



Safeguarding Vulnerable Adults Policy

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Boundless – Artful Wellbeing CIC

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1. Introduction and Purpose of this Policy

Boundless – Artful Wellbeing CIC is committed to creating a safe, supportive and respectful environment for all adults who engage with our services. Our organisation exists to deliver creative and wellbeing-focused activities, employment and enterprise-focused activities, workshops and events for adults with learning disabilities. Through these activities, we aim to foster personal growth, self-expression, and self-determination in an inclusive and welcoming space.

This safeguarding policy is essential to our work because many of the individuals we support are adults that may be at greater risk of harm or exploitation due to disabilities, health conditions, or personal circumstances. Our directors, staff, freelance facilitators, volunteers, those on work placements, and our community partners have a responsibility to promote the wellbeing of all participants and to take appropriate action if they suspect someone is at risk of abuse or neglect.

Our activities regularly bring us into direct contact with vulnerable adults through:

- The delivery of creative arts workshops.

- The delivery of health and wellbeing sessions and workshops.
- The delivery of keep fit and exercise classes.
- The delivery of enterprise and employability sessions and workshops.
- Group wellbeing sessions and social gatherings.
- Participation in community performances, events, and exhibitions.
- Partnership working with other cultural organisations, community groups and third-party organisations.

Additionally, Boundless – Artful Wellbeing CIC directors, staff, freelance practitioners, volunteers, and those on work placements may be involved in **controlled activities** that require handling sensitive personal data about vulnerable adults, or working in roles that involve indirect contact, such as administration where they may encounter participants information, or information relevant to safeguarding.

Safeguarding is the responsibility of everyone. This document outlines the steps and guidance for staff, freelance practitioners, volunteers, and those on work placements to follow in the event of a safeguarding concern involving a vulnerable adult at Boundless – Artful Wellbeing CIC. The aim of this policy is to ensure that all staff, freelance practitioners, volunteers, those on work placements, and community partners understand their duty to protect vulnerable adults from harm, know how to respond to concerns, and are committed to fostering a culture of dignity, respect and empowerment for everyone involved in our organisation.

2. Boundless – Artful Wellbeing CIC’s Responsibilities

Boundless – Artful Wellbeing CIC promotes a safeguarding culture that is ingrained into every aspect of our work. We recognise our responsibility to take the wellbeing, safety and dignity of all adults with and without (learning) disabilities seriously and are committed to creating an environment where they feel respected, supported and safe while engaging with our organisation and its activities.

You can find more information about specific responsibilities below.

- Ensure that all concerns or allegations of abuse are taken seriously and responded to appropriately.
- Boundless – Artful Wellbeing CIC will support staff and volunteers who report suspicions of abuse even if those suspicions and allegations are later judged to be unfounded but were made at the time in good faith.
- Appoint a trained Designated Safeguarding Lead and Deputy Safeguarding Lead (DSL’s).
- Ensure that all paid and unpaid staff, volunteers, and freelance facilitators are safely recruited, including appropriate references and DBS checks (in line with our safer recruitment policy).

- Ensure that all paid and unpaid staff, volunteers, and freelance facilitators have clear expectations about their conduct whilst working for Boundless – Artful Wellbeing CIC.
- Provide safeguarding training to all team members regularly (annually, or sooner if required due to changes in legislation or safeguarding best practice), and ensure that all paid and unpaid staff, freelance facilitators, and volunteers are offered training, advice and guidance in relation to this policy.
- Safeguarding inductions will be a requirement for all paid and unpaid staff, freelance facilitators, volunteers and visitors. Before being able to lead or take part in any activities hosted by Boundless – Artful Wellbeing CIC we will ensure everyone has read and understood our safeguarding adults at risk policy.
- Boundless – Artful Wellbeing CIC will put robust company policies in place to support and promote the safeguarding of vulnerable adults.
- This policy will be reviewed annually or sooner if required due to changes in legislation or safeguarding best practice.

Boundless – Artful Wellbeing CIC takes the safeguarding of adults with and without (learning) disabilities very seriously and is committed to taking all appropriate action to prevent abuse occurring, and to deal with any allegations promptly and effectively.

3. Definitions

3.a “Vulnerable Adult” or “Adult at Risk”

The Care Act 2014 changed the way adults (i.e. a person aged 18 or over) are considered “vulnerable”. Being “vulnerable” or “at risk” is not something that a person permanently is or isn’t. Different people can be vulnerable to different types of abuse at different times. To be considered “at risk”, an adult must meet **all three** of the following criteria:

1. Has needs for care and support (whether or not the local authority is meeting any of those needs) **and**;
2. Is experiencing, or is at risk of, abuse or neglect; **and**;
3. 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.

3b. Types of Abuse

Physical	May involve hitting, slapping, pushing, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, giving the wrong (or no) medication, restraining someone, or
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	otherwise causing physical harm. Physical harm may also be caused when a parent/guardian or carer fabricates the symptoms of, or deliberately induces, illness in a vulnerable adult.
Neglect or acts of omission	<p>The persistent failure to meet a vulnerable adult's basic physical and / or psychological needs where they are dependant. This is likely to result in the significant impairment of the vulnerable adult's health or development. Examples can include:</p> <ul style="list-style-type: none"> • failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care • providing care in a way that the person dislikes • failure to administer medication as prescribed • refusal of access to visitors • not taking account of individuals' cultural, religious or ethnic needs • not taking account of educational, social and recreational needs • ignoring or isolating the person • preventing the person from making their own decisions preventing access to glasses, hearing aids, dentures, etc. • failure to ensure privacy and dignity.
Self-Neglect	<p>This involves a wide range of behaviours that shows a vulnerable adult is unable, or unwilling, to care for their own essential needs, and where a lack of self-care becomes a threat to personal health and safety. It includes behaviour such as hoarding.</p> <p>Examples can include:</p> <ul style="list-style-type: none"> • neglecting to care for one's personal hygiene, health or surroundings • an inability to avoid self-harm • failure to seek help or access services to meet health and social care needs • an inability or unwillingness to manage one's personal affairs.
Domestic	<p>Psychological, physical, sexual, financial or emotional abuse, by someone who is a family member or is or has been, in a close relationship with the person being abused. This includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse. This also includes so-called 'honour' based violence, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:</p>

	<ul style="list-style-type: none"> • acts of assault, threats, humiliation and intimidation • harming, punishing, or frightening the person • isolating the person from sources of support • exploitation of resources or money • preventing the person from escaping abuse • regulating everyday behaviour
Sexual	<p>This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, activities involving physical contact, including penetrative or non-penetrative acts, and sexual teasing or innuendo.</p> <p>This can also include non-contact activities, such as involving vulnerable adults in looking at, or in the production of, sexual online images, watching sexual activities.</p> <p>It is important to recognise that this can also occur digitally e.g. via social media and networking platforms like Facebook, Tik Tok, etc and includes grooming. Grooming is the action of preparing a vulnerable adult for a meeting, with the intention of committing a sexual offence.</p>
Psychological	<p>This includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling, intimidation, putting pressure on someone to do something, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or support networks.</p> <p>It is important to recognise that this can also occur digitally eg. via social media and networking platforms. For example via “trolling”, a type of online bullying.</p>
Financial or Material	<p>Financial or Material abuse is abuse concerning money, property or belongings. This includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.</p> <p>Examples can include:</p> <ul style="list-style-type: none"> • Borrowing money and not giving it back • Stealing money or belongings • Taking benefit payments away from someone • Taking money as payment for coming to visit, or spending time together • Forcing someone into scams or debt
Discriminatory	<p>Forms of harassment, mistreatment, threats, and insults based on person’s race, age, culture, gender, gender identity, religion, sexual orientation, physical or learning</p>

	<p>disability/ neurodivergence, or mental-health needs. Discriminatory abuse can also be known as ‘hate crime’.</p> <p>Examples can include:</p> <ul style="list-style-type: none"> • Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic • Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader • Harassment or deliberate exclusion on the grounds of a protected characteristic • Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic • Substandard service provision relating to a protected characteristic
Modern Slavery	<p>This covers slavery (including domestic slavery), human trafficking (trading humans as material goods), and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment. A person who is trafficked and/or enslaved is being forced to work for little or no pay (including in the sex trade), being held against their will, tortured, abused or treated badly by others.</p>
Organisational	<p>This includes neglect and poor care in an institution or care setting such as a hospital or care home, or if an organisation provides care in someone’s home. This may be a one-off incident, repeated incidents or on-going ill-treatment of a single person or entire group of people. The abuse can be through neglect or poor professional practice, which might be because of structure, policies, processes and practices within an organisation. Neglect and acts of omission This includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support, or educational services, or not giving someone what they need to help them live, such as medication, enough nutrition and heating.</p>
Digital	<p>Digital abuse is any type of abuse that happens using technology. It can happen across any device that’s connected to the web e.g., computers, tablets, and mobile phones. And it can happen anywhere online, including social media, text messages and messaging apps, emails, online chats, online gaming, live-streaming sites. Vulnerable adults can be at risk of digital abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming, or the abuse might only happen online. It can include bullying, discrimination, and harassment, monitoring and stalking, coercion and control.</p>

Any or all of these types of abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.

4. Recognising Signs of Abuse

There is no clear dividing line between one type of abuse and another. The following section is divided into the different types of abuse listed in the table above to help categorise what may be seen or heard. Vulnerable adults may show signs from one, or all of the categories.

We have outlined the signs most likely to be observed within the different types of abuse but there are many more.

This should not be used as a checklist: staff, volunteers and freelance facilitators should be aware of anything unusual displayed by the vulnerable adult.

This list is not exhaustive and the presence of one or more of the above is NOT conclusive proof that abuse is actually taking place.

Physical Abuse

Signs and indicators of physical abuse are:

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

Neglect or Acts of Omission

Signs and indicators of neglect or acts of omission are:

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations

- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction
- Inappropriate or inadequate clothing

Self-Neglect

Signs and indicators of self-neglect are:

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding
- Collecting large numbers of animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury

Domestic Abuse

Signs and indicators of domestic abuse are:

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

Sexual Abuse

Signs and indicators of sexual abuse are:

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a particular person

Psychological Abuse

Signs and indicators of psychological abuse are:

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

Discriminatory Abuse

Signs and indicators of discriminatory abuse are:

- The person appears withdrawn and isolated

- Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

Financial or Material Abuse

Signs and indicators of financial and material abuse are:

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

Modern Slavery

Signs and indicators of modern slavery are:

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address

- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

Organisational or Institutional Abuse

Signs and indicators of organisational or institutional abuse are:

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

Digital Abuse

Signs and indicators of digital abuse are:

- spending a lot more or a lot less time than usual online, texting, gaming or using social media
- seeming distant, upset or angry after using the internet or texting
- being secretive about who they're talking to and what they're doing online or on their mobile phone
- having lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet
- having money or new things like clothes and mobile phones that they can't or won't explain

- having a new relationship with a partner that started online, and that partner is displaying controlling, coercive, abusive, or threatening behaviour
- being encouraged to engage in drinking or drug taking
- sexualised behaviour, language or an understanding of sex that is not appropriate to that individual and their level of capacity
- spending more time away from home or going missing for periods of time
- a change in behaviour, including being nervous, losing confidence, or becoming distressed and withdrawn
- a change in eating or sleeping habits

NB. Digital abuse is any type of abuse that happens using technology, therefore some of the signs of digital abuse are similar to other abuse types.

5. Procedure for reporting concerns

This is the process that should be followed if there is any concern around a vulnerable adult.

Any incident or allegation of suspected abuse, however minor, should be reported in the first instance to the Safeguarding Lead Sophie Curnock or failing this the Deputy Safeguarding Lead Lola Rodenas, whose contact details are provided on the first page of this Policy Document.

In the unlikely instance the Safeguarding Lead or Deputy Safeguarding Lead is not available, Jon Mairs – Director (jon@artfulwellbeing.co.uk – 07580 140007) should be contacted.

If the situation is clearly an urgent case and the vulnerable adult is very frightened or there are serious doubts about the vulnerable adults' safety, Boundless – Artful Wellbeing CIC's DSL's/directors will contact Worcestershire County Council Adult Social Care Safeguarding Team or the Police immediately.

If your concerns are more general about a vulnerable adult's welfare then these need to be discussed with the DSL's in the first instance, who will then make a referral to the Worcestershire County Council Adult Social Care Safeguarding Team.

In the unlikely event that staff or freelance facilitators are unable to contact either the DSL's/directors, direct contact should be made with **Worcestershire County Council - Adult Social Care Safeguarding Team** to raise the concern and seek advice. If the situation is clearly an urgent case and the vulnerable adult is very frightened or there are serious concerns for their safety, then the police must be called immediately (please see relevant contact information below).

Worcestershire County Council - Adult Social Care Safeguarding Team

Report a Safeguarding Concern

To report a safeguarding concern please call [01905 768053](tel:01905768053)

(Opening hours are Monday to Thursday 8:30am to 5pm and Friday 8:30am to 4:30pm.)

For out of hours emergencies call [01905 768020](tel:01905768020)

Professionals can complete this [online form](#) to report concerns about abuse or neglect.

For Safeguarding Advice

If you would like safeguarding advice, please phone the Adult Safeguarding Team on [01905 843189](tel:01905843189) (please note this number does not accept referrals).

Police

In an emergency call **999**

For non-emergencies call **101**

When dealing with a safeguarding concern in relation to an adult at risk, you must always:

Gain consent, unless there is an overriding public interest or vital interest, or if gaining consent would put the adult at further risk.

This includes situations where:

- There is a risk or harm to the wellbeing and safety of the adult or others
- Other adults or children could be at risk from the person causing harm
- It is necessary to prevent crime or if a crime may have been committed
- The person lacks capacity to consent

If you have consent, or if the above applies, your role is to report the information to the Designated Safeguarding Leads (DSL's) using the Safeguarding Incident Report Form and also share the information with the setting you are working in, if appropriate.

5a. Guidelines for staff and volunteers on recognising and reporting abuse

It is important that staff, volunteers and freelance facilitators communicate concerns accurately.

If you suspect that an adult at risk is experiencing or is at risk of harm:

1. **Recognise** – Be aware of signs of possible abuse.
2. **Respond** – Listen carefully, stay calm, avoid leading questions.

3. **Report** – Inform the DSL as soon as possible.
4. **Record** – Write down the facts as they were disclosed or observed, sign and date.
5. **Refer** – The DSL will decide whether to contact adult social care or the police.

If the adult is in immediate danger or in need of urgent medical attention, call 999.

You are not expected to make any decisions or judgements on your own. Your responsibility is simply to report any concerns following the procedures above. The Designated Safeguarding Officers hold information on the local and national Safeguarding Reporting Networks and will know what to do next.

If the concern is about a vulnerable adult from a social care setting the safeguarding lead or deputy will contact the relevant manager without delay. If the social care setting is implicated, the lead or deputy will contact the Worcestershire County Council - Adult Social Care Safeguarding Team without delay for advice.

5b. Complaints & allegations about Boundless – Artful Wellbeing CIC staff, volunteers, or freelance facilitators

If a complaint or allegation concerns another member of the Boundless – Artful Wellbeing CIC staff team (paid or voluntary), it is important to take a note and report it at once to the DSL's.

When a complaint has been made with regards to any inappropriate or poor practice, we will discuss the situation with Worcestershire County Council - Adult Social Care Safeguarding Team before making an open decision about the best way forward.

It is the responsibility of the Safeguarding Lead and/or deputy to ensure that these procedures are rigorously adhered to.

In the case that the lead is implicated, the deputy, or Jon Mairs - Director should be informed.

In the exceptional circumstances that both the DSL's are involved, it is vital to contact Worcestershire County Council - Adult Social Care Safeguarding Team directly.

Do not investigate. As a member of staff, volunteer, or freelance facilitator it is important not to lose focus of your role. By reporting an allegation quickly, any necessary investigations and/or judgement can then be made by trained professionals.

Maintain confidentiality. It is extremely important that any allegations are not discussed (unless absolutely necessary) as any breaches could be damaging to both the vulnerable adult and to any investigation that may follow.

With regards to disciplinary and grievance procedures, we are very clear that we will take no steps until we have fully discussed and agreed a strategy with Worcestershire County Council - Adult Social Care Safeguarding Team and/or the Police.

6. Responding to Disclosures

Disclosure is the process by which a person starts to share their experiences of abuse with others. All disclosures should be taken seriously and responded to quickly and sensitively.

You should:

- Stay calm and do not show shock
- Listen and watch carefully
- If appropriate, reassure the person and tell them that they have done the right thing by telling you and that you are treating the information seriously
- Gain direct consent to inform the Designated Safeguarding Leads relevant to the situation
- If consent is not given, or is difficult to obtain and you believe there is an overriding public interest or vital interest, or gaining consent would put the adult at risk of further harm, you must share the information without consent
- Write down what was said as soon as possible to ensure key information/facts are remembered (try to use the same phrasing and language used by the vulnerable adult in your recorded account).
- Report the disclosure following the process outlined above

You should not:

- Press the person for details
- Make promises you cannot keep (such as keeping the information shared with you a secret)
- Contact the alleged abuser
- Be judgmental or ask leading questions (e.g. why do you think this happened?)
- Pass on the information to anyone other than those with a legitimate need to know

Important Note: It would contravene this policy to tell anyone who does not need to know (this includes other staff members, freelance facilitators, volunteers).

7. Safer Recruitment and Training

Safer recruitment is a set of practices to help make sure staff and volunteers are suitable to work with vulnerable adults. We will ensure our staff, volunteers and freelance facilitators are carefully selected, screened, trained, and supervised.

Safer recruitment is a vital part of creating a safe and positive environment and keeping our commitment to keep adults with and without (learning) disabilities free from harm. It is a continuing process of improvement.

At Boundless - Artful Wellbeing CIC:

- Obtaining full personal details and CVs with particular relevance to previous work with vulnerable adults.
- Meeting the applicant in person for all staff, freelancer and volunteer roles.
- All new staff are required to provide two references (including one from their last employer) before a formal contract offer can be made.
- Setting an appropriate induction period (usually 3 months) to assess the individual's suitability to the position through observation and discussion and raising any problems that arise during this period.
- Boundless - Artful Wellbeing CIC ensures that all current staff have been subject to an appropriate level **DBS** check and undergo annual Safeguarding training.
- Renewing DBS checks every three years where a DBS check is required.
- Boundless - Artful Wellbeing CIC appoints at least two Designated Safeguarding Officers with appropriate level training and the directors are responsible for overseeing policy formulation.

Reasons for not appointing an applicant/discontinuing employment may include

- History of previous offences against children/vulnerable adults.
- History of offences that are unsuitable when working with vulnerable adults, i.e: drugs or violence.
- Unsuitable references.
- Unsuitable behaviour during employment.
- Failure to disclose relevant information.
- Inability to do the job.

8. Photography and Digital Media

Legally, the only person who can offer consent for the use of their image is the adult themselves. Parents/guardians should not be approached to sign consent forms for adults who are deemed to have capacity. An Easy Read consent form is available.

Parental/guardian permission must be sought for all photographs/recordings/films of vulnerable adults who are not deemed to have capacity. Those who have capacity will sign their own consent forms.

Images must be stored securely and only used for agreed purposes.

Boundless - Artful Wellbeing CIC will take all steps to ensure these images are used solely for the purposes they are intended. If you become aware that these images are being used inappropriately you should inform Boundless - Artful Wellbeing CIC DSL's immediately.

Boundless – Artful Wellbeing CIC holds no responsibility for photographs/films which are taken by parents/guardians/carers of vulnerable adults, or other vulnerable adults which may then be shared on social media or other.

All staff, volunteers and freelance facilitators have a responsibility to ensure those who are taking photographs of activities hosted by Boundless – Artful Wellbeing CIC are designated persons, or approved professionals allocated by Boundless – Artful Wellbeing CIC.

Ensure if you are designated person taking pictures of vulnerable adults that you have identified yourself to the relevant parties e.g. vulnerable adults, parents/guardians/carers, staff/volunteers/freelance facilitators, event organiser and/or facility owner.

Under no circumstances should staff, volunteers, or freelance facilitators take or possess photos/recordings of vulnerable adults who participate in activities hosted Boundless - Artful Wellbeing CIC on personal devices. In the event that you have been asked to capture photos/recordings on behalf of Boundless - Artful Wellbeing CIC you must use a password protected work phone or device that has been allocated to you for that purpose.

Press photographers must be asked to show ID when they arrive and should be refused permission to photograph if they fail to provide ID.

Press photographers have their own photograph permission policy, and it may be possible to obtain a copy by contacting their relevant press office.

If possible, warn participants in advance that photographs may be taken through a disclaimer on flyers and posters and at reception points.

There is no legal power to prevent photography or filming in a public place. However, certain individuals may visit events to take inappropriate photographs or video footage of adults, and this could include adults with care and support needs. All staff, volunteers, and freelance facilitators should be vigilant about this possibility. In the first instance, concerns about suspicious individuals should be reported to the police. Once the police have been alerted, report it at once to the DSL's.

9. Use of Touch in Boundless' Workshops, Sessions, and Activities

Boundless CIC recognises that close proximity and physical contact (touch) may naturally arise during arts and wellbeing activities, including creative workshops, movement-based arts, yoga, keep fit, and other therapeutic group experiences. These activities often include non-verbal communication, physical guidance, or contact that supports participation, inclusion, and emotional connection.

We understand that for some people with learning disabilities, touch can be a vital way of engaging, communicating, and connecting with others. Touch can also support safety and help individuals experience a sense of grounding, relaxation, or joy during physical activities.

Our Approach

- Any physical contact will be **appropriate to the context**, purposeful, and clearly connected to enhancing the person's participation, enjoyment, or safety.
- Staff will always aim to gain **consent**—verbal, non-verbal, or via a care/support worker where needed—before initiating physical contact.
- Every individual has the right to **refuse** or withdraw from touch or close proximity at any time, and this choice will be respected **without question or challenge**.

We recognise that some participants may not interpret or express physical boundaries in a conventional way. No participant will be made to feel "wrong" or "inappropriate" for expressing affection or seeking contact. Instead, Boundless staff will gently and professionally **model clear, safe boundaries** and communicate what is appropriate, in ways that respect each person's dignity and learning needs.

We also acknowledge that **a lack of appropriate human contact** can negatively affect a person's wellbeing. Our staff are trained to balance the importance of connection with a strong commitment to maintaining **professional boundaries** and ensuring participants always feel safe and respected.

Training and Awareness

All Boundless staff, volunteers, and facilitators receive **safeguarding training** that includes clear guidance on the appropriate use of touch. This includes scenario-based learning, discussions around professional practice, and regular team reflections to ensure we maintain a shared understanding of safe, sensitive, and empowering support.

10. Communication & Social Media

Boundless CIC recognises that participants may use a range of communication methods to stay connected, organise sessions, and participate fully in activities. We aim to ensure that communication is accessible, supportive, and safe for everyone involved.

Phone and Messaging

Boundless staff may choose to share their phone number with participants or with members of their support networks, such as family, carers, or personal assistants, when doing so helps facilitate access to our activities. However, staff are under no obligation to share their personal contact details if they are not comfortable doing so. In cases where regular communication is necessary, staff may request access to a work phone, and these requests will be considered individually.

We recognise that for some participants, phone calls, text messaging, or apps like WhatsApp may be the most accessible way to communicate—especially for those who do not use email or written communication. When using personal devices for work-related communication, staff are expected to maintain a professional tone and keep communication transparent. Any messages must be made available to the Designated Safeguarding Lead if requested, and any concerns about inappropriate messaging or

boundaries—whether initiated by staff or participants—must be reported immediately to the DSL's.

Social Media

Boundless recognises that social media plays an important role in communication, creativity, and connection. Participants may wish to connect with staff or volunteers online, and it is acceptable for Boundless staff to be connected with adult participants or their supporters on social media platforms. However, these interactions must always remain professional and respectful of boundaries.

No member of staff is expected to accept friend or follow requests on social media and should never feel pressured to do so. Whether or not to engage in social media connections is a personal choice. Staff should never connect on social media with anyone under the age of 18. We ask staff to be mindful of their privacy settings, the content they share, and how they engage online to ensure that their interactions reflect Boundless – Artful Wellbeing CIC's values and uphold our safeguarding standards. Any concerns about online behaviour or boundaries should be raised with the DSL's without delay.

Good Practice Guidelines

- Keep communications purposeful and related to Boundless – Artful Wellbeing CIC's activities.
- Avoid private or late-night messaging unless pre-agreed and appropriate.
- Use group messages or shared platforms when possible for visibility.
- Discuss any concerns about communication boundaries with the DSL.

11. Making Safeguarding Personal

Boundless is committed to ensuring adults are fully involved in decisions affecting their lives and wellbeing. Safeguarding will always aim to support their dignity, autonomy, and individual wishes wherever possible.

At Boundless CIC, *Making Safeguarding Personal* means putting the individual at the heart of every safeguarding conversation and decision. It's about working with—not just for—our participants. Rather than safeguarding being something done “to” someone, we aim to make it something we do *with* them. This means taking the time to listen, understand their perspective, and explore together what a safe, supportive environment looks like for them.

We recognise the importance of prevention over intervention, understanding that early support, and open communication are the most effective ways to reduce the risk of harm before it happens.

We believe safeguarding is most effective when it is rooted in meaningful conversations, built on trust, and shaped by the voices of the people at its centre. This means working

alongside our participants, recognising them as experts in their own lives, and ensuring they are involved in decisions that affect their safety and wellbeing.