Adult Safeguarding Policy and Procedures

Including Appendix One: Safeguarding procedure at a glance, and Appendix Two: Online abuse and digital safeguarding

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Policy owner	Designated Safeguarding Officer – Jackie Rosenberg, Deputy CEO - Head of Community Programmes
Approved by	Board of Trustees – 03 November 2026
Next review	November 2027

Key safeguarding contacts

Contact	Details
Designated Safeguarding Officer (DSO)	Jackie Rosenberg, Deputy CEO - Head of Community Programmes – jackie@pdt.org.uk – 07949 108112
If the DSO is unavailable or implicated	Graham Collins, Chief Executive – graham@pdt.org.uk – 07592 401188
Westminster Safeguarding Adults helpline (ask for the Adults Access Team)	020 7641 2176 (9am to 5pm, Monday to Friday)
Westminster Adult Social Care – out of hours	020 7641 2388
Westminster Adult Social Care – email	adultsocialcare@westminster.gov.uk
Police	999 if someone is in immediate danger; 101 for non-emergencies
DBS helpline	03000 200 190

If someone is in immediate danger, call 999.

If waiting for an internal response would put someone at risk, contact Westminster Adult Social Care or the police directly, then tell the Designated Safeguarding Officer as soon as you can.

Policy overview

This policy is organised into the following sections:

1. Context
2. Policy statement and commitment
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4. Individual responsibilities
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Appendix One: Safeguarding procedure at a glance

Appendix Two: Online abuse and digital safeguarding

1. Context

Safeguarding older people and adults at risk is a key priority within PDT and a responsibility that is shared by all associated with this charity – Board of Trustees, Chief Executive, staff team and volunteers.

This policy sets out the details of our safeguarding policy and the principles and resources of the safeguarding framework to which PDT is committed. It aims to reflect the legal framework provided under sections 42–46 of the Care Act 2014.

PDT recognises that every older person and/or adult at risk has the right to live free from abuse, and that we have a duty of care to every older person and/or adult at risk we interact with to protect them from any form of abuse. This policy accordingly includes guidance on how we must respond to allegations or suspicions of abuse.

The Care Act 2014 uses ‘safeguarding’ as a term to describe how we:

- Protect the rights of adults to live in safety, free from abuse and neglect
- Work together as individuals and organisations to prevent and to stop both the risks and experience of abuse or neglect
- Ensure an adult’s wellbeing is promoted – including, where appropriate, taking full account of their views, wishes, feelings and beliefs in determining a course of action
- Recognise that adults may have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore the risks to their safety or wellbeing

An adult at risk is someone who has needs for care and support, is experiencing or is at risk of harm, abuse or neglect and, as a result of those needs, is unable to protect themselves from the abuse or neglect or the risk of it.

Additionally, we recognise that older people may have specific age-related circumstances or conditions which make them especially vulnerable to abuse and neglect, and that this requires a high level of vigilance.

Staff can raise a safeguarding concern about any adult without first having to decide if this definition has been met.

Abuse includes (but is not limited to):

- Physical or psychological abuse
- Domestic abuse
- Sexual abuse and exploitation
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Not allowing contact with friends and family
- Poor care practices
- Neglect and acts of omission
- Self-neglect

Abuse can be a single act or may continue over a long period. It can be unintentional or deliberate, but will result in harm to the victim, either physically, emotionally or in its effect on the person's wellbeing or development.

The policy is designed to:

- Provide mechanisms to help safeguard people in later life from abuse and/or exploitation
- Provide a framework for effective working
- Reduce and prevent incidences of abuse
- Allow us to respond quickly and sensitively to suspicions or disclosed incidents of abuse
- Ensure that abuse of a client does not occur as a result, either directly or indirectly, of any of the services offered by PDT
- Increase overall awareness of the potential for abuse of older people
- Provide a process for staff and volunteers in respect of suspected, disclosed or observed abuse
- Empower older people at risk and enable them to speak out for themselves

Places to find additional information

- Care and support statutory guidance, Chapter 14 (adult safeguarding; sections 42–46 Care Act 2014): gov.uk – Care and support statutory guidance
- Disclosure and Barring Service – the legal duty to refer to DBS: gov.uk – The legal duty to refer to DBS
- Westminster City Council – Safeguarding adults: westminster.gov.uk/health-and-social-care/safeguarding-adults

2. Policy statement and commitment

Safeguarding older people and/or adults at risk is a responsibility we all share. We will act to protect all adults who may be in vulnerable circumstances. These people may be at risk of abuse or neglect due to the action (or inaction) of another person. We will work together and with all relevant agencies to identify people who are at risk and to put measures in place to help prevent abuse or neglect.

Abuse is a violation of an individual's human and civil rights by any other person or persons, and abuse and neglect can take many forms. We will aim not to be constrained in our view of what constitutes neglect or abuse and will always consider the circumstances of the individual case.

In providing services to people in Westminster, we will work to provide an environment where adults at risk (regardless of age, disability, gender, racial heritage, religious or other belief, or sexual orientation or identity) are kept safe from harm, abuse and neglect whilst they are involved with PDT. We will take every reasonable precaution to minimise such risks and will ensure their welfare is the paramount concern.

We will support person-centred care and promote choice and control (where appropriate) for all our clients. We will work in partnership with the older person, adult at risk, their relatives, carers and other agencies to promote their welfare.

We will regularly review and update this policy to ensure it is consistent with legislation and best practice.

3. Scope and overall responsibilities

This policy applies to all associated with PDT: Trustees, permanent and temporary staff, those employed under contract for services, agency workers, volunteers, tutors, and students or others on work experience.

This policy does not apply to anyone under the age of 18, who is covered by PDT's Child Safeguarding Policy.

Designated Safeguarding Officer and reporting route

The Designated Safeguarding Officer (DSO) for PDT is **Jackie Rosenberg, Deputy CEO - Head of Community Programmes.** She should be contacted and informed in all cases. If she is unavailable or implicated in an allegation, **Graham Collins, Chief Executive**, should be informed instead. This is the reporting route throughout this policy and both appendices.

Within the Employment & Training Team, the Designated Safeguarding Lead is **Andrea Audain (Head of Programme Support)**. Andrea should be informed alongside the DSO where, users, learners or staff within the Employment & Training Team are involved. Informing the Employment & Training Team's Designated Safeguarding Lead does not replace reporting to the DSO.

In any situation where waiting for an internal response would put someone at risk, staff and volunteers can contact Westminster Adult Social Care or the police directly, and should call 999 where someone is in immediate danger. They should then inform the DSO as soon as possible.

Learners on PDT Training courses

Adults enrolled on PDT Training courses (learners) are covered by this safeguarding policy. A copy of this policy is held by the Training Department. Staff and volunteers working with learners should follow this policy for concerns that arise in a learning context, including any additional requirements of Ofsted and PDT Training's funders. This policy applies to all adult safeguarding matters. Under this policy, the reporting route for PDT Training is the same: concerns are reported to the DSO (or to the Chief Executive if the DSO is unavailable or implicated), with the Employment & Training Team's Designated Safeguarding Lead also informed. All Employment & Training staff should follow this policy and report to the DSO.

Prevent duty

PDT Training's provision is subject to the Prevent duty under section 26 of the Counter-Terrorism and Security Act 2015, as an adult education and training provider. PDT Training's separate Prevent Policy sets out how PDT meets those requirements, including risk assessment, staff training, and the route for raising and referring concerns about radicalisation. The Prevent Policy is held in the Training Department and the Designated Safeguarding Lead for PDT Employment & Training is Andrea Audain (Head of Programme Support).

As part of the country's counter-terrorism strategy (CONTEST), and in particular its Prevent strand, PDT will work with partner organisations to contribute to the prevention of terrorism by safeguarding and protecting adults at risk. Any concern that an adult may be at risk of radicalisation is a safeguarding concern and should be reported to the DSO in the usual way.

Governance

Safeguarding will be a standing item in PDT's monthly SMT meetings, which are chaired by the Chief Executive.

Safeguarding will be a standing item within the Chief Executive's report to PDT's Trustee Board meetings, unless circumstances require an immediate specific report to be made outside Board meetings.

The Board and the DSO will together work to promote safeguarding within PDT, exercising this duty both in law and as a responsible organisation to ensure that PDT is compliant with its safeguarding responsibilities and that due governance is in place.

PDT is committed to openness and honesty. We operate a zero-tolerance approach to abuse, requiring that all actual and alleged abuse must be reported without delay. All allegations of abuse, whether within the organisation, within its operations, or in connection with an individual to whom PDT is providing services, will be taken seriously and responded to swiftly and appropriately.

All PDT Trustees, staff and volunteers, especially those in a position of trust with adults at risk, must maintain appropriate professional boundaries and avoid behaviour that might be misinterpreted by others. It is their responsibility to record and report to the DSO any incident with this potential. They should be aware that private social contact with a vulnerable person is not appropriate.

PDT will be accountable and transparent in delivering safeguarding, and we will work collaboratively with partner agencies at each stage of safeguarding. We will always endeavour to provide feedback, where appropriate, on action taken and any measures that we have taken to reduce the likelihood of a safeguarding incident happening again.

Most reporting will be done under this policy and supporting procedures, but it is recognised that a PDT member of staff or a volunteer may also wish to report under PDT's separate Whistleblowing Policy.

4. Individual responsibilities

All staff and volunteers in relevant roles will:

- Familiarise themselves with this policy
- Respond to safeguarding concerns that are reported to them
- Receive safeguarding training as part of their induction, which will be updated or refreshed as appropriate
- Ensure that all information in respect of safeguarding adults at risk is stored securely

- Inform their line manager if they receive any convictions or cautions, or are bound over

> **If someone is in immediate danger, call 999.**
>
> If waiting for an internal response would put someone at risk, contact Westminster Adult Social Care or the police directly, then tell the Designated Safeguarding Officer as soon as you can.

The DSO has day-to-day responsibility for ensuring the effective implementation of PDT's Safeguarding Policy and will:

- Monitor and evaluate safeguarding practice and systems at PDT, maintain an up-to-date knowledge of national policy and best practice, and make recommendations for areas of development
- Attend safeguarding training/refreshers as appropriate and as agreed with the Board
- Ensure appropriate training/refreshers are provided to staff and volunteers
- Provide practical and emotional support to colleagues and discuss any queries before, during and after a safeguarding concern is raised
- Receive concerns or reports of safeguarding concerns
- Be responsible for the risk assessment of any suspected or actual incident of abuse and decide whether a referral to the police or other authority is appropriate, in line with sections 6 and 7
- Cover safeguarding in their monthly Board reports, as well as reporting any urgent issues separately to the Board as they occur
- Maintain a safeguarding report file and appropriate documentation, including reports to statutory authorities
- Advise and support members of staff and/or volunteers in receiving and managing reports of alleged abuse, and maintain compliance with PDT's safeguarding policies and procedures

Overall responsibility for the governance of safeguarding rests with the PDT Board of Trustees.

5. Recruitment and DBS referrals

All offers of employment should be made in line with PDT's Recruitment and Selection Policy.

PDT recognises that it has a legal duty, under the Safeguarding Vulnerable Groups Act 2006, to make a referral to the Disclosure and Barring Service (DBS) when **both** of the following conditions are met:

1. **Removal condition:** PDT has dismissed the person, permanently transferred them, or otherwise removed them from regulated activity – or **would have done**

so had the person not resigned, retired, been made redundant or otherwise left before the process concluded.

2. Harm condition: PDT thinks the person has:

- engaged in relevant conduct – behaviour that has harmed an adult, or put an adult at risk of harm; or
- satisfied the harm test – there is a risk that they may harm an adult, even where no harm has actually occurred; or
- received a caution or conviction for a relevant offence.

Where someone leaves before the process concludes: leaving does not end PDT's duty. PDT will gather and record the information available and decide whether it would have removed the person from regulated activity. If it would have done so, and the harm condition above is met, PDT must make a referral to the DBS.

Referrals will be made by the DSO in consultation with the Chief Executive (or by the Chief Executive if the DSO is implicated), and the decision and reasons will be recorded whether or not a referral is made.

DBS helpline: **03000 200 190**

6. Process: what to do

If you suspect abuse or neglect, you have a duty to report it to the DSO without delay.

> **If someone is in immediate danger, call 999.**
> If waiting for an internal response would put someone at risk, contact Westminster Adult Social Care or the police directly, then tell the Designated Safeguarding Officer as soon as you can.

When the police should be contacted

Call 999 straight away if someone is in immediate danger, a crime is in progress, or someone needs urgent medical help.

In all other cases where you think a crime may have been committed against an adult – for example sexual, physical or financial abuse – report your concern to the DSO immediately. Do not delay reporting to the DSO while you decide whether something is a crime. The DSO will decide whether the police should be contacted and will normally discuss this with the adult first.

Where the adult has the mental capacity to make the decision, their wishes about police involvement should be respected wherever possible (see section 7). However, the police (and, where appropriate, Westminster Adult Social Care) will be contacted **without the adult's consent** where this is justified because:

- there is a serious or immediate risk to the adult's life, health or safety;

- other people – including other adults at risk or children – are, or may be, at risk;
- the person alleged to have caused harm is a PDT Trustee, member of staff or volunteer, or someone else in a position of trust;
- there are concerns that the adult is being coerced, threatened or unduly influenced by someone else;
- a serious crime is suspected, or sharing is otherwise in the public interest; or
- the law requires it (for example, a court order).

Where the adult lacks capacity to make the decision, it will be made in their best interests in line with the Mental Capacity Act 2005, taking account of their wishes and feelings and consulting those close to them where appropriate.

Where action is taken without consent, the adult should usually be told what is being shared, with whom, and why – unless telling them would increase the risk to them or to others. The DSO will record the decision and the reasons for it, including any decision not to contact the police.

Recognising and responding to abuse

You might suspect abuse if you see someone – a member of staff, a volunteer, or an older person accessing one of PDT's services – behaving in an inappropriate way. Alternatively, a member of staff, a family member, a friend or a member of the public might tell you that they are concerned about abuse of an adult at risk. An individual might also tell you that they are concerned about abuse or their own safety.

If you suspect abuse or neglect, you should:

- Ensure the individual is safe
- Listen carefully and take what is being said seriously. Do not make assumptions or accusations.
- Remember that it is not the responsibility of PDT to investigate – merely to record in detail so that a decision may be taken about a referral to authorities who may investigate
- Not ask leading questions – ask open questions, such as 'Can you tell me what happened?'
- Clearly and promptly record the information you receive, and sign and date everything you write
- Never guarantee confidentiality, but do assure the person that you will only share information with other people if they need to know about it
- Notify the DSO, Jackie Rosenberg, as soon as practicable, both verbally and in writing. If she is unavailable or implicated, notify Graham Collins, Chief Executive. Never attempt to handle a safeguarding matter in isolation.

Where the suspected abuse is alleged to have been carried out by a member of staff or a volunteer, the Whistleblowing Policy or internal disciplinary procedure will also be followed.

If a line manager or the DSO is implicated, the Chief Executive must be approached. If the Chief Executive is implicated, the Chair of Trustees must be approached.

7. Choice, consent and capacity

PDT aims to empower all adults to be in control of their own lives, and to make informed choices and their own decisions wherever possible. We seek to protect people in later life from abuse and at the same time to promote their dignity and right to live safely as they choose. We recognise that the balance between autonomy and protection is a delicate one for many older people. We recognise that circumstances may exist where the mental capacity of an older person or a person at risk is limited or affected by memory-related conditions such as dementia.

Where harm or abuse is suspected:

- Information will be shared only with the adult's consent, or with a person who has relevant legal authority to act in that matter, or where sharing is otherwise permitted under the Mental Capacity Act 2005 and data protection law.
- Consideration should be given to a referral to Westminster Adult Social Care, depending on the safeguarding circumstances or risk.

It is not the role of PDT to investigate incidents in detail or to question relatives or carers.

The wishes of all adults should in principle be respected, except where the law places a responsibility on agencies to intervene, such as if:

- A crime is suspected
- Allegations are made that involve a PDT member of staff or volunteer
- There is actual harm or a risk of significant harm to the adult at risk, or other people are at risk

In terms of capacity, PDT staff and volunteers must remain aware of the five key principles of the Mental Capacity Act 2005:

1. *A person must be assumed to have capacity unless it is established that they lack capacity.*
2. *A person is not to be treated as unable to make a decision unless all practicable steps to help them do so have been taken without success.*
3. *A person is not to be treated as unable to make a decision merely because they make an unwise decision.*
4. *An act done, or decision made, under the Act for or on behalf of a person who lacks capacity must be done, or made, in their best interests.*
5. *Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.*

8. Records and confidentiality

As noted above, when speaking with an individual about possible abuse, no guarantees of confidentiality should be given, but it is appropriate to explain that information will only be shared with people who need to know about it.

This must be backed up with the highest standards of professionalism and discretion on the part of staff and volunteers to whom any disclosure is made. Information must only be shared on a need-to-know basis in accordance with this policy and never discussed with others.

The DSO is responsible for maintaining confidential files and storing them securely. Reports to the Board on safeguarding matters should be anonymised where appropriate.

All personal data, including personal data processed in connection with safeguarding, will be kept confidential and respected in accordance with PDT's Data Protection Policy.

Record keeping

Whenever a complaint or allegation of abuse is made, the keeping of clear, accurate records is essential. Similarly, if there are suspicions that a person is at risk of abuse or may be being abused, careful records must be kept.

Records should include:

- Records of what the client actually said, using their own words and phrases
- No leading questions, and a record kept of any questions which are actually asked
- Description of the circumstances that brought about the disclosure
- Noting the setting and any others present at the time of disclosure
- Inclusion of observations of their behaviour and physical condition
- Recording of facts, not opinions
- Dates and times, including signature and who the record was sent to
- Written in black ink

9. Charity Commission serious incident reporting

Charity trustees are responsible for reporting serious incidents to the Charity Commission promptly. The Board has delegated this as follows:

Role	Responsibility
Decides whether a report is required	The **Chief Executive**, after consulting the DSO and the **Chair of Trustees**. The decision should be made as soon as possible after the incident comes to light.
Submits the report	The **Chief Executive** submits the report online to the Charity Commission promptly. The report must **not** wait for a Board meeting.
If the decision maker is unavailable or implicated	The **Chair of Trustees** (Grace Reid) takes over both the decision and the submission. If the Chair is also unavailable or implicated, the Vice-Chair (Tim Todhunter) does so.
Informing the Board	All Trustees are informed promptly, and the matter is reported at the next Board meeting. The decision and its reasons – including any decision **not** to report – are recorded.

Detailed guidance is available at How to report a serious incident in your charity, and an examples table of what should be reported is available at Deciding what to report – examples table.

10. How to alert the authorities at Westminster City Council

The referral is to be completed by a staff member or a third party who witnessed or was informed about the alleged or suspected abuse or neglect, normally with the support of the DSO. Referrals should be made without delay, with immediate action where an adult is at immediate risk of harm.

Local authority contact details

Service	Contact
Safeguarding Adults helpline – ask for the Adults Access Team	020 7641 2176 (9am to 5pm, Monday to Friday)
Adult Social Care – out of hours	020 7641 2388
Email	adultsocialcare@westminster.gov.uk
Secure email	Please discuss with the Adults Access Team
Emergency	999 if someone is in immediate danger

Appendix One: Safeguarding procedure at a glance

PDT will not tolerate the abuse of adults in any of its forms and is committed to safeguarding adults with care and support needs from harm. The aim of this appendix is to provide clear and simple instructions for all staff and volunteers who have safeguarding and/or welfare concerns about any client that they are working with. This may include allegations against PDT staff.

Fuller guidance on safeguarding at PDT is provided in the main Safeguarding Policy. All staff are expected to attend safeguarding training annually.

> **If someone is in immediate danger, call 999.**
> If waiting for an internal response would put someone at risk, contact Westminster Adult Social Care or the police directly, then tell the Designated Safeguarding Officer as soon as you can.

Who to report to

Who	Contact
Designated Safeguarding Officer – report all concerns here	Jackie Rosenberg, Deputy CEO - Head of Community Programmes – jackie@pdt.org.uk – 07949 108112
If Jackie is unavailable or implicated	Graham Collins, Chief Executive – graham@pdt.org.uk – 07592 401188
Employment & Training Team, including Learners or Training Team staff involved	Andrea Audain (Head of Programme Support), Employment & Training Team Designated Safeguarding Lead – andrea@pdt.org.uk – 07545 975469 Mayette Esdicul (MIS Manager) – Employment & Training Team Designated Deputy Safeguarding Lead – mayette@pdt.org.uk – 020 8092 4466 Out of Hours Cover – Abdolhossein Malek (Head of Skills Training) – hoss@pdt.org.uk – 07852 319919

If you have any safeguarding or welfare concerns about a client you are supporting, report them to the DSO by telephone or email at the earliest opportunity.

When to contact the police

Call 999 if someone is in immediate danger or a crime is in progress. If someone has been physically harmed, you may also need to call the ambulance service.

If you think a crime may have been committed – for example sexual, physical or financial abuse – but no one is in immediate danger, tell the DSO straight away. The DSO will decide whether to contact the police, normally after talking to the adult. An adult with capacity can usually decide whether they want the police involved, but the

DSO will contact the police without their consent where there is a serious risk to them, others are at risk, the alleged abuser is PDT staff, a volunteer or someone in a position of trust, the adult may be under pressure from someone else, or a serious crime is suspected. If the adult lacks capacity to decide, the decision is made in their best interests. See sections 6 and 7 of the main policy.

Recording and reporting

Step 1. As soon as possible, make notes of the situation or conversation that raised your concerns:

- What words did the client use?
- When did the incident or conversation take place?
- Who was involved?

Remember – if you suspect abuse or neglect, you should:

- Ensure the individual is safe
- Listen carefully and take what is being said seriously. Do not make assumptions or accusations.
- Remember that it is not the responsibility of PDT to investigate – merely to record in detail so that a decision may be taken about a referral to authorities who may investigate
- Not ask leading questions – ask open questions, such as 'Can you tell me what happened?'
- Clearly and promptly record the information you receive, and sign and date everything you write
- Never guarantee confidentiality, but do assure the person that you will only share information with other people if they need to know about it

Step 2. Share the information with the DSO (or the Chief Executive if the DSO is unavailable or implicated) at the earliest opportunity, both verbally and in writing. The DSO will advise on next steps and may follow up the concerns, which may include a referral to Westminster Adult Safeguarding. Never handle a safeguarding concern in isolation.

Step 3. Keep a record of all actions and ensure all matters are followed up by the DSO, who is responsible for ensuring that follow-up actions are recorded.

Contacting Adult Safeguarding at Westminster

Service	Contact
Safeguarding Adults helpline (9am to 5pm)	020 7641 2176
Adult Social Care – out of hours	020 7641 2388
Email	adultsocialcare@westminster.gov.uk

DSO follow-up actions

1. Ensure that appropriate follow-up actions are taken – this may include escalating the issue to Adult Safeguarding at Westminster or the police.
2. Ensure that the safeguarding/welfare concern and follow-up actions are recorded.
3. Ensure that the issue is reported to SMT and the Board of Trustees, and that the Chief Executive considers without delay whether a serious incident report to the Charity Commission is required (see section 9 of the main policy).

Detailed guidance is available at How to report a serious incident in your charity.

Record keeping

Whenever a complaint or allegation of abuse is made, the keeping of clear, accurate records is essential. Similarly, if there are suspicions that a person is at risk of abuse or may be being abused, careful records must be kept. Records should include:

- Records of what the client actually said, using their own words and phrases
- No leading questions, and a record kept of any questions which are actually asked
- Description of the circumstances that brought about the disclosure
- Noting the setting and any others present at the time of disclosure
- Inclusion of observations of their behaviour and physical condition
- Recording of facts, not opinions
- Dates and times, including signature and who the record was sent to
- Written in black ink

Appendix Two: Online abuse and digital safeguarding

Paddington Development Trust (PDT) recognises that safeguarding risks also arise through the use of digital technology, online platforms, mobile devices, messaging services and social media. E-safety and digital safeguarding are integral to PDT's responsibility to safeguard adults at risk.

This appendix applies to all staff, Trustees, volunteers, contractors and sessional workers, and to all digital activity connected to PDT, including use of PDT-owned or personal devices when undertaking PDT work.

Adults at risk may experience increased digital vulnerability due to factors such as learning disabilities, mental health needs, cognitive impairment, social isolation, dependency on others, language barriers or limited digital literacy. Digital abuse may occur alongside face-to-face abuse or independently.

Digital safeguarding concerns

Digital safeguarding concerns may include (but are not limited to):

- Online grooming or exploitation (sexual, criminal, financial or ideological)
- Financial abuse, online scams, phishing or fraud
- Coercive or controlling behaviour facilitated through technology
- Harassment, threats or intimidation via digital platforms
- Non-consensual sharing of images or personal information
- Misuse of assistive or monitoring technology to control or isolate an individual
- Impersonation or identity abuse

Professional digital boundaries

All staff, Trustees and volunteers must maintain clear professional digital boundaries. They must:

- Use only PDT-approved platforms and communication methods for work with service users
- Avoid private or secretive digital communication with adults at risk
- Avoid contact through personal social media accounts
- Never request or accept personal images, videos or inappropriate digital content
- Ensure all digital interactions are appropriate, necessary and proportionate to their role

Staff must not:

- Use encrypted or disappearing-message platforms for PDT business unless authorised
- Share personal contact details with service users without organisational approval

- Engage in online behaviour that could be perceived as coercive, exploitative or inappropriate

Consent, capacity and privacy

Consent, capacity and privacy must be carefully considered in all digital activity. Where there is doubt about whether an adult has capacity to make a particular decision, that decision must be approached in line with the Mental Capacity Act 2005; where the adult lacks capacity, the decision will be made in their best interests. Decisions about sharing information follow section 7 (Choice, consent and capacity) of the main policy.

Responding to a digital safeguarding concern

Any digital safeguarding concern involving an adult at risk must be treated as a safeguarding matter. Staff and volunteers must:

- Take concerns seriously and act promptly
- Preserve evidence where appropriate
- Not investigate independently
- Report concerns immediately to the DSO, Jackie Rosenberg (jackie@pdt.org.uk, 07949 108112), or, if she is unavailable or implicated, to Graham Collins, Chief Executive (graham@pdt.org.uk, 07592 401188)
- Follow PDT's adult safeguarding and referral procedures

All concerns must be recorded accurately, dated and signed.

> **If someone is in immediate danger, call 999.**
>
> If waiting for an internal response would put someone at risk, contact Westminster Adult Social Care or the police directly, then tell the Designated Safeguarding Officer as soon as you can.

Westminster Safeguarding Adults helpline: **020 7641 2176** (9am to 5pm) · Out of hours: **020 7641 2388** · adultsocialcare@westminster.gov.uk