



Safeguarding Policy

(Adults at Risk)

This policy was agreed by KLS Trustees on 1 July 2026.

This policy is reviewed annually, or earlier if the law, statutory guidance, organisational learning or safeguarding practice requires it, and will be reviewed again in April 2027. The April 2027 review date reflects KLS's planned governance cycle.

Katherine Low Settlement Ltd
108 Battersea High Street
London
SW11 3HP

020 7223 2845 (s/b)
www.klsettlement.org.uk

Charity Number: 1081248
Company Number: 3814833

Contents

1. Purpose and Safeguarding Commitment	4
2. About Katherine Low Settlement	4
3. Scope - who this policy applies to	4
3.1 This policy applies to:.....	4
3.2 It covers safeguarding adults at risk who:	4
3.3 Tenants and Hirers.....	5
4. Definitions	5
4.1 Adults at risk	5
4.2 Safeguarding and promoting the welfare of adults at risk	5
4.3 Abuse and neglect.....	5
5. Relevant Legislation & Guidance	5
5.1 Legislation	5
5.2 Guidance	6
6. Our safeguarding principles.....	6
7. Radicalisation, Extremism and the Prevent Duty	7
8. Female Genital Mutilation (FGM).....	7
9. Roles and responsibilities	8
9.1 Everyone at KLS (staff, volunteers, trustees).....	8
9.2 Additional responsibilities for staff:.....	8
9.3 Designated Safeguarding Lead and Deputies	9
9.4 Trustee safeguarding lead	9
10. Safer working practice and professional boundaries	9
11. Safe Recruitment of Staff, Volunteers and Trustees	10
11.1 DBS checks	10
11.2 Application and selection procedure	10

11.3 Previous convictions, concerns or other red flags.....	11
11.4 Induction	11
12. Medical assistance.....	11
13. Supporting Documents.....	11
14. Governance, training and review	12

1. Purpose and Safeguarding Commitment

Katherine Low Settlement (KLS) is committed to safeguarding adults at risk and creating a safe, inclusive and respectful environment across all KLS services and premises.

Safeguarding is everyone's responsibility. We will take all reasonable steps to prevent harm, respond appropriately to safeguarding concerns, promote safer working practices, and work in partnership with statutory and specialist agencies where required.

This policy sets out KLS's safeguarding commitment, responsibilities, principles and governance arrangements. The practical procedures to follow where there are safeguarding concerns, including reporting processes, escalation routes, recording requirements and guidance on recognising abuse and neglect, are contained within the KLS Safeguarding Handbook.

The KLS Safeguarding Handbook provides practical guidance for implementing this policy. Where there is any inconsistency between this policy and supporting guidance, this policy takes precedence unless legislation or statutory guidance requires otherwise.

Where a safeguarding concern relates to a child at risk, it should be managed under KLS's Safeguarding Children and Young People Policy and associated children and young people safeguarding procedures. Where a concern involves both a child or young person and an adult at risk, both policies should be considered and advice sought from the Designated Safeguarding Lead.

2. About Katherine Low Settlement

Katherine Low Settlement (KLS) is a charity that has been serving Battersea and the wider Wandsworth community since 1924. We are dedicated to building stronger communities and enabling people to challenge and find ways out of poverty and isolation.

We run a range of our own community projects to support older people. In addition to these direct services, we also use our premises to act as a local hub for other charities and community groups so that as partners, we can meet the diverse needs of the communities of Wandsworth. Each week, we work with 45+ charities and community groups supporting more than 1,100 people. Visit www.klsettlement.org.uk.

3. Scope - who this policy applies to

3.1 This policy applies to:

- All KLS staff (paid and sessional)
- Volunteers, interns and students on placement
- Trustees
- Contractors working for KLS
- Tenants and hirers using KLS premises (including out-of-hours access)

3.2 It covers safeguarding adults at risk who:

- Access KLS services or activities, and/or
- Are present on KLS premises during tenant/hirer use, building events or community activity.

3.3 Tenants and Hirers

Tenant and hirer organisations remain responsible for safeguarding within their own services and staffing. However, because KLS is a shared building and community setting, all tenants and hirers are expected to understand and comply with KLS safeguarding expectations, access arrangements and reporting requirements while operating on KLS premises. All tenant groups using KLS space and working with adults at risk must have their own safeguarding policy and confirm they have read and understood the KLS Safeguarding Policy. They must certify that their policy is compatible with KLS's standards. Where relevant, KLS may require tenants and hirers to provide evidence of their safeguarding policy, named safeguarding lead or contact, safer recruitment arrangements, insurance cover and confirmation that any safeguarding concern arising on KLS premises will be reported to KLS as well as managed through their own procedures.

4. Definitions

4.1 Adults at risk

Adults at risk refer to people aged 18 or over who have needs for care and support, whether or not the local authority is meeting any of those needs, and who are experiencing, or are at risk of, abuse or neglect and, as a result of those needs, are unable to protect themselves from the abuse or neglect or the risk of it.

4.2 Safeguarding and promoting the welfare of adults at risk is defined as:

- Protecting an adult's right to live in safety, free from abuse and neglect
- Preventing harm and reducing the risk of abuse or neglect
- Supporting adults to make informed choices and maintain control over their lives
- Promoting wellbeing, dignity and independence
- Working in partnership to prevent and respond to safeguarding concerns

4.3 Abuse and neglect

Abuse and neglect can occur anywhere, in public or private, and may be carried out by anyone, including family members, carers, professionals, volunteers, peers, visitors, tenants, hirers or members of the wider community. Abuse includes, but is not limited to, physical abuse, sexual abuse, psychological or emotional abuse, financial or material abuse, domestic abuse, discriminatory abuse, neglect and acts of omission, organisational abuse, modern slavery, exploitation, online abuse and self-neglect.

KLS will apply the principles of Making Safeguarding Personal by seeking, wherever safe and appropriate, to understand the adult's views, wishes, desired outcomes and consent before deciding what action to take.

5. Relevant Legislation & Guidance

5.1 Legislation

- Care Act 2014
- Mental Capacity Act 2005*
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Serious Crime Act 2015
- Female Genital Mutilation Act 2003, as amended by the Serious Crime Act 2015
- Equality Act 2010
- Human Rights Act 1998
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Domestic Abuse Act 2021
- Counter-Terrorism and Security Act 2015 (Prevent Duty)

5.2 Guidance

- Care and Support Statutory Guidance
- London Multi-Agency Adult Safeguarding Policy and Procedures
- Wandsworth Safeguarding Adults Board guidance
- Ann Craft Trust safeguarding guidance

This list is not exhaustive and KLS will comply with all relevant safeguarding legislation and statutory guidance.

*In applying the Mental Capacity Act 2005, KLS will presume that adults have capacity unless there is evidence to suggest otherwise, support adults to make their own decisions wherever possible, and ensure any action taken for a person who lacks capacity is necessary, proportionate and in their best interests.

6. Our safeguarding principles

KLS's approach to safeguarding adults is guided by the six key safeguarding principles under the Care Act 2014:

1. **Empowerment:** People are supported and encouraged to make their own decisions and give informed consent. We seek to understand each adult's views, wishes, feelings and desired outcomes wherever safe and appropriate. We facilitate opportunities for adults at risk to express their ideas and views regarding the services they receive and to access KLS' Complaints & Compliments Policy.
2. **Prevention:** We take proactive steps to reduce the risk of harm to adults at risk by creating safe environments, promoting positive relationships, and ensuring staff and volunteers understand safeguarding responsibilities. Safeguarding is embedded in recruitment, induction, training, programme design and day-to-day practice.
3. **Proportionality:** We respond to safeguarding concerns in a timely and proportionate way, taking the least intrusive action necessary to protect people from harm. Decisions are informed by risk, context, the adult's wishes where appropriate, and professional judgment, and escalated where required.

4. **Protection:** Every adult at risk has the right to adequate care and protection. We ensure all staff and volunteers are fully informed and trained in safeguarding adults at risk and understand their responsibilities. Every adult at risk has the right to be treated as an individual, to have their needs met, and to be shown respect for all aspects of their identity, including gender, nationality, ethnic origin, language, religion, sexual orientation, disability, and culture.
5. **Partnership:** We work with adults at risk, families, carers, local services, communities and statutory agencies, sharing information appropriately and lawfully where this is necessary to prevent or respond to harm.
6. **Accountability:** We take responsibility for safeguarding practice across the organisation and act transparently in our decision-making. Safeguarding roles and reporting routes are clearly defined, concerns are recorded securely, and safeguarding practice is regularly reviewed. Staff, trustees and volunteers are supported to remain up to date with legislation, guidance and best practice.

7. Radicalisation, Extremism and the Prevent Duty

KLS recognises that adults at risk may be vulnerable to radicalisation or exposure to extremist ideologies. Radicalisation refers to the process through which a person may come to support terrorism or extremist ideologies associated with violence, hatred or intolerance.

Under Section 26 of the Counter-Terrorism and Security Act 2015, certain organisations have a duty to have due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent Duty.

As part of our safeguarding responsibilities, KLS will:

- Provide appropriate safeguarding and Prevent awareness training for staff and volunteers.
- Promote inclusive values including the rule of law, individual liberty, mutual respect and tolerance of different faiths, beliefs and identities.
- Encourage safe, respectful discussion, curiosity and critical thinking.
- Respond proportionately to concerns relating to radicalisation or extremist influence.
- Work in partnership with relevant safeguarding agencies where concerns arise.
- Take reasonable steps to ensure service users are safeguarded from harmful extremist content when accessing digital platforms or the internet through KLS services.

KLS recognises the importance of balancing safeguarding responsibilities with respect for individual rights, privacy, culture, faith and freedom of expression. We will not carry out unnecessary intrusion into people's private lives, but staff and volunteers are expected to raise safeguarding concerns where behaviour, disclosures or changes in presentation give cause for concern.

Concerns relating to radicalisation or extremist influence should be reported through KLS safeguarding procedures in the same way as any other safeguarding concern.

8. Female Genital Mutilation (FGM)

KLS recognises that Female Genital Mutilation (FGM) is a form of violence against women and girls, a serious violation of human rights, and illegal in the UK.

KLS has a zero-tolerance approach to FGM and is committed to preventing harm, supporting adults affected by FGM with dignity and respect, and responding appropriately where concerns arise regarding an adult at risk or a child who may be at risk of FGM.

We will:

- Promote awareness and understanding of FGM as part of our wider safeguarding responsibilities.
- Support adults affected by FGM sensitively, respectfully and without prejudice.
- Work in partnership with statutory safeguarding agencies and specialist services where appropriate.
- Fulfil all relevant legal and safeguarding duties where concerns arise.

Where concerns relate to a child or young person, these will be managed through KLS safeguarding procedures and the relevant statutory child protection framework.

Detailed guidance on recognising indicators, responding to disclosures, referral pathways and the actions staff must take is contained within the KLS Safeguarding Handbook.

9. Roles and responsibilities

9.1 Everyone at KLS (staff, volunteers, trustees)

Everyone has a responsibility to:

- Be alert to safeguarding concerns.
- Respond appropriately if someone discloses harm, including listening, reassuring the person, avoiding promises of absolute confidentiality, and explaining that information may need to be shared to keep them or others safe.
- Report concerns promptly using KLS safeguarding procedures, even if unsure whether the concern meets a safeguarding threshold. This includes concerns about the welfare of service users and concerns relating to the conduct of staff, volunteers, trustees, contractors, tenants, hirers or partner organisations.
- Maintain appropriate confidentiality and share information only on a need-to-know basis.
- Report safeguarding concerns to the DSL or Deputy DSL as soon as possible and normally on the same working day.
- If someone is in immediate danger, call 999 first and then follow KLS safeguarding reporting procedures as soon as it is safe to do so.
- Escalate concerns to the local authority adult safeguarding route, police or other statutory agency where required, including where there is immediate risk, a possible crime, or concerns that cannot safely be managed internally.

9.2 Additional responsibilities for staff:

- Record safeguarding concerns, incidents, decisions, actions and outcomes accurately on Salesforce in accordance with KLS safeguarding recording procedures.
- Ensure safeguarding records are updated and maintained appropriately.

Volunteers are covered by this policy and share the same responsibility to raise safeguarding concerns. KLS recognises that volunteers may require additional support in understanding safeguarding procedures and reporting routes. Volunteers will receive safeguarding information and training appropriate to their role and will be supported to raise concerns through their designated staff contact, line manager or the Designated Safeguarding Lead.

9.3 Designated Safeguarding Lead and Deputies

KLS has a named Designated Safeguarding Lead (DSL) and Deputy DSLs. Current DSL, Deputy DSL and Trustee safeguarding lead names and contact routes are maintained in the KLS Safeguarding Handbook and internal safeguarding contact list.

The DSL and deputies are responsible for:

- Providing advice, guidance and support to staff and volunteers
- Coordinating safeguarding responses and referrals
- Liaising with statutory and specialist agencies
- Ensuring safeguarding records are completed and stored securely on Salesforce / KLS's CRM system
- Ensuring learning, improvements and reporting to trustees where relevant, while maintaining appropriate confidentiality
- Ensuring referrals are made to Wandsworth Adult Social Care, the police or other statutory agencies where threshold, risk or legal duties require this.

9.4 Trustee safeguarding lead

The Trustee safeguarding lead provides safeguarding oversight and assurance to the Board, including supporting safe governance, receiving updates on significant safeguarding matters, and ensuring safeguarding remains a strategic priority.

10. Safer working practice and professional boundaries

KLS expects staff and volunteers, and others acting on behalf of KLS, to:

- Treat all adults with dignity and respect
- Maintain appropriate professional boundaries
- Use appropriate language and behaviour
- Report concerns or poor practice immediately

Staff and volunteers, and others acting on behalf of KLS, must not:

- Work alone with an adult at risk where the activity cannot be seen, except in pre-approved circumstances and risk assessed
- Share personal contact details or social media accounts with service users, nor communicate with service users through personal phones, email accounts, messaging services or social media platforms, unless this has been explicitly authorised and risk assessed as part of service delivery.
- Engage in sexually suggestive comments, jokes or behaviour.
- Engage in inappropriate, unnecessary or intrusive physical contact.
- Use their position of trust to develop inappropriate personal, financial, emotional or sexual relationships with service users.
- Invite adults at risk to their home or accept social invitations from them.

11. Safe Recruitment of Staff, Volunteers and Trustees

11.1 DBS checks

KLS undertakes role-appropriate Disclosure and Barring Service (DBS) checks for staff, volunteers and trustees in line with legal requirements and safeguarding best practice. Where roles involve regulated activity with children and/or adults at risk, this will normally include an Enhanced DBS check with barred list checks where applicable.

KLS may accept a recent DBS certificate (typically within the last two years) only where it is appropriate to the role and can be verified, for example through the DBS Update Service. Otherwise, a new check will be undertaken.

DBS checks are renewed periodically (typically every three years) and may be rechecked sooner if the role changes, there is a break in service, or new information comes to light.

Where operationally necessary, staff or volunteers may begin in post prior to receipt of a DBS certificate only where:

- all other recruitment checks are completed and satisfactory, and
- duties are appropriately risk-assessed, and
- the individual is supervised at all times and does not undertake unsupervised regulated activity until clearance is confirmed.

11.2 Application and selection procedure

All applicants must complete an application form and participate in a selection process that includes an interview. KLS will:

- verify identity and right to work documentation
- take up appropriate references (including at least one from someone familiar with the applicant's relevant work), and
- require candidates to declare any information relevant to safeguarding and suitability for the role, in line with legal requirements.

KLS also ensures safeguarding is embedded in recruitment materials and role design, including safeguarding responsibilities in job descriptions, using safer recruitment interview questions, and ensuring appropriate supervision arrangements are in place from day one.

11.3 Previous convictions, concerns or other red flags

If a DBS disclosure, reference, interview information or other checks indicate potential safeguarding risk, KLS will carry out a proportionate risk assessment and make a documented decision. Decisions will be made by the DSL (or appropriate senior manager) in consultation with relevant senior staff and/or trustees, and external advice will be sought where necessary.

11.4 Induction

All staff, volunteers and trustees will receive safeguarding guidance as part of their induction, including this policy statement and reporting procedures, professional boundaries, confidentiality and information sharing, and the requirement to record concerns in line with KLS processes. Safeguarding training will be completed within the required timeframe for the role and refreshed on an ongoing basis.

12. Medical assistance

- Staff and volunteers must not administer medication unless this has been risk assessed, appropriately authorised, and is in line with KLS procedures and training.
- Where medical assistance is required, a qualified first aider or medical professional should be involved wherever possible.
- KLS has a defibrillator (AED) on site, and relevant staff are trained in its use.
- Relevant staff are also trained in the administration of emergency medication, including adrenaline auto-injectors (EpiPens), where required.
- In an emergency, staff should call 999 immediately and follow KLS emergency procedures.
- All accidents, incidents, medical interventions and safeguarding concerns must be recorded promptly and accurately on KLS' CRM system in accordance with organisational reporting and safeguarding procedures.

13. Supporting Documents

This policy should be read alongside the following KLS policies, procedures and guidance documents:

- Safeguarding Children and Young People Policy
- KLS Safeguarding Handbook - Children and Young People
- KLS Safeguarding Handbook - Adults at Risk
- Digital Safeguarding and Online Safety Policy
- Staff Welfare Policy
- Code of Conduct
- Health and Safety Policy
- Data Protection Policy

- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Lone Working Procedure
- Incident Reporting and Safeguarding Recording Procedures
- Complaints and Compliments Policy
- Anti-Harassment and Bullying Policy
- Anti-Slavery and Human Trafficking Policy

14. Governance, training and review

- This policy statement and procedures are approved by the Board of Trustees and reviewed at least annually, and following any significant safeguarding incident, change in legislation, or learning review.
- Safeguarding incidents, themes and organisational learning may be reported to senior leadership and trustees in line with KLS governance and confidentiality procedures. This includes periodic assurance reporting on safeguarding activity, training compliance, incident themes, referrals, lessons learned and actions taken to strengthen practice.
- KLS will review safeguarding records, incidents and near misses to identify trends, improve practice and ensure learning is shared appropriately across staff, volunteers and trustees.
- Safeguarding training is mandatory for all staff and volunteers and is refreshed regularly. Training includes how to respond to disclosures and recognise signs of abuse. Safeguarding Leads and Project Coordinators/managers must attend ongoing, higher-level safeguarding training.
- Policy access and acknowledgement is managed through the HR platform, which records that staff/volunteers have read the policy and supports scheduled review dates.