

# Common Purpose Charitable Trust

## Safeguarding Adults at Risk Policy



<b>Authors:</b>	David O Connor, Director, Creative Futures Lab
<b>SMT Sponsor:</b>	Adirupa Sengupta (Group Chief Executive of Common Purpose Charitable Trust)
<b>Area of Governance:</b>	Board of Trustees
<b>Date for Renewal:</b>	March 2027
<b>Approved by:</b>	Common Purpose Board of Trustees
<b>Geographical Scope:</b>	For all Common Purpose employees, volunteers and representatives worldwide, except in countries where the following policy contravenes local legislation. In these cases, local legislation must be followed with guidance from the Director, Creative Futures Lab. This document will apply if Common Purpose policy is more stringent than local legislation.
<b>Confidentiality:</b>	Public, additional guidelines and materials are available internally

### Policy Statement

Common Purpose is committed to safeguarding **adults at risk** from abuse, harm, exploitation, and neglect. For the purposes of this policy, an *adult at risk* is defined in accordance with the Care Act 2014 as a person aged 18 or over who:

- Has needs for care and support (whether or not the authority is meeting those needs), and
- Is experiencing, or is at risk of, abuse or neglect, and
- As a result of those needs is unable to protect themselves

Safeguarding means protecting adults' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, or neglect.

Common Purpose recognises that vulnerability is influenced by individual circumstances, context, and capacity to protect oneself.

All Common Purpose activities operate a 'No Tolerance' approach to abuse and exploitation, embedding safeguarding across programme design, delivery, and partner engagement.

This policy is mandatory and forms part of employment terms and conditions.

### Purpose

The purpose of this policy is to ensure that Common Purpose:

- Safeguards adults at risk in all activities
- Protects individuals from harm caused by staff, trustees, volunteers, or partners
- Provides clear responsibilities and reporting pathways
- Complies with UK statutory guidance and best practice

### Scope

This policy applies to:

- All Common Purpose staff, trustees, volunteers, and contractors
- Associated personnel engaged in programme delivery

## Common Purpose Charitable Trust Safeguarding Adults at Risk Policy

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- Partners, licensees, and suppliers
- All adults at risk engaged in Common Purpose activities

All programme participants are within scope for safeguarding protection.

### Principles

- Adults at risk have the right to live free from abuse
- Safeguarding is everyone's responsibility
- Prevention, early recognition, and intervention are critical
- Individuals should be empowered to make decisions about their care, where possible
- Safeguarding must be integrated into programme design and operational practice

### Legal Framework

- Care Act 2014
- Human Rights Act 1998
- Charity Commission guidance

### Implementation

Responsibility for leading implementation of this policy and procedure rests with the Common Purpose Operations Team, namely the Director, Creative Futures Lab.

The Director, Creative Futures Lab will have overall responsibility for implementation of this policy and procedure within their administrative area, and, will ensure that each manager of relevant Common Purpose activities will undertake the following:

- Communicate this policy to all staff and volunteers
- Appropriate training is provided
- Ensure that service specific procedures are developed, implemented and reviewed in compliance with this policy

### Definitions of Abuse

Abuse is defined as any act or failure to act that results in a breach of an individual's human rights, dignity, or wellbeing.

Abuse may result from:

- Deliberate intent
- Negligence
- Poor practice or organisational failure

Although this abuse definition focuses on acts of abuse by individuals, abuse can also arise from inappropriate or inadequacy of care or programmes of care.

There are several forms of abuse, any or all of which may be perpetrated as the result of deliberate intent, negligence or lack of insight and ignorance. A person may experience more than one form of abuse at any one time. The following are the main categories/types of abuse.

### Types of Abuse

- **Physical abuse:** hitting, slapping, pushing, restraint, inappropriate use of medication
- **Sexual abuse:** rape, sexual assault, sexual activity a person cannot consent to, grooming
- **Psychological/emotional abuse:** threats, humiliation, controlling behaviour, intimidation, verbal abuse
- **Financial or material abuse:** theft, fraud, coercion, exploitation of assets, inheritance, benefits
- **Neglect or acts of omission:** failure to provide basic needs, medical care, or support
- **Discriminatory abuse:** racism, sexism, ableism, ageism, or harassment
- **Organisational abuse:** poor care standards, rigid routines, inadequate response to complex needs
- **Domestic abuse, modern slavery, cyber abuse, stalking**

### Related Areas to Safeguarding

- Forced marriage
- Honour-based violence
- Hate crime
- Radicalisation and extremism
- Stalking and harassment
- Mate crime
- Bullying

### Prevention

#### Common Purpose Responsibilities

Common Purpose will:

- Promote safeguarding awareness across programmes
- Embed safeguarding into programme design and delivery
- Implement **safer recruitment** procedures:
  - DBS checks or international equivalents
  - References
  - Safeguarding questions in interviews
- Provide safeguarding training and guidance
- Maintain a code of conduct for staff and volunteers
- Conduct risk assessments, including international contexts
- Implement e-safety and digital protection measures
- Provide secure data handling and storage
- Establish complaints and whistleblowing mechanisms
- Maintain safe physical environments

#### Staff Responsibilities

Staff and associated personnel must:

- Treat adults at risk with dignity, respect, and empathy
- Contribute to creating a safeguarding culture
- Report all safeguarding concerns immediately
- Maintain professional boundaries

Staff must not:

- Engage in sexual, physical, or emotional abuse
- Exploit adults for financial or personal gain
- Exchange money, employment, goods, or services for sexual activity

### Consent and Capacity

Adults at risk have the right to:

- Make their own decisions about care and support
- Refuse interventions

However, safeguarding action may occur without consent where:

- There is risk of serious harm
- Others are at risk
- A criminal offence may have been committed

### Enabling Reports

Common Purpose has a duty of care to ensure we respond appropriately to concerns of actual or suspected abuse / harm both internally and externally.

Irrespective of role all Common Purpose staff have a responsibility and mandatory duty to report any allegations or concerns in a confidential manner. It is not for staff to decide whether abuse has taken place. No staff member can agree to keeping information relating to safeguarding in personal confidence.

As a result, Common Purpose has established a safe, appropriate and accessible means of reporting safeguarding concerns for staff and the programme participants we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Common Purpose's Whistleblowing Policy.

Common Purpose will also accept complaints from people other than staff, such as programme participants and members of the public.

Below you will find the appropriate channel to raise an allegation or concern.

### Reporting Procedures

Concerns must be reported to:

- Designated Safeguarding Lead (DSL) – David O'Connor (Director, Creative Futures Lab) – Tel:+44 (0)7305 021758
- Deputy DSL – Ed Herman (Group Operations Director) – Tel: +44(0)7739 319938
- Safeguarding Trustee – Jan Sanders – Email: [jansanders10@icloud.com](mailto:jansanders10@icloud.com)

Where immediate danger exists:

- Contact emergency services

Whistleblowing procedures are available if staff are uncomfortable reporting through the usual channels.

Programme participants or third parties may also report concerns via the DSL or Deputy DSL.

### Response

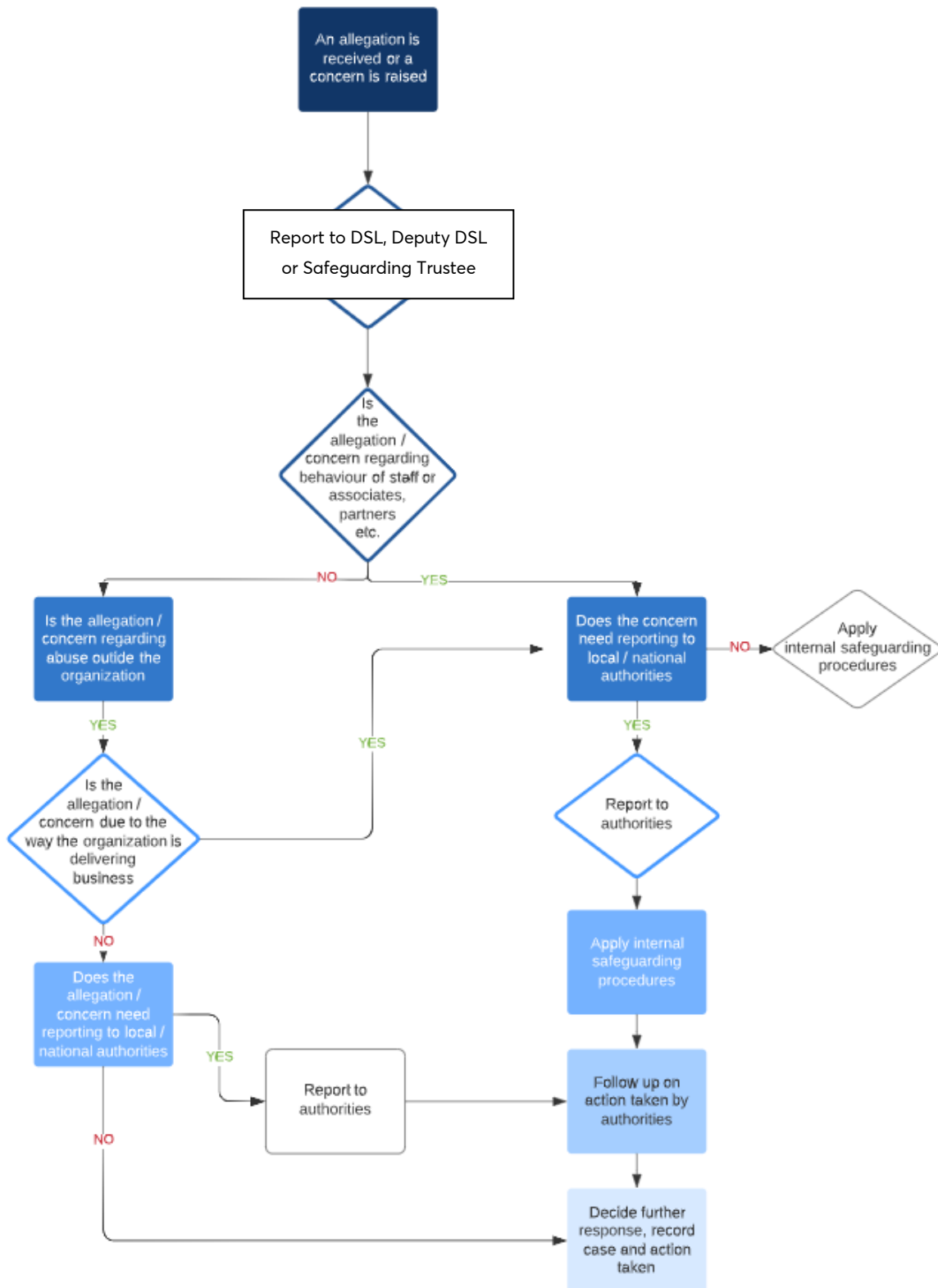
Common Purpose will follow up safeguarding allegations and concerns according to the transparent processes set out in the following Safeguarding Reporting Procedures, and legal and statutory obligations.

Common Purpose will:

- Respond promptly and appropriately
- Refer cases to statutory agencies where necessary (police, social services)
- Apply disciplinary procedures to staff or volunteers found in breach
- Offer support to affected adults

### Safeguarding Decision Tree

The following flow chart highlights the consideration stages we follow when an allegation or complaint is received.



### Investigation

Common Purpose is not an investigative authority.

Internal processes may:

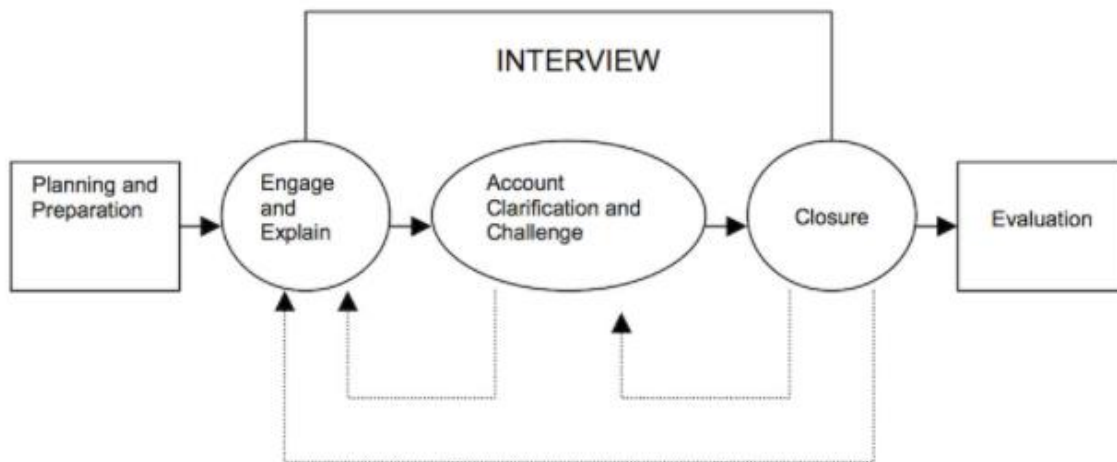
- Gather information
- Support external investigations

Our investigation procedure is based around the following key steps. The steps will be climbed up and down at different stages of the process and may need to be revisited as the investigation progresses.



### Investigation Process

To ensure complete transparency, during the investigation stage we use the PEACE model to ensure that we are gathering all pertinent information without bias. Our findings and final reports will outline the information found at each stage of this process.



### Confidentiality

Information will be:

- Shared on a need-to-know basis
- Stored securely
- Managed in line with data protection requirements

### Recording and Information Sharing

All safeguarding concerns must be:

- Recorded promptly
- Stored securely
- Shared proportionately

Decisions must be documented, including:

- Whether information was shared
- With whom
- Why

### Safeguarding Leadership

Common Purpose appoints:

- Designated Safeguarding Lead (DSL)
- Deputy DSL

- Safeguarding Trustee

### Working with Partners

- Partners must adhere to equivalent safeguarding standards
- Risk assessments and agreements must be completed before programme delivery

### Online Safety

- Safe digital engagement
- Protection of adult data
- Guidance on professional boundaries in online communication

### Review

Responsibility for reviewing and updating the Safeguarding Policy lies with the Director, Creative Futures Lab and nominated Trustee. This document will be reviewed and updated every 12 months.

**Last reviewed:** March 2026

*Common Purpose Charitable Trust*  
*124 City Road*  
*London EC1V 2NX*  
*United Kingdom*  
[www.commonpurpose.org](http://www.commonpurpose.org)

Next scheduled review: February 2027