PAMODZI CREATIVES

SAFEGUARDING VULNERABLE ADULTS POLICY 2026-27

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1. Policy Statement

Pamodzi Creatives CIC is committed to safeguarding the wellbeing, rights, and safety of all adults who engage with our work. We recognise our legal duties under:

- Care Act 2014 (updated statutory guidance 2026)
- Mental Capacity Act 2005
- Data Protection Act 2018
- UK GDPR
- NHS England Safeguarding Accountability & Assurance Framework (SAAF) 2026
- National Adult Safeguarding Board (NASB) Standards 2026

We also implement recommendations from the Casey Review (2026), including strengthened Section 42 enquiry thresholds, improved multi-agency escalation, and enhanced safeguarding governance.

This policy applies to: Directors, Delivery Leads, Freelancers, Volunteers, and External Partners acting on behalf of Pamodzi Creatives CIC.

We commit to creating a culture where safeguarding is everyone's responsibility and where concerns are responded to promptly, appropriately, and lawfully.

2. Definitions

2.1 Adult at Risk

An adult (18+) who:

1. Has needs for care and support
2. Is experiencing or at risk of abuse or neglect
3. Is unable to protect themselves as a result of their care/support needs

This includes, but is not limited to:

- Adults with disabilities
- Adults with mental health needs
- Older adults
- Adults experiencing domestic abuse
- Adults with learning difficulties
- Adults affected by substance misuse
- Adults experiencing homelessness
- Adults transitioning from youth to adult services (Transitional Safeguarding)

2.2 Types of Abuse

As defined in the Care Act 2014 and expanded in 2026 statutory guidance:

- Physical abuse
- Sexual abuse
- Psychological/emotional abuse
- Neglect and acts of omission
- Financial or material abuse
- Domestic abuse
- Modern slavery
- Discriminatory abuse
- Organisational/institutional abuse
- Self-neglect

Additional 2026 categories:

- Digital/online abuse, including AI-enabled exploitation
- Homelessness-related exploitation
- Substance misuse-related safeguarding risks
- Transitional safeguarding risks (18–25)
- Cuckooing (criminal exploitation of an adult's home)

3. Safeguarding Roles & Responsibilities

3.1 Designated Safeguarding Lead (DSL)

The DSL is responsible for:

- Receiving and responding to safeguarding concerns
- Liaising with Portsmouth Adult Social Care
- Contacting emergency services when required
- Maintaining secure safeguarding records
- Ensuring organisational training and compliance
- Supporting staff and volunteers
- Escalating concerns to the National Adult Safeguarding Board (NASB) where local responses are insufficient
- Embedding learning from Safeguarding Adult Reviews (SARs)

3.2 Responsibilities of All Staff, Freelancers & Volunteers

All personnel must:

- Report concerns immediately
- Follow this policy and safeguarding procedures
- Maintain clear professional boundaries
- Complete safeguarding training
- Participate in risk assessments when required
- Follow updated Section 42 enquiry thresholds (2026)

- Cooperate with multi-agency partners including NASB and NHS safeguarding frameworks

4. Mental Capacity & Consent (MCA 2005)

Staff and volunteers must:

- Assume adults have capacity unless proven otherwise
- Provide information in accessible formats
- Support adults to make their own decisions
- Recognise that unwise decisions do not equal lack of capacity

If an adult lacks capacity, decisions must be made in their best interests and recorded clearly.

2026 updates:

- Capacity assessments must consider *executive capacity* (Casey Review 2026).
- MCA assessments must reflect updated Code of Practice revisions (2026).

Consent may be overridden if:

- The adult is at risk of serious harm
- Another person is at risk
- A crime has been or may be committed
- Consent cannot be obtained and vital interests apply

5. Safer Recruitment & DBS Checks

Pamodzi Creatives CIC follows safer recruitment standards including:

- Written role descriptions
- Application screening
- Reference checks
- Identity verification
- Enhanced DBS checks for regulated activity
- Annual DBS Update Service checks where applicable
- Signed code of conduct for all staff and volunteers
- Fit and Proper Persons Test compliance for senior roles (NHS SAAF 2026)

No adult may work with vulnerable adults until all checks are complete.

6. Code of Conduct

All staff, freelancers and volunteers must:

- Treat adults with dignity, respect and professionalism
- Maintain appropriate boundaries

- Communicate responsibly
- Challenge and report unsafe or abusive behaviour
- Use consent-based, trauma-informed approaches
- Protect confidentiality within safeguarding limits
- Follow Duty of Candour principles
- Follow digital safeguarding protocols, including safe use of AI tools
- Use anti-discriminatory and anti-racist practice

Must not:

- Use discriminatory, sexual, abusive or inappropriate language
- Work under the influence of alcohol or drugs
- Give personal contact details
- Photograph adults without written consent
- Put themselves or adults at risk
- Promise secrecy

7. Reporting a Safeguarding Concern

7.1 Immediate Danger

Call 999.

7.2 Portsmouth Adult Social Care

Phone: 023 92 680810 Out of hours: 0300 555 1373

7.3 Reporting to the DSL

Reports must include:

- Date, time and location
- The adult's own words (verbatim)
- Observed behaviour or injuries
- Names of witnesses
- Signature and date

Do not investigate, interrogate, or confront the alleged perpetrator.

2026 updates:

- The DSL will assess whether the concern meets updated Section 42 enquiry thresholds.
- If local responses are insufficient, the DSL will escalate to:
    - Portsmouth Safeguarding Adults Board
    - National Adult Safeguarding Board (NASB)
    - NHS England safeguarding leads (if relevant)

8. Allegations Against Staff or Volunteers

Any concern that a staff member, freelancer, or volunteer has:

- Harmed an adult
- Failed in their duty of care
- Behaved in a way that may pose future risk

...must be reported immediately.

The DSL will consult with:

- Portsmouth Adult Safeguarding Team
- Police (if relevant)
- NASB (2026 escalation routes)

Staff may be suspended during investigation.

9. Whistleblowing

Pamodzi Creatives CIC encourages a transparent safeguarding culture.

Internal routes:

- DSL
- Director
- Delivery Lead

External routes:

- Portsmouth Adult Social Care
- Police
- CQC (if relevant)
- NSPCC Whistleblowing Helpline
- National Adult Safeguarding Board (NASB) for escalated concerns

Whistleblowers are protected under updated Public Interest Disclosure reforms (2026).

10. Information Sharing & Data Protection

Pamodzi Creatives CIC complies with:

- UK GDPR
- Data Protection Act 2018
- Care Act 2014, Section 45 (updated 2026)

- NHS SAAF 2026 information-sharing protocols

Information may be shared without consent if:

- There is risk of serious harm
- A crime may have been committed
- The adult lacks capacity
- A child or other adult is at risk

Records must be factual, dated, signed, stored securely, and retained according to statutory requirements.

Digital safeguarding includes safe handling of AI-generated content and digital evidence.

11. Partnership Working

Pamodzi Creatives CIC works in partnership with:

- Portsmouth Safeguarding Adults Board (PSAB)
- Portsmouth Adult Social Care
- Local police
- Health and social care professionals
- Venue partners and community organisations
- National Adult Safeguarding Board (NASB)

We participate in multi-agency audits, national learning reviews, and safeguarding assurance processes.

12. Risk Assessments

All activities involving adults at risk require:

- A safeguarding risk assessment
- Clear roles and responsibilities
- Venue and environment checks
- Emergency procedures
- Consent and data protection procedures

Risk assessments must consider:

- Homelessness
- Substance misuse
- Digital risks
- Transitional safeguarding (18–25)

13. Training

- DSL receives accredited safeguarding training every 2 years
- All staff/volunteers receive safeguarding induction
- Annual refresher training required

Training includes:

- Mental Capacity Act
- Prevent Duty
- Safer working practice
- Reporting procedures
- Homelessness and exploitation
- Substance misuse safeguarding
- Transitional safeguarding (18–25)
- Digital/AI-enabled abuse
- Learning from Safeguarding Adult Reviews
- NASB national priorities
- Duty of Candour
- Fit and Proper Persons Test requirements

14. Policy Review

This policy will be reviewed:

- Annually
- After any safeguarding incident
- In response to legislative changes
- In line with updated Care Act statutory guidance (2026 onwards)
- Following NASB national learning outputs and thematic reviews

Approvals

Approved by :

Alison Lee
Governance and Compliance Director

Signed By :

Roni Edwards-Wilson
CEO

Signature: 

Date: September 2026

Next Review: September 2027