Care (Access Point)</b>	accesspoint@brighton-hove.gov.uk Out of hours: 01273 295555 Note: between 9am and 5pm this is not an emergency service
<b>Emergency services</b>	999
<b>Sussex Police (non-emergency)</b>	101
<b>NHS 111 (health advice and mental health support)</b>	111
<b>Mental Health Rapid Response Service</b>	0300 304 0078
<b>NSPCC 24-hour helpline</b>	0800 800 5000
<b>Modern Slavery Helpline</b>	0800 0121 700
<b>S&amp;S Designated Safeguarding Lead: Kirsti Cox</b>	07900 190 285 hello@kirsticoxadvocacy.com

## 16. Related documents

The following internal documents are in place or in development:

- DBS records log (in place, December 2025)
- Data Protection and Confidentiality Policy: to be developed by December 2026
- Whistleblowing Policy: to be developed by December 2026
- Code of Conduct: to be developed by December 2026

External frameworks this policy references:

- Brighton & Hove Safeguarding Adults Board: thresholds guidance
- Pan Sussex Safeguarding Adults Policy and Procedures
- NHS England Intercollegiate Guidance on Adult Safeguarding

## Annex A: Step-by-step procedure summary

For quick reference during a concern:

<b>1</b>	Is the person in immediate danger? If yes, call 999.
<b>2</b>	Stay calm. Listen carefully. Do not interrogate or promise confidentiality.
<b>3</b>	Ask open questions. Establish what the person wants to happen.
<b>4</b>	Record what was said and what you observed, as soon as possible. Use facts.
<b>5</b>	Contact the DSL (Kirsti Cox: 07900 190 285) as soon as possible.
<b>6</b>	If the DSL is unavailable or implicated, contact another director or Adult Social Care directly.
<b>7</b>	Agree a plan. Keep the adult informed where safe to do so.
<b>8</b>	If a statutory referral is needed, the DSL contacts Adult Social Care (Access Point).
<b>9</b>	Monitor the situation. Record all updates.

## Annex B: Dos and don'ts when responding to a disclosure

### Do

- Treat what the person tells you seriously
- Reassure them they were right to tell you and that they are not to blame
- Use open questions: 'Tell me what happened' or 'Can you describe what you mean by that?'
- Be honest that you will need to speak with others and may need to pass the information on
- Keep them informed of what you are doing and when
- Record everything as soon as possible, using the person's own words where possible
- Seek medical attention if necessary
- Report to the DSL immediately

### Do not

- Make promises you cannot keep, including promises of confidentiality
- Interrogate the person or ask leading questions
- Express disbelief or interrupt

- Say or imply that the person is responsible for what happened
- Keep the concern to yourself or delay reporting
- Confront any alleged abuser
- Investigate the matter yourself

## **Annex C: Making a record of a safeguarding concern**

When a concern arises, a written record should be completed as soon as possible. These records may be shown to the police or Adult Social Care and could be used as evidence. They must be stored securely.

The record should include:

- Your name and role
- The date, time and location of the concern
- The name and date of birth of the adult at risk (and their address if known)
- The nature of the concern, including what was said or observed, in the person's own words where possible
- Any information about an alleged abuser, if known
- The person's own view of the situation and what they would like to happen
- Any consent given to share information
- Actions taken or agreed

Label the record clearly as a SAFEGUARDING CONCERN. Send a copy to the DSL promptly.

Always state facts. Record what was said and what you observed, not interpretations or assumptions.

## **Annex D: Information to provide to Adult Social Care (Access Point)**

When making a referral, having clear and current information will help Adult Social Care assess the level of risk and respond appropriately. Provide as much of the following as you have available:

### **About the individual**

- Name, date of birth, address
- GP details
- Known medical conditions or care and support needs
- Names of other workers or services involved

### **About the concern**

- The nature and category of harm or risk
- When the incident(s) occurred and whether this is a one-off or a pattern
- The impact on the individual now, and likely impact if the situation continues

### **About the individual's capacity and wishes**

- Their level of vulnerability and ability to protect themselves
- Their own view of the situation
- What they would like to happen
- Any others who may be affected or at risk

### **Accountability**

- Confirm that a copy of any referral and all related records are retained in the S&S safeguarding log
- Document how the adult has been kept informed

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This policy was adopted by the board of directors in March 2026 and is reviewed annually.