THE ROYAL PARKS

SAFEGUARDING PROCEDURES FOR ADULTS AT RISK

Status	Approved
Approved by	Executive Safeguarding Group
Last updated	March 2026
Latest date for next review	January 2029 (every three years, or sooner if required)
Policy Owner	Ledy Leyssen, Head of Learning
Document accessibility	A pdf version of this document is available on the intranet.

Contents

1	**Introduction**	**2**
1.1	Purpose of this procedure	2
1.2	Areas of responsibility	2
1.3	What to do if you have a safeguarding concern (summary)	3
1.4	Recognition of signs and indicators of abuse	3
2	**Procedures**	**4**
2.1	Raising a concern	4
2.2	Recording a concern	5
2.3	Confidentiality and storage of safeguarding concerns	5
2.4	Responding to a Direct Disclosure	6
2.5	Initial fact finding	6
2.6	Involving the adult at risk	7
2.7	Raising an alert with Adult Social Care Department or the Police	7
2.8	The Local Authority decision to accept, or not, the concern of an adult at risk	8
2.9	Workplace arrangements	8
2.10	Notifying the Disclosure & Barring Service and/or professional bodies	9
2.11	Restraint and physical abuse	9
2.12	Photography and film/video	9

2.13 Work experience and Volunteering 10
2.14 Online safety 10

Appendix

1. TRP Safeguarding Group and useful contacts
2. Definition of abuse and recognising signs and indicators of abuse
3. Summary of the Mental Capacity Act and Safeguarding
4. Raising an alert with Adult Social Care or the Police guidance
5. Reporting a Concern Flow Chart
6. Safeguarding Reporting Form

---

1 Introduction

1.1 Purpose of this procedure

This procedure provides a framework for all TRP staff and volunteers to follow when dealing with safeguarding issues. Used alongside the Safeguarding Policy for Adults at Risk, it helps prevent and reduce the risk of abuse to all adults who visit and engage with The Royal Parks onsite, offsite, online or those who have contact with staff or volunteers.

This document gives clear guidance on the steps to take when concerns and reports arise.

1.2 Areas of responsibility

- Safeguarding is a shared responsibility, and everyone has a role to play. All TRP staff - including temporary, agency, freelance and contract staff, trustees and volunteers (referred to collectively as 'staff') – must understand that adults at risk have the right to be safe from abuse and neglect, know how to recognise concerns, and report them immediately through the appropriate safeguarding channels. TRP is responsible for ensuring all staff are informed, trained and supported to the appropriate level for their role. Anyone can raise a safeguarding concern.
- Reporting: All staff are expected to report and discuss their safeguarding concerns without delay to the relevant Safeguarding contact (as specified in 2.1, Raising a concern).

  The seniority of the Designated Safeguarding Lead (DSL), Deputies, Safeguarding Leads (SLs) and Safeguarding Sponsor (SS) must never prevent concerns from being raised.
- Whistleblowing: All staff are protected under Whistleblowing legislation (Public Interest Disclosure Act 1998), when reporting in good faith.

- Exceptions: The only exception to informing the DSL, Deputies and SS is when they are implicated, in which case concerns must be reported to a line manager and HR.

1.3 What to do if you have a safeguarding concern (summary)

Anyone wishing to report an incident, suspicion or concern should follow these steps:

- Complete the Safeguarding Reporting Form available on the intranet, keeping as accurate a record as possible. If the disclosure is from the individual themselves, then care must be taken not to lead or interrogate the individual in a way that could prejudice further action by the relevant authorities.
- Once the online Safeguarding Reporting Form is completed, an automated notification will be sent to **safeguarding@royalparks.org.uk**. Please also alert the Designated Safeguarding Lead to confirm the form has been received, using other methods such as work email or phone. This mailbox is monitored daily by the Designated Safeguarding Lead and/or Deputies in their absence.
- If unsure, contact the Designated Safeguarding Lead, Deputy or your local Safeguarding Lead by email or phone.

The following procedures are mandatory and must be followed, including the use of flow charts, reporting forms and other guidelines included in the Appendix.

If you have any questions, please contact the DSL or Deputies. For a full list of all Safeguarding Group Leads and members, see **Appendix 1** – TRP Safeguarding Group and useful contacts.

1.4 Recognition of signs and indicators of abuse

TRP is committed to providing a safe environment for everyone to participate in our organisation and its activities. These procedures must be followed in any circumstances where an adult is at risk of harm.

Recognising signs of abuse is not always straightforward, especially for staff who do not work with adults at risk on a regular basis. All staff, trustees and volunteers who encounter adults in the Parks should have the awareness need to identify when something may be a cause for concern and report it promptly.

Adult abuse and neglect are described in the guidance in relation to the following categories:

- Physical - Domestic - Sexual - Psychological - Financial or material - Modern slavery - Discriminatory	- Organisational - Neglect and acts of omission - Self-neglect - Radicalisation - Hate crime - Forced Marriage - Female Genital Mutilation (FGM)

Appendix 2 offers a range of indicators and signs of abuse as well as examining some of the potential blocks to recognition and factors which can inhibit the taking of appropriate steps.

If a member of staff or volunteer believes that an adult is at immediate risk of harm or abuse, they should take immediate and reasonable steps to protect the adult. Examples of this would include calling **999** and, if possible, removing any immediate danger from the situation. Such situations are very rare and, in most circumstances, staff should raise a concern following the process below.

2 Procedures

All staff, trustees and volunteers must report any concerning or inappropriate behaviour, actions or attitudes from members of the public towards an adult at risk. If there is a reason to suspect abuse, they must take appropriate action, including calling the police if necessary, and record and report this to the relevant SL and DSL.

For any safeguarding concerns that arise during activities delivered or led by TRP, staff must follow the safeguarding procedures set out below.

When concerns arise during activities delivered by third-party organisations operating within The Royal Parks, staff should follow TRP's safeguarding procedures and inform the relevant SL, DSL or Deputy, while the third-party organisation remains responsible for applying its own safeguarding policies and procedures.

See **Reporting a Concern Flow Chart** in **Appendix 5.**

The procedures for raising a concern, recording, storage and initial fact finding must be followed. If the concerns and initial fact-finding lead to the conclusion that an adult may have been harmed or at risk of significant harm, then the SL, DSL or Deputy will raise an alert to the Adult Social Care Department in the local authority area in which the Royal Park is situated or where the incident happened. See **Appendix 1** for details.

2.1 Raising a concern

Concerns must be reported without delay and on the same day to one to a SL. If no SL is available, staff should contact the DSL or Deputies (these contacts are listed in **Appendix 1**). Volunteers report concerns to their volunteer coordinator, who will pass them to the relevant SL.

The member of staff or volunteer who noted and raised the concern is known as the 'alerter'. Adult social care or the police may wish to speak to the 'alerter' at some point.

2.2 Recording a concern

Accurate and prompt recording is essential to safeguarding. All staff and volunteers must complete a Safeguarding Reporting Form (**Appendix 6**) without delay and on the same day after raising a concern with the SL, DSL or Deputies. Forms can be completed online (available on the intranet) or completed on paper if needed (see Appendix 6 to print a copy), with support available from the DSL or a SL. Records must be clear, factual and separate opinion from fact.

When the DSL reports a concern to the local authority, they will confirm that a written record is available and send the details as soon as possible. If TRP or the local authority decide that no further action is needed, then the reason for this and who made the decision must be recorded in the original safeguarding report and stored in the secured online safeguarding database. The SL responsible for the case is responsible for updating this record. All further actions, events and documents from the local authority, police or other agencies must also be added in chronological order to the original report.

2.3 Confidentiality and storage of safeguarding concerns

Adults have a general right to independence, choice and self-determination including control over information about themselves. In the context of adult safeguarding these rights can be overridden in certain circumstances.

Under whistleblowing anyone in TRP may refer direct to either Adult Social Services or the Police if they are concerned that a vulnerable adult is at risk of harm, following TRP's Safeguarding Procedures and Flow Chart (see **Appendix 5**).

The DSL and SLs have responsibility to ensure all concerns that happen in their site or area of work are recorded, monitored and secured. Procedures are as follows:

- Electronic records including email will be saved to a secure safeguarding folder located on SharePoint. This folder will only be accessible to the Safeguarding Group.
- If there are any hard copy records (e.g. paper forms filled by hand), these will be scanned and kept within this secure folder.
- Access to these records will be strictly limited on a 'need to know basis' and controlled by the DSL, Deputies and the SS.

Roles and responsibilities for managing safeguarding concerns:

The DSL, Deputy DSLs, and SLs are responsible for responding to concerns. Once a concern is raised, the SL must escalate it to the DSL or Deputies, who will the level of risk using TRP's Safeguarding Escalation Chart and decide next steps. Cases rated as **Very Significant, Critical, or Complex** must be referred to the **SEG** for oversight and decision-making.

2.4 Responding to a Direct Disclosure

If an adult indicates that they are being harmed or abused, or you receive information that raises concern,

You should:

- Take it seriously, stay calm and listen carefully, allowing them to speak at their own pace
- Be sensitive and keep questions to a minimum. Ask only what is needed to clarify what they are telling you.
- Reassure them they have done the right thing in speaking up
- Explain what you will do next, including sharing information with the SL or DSL, and as what they would like to happen
- Seek their consent to share information outside the organisation where possible
- Agree how they can be contacted safely and offer help to contact support services (e.g. Police, Domestic Abuse helpline, Victim Support)
- Act quickly to report the concern and take any immediate actions
- Record what was said in their own words as soon as possible

Do not:

- Dismiss or ignore the concern, panic or show shock
- Make negative comments about the alleged perpetrator
- Speculate, investigate or ask unnecessary questions
- Promise to keep the information secret or make promises you cannot keep
- Confront the alleged perpetrator or take sole responsibility
- Share information widely – only tell those who need to know.

2.5 Initial fact finding

Note that in some circumstances the Police may lead an investigation and may need to interview staff or volunteers as witnesses.

Some basic fact-finding may be appropriate before alerting external professionals. The DSL will lead this initial fact-finding and may delegate tasks to staff not involved in the concern. This may include checking files or recent records, clarifying details with the alerter, or discreetly asking relevant staff whether they have observed any issues.

Initial fact finding **must never** involve asking an adult at risk to repeat or discuss a disclosure, as allegations may involve criminal offences and only the police or local authority should conduct interviews to preserve evidence, otherwise evidence may be inadmissible and could ruin the prospects of a prosecution.

Initial fact-finding may result in the SL or DSL deciding that no referral to Adult Social Care or the police is required. If no further action is taken, the decision and rationale must be recorded on the Safeguarding Report Form and shared with the SS.

See **Reporting a Concern flow chart** in **Appendix 5.**

2.6 Involving the adult at risk

Before making a referral to Adult Social Care or the police, staff must consider whether the adult at risk understands the concerns and has the capacity to consent to the referral. One of the first questions the local authority will ask is whether the adult has capacity to consent, as defined by the Mental Capacity Act 2005 (see **Appendix 3** for further details).

In brief:

It is essential to consider whether the adult at risk has the mental capacity to give informed consent. If they have capacity, their consent should be sought prior to making a referral, regarding:

- An activity that may be abusive (noting that consent to abuse or neglect given under pressure, fear, intimidation or exploitation is not valid), and
- Whether a safeguarding enquiry should proceed.

If an adult with capacity does **not** want action taken – and there are no public interest or vital interest concerns - their wishes must be respected. They must be given clear information, understand the risks, and be aware of the potential short and long term consequences of their decision.

An adult's wishes must be respected, unless:

1. There is a public interest or vital interest consideration, for example, where not acting will put other adults or children at risk.
2. There is a duty of care to intervene, for example, a crime has been or may be committed.

In these circumstances, a referral must be made to Adult Social Care, and where a crime is suspected, the police. If a child may be at risk, a child safeguarding referral also be made to the Local Authority (see TRP Safeguarding Procedures for Children and Young People).

Where the adult at risk lacks capacity, safeguarding action must always be taken. Decisions will be made in their best interests in line with the Mental Capacity Act 2005 and its Code of Practice. Under Section 44 of the Act, wilful neglect or ill-treatment of a person who lacks capacity is a criminal offence.

2.7 Raising an alert with Adult Social Care Department or the Police

A detailed description of the procedure to follow and what to expect from 'raising an alert with Adult Social Care or the Police' can be found in **Appendix 4** but has been summarised below:

1. Following Initial Fact Finding the SL / DSL will raise an alert with the Adult Social Care Department who are likely to require a lot of information to be shared. This should happen, where appropriate, without delay by telephone. All London local authorities now have forms that will also be required to be completed once the telephone referral has been made. The telephone call will require information sharing, use the Safeguarding Report Form (Appendix 7) to assist you in recording the relevant information.

2. The DSL will inform the SS (Safeguarding Sponsor and Chief Executive) and DTL (Safeguarding Trustee Lead) as appropriate. The Chief Executive in turn will brief and keep Trustees updated as appropriate.

2.8 The Local Authority decision to accept, or not, the concern of an adult at risk

Adult safeguarding processes have historically evolved out of serious concerns for adults living in institutional settings, therefore an Adult Social Care Department may not accept the nature of the concern if the abuse is within a family setting (for example, they may propose to classify the concern as domestic violence). In such circumstances, advice should be carefully recorded and any signposting to other agencies followed without delay.

2.9 Workplace arrangements

If the person alleged to be causing harm is a TRP staff, trustee, volunteer, or anyone engaged with TRP in any capacity, this must be reported immediately to the DSL or Deputy and HR. HR will manage the case in line with TRP's Grievance Policy and determine next steps.

Following advice from the Local Authority Designated Officer (LADO), TRP will decide whether the individual remains in the workplace or is suspended. The DSL must be consulted by the SL and HR at the earliest opportunity. If the person remains in post, safeguards will be put in place to protect the member of staff and the adult at risk.

TRP will provide appropriate support and advice that the member of staff may be accompanied by a colleague or union representative at meetings. The DSL or Line Manager will keep the staff member, the adult at risk and, where appropriate, their family or carer updated on timescales and procedures.

If The Royal Parks decides that suspension is necessary, then this will be done without prejudice. Suspension should be considered without delay if it is indicated that:

- A staff member has behaved in a way that may have, or has, harmed an adult at risk;
- A staff member has possibly committed an offence against, or related to, an adult at risk;
- A staff member has behaved towards an adult at risk in a way which indicates they are now unsuitable to work with adults at risk;
- The Adult Social Care Department or the police are advising suspension;
- It is likely to be impossible to investigate the concern unless the staff member is away from the workplace.

No internal inquiry can begin until the LADO and police have completed their processes, and written confirmation has been received from the local authority. Through the process, the DSL must take HR advice and, with the local authority's agreement, keep the staff member, the adult at risk, and, where appropriate, their family, updated.

2.10 Notifying the Disclosure & Barring Service and/or professional bodies

If a staff member is dismissed because of abuse concerns, then TRP has a legal duty to formally notify the Disclosure & Barring Service. This also applies if a member of staff resigns as a result of safeguarding concerns being raised. The referral process is fully detailed on the DBS website.

If a staff member is dismissed or resigns because of abuse/ neglect concerns, then TRP has a duty to formally notify relevant professional bodies the member of staff belonged to.

2.11 Restraint and physical abuse

Unlawful or inappropriate restraint, physical intervention or deprivation of liberty is a form of physical abuse. The distinction between restraint, restriction and deprivation of liberty depends on the circumstances, including the level of restrictions, its duration, impact and how they are carried out.

- Deprivation of liberty is judged case by case, based on the intensity and nature of the restriction.
- Unlawful or inappropriate restraint may constitute a criminal offence. Restraint involves using force (or threatening force) to make someone do something they resist or restricting their movement, whether they resist or not.
- Restraint covers many actions but may be justified to prevent harm to a person who lacks capacity, provided it is proportionate to the risk and seriousness of harm.

2.12 Photography and film/video

TRP may photograph or film adults during TRP activities for purposes including, but not limited to, use on the TRP digital channels, marketing materials (e.g. flyers, posters) and funding websites and applications. TRP may also share these images and recordings with third parties, such as the press, online news sites or applications, or with event partners.

Permission will be sought from the adult at risk or the supervising adult responsible, who will be asked to read and sign a release form for photo/filming and sound recording. In the case of pre-booked groups (e.g. community groups), this is done in advance. Where permission is denied, the adult at risk will be given a sticker to identify them to the photographer and must not be photographed or filmed.

For general photography (e.g. crowds gathered at an event), TRP must give advance notice in the event listing and display clear signage on the day. An example of this type of activity is a community open day in the park led by TRP staff.

- Any visitor taking photographs or video in suspicious or inappropriate circumstances must be reported immediately to a supervisor or manager;
- Staff may challenge the behaviour where appropriate, with support from a supervisor or manager;
- If inappropriate behaviour around adults at risk is confirmed, the police must be contacted immediately;

- All concerning behaviour must be reported, and staff can request support when approaching members of the public;
- Volunteers are not expected to challenge directly but must report any concerns to TRP staff.

2.13 Work experience and Volunteering

The Royal Parks welcomes students on work experience placements, some of whom may be considered adults at risk. Work experience enquiries should be directed to the Learning, Access and Engagement team, and Volunteering enquiries to the Volunteering team, who will follow their respective procedures.

Supervisors must review safeguarding policies and procedures before placements begin. Any welfare or safety concerns about an adult at risk taking part in TRP work experience or volunteering must be referred to the DSL, Deputy or SL immediately.

2.14 Online safety

The Royal Parks is committed to the safety of adults at risk engaging in online and digital activities with TRP. All digital and online activity will be developed in accordance with TRP ICT Security Policies & Procedures.