

Managing Allegations against Staff and Volunteers.

1. INTRODUCTION

This guidance contains links (underlined in blue) to internet pages that practitioners may find helpful so is best viewed electronically.

This local practice guidance has been developed to provide additional guidance when allegations are made against employees or volunteers or other people working with adults at risk. The guidance supplements the [London Multi-Agency Adult Safeguarding Policies & Procedures \(November 2025\)](#) also [Department of Health Care and Support Guidance](#).

All work in dealing with risk and safeguarding should consider the six Making Safeguarding Personal principles of Prevention, Participation, Empowerment, Partnership working, Proportionality and Accountability. Decision making should be clearly recorded to reflect these principles in any form of safeguarding work.

In such cases consideration must be given to whether a crime has been committed, and in these cases the police investigation will need to be considered as part of the enquiry.

Key points to consider are:

- Ensuring any immediate risks around that person's job role are dealt with appropriately – this will probably involve a risk assessment and may lead to suspension or reassignment during the course of the enquiry.
- Ensuring that Enquiry processes support disciplinary processes if required but always maintain the focus on Making Safeguarding Personal.
- Information security and confidentiality
- Ensuring that information held elsewhere than usual is still accessible to appropriate people if required.
- Consideration of DBS referral and/or referral to registering bodies.

Where there is a concern that a crime may have been committed by an employee then this should go through the usual processes for a criminal investigation (in addition to the issues above being considered). In cases of neglect, it may be relevant to consider if this may constitute willful neglect and therefore require Police involvement.

Often in a case where a concern is raised against an employee there will be public interest (potential risk to other members of the public beyond the initial adult at risk) - this may mean that the concern needs to be progressed against the wishes of the adult at risk. It is important to explain this respectfully and sensitively to the adult at risk. It is also important to note that the adult at risk may feel vulnerable having made this allegation about those working with them – this should be considered throughout and, if appropriate, be part of the Safeguarding plan.

Where there is an allegation that a person may not have abused or neglected an adult at risk but nevertheless there are concerns about their suitability to work with adults at risk (perhaps because of an incident outside of their job role involving children or adults without care and support needs) then this needs to be considered under [the Persons' in a Position of Trust \(PIPOT\)](#) Policy (where they work with adults) or [the Local Authority Designated Officer \(LADO\)](#) (where they work with children).

2. ON RECEIPT OF A SAFEGUARDING CONCERN

When an employer is aware of abuse or neglect in their organisation, then they are under a duty to correct this and protect the adult from harm as soon as possible. They also must inform the Local Authority (both host authority and placing authority if different), CQC and Integrated Care Board (where the latter is the commissioner).

Where a Local Authority has reasonable cause to suspect that an adult at risk may be experiencing or at risk of abuse or neglect, then it is still under a duty to make whatever enquiries it thinks necessary to decide what if any action needs to be taken and by whom.

The employer can be caused (by the Local Authority) to make an enquiry into a concern (and provide any additional support that the adult may need) and this may be appropriate (as well as most effectively dovetailing the disciplinary and enquiry processes); however, issues of objectivity and appropriateness must be considered. For example, this could be a serious conflict of interest on the part of the employer, concerns have been raised about non-effective past enquiries or serious, multiple concerns, or a matter that requires investigation by the police.

Even where an employer has completed the enquiry, the Local Authority would have to satisfy itself that an employer's response has been sufficient to deal with the safeguarding issues and, if not, to undertake any enquiry of its own and any appropriate follow up action.

The Local Authority should satisfy itself that:

- the adult at risk(s) are aware of the concern,
- have had an opportunity to discuss how they would like the concern to be managed or their wishes known in respect to the outcomes,
- and that this has been taken into consideration by the provider.
- That the provider has given evidence and reason for their conclusions.
- That the provider demonstrates learning and has identified improvements appropriately.

Please see practice guidance on Managing External Enquiries for more information. It is important that, if the allegation is against a member of staff and the Provider is asked to conduct an enquiry, they are able to demonstrate enough objectivity and transparency around the process.

It is essential that any allegation of abuse against a paid employee or a volunteer is dealt with fairly, quickly and consistently, so as not to breach the right to a fair trial in Article Six of the European Convention on Human Rights, as incorporated by the Human Rights Act 1998.

Immediate risk.

As with any Safeguarding Concern, an interim Safeguarding Plan should be put in place as soon as possible in order to address any risk of abuse or neglect to the named adult at risk or any others.

This should be prompt, proportionate, transparent and focused on prevention of harm.

The SAM or responsible officer should speak as soon as possible to the individual's line manager to discuss any risks (either to the named adult at risk or to others that the employee works with) whilst an enquiry is conducted. It may be that the employee is suspended, moved to other duties, put on shifts where they are working with others or any number of other measures based on risk assessment. In most cases, this conversation would happen after engagement with the adult at risk but it may happen immediately if particularly high risks are present.

It is vital to ensure that information is kept securely and the identity of the key people to communicate with are confirmed. In some cases, there may be confusion about the specific job role that the member of staff has (particularly at the point of the initial referral – it is not uncommon for members of the public to be unclear on this point). Therefore, it is vital that information is kept confidential until this is confirmed and

clarified.

It should be highlighted that, at this stage, the allegations have not been looked into so all actions should be protective and proportionate. A large proportion of employees who have allegations made against them have to return to those places of work following enquiries (sometimes with learning and development programmes and sometimes after the allegation has been found not to have taken place) – it is important that confidentiality is respected as far as possible so that they do not experience persecution from colleagues or other service users.

It may also at this stage be appropriate to discuss ensuring that records, evidence and CCTV footage are put to one side to assist with the eventual enquiry.

2. 1 Referrals as a result of Whistle Blowing.

Organisations should have their own whistleblowing policies – the Enfield Council policy is [here](#). If the concern came about as the result of whistle blowing, then the person who has received that concern is duty bound to not reveal the identity of the whistle-blower, if they have requested this. All efforts should be made to obscure the identity of the whistle-blower (for example not mentioning identifiable characteristics, referring to them by gender etc).

It should be noted that individuals may try to guess the identity of a whistle-blower (sometimes based on specifics of the allegation or internal organisational relationships) – the best policy in these cases is to make clear that you will not confirm (or deny) any guess that they have made and that you will not discuss the identity of the whistle-blower. In some cases, there may be an attempt to frame the whistle-blowers' comments as retribution for previous actions – again, the enquiry is to look into the specific concerns about abuse or neglect raised and Enquiry Officers and SAMs should not engage in these conversations.

However, if a situation arises that the identity of the whistle-blower needs to be disclosed (for example a Police investigation where they would need to be interviewed) then a discussion must take place with the whistle-blower to agree on a way to proceed. The line manager will also need to ensure that whistle-blower receives support and is not harassed or victimised in any way.

2.2 *Employees of organisations external to Enfield Council.*

The employee named as the person alleged to have caused harm could be a person employed by a service who has been contracted by Adult Social Care or Health services either as a block or spot purchase provider. Alternatively, there may be someone named as a perpetrator who is engaged to work in Enfield in a statutory service but on an employment agency contract.

It would be expected, through commissioning arrangements, that the employment agency would have a robust disciplinary procedure and matters could be progressed as they would for statutory sector employees. As for other provider organisations the employer could be caused to make enquiries by the Local Authority and ensure the safety of the adult at risk unless there is compelling reason why it is not safe to do so. In this case, it may be more appropriate for the local authority to make enquiries or cause them to be made by another partner (i.e. ICB).

A similar process will be in place for anyone employed by Health (for example hospital, clinical commissioning group or mental health trust) or another partner agency of the Safeguarding Adults Board. A robust disciplinary procedure will be in place for all employees and, as a partner agency, statutory health providers will acknowledge the need for the Local Authority in cases of safeguarding to be satisfied that the enquiry was robust and takes into account the wishes of the adult(s) at risk.

The line manager may be the person who has made the report and so they may have made some preliminary enquiries to establish the facts of an incident before reporting it as a safeguarding concern. However, they should have received safeguarding training and be aware that these enquiries should be kept to the minimum and confined to open questions to clarify the basic information.

They should also be responsible for ensuring the adult at risk is safe immediately after the allegation comes to light - they will need to do this in conjunction with the relevant Adult Care Team. The line manager may also have taken some immediate action in relation to the staff member accused of the potential abuse – e.g. moving them to other work or suspending them etc. If a staff member is suspended, they must comply with the terms and conditions of the suspension which will be set out in the suspension letter. The line manager must adhere to their organisations policies and procedures and seek advice from Human Resources.

The line manager has a duty to ensure the staff member, who has been named as the person alleged to have caused harm, is supported accordingly throughout the whole process and is kept informed of progress. The line manager will need to be able to give the timescales for the safeguarding enquiry and assist where necessary to ensure this is done promptly.

However, this is not always possible especially if a criminal offence has taken place. The timescales and potential delays will need to be discussed and ensure the adult at risk or their advocate is kept informed.

The SAM is responsible for ensuring the enquiry is properly planned and this could be done through an enquiry planning meeting. An enquiry needs to balance the views of the adult at risk and focus on their wellbeing alongside the alleged breach by an employee of their employment terms and the disciplinary process.

An important consideration will be the planning of interviews with the adult at risk, the person alleged to have caused harm and any witnesses or other key parties. This will allow the interviews to cover all the aspects of the two procedures in the most efficient and least distressing way. Disciplinary procedures can be used as an enquiry type so long as they meet the outcomes identified by the adult at risk and the Safeguarding Adults Manager within the Local Authority is assured this has been done to a satisfactory level – showing transparency, objectivity and a focus of protection of adults at risk.

The outcome for the person alleged to have caused harm may mean a referral to the Disclosure and Barring Service (DBS) – please see below. This referral is the responsibility of the line manager but it needs to be discussed during any safeguarding meetings and the decision to refer or not must be recorded as part of the outcome of an enquiry.

2.3 Enfield Employee

Data management

If a Safeguarding Adults Concern is received around a London Borough of Enfield employee (or a Barnet, Enfield and Haringey Mental Health Trust employee if the adult at risk is being worked with by the Mental Health Trust and seconded staff are reviewing the concern) then immediate action must be taken around data security. If the employee has access to the systems where safeguarding information would be held then a conversation must be had with the Safeguarding Adults Manager (SAM) – who in turn may speak with Digital Services around keeping records secure. In some cases, it may be possible to secure the case notes so only certain individuals can see these and, in others, it may be that a decision is made to keep relevant records off Eclipse and/or Rio and store elsewhere.

For data management purposes, the relevant Safeguarding forms will still need to be completed but information that identifies the person alleged to have caused harm should be kept securely (either by restricting records or by holding specific information off the usual systems).

‘A Safeguarding Adults Concern has been received – due to confidentiality concerns, the detailed records related to this concern will be kept in X location [for example a secure network drive]’

This ensures the person alleged to have caused harm cannot see the information about the enquiry while it is on-going. It also helps to respect the confidentiality of the employee throughout the enquiry process and afterwards (since their colleagues may have access to this system). However, as above, the full details of

that individual should be kept elsewhere in a secure location (and the system should indicate who to speak with – usually the SAM – in order to gain access to this information).

Working with the adult at risk.

As with any Safeguarding Concern, the first steps will be around contacting the Adult at Risk, ensuring their safety and ascertaining their capacity and desired outcomes. Where there is an allegation against an Enfield employee, there will be risks to other adults at risk (often termed public interest concern) which means that the enquiry should go ahead – even if the adult at risk does not necessarily wish this. This doesn't mean that the adult at risk should not be involved in the enquiry and given the opportunity to highlight desired outcomes as appropriate.

It should be noted that adults at risk may feel anxious about disclosing complaints about Enfield employees to a Local Authority Enquiry Officer. This will need to be handled sensitively by both Enquiry Officer and SAM. Where there are concerns about transparency and objectivity then these need to be considered – it may be that an enquiry officer from another part of the organisation needs to be considered (or even an external enquiry officer – though there are often timescale and financial implications to this).

Enquiries around allegations against Enfield Staff.

As with any Safeguarding concern, immediate risk should be addressed as soon as possible – please see above sections.

There is a clear disciplinary procedure to be followed for staff employed directly by Enfield Council. The Safeguarding Adults Manager (SAM) receiving the concern should speak to the line manager of the person who is highlighted as the person alleged to have caused harm. They should explain that, while the steps of the disciplinary procedure must be adhered to, the safeguarding enquiry and management of risk to adults at risk takes priority

Many of the factors discussed above will also apply to enquires which look into allegations against Enfield staff. It is important that we are able to demonstrate that allegations against Enfield staff are treated as robustly and with as much transparency as those against staff of other organisations.

Given that both the assigned manager and the Enquiry Officer and SAM are employed by Enfield Council, it is important to ensure lines of responsibility for actions do not become blurred in any way. It may help to consider the different departments as entirely different organisations. This does not mean that they should not work together closely but meetings and recording should be as formal as when working with an outside organisation. If there is a lack of clarity around responsibilities then it is important that these are resolved quickly – advice on this can be sought from both HR and Strategic Safeguarding Adults (as well as line management).

The organisation will assign a specific manager to work around this incident. It is the line manager's responsibility to support the person alleged to have caused harm throughout the process with support from Human Resources. Once the enquiry is completed a decision must be taken as to whether there is a disciplinary case to be answered. There may be a recommendation regarding disciplinary action, however the decision to proceed to disciplinary action or hearing is the responsibility of the assigned manager in conjunction with and as advised by HR.

The enquiry may close concluding there is no case to answer.

The outcome of the safeguarding and disciplinary investigation/hearing may mean a referral to the Disclosure and Barring Service or other regulatory bodies as appropriate, such as the Health Care and Professionals Council or Social Work England. This referral is the responsibility of the assigned manager but it needs to be discussed during the safeguarding meetings and the decision to refer or not must be recorded as part of the safeguarding enquiry.

While this guidance gives an outline of the procedure to follow, each case will need to be decided on its own merits and decisions must be made that meet all the requirements and the best interests of the adult at risk.

Communication

The communication agreement will form part of the enquiry planning. The Safeguarding Adults Manager is responsible for ensuring that the adult at risk is supported through the process and the London Adult Safeguarding procedures apply.

Communication with the person alleged to have caused harm is the responsibility of the assigned manager with their employing organisation and agreement on how communication will take place should be considered as part of the enquiry planning. The employee alleged to have caused harm has a right to be supported and kept informed throughout the safeguarding adults process and into the disciplinary process, if applicable. Trade Union involvement or support should be discussed with their employing organisation by them.

Employees who feel that they have been treated unfairly by an employer may wish to explore [ACAS](#) – Enfield employees will also be able to access the Employee Assistance Programme.

If an allegation is made about an Enfield Employee, then a Need to Know should be completed for Senior staff.

2.4 Employee of a service user using Direct Payments or Individual Budgets

If an adult at risk is employing a person who has been alleged to have caused harm, it would not be possible for them to undertake an enquiry. In these cases, the Local Authority should lead the enquiry and work with the adult at risk to understand how they would like to proceed and the outcomes they would like (especially in respect to their care and well-being). The safeguarding enquiry should carry on in the usual way and the adult at risk must be aware of outcomes with respect to the person alleged to have caused harm so they can take the relevant action if they wish.

However, it is possible that the alleged perpetrator is working with more than one service user and consideration needs to be taken as to public interest and the safety of others. The SAM should take responsibility to ensure these other service users are contacted either by letter or in person as thought appropriate.

The service user will need to seek independent advice to ensure that they work within employment law if they wish to take any action. This is particularly important if the service user wants to dismiss the care worker. This advice should be independent, but the SAM or appointed person can advise the service user where they might seek help on how to proceed through an agent, solicitor or other appropriately qualified relevant person.

Some service users involve an agent to manage matters in respect to their care workers under direct payments or individual budgets. The agent would need to be aware of the safeguarding enquiry but as they are not the direct employer, any disciplinary issues or issues of dismissal would still require independent advice to ensure the service user acts within employment law.

2.5 Employee or Volunteer of a Voluntary Group

If the alleged perpetrator is an employee of a voluntary group then all the issues stated for statutory and private employers will apply. If the person is a volunteer then a discussion with a senior manager of the organisation must take place and an agreement on how to handle the issue must be made. It is expected that voluntary groups would have procedures for such incidents. The DBS barring list also applies to volunteers in regulated settings, therefore consideration of whether to refer will be required.

2.6 Other Employees

Employees alleged to have caused harm may come from any organisation or be an employee of any firm (not traditionally associated with adult social care or health) e.g. post office employees, local building firms, insurance companies etc. It may be more complex to work alongside those organisations or firms to ensure an enquiry meets the standard required and thoughtful planning meetings may help this process.

Organisations not directly involved in adult social care may require particular advice and support around understanding the Safeguarding Adults process.

3. The Enquiry

Safeguarding as defined in the Care Act 2014 is not a substitute for:

- Providers' responsibilities to provide safe and high-quality care and support;
- Commissioners regularly assuring themselves of the safety and effectiveness of commissioned services;
- The Care Quality Commission (CQC) ensuring that regulated providers comply with the fundamental standards of care or by taking enforcement action; and
- The core duties of the police to prevent and detect crime and protect life and property.

Although the local authority has the lead role in making enquiries or requesting others to do so, where criminal activity is suspected, early involvement of the police is essential. Police investigations should be coordinated with the Local Authority who may support other actions but should always be police led. This does not mean, however, that safeguarding or disciplinary procedures cannot be initiated or that the interests of the service user are not safeguarded.

As with any Safeguarding Concern, a safeguarding plan should be produced which should be regularly reviewed while other investigations are taking place.

What happens as a result of an enquiry should reflect the adults' wishes wherever possible, as stated by them or by their representative or advocate. If they lack capacity it should be in their best interests if they are not able to make the decision and be proportionate to the level of concern. The adult should always be involved from the beginning of the enquiry unless there are exceptional circumstances that would increase the risk of abuse. If the adult has substantial difficulty in being involved, and where there is no one to appropriate to support them, then the local authority must arrange for an independent advocate to represent them for the purpose of facilitating their involvement.

Often in a case where a concern is raised against an employee there will be public interest (potential risk to other members of the public beyond the initial adult at risk) - this may mean that the concern needs to be progressed against the wishes of the adult at risk. It is important to explain this respectfully and sensitively to the adult at risk. It is also important to note that the adult at risk may feel vulnerable having made this allegation about those working with them – this should be considered throughout and, if appropriate, as part of the Safeguarding plan.

An employee accused of abuse may resign or simply disappear. This does not mean the enquiry should be terminated. The enquiry should go ahead and, if necessary, the employee can be reported to a registering authority or referred to the Disclosure and Barring Service. DBS guidance states that an employer should consider referring to them if the employee has left but, if they had stayed, a disciplinary hearing would have taken place and they may have been dismissed as a result.

It is good practice is to use the term "staff member" or the like in recording. Sharing of information regarding a member of staff should be based on the principle of "need to know" and every effort taken to protect the anonymity of the person alleged to have cause harm.

It is also vitally important that information shared with the adult at risk, family or appointed representative is carefully handled. Service users need to be participants in the safeguarding adults process but should not be part of the decision making around the member of staff or their disciplinary procedures. This should also be considered if sharing meeting minutes or similar – personal information about the member of staff should be appropriately redacted. Please speak to the Data Protection Officer to clarify if this situation arises.

4. OUTCOMES

There are outcomes for the adult(s) at risk and outcomes for the person alleged to have caused harm. The adult at risk should have, at the beginning of the safeguarding enquiry, been asked what outcomes they would like to see; this should be checked throughout the process as appropriate. It should be discussed with them how achievable or realistic these outcomes are (or which outcomes are things that the Local Authority can achieve or which can only be advised to another agency).

At the closure of the enquiry, it is a chance to determine if these outcomes were realised and identify any further support required to prevent further harm or improve personal well-being and safety.

Sometimes during an enquiry where a member of staff is stated as the person alleged to have caused harm, it becomes clear that the situation is more one of poor practice or lack of training rather than a deliberate attempt to abuse a service user. The outcomes may be more tailored to improving practice or suggested training for an individual.

Please see below section on DBS if there is a considered risk of harm around an individual working with adults with care and support needs.

It may also become apparent during initial enquiries that it is not only one person who has poor practice but that it is an organisational issue. In this case the incident may be investigated as organisational abuse and the outcomes would be in relation to the Provider.

The safeguarding enquiry report might make recommendations with respect to changes of practice within a service, reviewing of policies and procedures and/or the need for specific training for one or more staff members within a service. The line manager will need to decide whether it is appropriate to consider taking “capability” action.

These recommendations should be followed up with a review, not necessarily of the adult at risk which would be normal in the safeguarding process, but this would be a review of the service with the relevant manager taking into account the recommendations of the safeguarding enquiry report.

If the service is regulated by a formal authority e.g. Care Quality Commission (CQC), then they should be informed or be party to the recommendations. The organisation should be informed from the start of a safeguarding procedure and may also be part of the whole safeguarding procedure in certain cases. If the service is a contracted service then contracts and procurement team and commissioners should be notified of such recommendations so they can also monitor improvements.

If abuse is found not to have occurred then the employer must ensure the employee is supported to return to work. The return to work might be accompanied by some requirements with respect to training, monitoring and work practices, which the final safeguarding report might have recommended or the manager felt were required to ensure the safety of service users.

Feedback to the adult at risk must consider the restrictions of confidentiality as the member of staff's personal information is also involved.

5. Referral to the Disclosure and Barring Scheme or other Registering bodies.

It may well be that following the Enquiry, the SAM is concerned that the person alleged to have caused harm poses an on-going risk to adults with care and support needs in a professional context. There are also circumstances where an employer is obligated to refer to the Disclosure and Barring Scheme and relevant registering bodies. This section should be read in conjunction with the DBS referral guidance and referral form which can be found at <https://www.gov.uk/government/organisations/disclosure-and-barring-service>.

A referral must be made to the DBS by an employer or personnel supplier when they:

‘1. withdraw permission for an individual to engage in or would have done so had that individual not resigned, returned, been made redundant or been transferred to a position which is not regulated activity; because

2. they think that the individual has:

- ☐ Engaged in relevant conduct;
- ☐ Satisfied the harm test; or
- ☐ Received a caution or conviction for a relevant offence’

If both conditions are met the information must be referred to the DBS by the employer or personnel supplier. This would apply in any case where the employer has dismissed the adult as a result of a Safeguarding Enquiry due to risk – or where they would have if the individual had not left voluntarily.

Other organisations, such as the Local Authority, have a power to refer. Good practice should be that a referral is only made once there is sufficient evidence as part of the enquiry to support their reasons for withdrawing the person from regulated activity.

A helpful flowchart to help decide if a referral to DBS may be appropriate can be found [here](#).

‘Relevant conduct in relation to vulnerable adults is conduct which:

- Endangers a vulnerable adult or is likely to endanger a vulnerable adult
- If repeated against or in relation to a vulnerable adult, would endanger an adult or would be likely to endanger them
- Involves sexual material relating to children (including possession of such material)
- Involves sexually explicit images depicting violence against a person (including possession of such images)
- Is of a sexual nature involving a vulnerable adult’

There are occasions where a person may not have engaged in relevant conduct but there are still serious concerns. To satisfy what is termed ‘the harm test’ there needs to be credible evidence of a risk of harm to adults at risk such as statements made by an individual regarding conduct/behaviour, etc. For example, a care worker who confides in another member of staff that they are sexually attracted to some of the people they care for (but who had not engaged in ‘relevant conduct’) would satisfy the harm test.

A relevant offence for the purposes of referrals to DBS is an automatic inclusion offense as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009.

A DBS referral and possible referral to any registering bodies (such as Social Work England, the NMC or the GMC as well as others) should be considered in any case where it is believed (on balance of probabilities or via a criminal investigation) that an employee or volunteer has harmed an adult with care and support needs.

In most cases, the assigned manager through the employer would be expected to refer to the DBS and send relevant information. The SAM should require evidence that this has been done. In cases where the employer has not provided such evidence (or refuses to refer) then it may be appropriate for the Local

Authority to refer themselves to avoid any future risk. As said above, an employee accused of abuse may resign or simply disappear. This does not mean the enquiry should be terminated. The enquiry should go ahead and, if necessary, the employee can be reported to a registering authority or referred to the Disclosure and Barring Service. DBS guidance states that an employer should consider referring to them if the employee has left but, if they had stayed, a disciplinary hearing would have taken place and they may have been dismissed as a result.

As DBS review the referral, it is likely that they will come back to the Local Authority or Employer for further information.

All potential referrals to the DBS by the Local Authority following an outcome which was not determined as to whether abuse occurred should be discussed with the Service Manager of the relevant care group, before the DBS referral is made.

Where there is a criminal prosecution then that offence would show on a DBS check in future without a specific referral being made. However, it may be appropriate for Police to disclose to a second employer if one is known about (since most employers check DBS 3-yearly so this risk would not necessarily be picked up promptly).

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