



Pelican of London Limited (POL) (the charitable company)

Adult Safeguarding Policy and Procedures – August 2025

This policy is based upon good practice, national guidance and current legislation including The Care Act, 2014 and The Mental Capacity Act, 2005 and has been verified by an external third party.

Vulnerable adults in our care or working for us have the right to be protected from harm. It is our duty as an organisation to:

- keep vulnerable adults safe
- respond promptly and thoroughly to adult protection concerns.

Our safeguarding policy and procedures demonstrate how we aim to protect vulnerable adults from abuse and neglect. They explain the steps we will take to keep vulnerable adults safe and what we do when there are concerns about their safety or well-being. This applies whether there are concerns raised about or during our activities or any disclosures made about past events when they are in our care.

Our Safeguarding procedures are detailed guidelines and instructions that support our overarching adult safeguarding policy statement; we recognise that these must be supported by good governance: health and safety, risk management, financial management, recruitment and staff selection, supervision and management.

At Pelican of London (POL), we believe that Safeguarding is everyone's responsibility; we must all play our part in keeping vulnerable adults safe by adopting a person-centred approach.

Adrian Ragbourne, CEO

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Safeguarding Adults Policy April 2024

1. Safeguarding Adults Policy Statement

Pelican of London believes in protecting every adult's right to live in safety, free from abuse and neglect. This policy sets out the roles and responsibilities of Pelican of London working together to promote the welfare of vulnerable adults and to safeguard them from abuse and neglect. Our policy and procedures comply with current legislation, principally The Care Act 2014 and The Safeguarding Vulnerable Groups Act 2006.

This policy aims to ensure that Pelican of London has all the correct procedures in place to protect and safeguard adults and to ensure that staff, contracted staff and volunteers can recognise the symptoms of abuse and neglect and act appropriately upon them.

We are primarily a charitable company working with children and young people aged 14 to 17 and there will be occasions when a young person in our care reaches 18 years of age and becomes an adult e.g. on one of our voyages. We also work with young adults aged 18 to 25. We also recognise that our staff, crew, volunteers and other people who come into contact with our charitable company through its work could be vulnerable adults and make disclosures whilst working with us and in our care.

This policy and related procedures are applicable to the Chief Executive Officer, directors/trustees, employees, contractors and volunteers of Pelican of London. Failure to comply with the policy and related procedures will be addressed without delay and may, ultimately, result in dismissal or exclusion from the organisation.

Employees, directors/trustees and volunteers should be made aware of how this policy can be accessed so that correct procedures can be followed and training on Adult Safeguarding is also compulsory.

2. Supporting documents

This policy statement should be read alongside POL's policies, procedures, guidance and other related documents which include:

- risk assessment procedures – See Appendix 1 and Part A Section 5.2
- dealing with disclosures and concerns about a vulnerable adult See Part B, Sections 2,3 & 4 and Appendix 2
- managing allegations against staff and persons of trust- See Part B, Section 3
- recording concerns and information sharing – See Part B, Sections 3 & 10 and Appendix 2
- adult protection records retention and storage – See Appendix 4
- Photography, sharing images and social media guidance- See Part B, Section 8

- online safety
- induction, training, supervision and support of staff and volunteers- See Part B, Section 9
- Children and Young People Safeguarding Policy
- Staff Handbook including Staff Code of Conduct including The Merchant Navy Code of Conduct
- Volunteer and Director/trustee Codes of Conduct
- Recruitment & Selection Policy
- Health & Safety Policy
- Wellbeing Policy
- Risk Management Policy
- Modern Slavery Policy
- Equality, Diversity and Inclusion Policy
- Anti Bullying and Harassment Policy
- Lone Worker Policy
- Whistleblowing Policy
- Privacy and GDPR Policy
- Complaints Policy
- Social Media Policy
- Information Sharing Policy

3. Definition of an Adult at Risk of Abuse - Care Act 2014

There are three factors that determine whether an adult is at risk of abuse. These are: where an adult in our care:

- (a) has needs for care and support,
- (b) is experiencing, or is at risk of, abuse or neglect, and
- (c) because of those needs is unable to protect his her or themselves against the abuse or neglect or the risk of it.

4. Key Principles of Adult Safeguarding

Pelican of London is guided by the six key principles of adult safeguarding as set out in The Care Act 2014 and Making Safeguarding Personal. Pelican of London aims to demonstrate and promote these six principles in our work:

- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent
- **Prevention:** It is better to act before harm occurs.

- **Proportionality** – The least intrusive response appropriate to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Working with partners, clients and regulatory services to prevent, detect and report neglect and abuse.
- **Accountability** – Accountability and transparency in delivering safeguarding.

5. Recognising the signs of abuse

We aim to ensure that all staff, contracted crew, directors/trustees and volunteers are well-placed to identify abuse from things that the adult may say or do or that let you know something is wrong. It may come in the form of a disclosure, complaint, or an expression of concern. Everyone within the organisation should understand what to do, and where to go to get help, support and advice. See Section 4.1. and 4.2, also Section 5 of this policy.

5.1 Types of Abuse

The Care Act 2014 defines the following areas of adult abuse. Pelican of London, in line with many other organisations, also includes self-neglect as an additional category. These are not exhaustive but are a guide to behaviour that may lead to a safeguarding enquiry. This includes:

- **Physical abuse** - Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- **Domestic Violence/ Domestic Abuse** - Including psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence.
- **Exploitation**- Including sexual and/or criminal exploitation
- **Sexual abuse** - Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography. Witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological abuse** - Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial or material abuse** - Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Modern slavery** - Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and those who coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. *See our Modern Slavery Policy for more information.*

- **Discriminatory abuse** - Including forms of harassment, slurs or similar treatment because you are, or are perceived to be different due to race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational abuse** - Including neglect and poor care practice within an institution or specific care setting or in relation to care provided in one's own home from one off incidents to long-term ill treatment through neglect or poor professional practice because of the structure, policies, processes or practices within an organisation.
- **Neglect and acts of omission** - Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Self-neglect** - This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

5.2 Mental Capacity

The Mental Capacity Act, 2005, defines someone who is lacking capacity, because of an illness or disability such as a mental health problem, dementia or a learning disability, who cannot do one or more of the following four things:

- Understand information given to them about a particular decision
- Retain that information long enough to be able to make the decision
- Weigh up the information available to make the decision
- Communicate their decision. Refer to the Mental Capacity Act Code of Practice, <https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice>. Pelican of London will need to involve an advocate if the person lacks capacity to make decisions about a safeguarding concern.

Pelican of London works with the client chartering our ships and participating in activities organised by us to identify and record the specific needs of individuals who may lack mental capacity or have other needs which make them more vulnerable than other people. This will allow us to adapt our practices and accommodate specific needs accordingly. This will be recorded in a risk assessment. ***See Appendix 1 for a risk assessment form.***

5.3 Radicalisation to Terrorism – PREVENT Programme

- Through this programme, the Government has highlighted how some adults may be vulnerable to exploitation, radicalisation and involvement in terrorism. Signs and indicators are:
 - Being in contact with extremist recruiters.
 - Articulating support for violent extremist causes or leaders.
 - Accessing violent extremist websites, especially those with a social networking element.
 - Possessing violent extremist literature.
 - Using extremist narratives to explain personal disadvantage.

- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance and/or behaviour.

Pelican of London Adult Safeguarding Operational Procedures

1. Safe Recruitment & Selection

All applications for work, whether paid staff, contracted professional crew or volunteers, will be subject to scrutiny. The Disclosure and Barring Service (DBS) application procedure seeks to elicit information about the applicant's motivation, past career or experience and to establish if any criminal record exists. As we are a sail training organisation with a tall ship, we often have foreign nationals who work for us as crew. DBS vetting does not cover foreign nationals so we either use the Irish Garda Vetting Service or the vetting service of the foreign nationals' country of residence. Please contact our Operations Co-ordinator if you need help or information with vetting individuals for employment or volunteering.

Pelican of London is committed to safe employment and safe recruitment practices, that reduce the risk of harm to adults with care and support needs from people unsuitable to work with them. ***See POL's Recruitment and Selection Policy, Staff, Volunteer and Director/trustee Codes of Conduct.***

2. Reporting Concerns

Any employee, contracted crew member, director/trustee or volunteer who becomes aware that an adult is, or is at risk of, being abused must raise the matter immediately with the Master if at sea, or with the organisation's designated safeguarding person.

If the adult requires immediate protection from harm, contact the police and Adult Social Care. See our Information Sharing Policy for further advice on confidentiality and appropriate sharing of information with the relevant authorities.

Early sharing of information is the key to providing an effective response where there are emerging concerns. ***To ensure effective safeguarding arrangements no one should assume that someone else will do it.***

3. Managing Allegations

3.1 Paid and Contracted Shore and Sea Staff/Volunteers and Shore Helpers

A complaint, concern or allegation may come from several sources: the vulnerable adult, their carer/s or someone else within the organisation. It may involve the behaviour of a POL volunteer, director/trustee, contractor or employee, or something that has happened to the vulnerable adult outside a POL activity. Vulnerable adults may confide in other adults they trust, in a place where they feel at ease.

An allegation may involve something in a range from mild verbal bullying to physical or sexual abuse or neglect. Taking appropriate action if you are worried about abuse or neglect is never easy - it takes courage, but it may be lifesaving.

You may be upset about what the vulnerable adult has said, or you may worry about the consequences of your actions, but you cannot ignore it. Sometimes people worry about the vulnerable adult being removed from their normal home as a result of abuse, but in reality this rarely happens. The effects of abuse on a vulnerable adult can be devastating, especially if they are left unprotected or do not receive help to cope with the abuse. The most serious effect is that vulnerable adults can and do die as a result of abuse. They can develop behavioural difficulties, suffer from withdrawal, fail to function with day-to-day life and they can become depressed and withdrawn. Some of these problems, if left untreated, can persist.

If you are concerned that a vulnerable adult may be being or has been abused, it is NOT your responsibility to decide if it is abuse or to investigate further BUT it is your responsibility to act on your concerns and report them to the Master/ Designated Safeguarding Officer/ Chief Executive.

3.2 What to do if a Person in a Position of Trust is Involved

In any instance of safeguarding, consideration must be given as to whether an allegation has been made against a person in a position of trust and who may be a risk to others. This can be anyone from a formal employee, contractor, director/trustee or volunteer.

3.3 Directors/trustees

Safeguarding incidents where a director/trustee is implicated should be reported to the Safeguarding Director/trustee who should then report the matter direct to the Chairman of the Charitable company. If the Safeguarding Director/trustee is implicated, the matter should be reported direct to the Safeguarding Officer who should then report the matter direct to the Chairman of the Charitable company. If the Chairman of the charitable company is implicated, the matter should be reported direct to the Safeguarding Director/trustee who should then report the matter to the Safeguarding Officer and Chairman of the Governance and Finance sub-committee.

3.4 Organisational Reporting and Oversight of Safeguarding

Incidents involving safeguarding issues are reported as soon as practicable to the Safeguarding Director/trustee and thereafter via the Governance and Finance sub-committee and Board. One key area where Directors/trustees may need to be involved is where there is an allegation against someone working or volunteering for the Trust including a director/trustee.

4. Recording and Record Keeping

A written record must be kept about any concern regarding an adult with safeguarding needs. This must include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made. A reporting form should be completed and submitted **without delay** to the Master and the Safeguarding Officer. *See Appendices 2 and 3.*

All records must be signed and dated. All records must be securely and confidentially stored in line with General Data Protection Regulations (GDPR). *See Appendix 4*

For guidance on what to do if an adult tells me s/he is/they are being abused and how to record information see Appendices 2 and 3.

5. Safeguarding Roles in Pelican of London

5.1 Role of Designated Safeguarding Officer

The role of the Designated Safeguarding Officer is to ensure that the organisation has up-to-date operational procedures to support POL's Adult Safeguarding Policy; and that relevant staff and volunteers understand the procedures and put them into practice; to receive reports of any concerns or allegations; in conjunction with the person in charge, to decide on the appropriate action to be taken; to keep a record.

5.2 Role of Master

When any safeguarding incident happens at sea, it is reported to the Master in the first instance and entered in the ship's log together with a completed safeguarding incident form. It is the Master's responsibility to report to the Safeguarding Officer and take advice on any disciplinary procedures to be taken.

5.3 Role of the Designated Safeguarding Director/trustee

The role of the Designated Safeguarding Director/trustee is to ensure that the organisation has an up-to-date policy with procedures to support it, to receive information on adult and children and young persons' safeguarding incidents, to provide supporting advice to staff and to prepare reports to the Governance & Finance sub-committee and the Board. The Safeguarding Director/trustee will also consider whether Pelican of London's governance procedures are fit for purpose or require amendment and recommend any organisational learning.

6. Disciplinary Procedures

Where there is an allegation of abuse against a member of staff contracted crew, directors/trustees or volunteers, there may be three types of investigation:

- a criminal investigation
- a safeguarding investigation
- a disciplinary or misconduct investigation by POL and / or the RYA. and a disciplinary investigation under The Merchant Navy Code of Conduct disciplinary procedures. Procedures for both are in the POL Staff Handbook.

The results of the police and/or social services investigation may well influence the disciplinary investigation, but not necessarily.

It is important that we have a means to address misconduct. Disciplinary procedures are in place. The Merchant Navy Code of Conduct is used in the case of contracted voyage crew and professional mariners and internal disciplinary procedures for shore staff, volunteers and directors/trustees. A copy of both documents is kept in the on-board staff manual. ***See our Disciplinary Policy at Appendix 5.***

If we dismiss or remove someone from a regulated activity (or we would have done had they not left) **because they harmed or posed a risk of harm to vulnerable groups** including young people then we are legally obliged to forward information about that person to the DBS, Garda or foreign national authorities. The appropriate Local Authority Designated Officer must also be informed. It is a criminal offence not to do so. In these circumstances consideration will also be given as to whether the RYA should be informed. Guidance on referrals can be found on <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-a-referral>

It is important to understand that a member of staff reporting an alleged case of adult abuse or neglect particularly by a colleague, may undergo a very high degree of stress, including feelings of guilt for having reported the matter. It is therefore important to ensure that appropriate counselling and support is available in such a situation.

7. Complaints procedure

The Charitable company takes complaints from service users, their relatives and or friends and/or members of the public seriously and aims to deal with them professionally and openly and, where necessary, make improvements in service delivery and/or procedures. Staff should ensure they are familiar with the Complaints procedure. It is important to record all complaints, however minor, or informally stated, to inform the Line Manager of them and to follow the correct procedure.

On receipt of a complaint, it is important to ascertain and record the details including the nature of the complaint, the contact details of the complainant and what recompense or action is being sought. The Senior Management Team of the Charitable company should be informed, and the details should be filed under a separate hard copy or specific file folder on the server. An acknowledgement of receipt of the complaint will be sent within 5 working days. All subsequent correspondence including emails and telephone calls should then be appended to the file. If the complaint is concerning the CEO, a Director/trustee or the Board of Directors/trustees it should be referred to Chair/Deputy Chair of the Charitable company. If complaint is against the Chair it should go to the deputy Chair and vice versa.

Senior management will then decide on the recommended response to the complaint and whether any recompense is justified. The file will remain open until either a mutually acceptable resolution or six months have passed with no further action. In all cases the file will remain accessible for any follow-up action.

It is important to meet any commitment timescales made in terms of actions or recompense to avoid escalating the complaint and to keep the complainant informed of progress.

8. Social Media

All employees, contractors, directors/trustees and volunteers should be aware of the Pelican of London social media policy and procedures – **See Pelican of London Social Media Policy, Staff Code of Conduct, Director/trustee Code of Conduct and Volunteer Code of Conduct.**

9. Training and Awareness

Pelican of London will ensure an appropriate level of safeguarding training is available to its Directors/trustees, Contracted Crew, Employees, Volunteers and any relevant persons linked to the organisation who requires it (e.g. contractors). For the on-line training course see: <https://alison.com/course/safeguarding-vulnerable-adults>

For all land staff, crew and contracted crew who are working or volunteering with adults at risk this requires them as a minimum to have awareness training that enables them to:

- Understand what safeguarding is and their role in Safeguarding Adults.
- Recognise an adult potential in need of safeguarding and take action.
- Understand how to report a safeguarding Alert.
- Understand dignity and respect when working with individuals.
- Have knowledge of the Vulnerable Adults Safeguarding Policy.

Similarly, employees and volunteers may encounter concerns about the safety and wellbeing of children/young people. ***For more information about children's safeguarding and training, refer to Pelican of London Children and Young People's Safeguarding Policy.***

10. Confidentiality and Information Sharing

Pelican of London expects all employees, contracted crew, volunteers and directors/trustees to maintain confidentiality. Information will only be shared in line with the General Data Protection Regulations (GDPR) and Data Protection. ***See Pelican of London Privacy and General Data Protection Policy and Information Sharing Policy.***

However, information should be shared with the Local Authority if an adult is deemed to be at risk of harm or **contact the police if they are in immediate danger, or a crime has been committed**. For further guidance on information sharing and safeguarding see ***Pelican of London Information Sharing Policy.***

11. Whistleblowing

Pelican of London is committed to ensuring that employees, contracted crew, directors/trustees and volunteers who in good faith whistle-blow in the public interest, will be protected from reprisals and victimisation. ***See Pelican of London Whistleblowing Policy.***

12. Important Contacts

Safeguarding Officer

Name: Simon Thorrington

Email address: simon@pelicanoflondon.org

Telephone number: 07395 360922

Safeguarding Director/trustee

Name:

Email address:

Police

Emergency – 999

Non-emergency – 101

Telephone: 0808 2000 247

<https://www.nationaldahelpline.org.uk/>

Appendix 1 - Risk assessment form for vulnerable persons – to be completed prior to joining ship

Types of Behaviour Causing Concern <i>(Please select those applicable and known to have occurred)</i>	✓	Frequency H = hourly D = daily W = weekly O = occasionally	Intentionality D = deliberate A = accidental or Incidental I = involuntary	Risk		
				Hazard (H) 1-4	Probability (P) 1-4	Level of Risk (H x P) 1-16 (add level descriptor)
Self Harm						
Bullying						
Swearing/Abusive						
Sexually abusing/inappropriate behaviour						
Violent/aggressive behaviour						
Impulsive/dangerous behaviour						
Substance/alcohol misuse						
Racial/Gender/Religious/Learning						

Disability discrimination						
Absconding/absenting						
Damage to property						
Offending behaviour (e.g stealing)						
Carrying/using weaponry						
Reckless disregard for personal safety (e.g. persistent failure to clip on						
Other (<i>Please specify</i>)						

APPENDIX 2

What to do if a vulnerable adult tells me s/he or they is/are being abused and how to record information

A three-step approach – Receive, Reassure, Respond

If a vulnerable adult starts to tell you about something that might indicate potential abuse, listen but do not ask for detail. You need to let them know as soon as possible that if they tell you something that might cause concern, you will have to tell someone else, and you will need to follow POL's Adult Safeguarding policy and procedures

Under no circumstances agree to keep it a secret. Remember abuse thrives on secrecy. Make sure you are aware of POL's Safeguarding and Information Sharing policies and procedures and follow them.

Do not ask probing questions. It may undermine any investigation by Police or Adult Services if it looked as though the vulnerable adult was led to give their answers. Adult Services in Social Care are the only organisation that have legal power to investigate allegations of abuse against vulnerable adults. If the allegation is against one of Pelican of London's employees, we are responsible for investigating allegations, informing the employee of the concerns if appropriate, and advising them what will happen in accordance with its management procedures.

The main aim is to keep calm and provide a positive, friendly attitude to encourage the vulnerable adult to talk. The complexity of safeguarding issues means that there can never be a set of prescriptive questions. Don't try to get too much information: rather, let the vulnerable adult give you as much as they feel prepared to give. The person listening should try to act as naturally as possible throughout.

When listening try to make sense of what you are being told:

- Are they being harmed?
- Are they currently at risk?
- Is anyone else at risk?
- Do they need medical attention?
- What are their overall needs?
- What is important to them?

It can help to keep the 3Rs in mind outlined below and over - but as mentioned, it is very important that you follow POL's safeguarding policies and procedures.

Receive

- listen, do not look shocked or disbelieving

- do not be judgemental
- take what they are saying seriously and believe them
- don't make the vulnerable adult feel bad, for example by saying things like 'You should have told me earlier'

Reassure

- stay calm, tell them that they have done the right thing in telling you
- ensure the vulnerable adult is safe and feels safe
- acknowledge how hard it must have been to tell you
- tell them that they are not to blame
- empathise – but don't tell them how they should be feeling
- don't promise confidentiality – be honest, explain that only those that need to know will be told (i.e. follow our Safeguarding policies and procedures)
- be honest about what you can and can't do
- be careful about physical contact, it may not be what the vulnerable adult wants

Respond

- refer your concern on through POL's Safeguarding policies and procedures
- record the date and time and any information given to you; always use the words said to you; never interpret what was said and put it in your own words (this information could be used as evidence)
- sign and date everything that you record
- don't criticise or judge the abuser – the vulnerable adult may have feelings for him or her; remember abuse often happens by someone known and trusted by the young person
- maintain confidentiality – but say you will have to tell others if it will help protect the vulnerable adult
- try to follow things through yourself so they don't need to repeat their story to other staff
- tell POL and make sure that all information is passed onto the Social Services / Police if appropriate.
- explain what will happen next – for example, the designated officer will be informed, and they may want to speak to the vulnerable adult further.
- get support for yourself. It can be distressing dealing with disclosure

COMMON QUESTIONS that could be used in some situations.

THE DO's - open questions/statements

- Would you like to tell me what happened?
- Can you tell me where/when this happened?
- Would you like to tell me who was involved?
- Can you tell me what happened next?
- Is there anything else you would like to tell me?

- Thank you for telling me this but you do realise that I will have to do something about it

THE DON'T's - leading/closed questions/comments

- Was it a (*named person*) that did this to you?
- Are you sure that's what happened?
- Why did you let them do that to you?
- Why do you think this happened?
- I expect you must be very upset about this
- This can be our little secret

If in doubt, follow the Flowchart on the following page.

APPENDIX 3

Pelican of London – Adult Safeguarding Report and Referral Form	
Victim's Details	
Name	
Address	
Date of Birth /or age	
Gender	Ethnic Origin
Does this person know a referral is being made?	
What does this person want to happen?	
What is the allegation?	
What has happened & when?	
What has been the impact on this person?	
What, where, when, who and how did it come to light?	

Details of witnesses	
Is the person currently at risk? Is immediate action required to protect the adult at risk? Are any other people at risk?	
What other agencies are involved?	
Is there anything to suggest this person does NOT have mental capacity?	
Alleged Person/s causing harm details <i>(expand as necessary)</i>	
Name	
Address	
Date of Birth /or age	
Gender	Ethnic Origin
What is the person causing harm's relationship to the victim?	
Is the person causing harm employed by or contracted by Pelican of London?	
Referrer's Details <i>(expand as necessary to include any advice received)</i>	
Name	
Address	
Position in Pelican of London	

Referrer's relationship and involvement with victim and/or person causing harm.	
Is this a whistleblowing situation?	
Reported to Safeguarding Officer and Director/trustee? [who and when]	
Advice received:	
Signature	Date form completed

APPENDIX 4

POLICY ON THE SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL OF DBS DISCLOSURES AND DISCLOSURE INFORMATION

1. General principles

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, POL complies with the government guidelines regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

Storage and access

Certificate information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

Certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Once the inspection has taken place the certificate should be destroyed in accordance with this code of practice.

Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and human rights of the individual before doing so.

Throughout this time, the usual conditions regarding the safe storage and strictly

controlled access will prevail.

Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of a certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of a certificate, the position for which the certificate requested, and the unique reference number of the certificate/s and the recruitment decision made.

Appendix 5

Pelican of London Limited (POL) (the charitable company)

Disciplinary Procedure

1. Purpose and scope

This procedure is designed to help and encourage all employees to achieve and maintain good standards of conduct, attendance and job performance. This procedure applies to all employees. The aim is to ensure consistent and fair treatment for all in the organisation.

These disciplinary procedures do not apply to seafaring, contracted crew. They are governed by the Merchant Navy Code of Conduct and disciplinary procedures.

2. Principles

Informal action will be considered, where appropriate, to resolve problems. For example, if extra training or additional temporary support are considered appropriate these will be suggested for an agreed period.

No disciplinary action will be taken against an employee until the case has been fully investigated.

In the case of formal action, the employee will be advised in writing of the nature of the complaint against him or her and will be given the opportunity to state his or her case, within a defined timeframe, before any decision is made at a disciplinary meeting.

Employees will be provided, where appropriate, with written evidence and relevant witness statements before a disciplinary meeting.

At all stages of the procedure the employee will have the right to be accompanied by a trade union representative, or work colleague (not a legal representative).

No employee will be dismissed for a first breach of discipline except in the case of gross misconduct, when the penalty will be dismissal without notice or payment in lieu of notice. An employee will have the right to appeal against any formal disciplinary action.

The procedure may be implemented at any stage if the employee's alleged misconduct warrants this.

3. The procedure

First stage of formal procedure

This will normally be either:

- an improvement note for unsatisfactory performance if performance does not meet acceptable standards. This will set out the performance problem, the improvement that is required, the timescale, any help that may be given and the right of appeal. The individual will be advised that it constitutes the first stage of the formal procedure. A record of the improvement note will be kept securely for 12 months, but will then be considered spent – subject to achieving and sustaining satisfactory performance

or

- a first warning for misconduct if conduct does not meet acceptable standards. This will be in writing and set out the nature of the misconduct and the change in behaviour required and the right of appeal. The warning will also inform the employee that a final written warning may be considered if there is no sustained satisfactory improvement or change within a defined time period. A record of the warning will be kept, but it will be disregarded for disciplinary purposes after a specified period (eg, six months).

Final written warning

If the offence is sufficiently serious, for example resulting in major disruption to the charitable company's operations or damage to its reputation, or if there is further misconduct or a failure to improve performance during the currency of a prior warning, a final written warning may be given to the employee. This will give details of the complaint, the improvement required and the timescale. It will also warn that failure to improve may lead to dismissal (or some other action short of dismissal) and will refer to the right of appeal. A copy of this written warning will be kept by the supervisor but will be disregarded for disciplinary purposes after 12 months subject to achieving and sustaining satisfactory conduct or performance.

Dismissal or other sanction

If there is still further misconduct or failure to improve performance the final step in the procedure may be dismissal or some other action short of dismissal such as demotion or disciplinary suspension or transfer (as allowed in the contract of employment). Dismissal decisions can only be taken by the appropriate senior manager, and the employee will be provided in writing with reasons for dismissal, the date on which the employment will terminate, and the right of appeal.

If some sanction short of dismissal is imposed, the employee will receive details of the complaint, will be warned that dismissal could result if there is no satisfactory improvement, and will be advised of the right of appeal. A copy of the written warning will be kept by the supervisor but will be disregarded for disciplinary purposes after 12 months subject to achievement and sustenance of satisfactory conduct or performance.

Gross misconduct

The following list provides some examples of offences which are normally regarded as gross misconduct:

- theft or fraud
- physical violence or bullying
- deliberate and serious damage to property
- serious misuse of an organisation's property or name
- deliberately accessing internet sites containing pornographic, offensive or obscene material
- serious insubordination
- unlawful discrimination or harassment
- bringing the organisation into serious disrepute
- serious incapability at work brought on by alcohol or illegal drugs
- causing loss, damage or injury through serious negligence
- a serious breach of health and safety rules
- a serious breach of confidence.
- Abuse of a minor

If you are accused of an act of gross misconduct, you may be suspended from work on full pay, normally for no more than five working days, while the alleged offence is investigated. If, on completion of the investigation and the full disciplinary procedure, the organisation is satisfied that gross misconduct has occurred, the result will normally be summary dismissal without notice or payment in lieu of notice.

Appeals

If you are unhappy with your manager's decision and you wish to appeal, you should let your manager know.

You will be invited to an appeal meeting, normally within 5 days, and your appeal will be heard by a more senior manager (or a director/trustee). You have the right to be accompanied by a colleague at this meeting if you make a reasonable request.

After the meeting the manager (or director/trustee) will give you a decision, normally within 24 hours. The manager's (or director/trustee's) decision is final.

Policy Version Control

Policy area	Periodic Review	Last Review date	Board Approval date	Next review date	Notes

Safeguarding Adults	Annual	August 2025	August 2025	August 2026	
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