CarmDAS
Safeguarding Adults
Policy & Procedure

Approved 1 September 2026 | Review 1 September 2028

Principle:	CarmDAS Adult Safeguarding Policy describes how we help keep people safe from abuse, neglect and other forms of harm when they are receiving or in need of support
Purpose:	To outline CarmDAS' approach to duties to safeguard under the law and our commitment to improve the lives and safety of individuals
Applies to:	This policy should be implemented by all who are acting for Carmarthen Domestic Abuse Services on-call service, whatever their role. It also applies to clients who have been de
Other Related Policies:	CarmDAS Client Handbook CarmDAS Safeguarding Children and Young People Policy CarmDAS Complaints Policy CarmDAS Confidentiality and Information Sharing Policy CarmDAS Case Management Policy CarmDAS Intake Policy CarmDAS Eligibility Policy CarmDAS Equality & Diversity Policy CarmDAS Quality Assurance Policy CarmDAS Employee Handbook CarmDAS Health & Safety Policy CarmDAS Boundaries Policy CarmDAS Domestic Abuse in the Workplace Policy CarmDAS Recruitment Policy

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Introduction
CarmDAS Domestic Abuse Services (Carmarthen Domestic Abuse Services) is a charity driven by lived experience, dedicated to supporting individuals affected by abuse in their relationships. Our team is deeply committed to offering compassionate, trauma-informed support to survivors, helping them regain control of their safety and well-being.

We believe that violence against women, domestic abuse, and sexual violence (VAWDASV) is rooted in gender inequality, and we are committed to working toward a society where such violence is neither tolerated nor inevitable. We recognise that anyone can be a victim of abuse, and we provide inclusive, tailored support to all survivors, regardless of gender, identity, or background.

At CarmDAS we place the highest importance on safeguarding adults and are committed to both Safeguarding Adults in line with national legislation and relevant national and local guidelines but to create a culture in which adults are listened to, heard and valued and their right to be safe is paramount.

We will safeguard adults by ensuring that our activities are delivered in a way which keeps all adults safe.

CarmDAS is committed to creating a culture of zero-tolerance of harm to adults which necessitates: the recognition of adults who may be at risk and the circumstances which may increase risk; knowing how adult abuse, exploitation or neglect manifests itself; and 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.

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

In line with our values and mission, this policy sets out CarmDAS's commitment to safeguarding, ensuring compliance with legal frameworks and best practices to protect adults at risk.

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

CarmDAS recognise adults' right to live a life free from abuse and neglect, and to be treated in a way that respects and promotes their human rights under the European Convention of Human Rights via the Human Rights Act 1998 and the Equality Act 2010.

- Everyone has the right to live their lives free from coercion, intimidation, oppression and physical, sexual, emotional, or mental harm.
- Everyone has the right to family life and privacy.

- Everyone has a right to confidentiality in respect of personal information, where this does not infringe the rights of other people.
- Everyone has the right to receive full and comprehensive information to allow them to make informed choices about their own circumstances.
- Everyone has the right to the protection of the law and full access to the judicial process and criminal justice system.
- Accordingly, adult protection should operate in the context of fully engaged citizenship, not restricted to social care, health services and the criminal justice system.

The general principles of safeguarding procedures in the Wales Safeguarding (WSP) Procedure are that:

- safeguarding is everyone's responsibility: for safeguarding arrangements to be effective each professional and organisation has a duty to act upon and communicate safeguarding concerns and
- a person-centred approach: for safeguarding arrangements to be effective they should be based on a clear understanding of the personal outcomes that the adult wishes to achieve in day-to-day life and what matters to the individual.

CarmDAS is 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.

CarmDAS acknowledges that safeguarding is everybody's responsibility and is committed to prevent abuse and neglect through safeguarding the welfare of all adults involved.

CarmDAS recognises that health, well-being, 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.

CarmDAS recognises that there is a legal framework within which we 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 CarmDAS 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.

Purpose and Scope

This safeguarding policy lays out CarmDAS's approach and processes to safeguarding adults at risk of harm. This policy applies to all CarmDAS's staffs, trustees, volunteers, ambassadors, project participants and associates who each have a duty of care regardless of role and location and covers all issues relating directly to safeguarding adults deemed at risk.

This policy aims to provide guidance on what constitutes a safeguarding concern. The policy is only applicable to people over the age of 18 and should be read in conjunction with the separate organisational policies on the prevention of suicide and self-harm, whistleblowing, and serious incidents.

This policy should be read and delivered in conjunction with Wales Safeguarding Procedures Safeguarding Wales.

Legal Framework
Carmarthen Domestic Abuse Services (CarmDAS) operates in accordance with a comprehensive legal framework that underpins safeguarding practices for adults at risk. This framework is designed to protect individuals from abuse, neglect, and harm, while promoting their well-being and rights.

Key legislation includes:

- The Social Services and Well-being (Wales) Act 2014 (SSWBA 2014): Social Services and Well-being (Wales) Act 2014 (legislation.gov.uk)
- This act provides a legal framework for improving the well-being of adults and children requiring care and support in Wales. It emphasises early intervention, prevention of abuse, and the active involvement of individuals in decisions affecting their care.
- The SSWBA highlights the importance of a person-centred approach in safeguarding, requiring all actions taken to reflect the outcomes that matter most to the individual.
- Well-being Principle: The Act promotes well-being in terms of physical, mental, and emotional health, protection from abuse, social relationships, education, and personal control over day-to-day life.
- The Mental Capacity Act 2005 (MCA): Mental Capacity Act 2005 (legislation.gov.uk). The MCA establishes the framework for supporting individuals in making decisions for themselves wherever possible and provides protection for those who lack capacity. Under the MCA, individuals are presumed to have capacity unless proven otherwise. The Act also allows for advance planning for times when individuals may lack capacity in the future. Decisions made on behalf of those lacking capacity must always be in their best interests, and the least restrictive option should always be chosen to preserve their rights.
- Liberty Protection Safeguards (LPS): Liberty Protection Safeguards: what they are - GOV.UK (www.gov.uk). Introduced under amendments to the MCA, the LPS protect individuals deprived of their liberty in care settings. CarmDAS ensures compliance with these safeguards by working with external agencies to assess and authorize deprivations of liberty in line with the person's best interests.
- Equality Act 2010: Equality Act 2010 (legislation.gov.uk). This act protects individuals from discrimination on the grounds of protected characteristics such as age, disability, gender, race, religion, sexual orientation, and more. CarmDAS is committed to upholding these rights and ensuring that every individual, regardless of their background, receives the protection they are entitled to.
- Human Rights Act 1998: Human Rights Act 1998 (legislation.gov.uk). The Act ensures that everyone has the right to live free from harm, coercion, and

intimidation. It guarantees a person's right to privacy, family life, and protection from inhumane treatment.CarmDAS aligns its safeguarding practices with these core principles, ensuring the dignity and safety of all individuals.

- The Modern Slavery Act 2015: Modern Slavery Act 2015 (legislation.gov.uk). This Act outlines the offences related to modern slavery, including trafficking, exploitation, and servitude. CarmDAS takes a strong stance against modern slavery, and its safeguarding procedures include clear guidelines on recognizing and reporting any instances of such exploitation.
- Serious Crime Act 2015 – Coercive Control Legislation: Serious Crime Act 2015 (legislation.gov.uk). The Act criminalises patterns of controlling and coercive behaviour in relationships. CarmDAS incorporates these legal protections into its safeguarding protocols, ensuring staff are trained to recognise and respond to cases of coercive control.

Other Relevant Statutes:

- Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012): This Act mandates CarmDAS to conduct background checks through the Disclosure and Barring Service (DBS) for all staff and volunteers who work with adults at risk. Safeguarding Vulnerable Groups Act 2006 (legislation.gov.uk)
- Well-being Statement for People Who Need Care and Support (Welsh Government): This statement reinforces the commitment to improving the well-being of individuals and their carers, aligning with the well-being principle embedded in safeguarding. Well-being statement for people who need care and carers | GOV.WALES

Cultural Competence

Building on our legal responsibilities, CarmDAS also recognises the importance of cultural competence in safeguarding, ensuring that our practices are inclusive and sensitive to the diverse needs of all individuals.

Our staff will receive training on cultural competence to ensure they are sensitive to the diverse needs of individuals, including those related to language, ethnicity, gender identity, sexual orientation, and disability.

We will ensure that language barriers do not prevent access to support by providing translation services and offering safeguarding materials in multiple languages. Where necessary, culturally specific advice and resources will be sought to ensure individuals receive appropriate support. All safeguarding interventions will be tailored to reflect the diverse needs of individuals, and investigations will be conducted without cultural bias or assumptions.

“Through collaboration with organisations that specialize in supporting diverse communities, CarmDAS aims to create a safeguarding environment where all individuals feel understood, respected, and supported."

Multi-Agency Working and Confidentiality
CarmDAS recognises that safeguarding adults at risk requires a collaborative approach involving multiple agencies to ensure effective protection and support. We are committed to working closely with local authorities, healthcare providers, law enforcement, and other relevant organisations to share information, expertise, and resources.

Our multi-agency working ensures:

- Holistic Support: By engaging with various professionals and agencies, we provide a comprehensive approach to safeguarding that addresses the individual's needs across different areas, such as health, social care, and legal protection.
- Information Sharing: In line with legal guidelines and best practice, we will share information with partner agencies to protect adults at risk, ensuring confidentiality is maintained where appropriate and following data protection principles.
- Coordinated Action: CarmDAS will participate in multi-agency meetings, case conferences, and safeguarding forums to ensure that interventions are timely, proportionate, and aligned with the safeguarding priorities set by local authorities and other partners.

Staff are encouraged to engage with multi-agency forums, safeguarding panels and case conferences to ensure that safeguarding interventions are comprehensive and collaborative.

Information Sharing and Confidentiality
While working with partner agencies, CarmDAS will strictly adhere to data protection laws and best practice on information sharing. Confidential information will only be shared where it is necessary for safeguarding purposes or to prevent harm. In all cases, the person at risk will be informed of any information-sharing decisions, unless doing so would place them at further risk." Please see our Confidentiality and Information Sharing Policy which sets out our policy and procedures in full.

Safeguarding – Key Definitions

Safeguarding
In line with the Wales Safeguarding Procedures, safeguarding refers to protecting children and adults at risk from abuse, neglect, and other forms of harm, while promoting their well-being. It involves a multi-agency approach to ensure that individuals' rights to protection and care are upheld.

Safeguarding aims to prevent harm by identifying risks, intervening when necessary, and ensuring that people live free from abuse and exploitation.

In practical terms, safeguarding includes creating safe environments, empowering individuals to voice concerns, and providing early help to prevent harm from occurring. It is about actively working to protect those who are vulnerable, while ensuring that any allegations or signs of abuse are promptly and appropriately responded to.

This definition aligns with the principles and processes outlined in the Social Services and Well-being (Wales) Act 2014 and the Wales Safeguarding Procedures 2019, which provide the legal and operational framework for safeguarding across Wales.
For more detailed information, you can refer to the Wales Safeguarding Procedures website Safeguarding Wales

Definition of an Adult at Risk
Previously termed 'vulnerable adults', the SSWBA 2014 defines an Adult at Risk as someone who meets the following three conditions:

- is experiencing or is at risk of abuse or neglect AND
- has needs for care and support (whether or not the authority is meeting any of those needs), and
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it. Use of the term 'at risk' means that actual abuse or neglect does not need to occur before practitioners intervene, rather early intervention to protect an adult at risk should be considered to prevent actual abuse and neglect.

It should be noted that that the abuse of adults deemed to be 'at risk' is often linked to their circumstances rather than the characteristics of the people experiencing harm and that risk of abuse or neglect may be the consequence of one concern or a result of cumulative factors.

In the context of safeguarding adults, the vulnerability of the adult at risk is related to how able they are to make and exercise their own informed choices free from duress, pressure or undue influence of any sort, and to protect themselves from abuse, neglect and exploitation. The definition of mental capacity is given below.

Mental Capacity
We make many decisions every day, often without realising. UK Law assumes that all people over the age of 16 have the ability to make their own decisions, unless it has been proved that they can't. It also gives us the right to make any decision that we need to make and gives us the right to make our own decisions even if other consider them to be unwise.

We make so many decisions that it is easy to take this ability for granted. The Law says that to make a decision we need to:

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

A person's ability to do this may be affected by things such as learning disability, dementia, mental health needs, acquired brain injury and physical ill health.

Most adults have the ability to make their own decisions given the right support however, some adults with care and support needs have the experience of other people making decisions about them and for them.

Some people can only make simple decisions like which colour T-shirt to wear or can only make decisions if a lot of time is spent supporting them to understand the options. If someone has a disability that means they need support to understand or make a decision this must be provided. A small number of people cannot make any decisions. Being unable to make a decision is called “lacking mental capacity”.

Mental capacity refers to the ability to make a decision at the time that decision is needed. A person’s mental capacity can change. If it is safe/possible to wait until they are able to be involved in decision making or to make the decision themselves.
For example:

- A person with epilepsy may not be able to make a decision following a seizure.
- Someone who is anxious may not be able to make a decision at that point.
- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue.

Mental Capacity is important for safeguarding for several reasons. Not being allowed to make decisions one is capable of making is abuse. For example, a disabled adult may want to take part in an activity but their parent who is their carer won’t allow them to and will not provide the support they would need. Conversely the adult may not seem to be benefiting from an activity other people are insisting they do.

Another situation is where an adult is being abused and they fear the consequences of going against the views of the person abusing them. It is recognised in the law as coercion and a person can be seen not to have mental capacity because they cannot make ‘free and informed decisions.

When safeguarding concerns arise, we must always consider mental capacity. It’s important to ensure that adults at risk are given choices about the actions taken to protect them. However, there may be instances where the person does not have the mental capacity to understand the decision or to express their views.

At CarmDAS, employees are not qualified to assess mental capacity. Our role is to report any safeguarding concerns and work closely with Adult Services to ensure that the appropriate steps are taken. If a person cannot plan at the time, we must wait for them to regain capacity if possible or ensure they receive the support they need to make the decision themselves. In cases where a decision must be made on their behalf, we will refer the matter to social services for them to advise on what is in their best interest.

Mental Capacity must also be considered when we believe abuse or neglect might be taking place. It is important to make sure an ‘adult at risk’ has choices in the actions taken to safeguard them, including whether or not they want other people informed about what has happened, however, in some situations the adult may not have the mental capacity to understand the choice or to tell you their views.

Significant harm
‘Significant harm’ refers to:

- ill-treatment (including sexual abuse and forms of ill-treatment that are not physical);

- impairment of, or an avoidable deterioration in, physical or mental health; and/or
- impairment of physical, emotional, social, or behavioural development.

Significant harm may result from a series of incidents that, in isolation, may not seem significant but when repeated become serious.

The impact of abuse upon individuals is personal to them; the same type of incident may have different consequences for different victims, for example seemingly trivial incidents may leave a victim afraid to leave their home. Relatively minor incidents can also become far more significant once they are not isolated events.

If abuse has not occurred but there is a likelihood of abuse occurring, or the victim has been abused but there has not been significant harm, adult protection procedures may nonetheless be used.

Abuse
The SSWBA 2014 defines abuse to mean physical, sexual, psychological, neglect and financial abuse (and includes abuse taking place in any setting, whether in a private dwelling, an institution or any other place), and coercive control.

There are many ways in which a adult at risk may be abused. It is not unusual for an abused adult to suffer more than one kind of abuse. Accordingly, the impact of abuse and its seriousness for the individual must be evaluated in every case. In determining the categories of abuse that apply, the impact upon the victim is the primary consideration, not whether or not the abuse is intentional, reckless or wilful.

Abuse can take the form(s) of:
- a single or repeated act, or multiple acts
- a lack of appropriate action
- act(s) perpetrated as a result of deliberate intent, negligence or ignorance.
- an act of omission (failing to act) or neglect.

Abuse or neglect may constitute a criminal offence. These include offences against the person (violent offences), sexual offences and property offences such as theft. If abuse or neglect is motivated by someone's personal characteristic – disability, race and ethnicity, religion and belief, sexual orientation, and transgender / gender identity – then this may be a hate crime.

Physical abuse is the deliberate infliction of any physical pain, suffering or injury by a person who has responsibility, charge, care, or custody of, or who stands in a position of or expectation of trust to, a person at risk. Physical abuse may also be perpetrated by one adult at risk upon another.

Physical abuse includes prescription of inappropriate medication or misuse of medication, for example to sedate an adult at risk to make it easier to care for them when this has not been assessed and agreed to be in their best interests.

Physical abuse includes inappropriate restrictive physical interventions (formerly known as restraint, care and control).

Sexual abuse refers to the direct or indirect involvement of an adult at risk in sexual activity to which they are unwilling or unable to give informed consent, or which they do not fully comprehend, or which violates the social taboos of family roles, such as incest.

Sexual abuse may also be perpetrated by one adult at risk upon another. Any sexual activity that is not freely consenting is criminal. Where there is an abuse of trust, sexual activity may appear to be with consent but is unacceptable because of the differences in power and influence between the people involved.

Emotional or Psychological Abuse is the infliction of mental suffering by a person in a position or expectation of trust upon an adult at risk. Emotional/psychological abuse may also be perpetrated by one adult at risk upon another. Emotional and psychological abuse includes **bullying**, which is typically deliberate, hurtful behaviour repeated over time, which can include physical abuse but often is verbal (name-calling and threats). It can undermine self–confidence, may cause the victim to become more isolated and sometimes leads to self-harm.

Financial or material abuse is any theft or misuse of a person's money, property or resources by a person in a position of, or expectation of, trust to an adult at risk. Common forms of financial abuse are misuse by others of a adult at risk's state benefits or undue pressure to change wills. Financial/material abuse may also be perpetrated by one adult at risk upon another.

Neglect is the failure of any person for whom there is an expectation of trust and/or the responsibility, charge, care or custody of a adult at risk to provide that degree of care which a reasonable person in a like position would provide. Neglect may be criminal or non-criminal. It may also be because of intentional or non-intentional acts or omissions.

Discrimination and Hate Crime may be features of any form of abuse of an adult at risk but can also be motivated because of their age, gender, disability, sexual orientation, religion, class, culture, language, race or ethnic origin. Please see the Anti-Discrimination, Harassment and Bullying Policy.

Institutional abuse can occur because of regimes, routines, practices and behaviours that occur in services that adults at risk live in or use and which violate their human rights. This may be part of the culture of a service to which staff are accustomed. Thus, such practices may pass by unremarked upon by staff.

They may be subtle, small and apparently insignificant, yet together may amount to a service culture that denies, restricts or curtails the dignity, privacy, choice, independence or fulfilment of adults at risk.

Domestic abuse is best described as the use of physical and/or emotional abuse and/or violence, including undermining of self-confidence, coercion, sexual violence or the threat of violence, by any person or persons, who is or has been in a close relationship with the victims/survivors, including abuse of parents or adult children. Children who have seen, heard, or experienced the effects of domestic abuse are recognised as victims in their own right.

Forced marriage is defined as a marriage conducted without the valid consent of both parties, where one or both spouses do not (or, in the case of some adults at risk, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure. For more information and statutory guidance: https://gov.wales/forced-marriage-guidance-professionals.

Honour-based violence is a crime or incident, which has or may have been committed to protect or defend the 'honour' of the family and/or community. It is not a form of violence, but the reason or motive given or assumed for violence. It is a fundamental abuse of human rights.

Honour based violence manifests itself in a diverse range of ways with adults including forced marriage, rape, physical assaults, kidnap, threats of violence (including murder), female genital mutilation or witnessing violence directed towards a sibling or another family member.

Whilst it can sit within the framework of domestic abuse as much of the violence does originate from intimate partners and the immediate family, further violence can be instigated by extended family and members of the community who support the family's actions or collude in or perpetrate the violence on behalf of the family.

Modern slavery/human trafficking is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory.

Wellbeing Principle
The concept of well-being is threaded through the SSWBA 2014. The act specifically requires "any persons exercising functions under the Act to seek to promote the well-being of people who need care and support, and carers who need support."
"Well-being", in relation to an adult is defined in the SSWBA 2014 (section two) as:

- physical and mental health and emotional well-being
- protection from abuse and neglect
- education, training and recreation
- domestic, family and personal relationships
- contribution made to society
- securing rights and entitlement
- social and economic wellbeing
- suitability of living accommodation
- control over day-to-day life
- participation in work

The Welsh Government has published a Well-being Statement to set out what this means.

Person Centred Safeguarding
The legislation also recognises that adults make choices that may mean that one part of our well-being suffers at the expense of another – for example we move away from

friends and family to take a better job. Similarly, adults can choose to risk their personal safety; for example, to provide care to a partner with dementia who becomes abusive when they are disorientated and anxious.

None of us can make these choices for another adult. If we are supporting someone to make choices about their own safety, we need to understand 'What matters' to them and what outcomes they want to achieve from any actions agencies take to help them to protect themselves.

The concept of 'Person Centred Safeguarding' means engaging the person in a conversation about how best to listen, understand and respond to their situation in a way that enhances their involvement, choice and control, as well as improving their quality of life, well-being and safety.

Organisations work to support adults to achieve the outcomes they want for themselves. The adult's views, wishes, feelings and beliefs must be taken into account when decisions are made about how to support them to be safe. There may be many different ways to prevent further harm. Working with the person will mean that actions taken help them to find the solution that is right for them. Treating people with respect, enhancing their dignity and supporting their ability to make decisions also helps promote people's sense of self-worth and supports recovery from abuse.

If someone has difficulty making their views and wishes known, then they can be supported or represented by an advocate. This might be a safe family member or friend of their choice or a professional advocate (usually from a third sector organisation).

CarmDAS Commitments

CarmDAS recognise adults' right to live a life free from abuse and neglect, and as such they will be treated in a way that respects and promotes their human rights under the Human Rights Act 1998 and the Equality Act 2010. We make the following commitments:

- We will approach safeguarding within a human rights lens and adopt the principles of the European Convention of Human Rights and Human Rights Act 1998
- Everyone has the right to live their lives free from coercion, intimidation, oppression and physical, sexual, emotional or mental harm
    - Everyone has the right to a family life and privacy
    - Everyone has a right to confidentiality in respect of personal information, where this does not infringe the rights of other people
    - Everyone has the right to receive full and comprehensive information to allow them to make informed choices about their own circumstances
    - Everyone has the right to the protection of the law and full access to the judicial process and criminal justice system
    - Accordingly, adult protection should operate in the context of fully engaged citizenship, not restricted to social care, health services and the criminal justice system.
- Individuals will be assumed to have the capacity to make informed decisions, unless there is clear evidence to the contrary. If there are serious concerns about an individual's ability to make informed decisions, guidance

will be sought in accordance with the Mental Capacity Act 2005 and through local Adult Services.
- Adults capable of making informed decisions, having been made aware of their rights and options, will be supported in making their own decisions about their lives.
- Provide culturally sensitive and inclusive safeguarding support for all individuals.
- We will meet our responsibilities and ensure compliance with guidance on compliance, quality, safeguarding and safety standards.
- We will operate safe recruitment practices and rigorously take up and check references.
- We will fulfil legal obligations under the Vulnerable Groups Act 2006, the Vulnerable Groups Order 2007 (As amended by the Protection of Freedom's Act 2012) and act in full compliance with the Disclosure and Barring Scheme.
- Ensure that there is a Designated Safeguarding Officer
- Ensure that all staffs, volunteers, and trustees receive mandatory safeguarding training upon induction, with refresher training provided at regular intervals, no less than every three years, to maintain up-to-date knowledge and compliance with safeguarding best practices.

Responsibilities

Board of Trustees

The Board of Trustees holds ultimate responsibility for ensuring that the organisation upholds its safeguarding obligations to protect everyone who comes into contact with their organisation from harm. Their key responsibilities include:

- Strategic Oversight: Ensuring adult safeguarding is embedded within the organisation's strategic priorities and risk management frameworks.
- Policy Approval: Reviewing and approving the adult safeguarding policy and any updates or amendments to reflect best practice and legislative changes.
- Governance and Accountability: Monitoring safeguarding practices through regular reports and ensuring robust governance structures are in place.
- Culture of Safeguarding: Promoting a culture where safeguarding is recognised as everyone's responsibility and the organisation remains proactive in protecting adults at risk. Making sure everyone in their organisation is aware of their safeguarding responsibilities and knows how to respond to concerns.

Chief Executive Officer (CEO)

The CEO is responsible for the operational implementation of the safeguarding policy across the organisation. Specific responsibilities include:

- Policy Leadership: Ensuring the safeguarding policy is effectively implemented and adhered to across the organisation.
- Risk Management: Overseeing safeguarding risks, ensuring they are properly managed, and escalating concerns to the Board of Trustees when necessary.
- Resource Allocation: Ensuring sufficient resources (training, time, personnel) are allocated to safeguarding initiatives.

- Incident Oversight: Ensuring safeguarding incidents are reported and addressed in a timely, appropriate manner, in line with statutory requirements.

CarmDAS Designated Safeguarding Person (DSP)
The Designated Safeguarding Person (Operations Manager) is tasked with the following responsibilities:

- Point of Contact: Acting as the primary point of contact for safeguarding concerns and liaising with external agencies such as local authorities and police as needed.
- Incident Management: Coordinating responses to safeguarding concerns and ensuring all incidents are logged and managed appropriately.
- Training and Guidance: Ensuring all staff receive appropriate safeguarding training and are aware of their responsibilities and procedures.
- Policy Review: Leading on the periodic review of safeguarding policies and procedures, ensuring compliance with relevant legislation.
- Supporting the CEO: Assisting the CEO in the management of safeguarding risks and providing regular updates to the Board of Trustees.

Management Team
The Management Team plays a critical role in embedding safeguarding into everyday operational practices. Their responsibilities include:

- Operational Oversight: Ensuring safeguarding procedures are integrated into day-to-day operations across their departments and teams.
- Supporting Staff: Providing support and guidance to staff in handling safeguarding concerns and referring issues to the DSP when necessary.
- Monitoring and Reporting: Regularly monitoring safeguarding issues within their areas of responsibility and reporting these to the DSP.
- Role-Modelling: Promoting best practices in safeguarding, acting as role models for other staff in ensuring the safety and wellbeing of adults at risk.
- Training Oversight: Ensuring that their teams are up-to-date with mandatory safeguarding training and any updates to relevant procedures.

Staff (Staff and Volunteers)
All staff, including staff and volunteers, have a duty to actively contribute to safeguarding within the organisation. Their responsibilities include:

- Awareness and Reporting: Being aware of and alert to signs of abuse, neglect, or exploitation, and reporting any concerns to the Designated Safeguarding Person immediately.
- Compliance: Adhering to the safeguarding policy and attending relevant training sessions to maintain awareness of current safeguarding practices.
- Promoting Safe Practices: Ensuring that their own work is conducted in a way that prioritises the safety and wellbeing of adults at risk.
- Cooperation: Cooperating fully with investigations into safeguarding concerns and following guidance provided by the Designated Safeguarding Person.

Whistle-blowing and Safeguarding:
CarmDAS encourages all staff, volunteers, and trustees to raise concerns about safeguarding breaches or misconduct through the organisation's whistle-blowing

procedure. Even if staff are unsure or worried about being mistaken, it is better to report concerns, as safeguarding the welfare of adults at risk is our priority. All concerns will be treated seriously, and investigated thoroughly.

CarmDAS will ensure that individuals raising concerns in good faith are protected from retaliation or adverse treatment, in line with our commitment to a transparent and safe safeguarding culture.

Reports can be made to the Designated Safeguarding Person, CEO, or if necessary, directly to the Chair of the Board of Trustees. Confidentiality will be respected to the fullest extent possible.

Guidance for staff, volunteers and trustees
This section provides a synopsis of the CarmDAS Safeguarding Adults Policy and Procedure. Appendix 1 of this document contains flow charts that detail procedures to follow in relation to safeguarding adults.

Staffs must download the Wales Safeguarding Procedures on their work mobile phones and laptop. https://socialcare.wales/cms-assets/documents/16.-Wales-Safeguarding-Procedures-app-activities.pdf.

Dealing with Disclosures

Identifying abuse
Suspected abuse may be identified in the following ways:

- 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 in a team has been missing from sessions and is not responding to reminders from employees/volunteers.
- Someone losing or gaining weight / an unkempt appearance. This could be a player whose appearance becomes unkempt, and there is a deterioration in 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.
- They may self-harm.
- They may have a fear of a particular group of people or individual
- They may tell you / another person they are being abused – i.e. a disclosure.
- Harassment of a participant because they are or are perceived to have protected characteristics.
- A participant who sends unwanted sexually explicit text messages to an adult
- A participant threatening another participant with physical harm and persistently blaming them for poor performance.

Whilst it is important not to immediately assume that any of the indicators within the above list automatically mean that abuse is taking place, there may be other reasons,

it is essential to be aware of the possibility that abuse may be taking place and to take action where there are concerns.

Responding to disclosure of abuse
It is not your responsibility to decide whether an adult has been abused. It is, however, everyone's responsibility to respond to and report concerns.

If you have concerns and or you are told about possible or alleged abuse, poor practice, or wider welfare issues you must report this to the CarmDAS Designated Safeguarding Person (DSP). If the DSP is implicated, then report to the CarmDAS CEO or Trustee.

Handling Cases Involving Children: If safeguarding concerns involve children—whether as witnesses or directly involved—staff must also follow the Safeguarding Policy for Children and Young People. Any disclosure involving children should be reported to the Designated Safeguarding Person, who will work with appropriate authorities to ensure that both the adult and any children at risk are safeguarded. The adult must be informed of the procedures and where possible contribute to the referral by sharing their child's experiences, but where necessary, staff may proceed without consent if the child's welfare is at immediate risk.

Historical Abuse Allegations: Historical abuse allegations must be treated with the same seriousness as current cases. If a disclosure of historical abuse is made, it must be reported to the Designated Safeguarding Person. The adult who makes the disclosure will be supported throughout the process, and where necessary, referrals will be made to appropriate authorities and support services. Staff must ensure that historical disclosures are documented accurately, and where safe to do so, shared with the individual making the disclosure. The individual must be informed of the next steps and any involvement from external agencies.

Immediate Response to Disclosure
If you receive a disclosure of abuse or have concerns about an adult at risk, follow these steps to ensure their safety.

The safeguarding process involves several key steps: listening to disclosures, assessing immediate safety, documenting concerns, escalating to the DSP, and working with external as needed. Eash step ensures that the individuals safety is prioritised.

Listen and Acknowledge:

- Allow the person to speak without interrupting. Use open-ended questions only if necessary and avoid pressing for more information than they are comfortable providing. It's crucial to remain calm and supportive.
- Assess Immediate Safety:
- Determine whether the person is in immediate danger or requires urgent medical assistance. If so, call emergency services (999 for police or ambulance) without
- hesitation.
- If the individual is at risk of harm, including from self-harm or violence, take steps to ensure both their safety and your own before proceeding with any

further action. Always follow the guidance outlined in the Safe Working Practices Policy to protect yourself and others.

- If at any point you feel your own safety is compromised, remove yourself from the situation and seek help. Prioritise your own well-being and do not hesitate to call 999 if necessary.

Explain Next Steps and Confidentiality:

- Gently inform the person that you have a duty to pass on information regarding their safety, especially if they or someone else is in immediate danger. Clarify that you will need to report this to the Designated Safeguarding Person (DSP) or the Deputy Designated Safeguarding Person (DDSP) in their absence and relevant authorities. Should the situation arise where there is a disagreement between the DSP or Deputy DSP about whether the matter reaches threshold for referral, and the practitioner's view remain that a referral is still required, the practitioner's duty is to report to adult safeguarding.
- Be transparent about the confidentiality limits, especially if the individual's wishes cannot be honored due to safeguarding obligations.
- Record the Disclosure:
- Use the person's own words as much as possible when recording their disclosure. Avoid interpretations or assumptions. Note the time, date, and details of the conversation.
- Document any immediate actions taken, such as contacting emergency services or the Designated Safeguarding Person (DSP)/Deputy Designated Safeguarding Person.
- Escalate the Concern:
- Immediately escalate the case to the DSP or Deputy DSP. If the concern involves staff, volunteers, or trustees, follow the procedure for reporting to a more senior authority, such as the CEO or Board of Trustees.

Non-Urgent Disclosures:

- In cases where the individual is not in immediate danger but still discloses past or ongoing abuse, follow the same steps while ensuring they understand what happens next. Historical disclosures should be treated seriously and reported within 5 working days.
- Assess whether the person is currently at risk or if any other individuals, such as children, may be at risk. If this is the case, report the concern without delay, ensuring that any necessary referrals are made within 24 hours of the disclosure. accordingly.
- Follow-Up After Disclosure
- Keep the Person Informed: Ensure that the person who made the disclosure is aware of the steps being taken, and inform them of what to expect in terms of further communication, investigation, or involvement from external agencies.
- Involve the Person in Decision-Making: Where possible, involve the individual in decisions regarding their safeguarding and seek their consent to share information, unless there are overriding safety concerns.
- Follow Up on Referral: It is essential to follow up on any referral made to the Local Authority. Ensure that their decision or any actions taken are clearly

documented in the client's records, including any next steps or outcomes related to the safeguarding process.

Disclosures made against staff, Volunteers or Trustees
Where there is an allegation or concern that any CarmDAS staff, volunteer or Trustee has behaved in a way that has (or may have):

- harmed an adult
- committed a criminal offence against or related to an adult or
- behaved in a way that indicates that they are unsuitable to work with adults at risk.

Where an allegation is made against a CarmDAS staff, volunteer, or trustee, CarmDAS will follow a clear step-by-step process:

Report: The allegation must be reported immediately to the Designated Safeguarding Person (DSP). If the allegation involves the DSP, it should be reported directly to the CEO or the Chair of the Board.

Initial Inquiry: The DSP will make an initial inquiry with 24 hours to assess whether immediate action is required, such as notifying Social Services or the Police. The DSP will decide if there is an immediate safeguarding risk.

Suspension: Depending on the nature of the allegation, suspension may be considered within 48 hours as a neutral act to safeguard all parties while investigations are ongoing.

Referral: If criminal activity is suspected, a referral will be made to external authorities, including the police and Social Services within 24 hours of the initial inquiry.

Fact Finding: An internal fact-finding process will commence within 5 working days, where necessary, this will be conducted in collaboration with external agencies, where necessary. Documentation of all actions, conversations, and decisions is essential.

Professional Strategy Meetings: In cases involving serious allegations, particularly where criminal investigations are involved, CarmDAS will participate in professional strategy meetings co-ordinated by the Local Authority. These meetings ensure that a coordinated approach is taken to protect the person at risk, review the actions taken by all agencies, and determine further steps. Strategy meetings will be documented, and all actions agreed upon will be implemented promptly by the relevant parties.
All strategy meetings will be documented by the local authority, and any actions agreed upon will be implemented promptly by CarmDAS in collaboration with other agencies. CarmDAS will continue to liaise with the local authority and any other relevant partners throughout the safeguarding process.

Outcome: The conclusion of the investigation will determine whether disciplinary action is necessary. Even if the police do not prosecute, disciplinary action may still be taken, based on internal findings.

Should the investigation determine that there is no case to answer, the staff, volunteer or trustee will be offered additional support and supervision to assist them in either continuing to work or returning to work.

Training and Supervision
CarmDAS will ensure that all staffs, volunteers, and trustees receive mandatory safeguarding training upon induction, with refresher training provided at regular intervals, no less than every three years, to maintain up-to-date knowledge and compliance with safeguarding best practices.
Mandatory training will also include cultural competence as set out in our Equality, Diversity and Inclusion Policy to ensure all staff are equipped to support individuals from diverse backgrounds sensitively and effectively. Training will be regularly updated to reflect changes in legislation and best practice. The training will also emphasise the importance of intersectionality and diverse experiences of abuse faced by individuals from various cultural, ethnic, and identity backgrounds.

Supervision and regular updates through training ensure that staffs remain informed of the latest safeguarding practices and supporting in handling complex safeguarding cases effectively.

Data Protection and Confidentiality
All staffs, volunteers, and trustees are required to uphold data protection, information sharing and confidentiality requirements in relation to information received or shared as part of the safeguarding adults at risk procedures.

The person disclosing or potentially at risk should be informed of their rights in an appropriate language format and style.

Where there are apparent conflicts with other legislation, the DSP, Deputy DSP or other designated staff can be consulted to assess which details should be shared. The following can be used as a guide:
https://www.gov.wales/sites/default/files/publications/2019-09/information-sharing-to-safeguard-children-and-adults.pdf

Staff are required to document all safeguarding concerns, disclosures, and actions taken promptly and accurately. This documentation should include the time, date, and nature of the disclosure, the steps taken to protect the person at risk, and any decisions made.

All records must be recorded onto our client management system, Oasis under the safeguarding tab. If information is shared with external agencies, this must also be documented, ensuring that staff have followed the necessary procedures for obtaining consent where applicable.

Complaints
If someone wishes to make a complaint about the actions or behaviour of CarmDAS staff, volunteer, or trustee in connection with this policy, this can be done in line with CarmDAS's complaints policy.

If someone wishes to make a complaint about the actions or behaviour of another agency in connection with this policy, CarmDAS will support them to access and follow the relevant procedures for doing so.

Should CarmDAS wish to make a complaint about the actions or behaviour of another agency in connection with this policy, this should be done no later than 1 week after the decision is made and only by the CEO or Operations Manager, following discussion with the relevant managers.

Suspected breaches of policies and procedures

CarmDAS encourages an environment where people feel safe to express their concerns about the practice of others and staffs have a duty to inform their line manager if they believe a breach of the policy or procedure has occurred, or a more senior manager if their line manager is suspected of a breach. No one will be treated less favourably for raising concerns regarding a breach of policy and will be supported appropriately.

Policy review date 1 September 2028
Reviewed / approved 1 September 2026

Signed

Name (Removed for confidentiality)

Role Chair of Trustees
Date 1 September 2026

Appendix 1: Further resources and information

External links to relevant documents, guidance and legislation

- Wales Safeguarding Procedures 2019 www.safeguarding.wales
- Working Together to Safeguard People: Code of Safeguarding Practice: https://www.gov.wales/sites/default/files/publications/2022-01/working-together-to-safeguard-people--code-of-safeguarding-practice.pdf
- Working Together to Safeguard People: Information Sharing https://www.gov.wales/sites/default/files/publications/2019-09/information-sharing-to-safeguard-children-and-adults.pdf
- Wales Accord on Sharing Personal Information http://www.waspi.org/
- Adult at Risk: https://socialcare.wales/cms-assets/documents/23.-Adult-at-Risk-handout.pdf
- Mental Capacity Act at a glance: https://www.scie.org.uk/mca/introduction/mental-capacity-act-2005-at-a-glance/
- Mental Capacity Act 2005http://www.legislation.gov.uk/ukpga/2005/9/contents
- Anti-Social behaviour, Crime & Policing Act 2014: https://www.legislation.gov.uk/ukpga/2014/12/contents/enacted
- Forced Marriage Guidance: https://www.gov.uk/guidance/forced-marriage
- Female Genital Mutilation Act 2003: https://www.legislation.gov.uk/ukpga/2003/31/contents Protection of Freedoms Act 2012 http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted
- Social Services and Well Being (Wales) Act (2014) http://www.legislation.gov.uk/anaw/2014/4/pdfs/anaw_20140004_en.pdf
- Serious Crime Act 2015 (Coercive Control legislation) https://www.legislation.gov.uk/ukpga/2015/9/section/76/2015-12-29
- Well-being statement for people who need care and support and carers who need support https://www.gov.wales/sites/default/files/publications/2019-05/well-being-statement-for-people-who-need-care-and-support-and-carers-who-need-support.pdf

Dyfed Powys Adult Multi-Agency referral contact details:

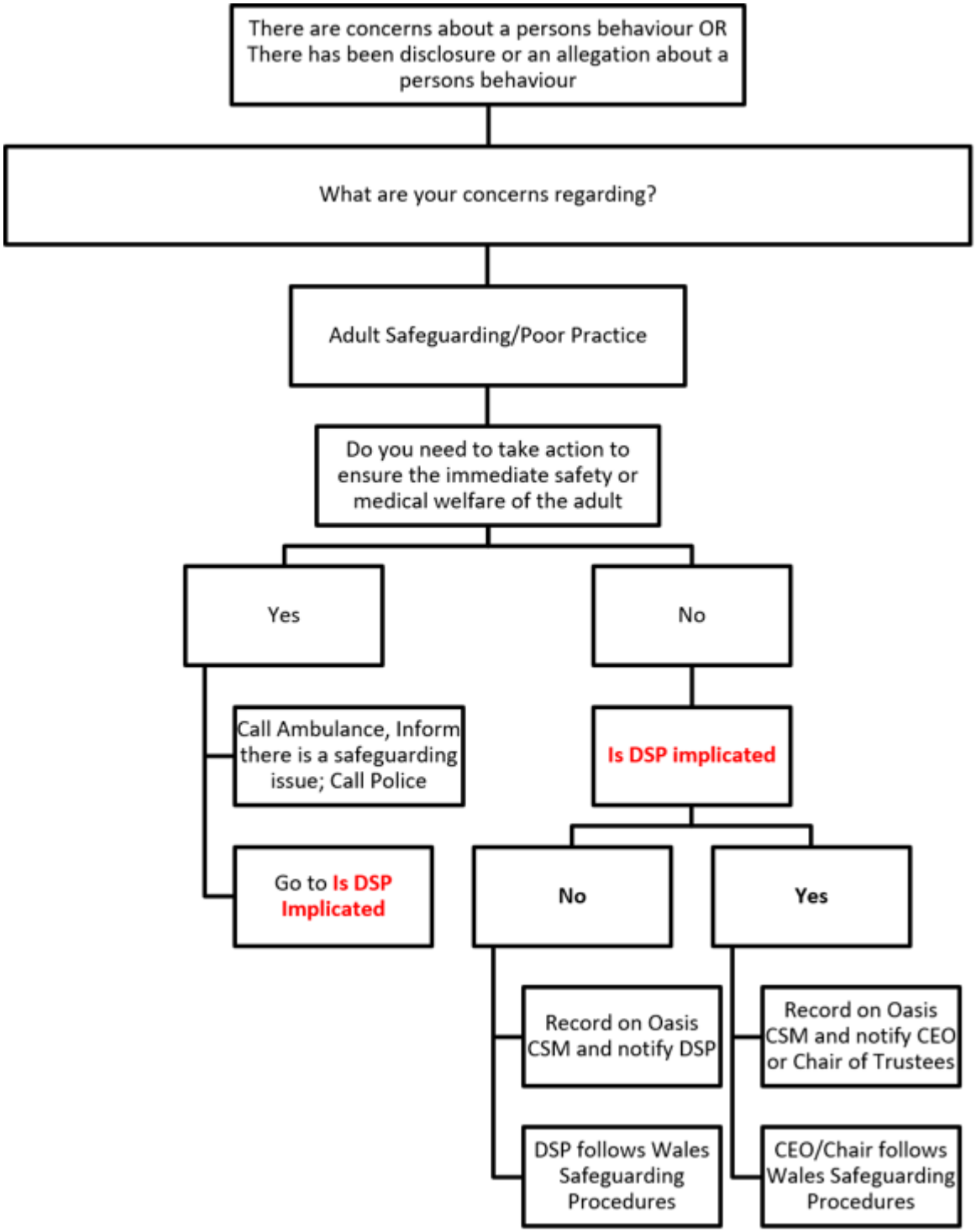
- **Email is IAA iaa@deltawellbeing.org.uk**

Adult Safeguarding SCHAdultSafeguarding@carmarthenshire.gov.uk
Adult Multi Agency Referral Form: Adult MARF Blank

Carmarthen Domestic Abuse Services\CDAS SharePoint - Shared\Referrals\Marf Referrals Adult MARF Blank

Or Oasis Saved Group Documents – Adult MARF

Appendix 2: Flowchart for responses



Appendix 3: Wales Accord on Sharing Personal Information (WASPI)

CarmDAS have signed the Wales Accord on the Sharing of Personal Information. Voluntary Sector and Charities - Welsh Accord on Sharing of Personal Information.

The Wales Accord on the Sharing of Personal Information (WASPI) provides a framework for service-providing organisations directly concerned with the health, education, safety, and social wellbeing of people in Wales. In particular, it concerns those organisations that hold information about individuals and who need to share that information to deliver effective services.

It is a key element of the Welsh Government-led Sharing Personal Information Project which aims to make sure public services, as well as appropriate third and private sector service providers, share personal information about individuals legally, safely and with confidence. The framework facilitates this by establishing agreed requirements and mechanisms for the exchange of personal information between service providers.

All Welsh Local Authorities, Health Boards/Trusts, Police Forces, Fire Services, a large number of charities and voluntary sector organisations have signed up to the Accord. Other organisations, such as schools, GP practices, Housing Associations and some private sector organisations have also signed the Accord.

The Accord sets out a common set of corporate principles and standards under which partner organisations will share information. Sign up to the Accord demonstrates a commitment, at the highest level from each partner organisation, in meeting the agreed conditions, obligations and requirements for sharing personal information within the framework.

The Accord will be supported within organisations by Information Sharing Protocols and Data Disclosure Agreements.

Information Sharing Protocols (ISPs) identify the operational requirements when sharing specific sets of personal information between multiple organisations on a reciprocal basis. They detail the:

- specific and lawful purpose(s) for information sharing;
- group(s) of service users it impacts upon;
- relevant legislative powers and the consent processes involved;
- data which is to be shared;
- required operational procedures and the process for review;
- means of communicating to practitioners the specific operational requirements.

Data Disclosure Agreements (DDAs) provide the same fundamental principles as an ISP for partner organisations to adhere to but have a propensity to focus on the one-way regular, non-reciprocal transfers of information, generally between just two organisations.

Essentially an ISP or DDA will set out the “who, why, where, when, what and how” of sharing personal information. There will only be one version of the Accord for Wales, whilst there will be many ISPs and DDAs developed to support it.

A set of documentation and templates have been produced to enable partner organisations developing ISPs and DDAs within the WASPI framework.