

Safeguarding Adults Policy

Executive Summary

This policy sets out the College's commitment to safeguarding adults at risk and explains how the College meets its legal, statutory and partnership responsibilities under the Care Act 2014, the Care and Support Statutory Guidance, the Mental Capacity Act 2005, the Counter-Terrorism and Security Act 2015 and other relevant safeguarding legislation and guidance.

It also sets out the process staff must follow if they have concerns about the safety, welfare, rights or wellbeing of an adult at risk. Because the College works with mixed-age learner groups, apprentices, residential students and higher education students, the policy also links to the Child Protection and Safeguarding Policy and reflects relevant safeguarding terminology from Keeping Children Safe in Education 2026 where this supports recognition of abuse, exploitation, online harm or harmful behaviour affecting adults at risk.

The following post-holders have designated responsibility for safeguarding adults at risk at Reaseheath College:

Designated Safeguarding Lead	Deputy Designated Safeguarding Lead	Safeguarding Governor
Laura Williams Laura.Williams@reaseheath.ac.uk	Paul Spearritt Paul.Spearritt@reaseheath.ac.uk Kay Murray Kay.Murray@reaseheath.ac.uk	Mike Gorton Via Head of Governance jackies@reaseheath.ac.uk

The following post-holders have designated responsibility for allegations against staff or others working on behalf of the College:

Designated Senior Manager Normally the Principal	Chair of Governors Where the allegation concerns the Principal
Marcus Clinton Marcus.Clinton@reaseheath.ac.uk	Jane Cowell Via Head of Governance jackies@reaseheath.ac.uk

Policy Context

The Care Act 2014, supported by the Care and Support Statutory Guidance and amended where relevant by the Health and Care Act 2022, is the legal framework for adult safeguarding in England. Adult safeguarding means protecting an adult's right to live in safety, free from abuse and neglect, while promoting wellbeing, independence, dignity, choice and control. The College is committed to these partnership arrangements and recognises that safeguarding adults at risk is everyone's responsibility. Under the Care Act 2014, local authorities must:

- Make enquiries, or cause others to make enquiries, where there is reasonable cause to suspect that an adult with care and support needs is experiencing, or is at risk of, abuse or neglect and unable to protect themselves due to those needs;
- Establish a Safeguarding Adults Board with statutory partners, including the local authority, police and NHS, and work with relevant agencies to coordinate adult safeguarding arrangements.
- Appoint a Safeguarding Adults Review lead or appropriate designated safeguarding decision-maker to manage complex safeguarding issues;
- Arrange for an independent advocate to support any adult who needs extra help during a safeguarding enquiry or review;
- Co-operate with partners in order to protect an adult with care and support needs who is experiencing, or is at risk of, abuse or neglect.

At Reaseheath College, we follow the six statutory adult safeguarding principles. Our approach will be person-centred and outcome-focused, consistent with Making Safeguarding Personal. Wherever possible, adults will be involved in decisions about their safety, their views and wishes will be sought and recorded, and action will be proportionate to the risk, subject to mental capacity, public interest, legal duties and the need to protect others.

Main policy sections

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1. Statement of Policy and Commitment

Reaseheath College has a duty of care to safeguard adults at risk who receive education, training, accommodation, support or other services from the College. The College will work with local authority adult safeguarding services, the Safeguarding Adults Board, police, health services and other relevant partners to prevent abuse and neglect, respond promptly to concerns and promote the adult's wellbeing, wishes, rights and desired outcomes wherever it is safe and lawful to do so.

An adult at risk is a person aged 18 or over who has needs for care and support, whether or not those needs are being met; is experiencing, or is at risk of, abuse or neglect; and, as a result of those care and support needs, is unable to protect themselves from the abuse or neglect or the risk of it. The term "adult at risk" is used throughout this policy. The term "vulnerable adult" may still appear in some external or legacy guidance but should not be used to imply that vulnerability is an inherent characteristic of the person.

People with learning difficulties/disabilities, mental health problems, older people and disabled people with impairments are included in this definition, particularly where their situation is complicated by additional factors such as physical frailty or chronic illness, sensory impairment, challenging behaviour, drug or alcohol problems, social or emotional problems, poverty or homelessness.

It is not the responsibility of staff to investigate or determine whether abuse or neglect has occurred. Staff must report any concern, disclosure, allegation or pattern of behaviour, however apparently minor, to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead without delay. Where there is immediate risk of harm, staff must contact the emergency services. The Local Authority has statutory responsibility for deciding whether a safeguarding enquiry under section 42 of the Care Act 2014 is required.

The College will maintain contact with relevant Prevent leads, Channel partners and local safeguarding partners.

2. Responsibilities for Implementing the Policy

2.1 Corporation Board

The Corporation Board is responsible for ensuring that the College maintains effective adult safeguarding arrangements and receives sufficient assurance that statutory duties, local safeguarding expectations and internal procedures are being met.

- approve and review this policy annually, or sooner where statutory guidance, local safeguarding arrangements, organisational learning or risk require amendment;
- receive regular safeguarding assurance reports, including themes, training compliance, referral patterns, audits, lessons learned and areas for improvement;
- ensure that adult safeguarding is supported by appropriate leadership, resources, training, escalation routes and governance oversight;
- hold senior leaders to account for effective implementation of this policy and for compliance with relevant legal, statutory and partnership duties;

- ensure that the College promotes a safe environment in which adults at risk can learn, live, train, work and seek support.

2.2 Safeguarding Governor

The Safeguarding Governor provides strategic oversight and challenge on behalf of the Corporation Board. The role supports assurance; it does not replace the operational responsibilities of the Principal, Designated Safeguarding Lead or safeguarding team.

- liaise with the Principal, Designated Safeguarding Lead and relevant senior leaders on adult safeguarding matters;
- provide appropriate support and challenge on policy implementation, safeguarding culture, training, reporting and lessons learned;
- ensure that the Corporation Board receives an annual safeguarding report and appropriate interim updates where risk, statutory change or significant incidents require this;
- maintain appropriate safeguarding training and awareness to discharge the governance role effectively;
- support effective communication between the College, local safeguarding partners and governance structures where appropriate.

2.3 Principal

The Principal is accountable for ensuring that this policy is implemented effectively across the College. Operational duties may be delegated to senior leaders, the Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and other designated staff, but overall accountability remains with the Principal.

- ensure that adult safeguarding responsibilities are clearly allocated and understood;
- ensure that staff receive appropriate safeguarding induction, training, supervision and support;
- ensure that safeguarding concerns, allegations and low-level concerns are managed promptly, proportionately and in line with this policy;
- ensure that staff involved in adult safeguarding cases have access to appropriate support;
- ensure that safeguarding risks, themes and lessons learned are reported through the appropriate senior leadership and governance routes;
- ensure that external reporting duties are considered where relevant, including referral to local authority adult safeguarding services, the police, the Disclosure and Barring Service, professional or regulatory bodies, and Prevent/Channel arrangements.

2.4 Designated Safeguarding Lead

The Designated Safeguarding Lead has lead operational responsibility for adult safeguarding practice, advice, referral coordination, record keeping and liaison with external safeguarding partners.

- act as the first point of contact for adult safeguarding concerns and provide advice to staff;
- ensure that concerns are recorded securely and that decisions, actions and reasons are documented;

- make, support or oversee referrals to the relevant Local Authority Adult Safeguarding Service, police, Prevent/Channel arrangements or other agencies where appropriate;
- liaise with local safeguarding partners, including the Safeguarding Adults Board and statutory agencies, as required;
- ensure that safeguarding practice reflects the Care Act 2014, Making Safeguarding Personal, mental capacity principles, information sharing duties and local safeguarding arrangements;
- ensure that staff understand how to report safeguarding concerns and how to respond to disclosures safely;
- report safeguarding themes, risks, training compliance, audit findings and lessons learned to senior leaders and governors through agreed assurance routes.

2.5 Deputy Designated Safeguarding Leads and Safeguarding Team

Deputy Designated Safeguarding Leads and members of the safeguarding team support the Designated Safeguarding Lead and provide operational resilience across the College.

- respond to safeguarding concerns, disclosures and referrals in line with this policy and local procedures;
- provide advice and support to staff, learners and adults at risk where appropriate;
- support accurate and timely recording of concerns, decisions and actions;
- attend safeguarding meetings, strategy discussions or reviews where appropriate;
- maintain current knowledge of adult safeguarding, Prevent and local referral routes;
- ensure that urgent concerns are escalated without delay to the Designated Safeguarding Lead, senior leaders, emergency services or external safeguarding partners as required.

2.6 Managers and All Staff

Safeguarding adults at risk is everyone's responsibility. Managers and staff must act promptly on concerns and must not investigate safeguarding concerns themselves.

- understand and follow this policy, associated safeguarding procedures and relevant staff conduct expectations;
- complete required safeguarding training and know how to access advice from the safeguarding team;
- respond calmly and appropriately to disclosures, avoiding investigation, leading questions or promises of confidentiality;
- report immediately to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead any concern about the wellbeing, safety, rights or protection of an adult at risk;
- record concerns, disclosures, decisions and actions accurately, promptly and securely using the College's safeguarding reporting arrangements;
- contact emergency services where there is immediate risk of harm and inform the safeguarding team as soon as possible;

- respect confidentiality while recognising that information may need to be shared lawfully and proportionately to protect the adult or others from abuse, neglect, serious harm or crime;
- work with employers, placement providers, residential services, support teams and external partners where relevant to maintain appropriate safeguards for adults at risk.

2.7 Training, Reporting and Assurance

The College will maintain adult safeguarding training, reporting and assurance arrangements proportionate to staff roles and safeguarding risk. Training will be reviewed regularly and updated in response to statutory guidance, local safeguarding arrangements, incidents, audit findings and organisational learning.

- all staff will receive appropriate safeguarding induction and refresher training;
- designated safeguarding staff will maintain enhanced knowledge of adult safeguarding, mental capacity, information sharing, Prevent and local referral arrangements;
- records of safeguarding concerns, referrals, decisions and outcomes will be maintained securely and reviewed to identify themes, patterns and learning;
- significant risks, themes, audit findings and policy improvements will be reported through senior leadership and governance assurance routes;
- the College will maintain up-to-date referral contacts and ensure staff know how to access them in urgent and non-urgent situations.

3. Categories of Abuse and Neglect

Abuse and neglect may occur in any setting and may involve a single incident, repeated incidents, deliberate acts, omission, poor practice, coercion, discrimination, organisational failure or online behaviour. The categories below reflect the adult safeguarding framework under the Care Act 2014 and associated statutory guidance. They are intended to support recognition, professional curiosity and timely reporting; they are not exhaustive and more than one category may apply in the same situation.

3.1 Physical abuse

Physical abuse includes assault, hitting, slapping, pushing, kicking, inappropriate restraint, misuse of medication, force-feeding or any other action that causes, or could cause, physical harm. It may be deliberate, reckless or arise from unsafe practice or failure to prevent avoidable injury.

3.2 Neglect and acts of omission

Neglect and acts of omission include failing to meet medical, emotional or physical care needs; failing to provide access to appropriate health, care, support or educational services; withholding or failing to provide medication, nutrition, hydration, heating, clothing, personal care or a safe environment; or failing to respond to known safeguarding concerns.

3.3 Self-neglect

Self-neglect describes behaviour where an adult is unable or unwilling to care for their own health, hygiene, nutrition, accommodation or environment in a way that may cause serious harm. It may include hoarding, refusal of essential support, unsafe living

conditions or repeated failure to engage with services. Staff must consider capacity, coercion, trauma, mental health, exploitation and safeguarding advice before assuming that self-neglect is a lifestyle choice.

3.4 Sexual abuse

Sexual abuse includes rape, sexual assault, indecent exposure, sexual harassment, inappropriate looking or touching, sexual exploitation, taking or sharing sexual images without consent, and any sexual act to which the adult has not consented, could not consent, or was pressured, coerced, manipulated or forced into consenting.

3.5 Psychological or emotional abuse

Psychological or emotional abuse includes threats, humiliation, intimidation, coercive or controlling behaviour, harassment, verbal abuse, isolation, deprivation of contact, cyberbullying, withdrawal of services or support, or any behaviour that causes fear, distress, loss of confidence, reduced autonomy or social isolation.

3.6 Financial or material abuse

Financial or material abuse includes theft, fraud, scams, coercion, exploitation or pressure relating to money, benefits, property, possessions, wills, inheritance, financial transactions, online accounts, devices or access to services. It may also include preventing an adult from accessing or controlling their own resources, forcing or misleading them into financial decisions, or exploiting dependency, fear, coercion or lack of capacity for financial gain.

3.7 Discriminatory abuse

Discriminatory abuse includes harassment, bullying, exclusion, degrading treatment, unequal treatment, hate incidents or denial of services because of protected characteristics, perceived difference or personal identity. This includes abuse linked to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

3.8 Organisational abuse

Organisational abuse includes neglect, poor practice or abusive cultures within an institution, service, placement, residence, workplace or other organised setting. It may involve unsafe staffing, rigid routines, poor record keeping, lack of privacy, misuse of restraint, disrespectful practice, failure to respond to concerns, discriminatory cultures or systems that prioritise organisational convenience over the rights, dignity and wellbeing of the adult.

3.9 Domestic abuse

Domestic abuse is abusive behaviour between people aged 16 or over who are personally connected. It may include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, and technology-facilitated abuse. It can occur inside or outside the home and may affect adults with care and support needs directly or indirectly.

3.10 Modern slavery

Modern slavery includes slavery, servitude, human trafficking, forced or compulsory labour, domestic servitude, criminal exploitation and sexual exploitation. Perpetrators

may use coercion, deception, debt, threats, violence, control of documents, accommodation or wages, or abuse of authority to exploit an adult.

3.11 Online, technology-facilitated and AI-enabled abuse

Online, technology-facilitated and AI-enabled abuse includes cyberbullying, harassment, stalking, grooming, coercive control, fraud, identity misuse, image-based abuse, threats to share intimate images, non-consensual creation or manipulation of images, AI-generated sexualised or humiliating content, online radicalisation, misogyny, hate incidents or pressure to share personal or financial information.

3.12 Radicalisation and extremism

Radicalisation is the process by which a person comes to support terrorism or extremist ideologies that may lead to terrorism. Safeguarding concerns may arise where an adult is being targeted, groomed, coerced, isolated, influenced online or made susceptible through personal, social or contextual factors. Prevent concerns must be raised through the College's safeguarding procedures.

Staff must not wait for certainty or attempt to classify a concern before taking action. Concerns should be reported promptly where there is risk, disclosure, observed behaviour, professional curiosity or a pattern of concern. Where a concern involves a learner under 18, a mixed-age peer group, an apprentice, a residential learner or overlapping child and adult safeguarding duties, staff must also follow the Child Protection and Safeguarding Policy and relevant Keeping Children Safe in Education guidance.

4. Dealing with Disclosure of Abuse: Procedure for Reporting Concerns

Anyone can abuse, exploit or neglect an adult at risk, including partners, family members, friends, neighbours, acquaintances, carers, other adults with care and support needs, staff, volunteers, professionals, employers, placement providers, strangers or people who deliberately target adults for exploitation.

4.1 Immediate response to a disclosure

If an adult at risk tells a member of staff about possible abuse, neglect or exploitation, the member of staff must respond calmly, listen carefully, avoid investigating and report the concern without delay. If the adult or another person is in immediate danger, staff must contact the emergency services and then inform the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead as soon as possible.

4.2 What staff should do

- Take the adult seriously and listen without judgement.
- Remain calm and allow the adult time to speak.
- Use open prompts only where needed, such as "Tell me", "Explain what happened" or "Describe that for me".
- Record the adult's own words as accurately as possible, including the date, time, location, people present and any immediate risks.
- Explain that information may need to be shared with safeguarding staff or external agencies to protect the adult or others.

- Report the concern promptly through the College's safeguarding reporting arrangements or directly to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead if urgent.

4.3 What staff must not do

- Do not investigate the concern or try to establish whether abuse has occurred.
- Do not ask leading, closed or repeated questions.
- Do not promise confidentiality or agree to keep secrets.
- Do not contact, challenge or alert the alleged perpetrator.
- Do not take photographs, examine injuries, remove clothing or contaminate potential forensic evidence.
- Do not offer food, drink, washing facilities or a change of clothing following a possible sexual or physical assault unless advised by police, health professionals or safeguarding leads.
- Do not delay reporting because information is incomplete or because the adult asks for secrecy.

4.4 Recording and reporting

- All safeguarding concerns, disclosures, observations, decisions and actions must be recorded promptly, accurately and securely using the College's safeguarding reporting arrangements. Records should distinguish clearly between what was seen, heard, disclosed, decided and done. Staff should not share detailed safeguarding information by routine email unless specifically advised to do so by the safeguarding team or where this is necessary to manage immediate risk securely.
- All staff have the right to contact the police or the relevant Local Authority Adult Safeguarding Service directly if they believe an adult or another person is at immediate risk, if they cannot reach designated safeguarding staff, or if they believe the agreed procedure is not being followed appropriately. The safeguarding team must be informed as soon as it is safe and practical to do so.

4.5 Confidentiality and information sharing

- The adult's wishes should be sought, considered and recorded wherever possible. However, staff must not promise confidentiality. Information may need to be shared with the safeguarding team, local authority, police, health services, Prevent/Channel partners or other relevant agencies where this is necessary, proportionate and lawful to protect the adult or others from abuse, neglect, serious harm or crime.
- Information must be handled in accordance with the UK GDPR, the Data Protection Act 2018, the College's information governance arrangements and safeguarding record-keeping procedures. Confidential reporting and whistleblowing routes are available where staff need to raise concerns about the actions, inaction or behaviour of colleagues or others working on behalf of the College.

4.6 Mental capacity and consent

- Where there is doubt about whether an adult has capacity to make a relevant decision, or whether their decision is affected by coercion, duress, exploitation, fear or undue influence, staff must seek advice from the Designated Safeguarding

Lead or a Deputy Designated Safeguarding Lead. Adults should be supported to make their own decisions wherever possible, and all practical steps should be taken to help them express their views, wishes and desired outcomes.

- If an adult lacks capacity for a specific safeguarding decision, decisions must be made in their best interests and in accordance with the Mental Capacity Act 2005. Parents, carers or representatives should not be allowed to prevent safeguarding action where this would place the adult or others at risk, particularly where they may be involved in the concern. Staff must report concerns promptly and allow the relevant safeguarding agencies to determine the appropriate response.

5. Reporting and Dealing with Allegations of Abuse Against Members of Staff

These procedures apply to all employees, agency staff, contractors, volunteers, governors, visitors, placement providers and any other person working on behalf of, or in connection with, the College. For ease of reference, the term “staff” is used throughout this section.

5.1 Introduction

- Any allegation, concern or disclosure that a member of staff may have abused, neglected, exploited, harmed, placed at risk of harm, or behaved inappropriately towards an adult at risk must be reported immediately to the Designated Safeguarding Lead.
- Where the allegation concerns the Designated Safeguarding Lead, the matter must be reported to the Principal. Where the allegation concerns the Principal, the matter must be reported to the Chair of Governors. Where the allegation involves a child or young person under 18, the Child Protection and Safeguarding Policy and LADO procedures must also be followed.
- The College will manage allegations fairly, promptly and proportionately, maintaining an open mind, protecting the adult at risk, preserving evidence, supporting those involved and avoiding delay.
- The Designated Safeguarding Lead, Principal or Chair of Governors, as appropriate, must ensure that the relevant local authority adult safeguarding service is consulted from the outset where the concern involves an adult at risk.

5.2 Initial assessment by the DSL (or Principal/Designated Governor)

- The Designated Safeguarding Lead, or the appropriate senior decision-maker if the concern involves the Designated Safeguarding Lead or Principal, will make an initial assessment based on the information received.
- The purpose of the initial assessment is not to investigate the allegation, but to determine immediate risk, safeguarding actions, external reporting requirements and whether further enquiry is required.
- The decision-maker will consult the Director of People and Culture and seek advice from the relevant local authority adult safeguarding service, police, LADO, DBS, Prevent/Channel or other statutory partner where appropriate.
- Where the allegation may indicate a criminal offence, abuse or neglect of an adult at risk, risk of significant harm, professional misconduct, breach of trust or regulated activity concern, external advice or referral must be sought without delay.

- All decisions, advice received, actions taken and reasons must be recorded securely.

5.3 Enquiries and Investigations

- External safeguarding, police or regulatory enquiries take precedence over internal disciplinary enquiries where simultaneous action could prejudice evidence, witness accounts or statutory processes.
- The College will cooperate fully with local authority adult safeguarding enquiries, police investigations, LADO processes where a child is involved, DBS enquiries, Prevent/Channel arrangements and any relevant professional or regulatory body.
- Internal management or disciplinary action may proceed only where it is safe, lawful and appropriate to do so, following consultation with the relevant external agencies and People and Culture.
- The College may use the outcome of external enquiries to inform internal procedures, risk assessment, employment decisions and action to protect adults at risk, learners, staff and the wider College community.
- Where no external safeguarding or criminal threshold is met, the matter may still be addressed under staff conduct, performance, disciplinary, capability, low-level concern or professional standards procedures.

5.4 Suspension of Staff

- Suspension must not be automatic. It is a neutral act and will be considered only where it is necessary and proportionate to protect an adult at risk or others, preserve the integrity of an investigation, manage serious risk, or where the allegation may amount to gross misconduct.
- Before suspension is considered, the Principal, or the Chair/Vice Chair of Governors where the allegation concerns the Principal or a senior post-holder, should consider alternatives such as temporary adjustment of duties, supervision, redeployment, remote working, paid leave or restricted access to specific settings.
- Where police, adult safeguarding services, the LADO or another external agency is involved, the College must consult the relevant agency before interviewing the member of staff or taking action that could prejudice an investigation.
- A suspended member of staff will be informed in writing of the suspension, the reason, the expected contact arrangements, support available and the review process. Suspension will remain under regular review in accordance with College procedures.

5.5 Communication, confidentiality and support

Information about allegations will be shared only with those who need to know in order to protect adults at risk or others, comply with legal or statutory duties, support a fair process, or manage operational risk. The College will consider the wishes, rights, capacity and support needs of the adult at risk, while recognising that safeguarding action may be required even where consent is not given.

The College will provide appropriate support to the adult at risk, the person who raised the concern, and the member of staff subject to the allegation. Communication with parents, carers, representatives, employers, placement providers, governors, staff,

students or external agencies will be managed carefully, taking account of confidentiality, consent, mental capacity, safeguarding risk and legal duties.

5.6 Recording, outcomes and onward referrals

The Designated Safeguarding Lead, Principal or Chair of Governors, as appropriate, will ensure that a secure written record is maintained of the allegation, information received, advice sought, decisions made, actions taken, rationale, outcomes and any lessons learned. Records will be retained in accordance with safeguarding, data protection and employment record requirements.

At the conclusion of the process, the College will consider whether any referral or notification is required to the local authority adult safeguarding service, police, DBS, LADO where a child is involved, professional regulator, funding body, employer, placement provider or other relevant agency. Senior leaders and governors will consider any learning for policy, practice, training, supervision, safer recruitment, risk assessment or safeguarding culture.

6. The Disciplinary Investigation

The College will only proceed with an internal disciplinary investigation when it is safe and appropriate to do so, and after any relevant police, local authority adult safeguarding, LADO or other statutory process has concluded or confirmed that internal action may proceed.

- The member of staff will be informed of the disciplinary concern or charge and their right to be accompanied or represented in accordance with College procedures and employment law.
- Where a member of staff has been suspended and no disciplinary action is to be taken, the suspension will be lifted without delay and appropriate arrangements made for their return to work, including consideration of support where required.
- The adult at risk, and any parent, carer or representative where appropriate, will be informed of the outcome where this is lawful, proportionate and consistent with confidentiality, consent, capacity, safeguarding risk and legal duties.
- The Principal, or designated senior decision-maker, will consider whether wider communication is required within the College, taking account of confidentiality, operational risk, legal duties and the need to prevent speculation or further harm.

7. Allegations Without Foundation

Where an allegation is found to be without foundation, the College will still consider whether the allegation indicates wider safeguarding, welfare, conduct or support concerns that require action.

- The Designated Safeguarding Lead and Director of People and Culture will ensure that the member of staff is informed, orally and in writing, that no further disciplinary or safeguarding action will be taken where this is the outcome.
- Appropriate support will be considered for the member of staff and any adult at risk, learner or other person affected by the allegation.
- Communication with parents, carers, representatives or external agencies will be managed only where appropriate, lawful and consistent with consent, capacity, confidentiality and safeguarding risk.

- A secure record will be retained setting out the allegation, information considered, advice received, outcome, rationale and any learning or follow-up action.

8. Low-Level Concerns

A low-level concern is any concern, however small, that an adult working in or on behalf of the College may have acted in a way that is inconsistent with the Staff Code of Conduct, professional boundaries or expected safeguarding standards, but does not meet the threshold for a formal allegation.

- Examples may include behaviour that is over-familiar, creates inappropriate favouritism or dependency, takes place unnecessarily in isolated settings, breaches professional boundaries, humiliates an adult at risk or otherwise causes concern about safe practice.
- Low-level concerns must be reported through the same safeguarding route as other concerns, so that advice can be provided and appropriate action considered.
- Records of low-level concerns will be retained securely and reviewed to identify patterns of concerning, problematic or inappropriate behaviour.
- Where a pattern or escalation of concern is identified, the Designated Safeguarding Lead will agree the appropriate response with the Principal and Director of People and Culture. This may include management action, training, disciplinary procedures, consultation with adult safeguarding services, referral to the LADO where a child is involved, police referral, DBS referral or other regulatory or professional reporting.
- The Principal will consider whether any wider cultural, supervision, training or procedural issues contributed to the concern and whether policy or practice changes are required.

9. Records

The College will maintain secure, accurate and proportionate records of adult safeguarding concerns, allegations, decisions, actions, referrals and outcomes. Records must distinguish clearly between fact, disclosure, observation, professional judgement, advice received and action taken.

- Safeguarding records will be stored securely and accessed only by those with a legitimate safeguarding, management, statutory or legal need to know.
- Where a concern involves a member of staff, records will be managed in accordance with safeguarding, People and Culture, disciplinary, data protection and employment record requirements.
- Records will include the nature of the concern, decisions made, advice received, referrals completed, outcomes, rationale and any learning or follow-up action.
- Where a member of staff is dismissed, removed from regulated activity, would have been removed had they not resigned, or resigns before a process is concluded, the College will consider and, where required, make a referral to the Disclosure and Barring Service.

- The College will also consider any additional statutory, regulatory or professional reporting duties where the concern relates to teaching, regulated professional practice, criminal conduct, Prevent, or an allegation involving a child.

10. Monitoring Effectiveness

The effectiveness of this policy will be monitored through the College's safeguarding assurance arrangements. Monitoring will focus on whether adult safeguarding concerns are identified, reported, recorded, escalated and reviewed appropriately, and whether learning leads to improvement in practice.

- The Designated Safeguarding Lead will monitor safeguarding themes, referral patterns, recording quality, training compliance, audit findings and lessons learned.
- The Principal and senior leaders will ensure that identified risks, emerging themes and required improvements are considered through the appropriate leadership forums.
- The Safeguarding Governor and Corporation Board will receive appropriate assurance on implementation, compliance, significant themes, improvement actions and annual review outcomes.
- Following any allegation, safeguarding concern, audit or external review, the College will consider whether policies, procedures, training, supervision, safer recruitment, recording or safeguarding culture require improvement.
- Relevant learning will be shared with staff, governors and external partners where appropriate and lawful.

11. Recruitment and Selection Procedures

The College will apply safer recruitment and selection procedures to all roles that may involve contact with adults at risk, learners, residents, apprentices or other people using College services. Recruitment decisions will be proportionate to the role, the level of safeguarding responsibility and any regulated activity requirements.

- Roles will be clearly defined, with safeguarding responsibilities and supervision arrangements identified where relevant.
- Selection criteria will reflect the knowledge, skills, values and behaviours required to work safely with adults at risk and other learners.
- Vacancies will be advertised and assessed in line with College recruitment procedures, equality duties and safer recruitment expectations.
- Applicants will be required to provide appropriate evidence of identity, right to work, qualifications, employment history and relevant professional status.
- References, employment history and gaps in employment will be explored before appointment where required by the College's safer recruitment procedures.
- Disclosure and Barring Service checks, barred list checks and other pre-employment checks will be completed where required and handled securely, sensitively and confidentially.
- Safeguarding concerns arising during recruitment, induction, probation or employment will be considered through the appropriate safeguarding, People and Culture, disciplinary, DBS or regulatory routes.

- Recruitment records will be retained in accordance with data protection, safer recruitment and employment record requirements.

12. Control of This Document

The Designated Safeguarding Lead, supported by the Vice Principal Curriculum and Quality, will review this policy and associated procedures annually, or sooner if statutory guidance, local safeguarding arrangements, organisational structure, audit findings, incidents or operational learning require amendment. Recommendations for change will be presented through the appropriate senior leadership and governance approval routes. The latest approved version will be maintained on the College's SharePoint and published through agreed College channels.

13. Other Related Policies

This policy forms part of the College's wider safeguarding and conduct framework. It should be read alongside other policies and procedures that support the welfare, safety, rights and professional standards of learners, apprentices, residents, staff and adults at risk.

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Safer Recruitment and Vetting Policy
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Student Conduct Policy
- Learner Harassment and Bullying Procedure
- Online Safety and Acceptable Use policies
- Student Substance Misuse Policy
- College Security Policy

Issue/Version	September 2026
Lead	Vice Principal Curriculum and Quality
Review Period	Annual
Next Review	September 2027
Equality Analysis Review (if applicable)	September 2026
Approved by	Executive 09/09/2026 Corporation December 2026 Substantive 2026 review completed: terminology updated to "adult at risk"; Care Act abuse categories strengthened; self-neglect and online/AI-enabled abuse added; Domestic Abuse Act, Prevent, DBS, UK GDPR and KCSIE 2026 crossover wording updated.

Appendix 1: Indicators of Abuse and Neglect

Appendix 1 provides indicative signs that may assist professional curiosity and safeguarding judgement. Indicators are not proof that abuse or neglect has occurred, and the absence of indicators does not mean an adult is safe. Staff should consider context, patterns of concern, the adult's views and wishes, capacity, coercion, immediate risk and professional judgement, and must report concerns through the College's safeguarding procedures.

Category	Possible indicators
Physical abuse	Unexplained or inconsistent injuries; repeated bruising, burns or fractures; signs of restraint or misuse of medication; fear of physical contact; reluctance to be alone with a particular person; withdrawal, distress or significant behaviour change.
Neglect and acts of omission	Poor hygiene, unsuitable clothing, untreated medical needs, lack of food, hydration, heating or medication, unsafe living conditions, missed appointments, pressure damage, repeated failure to provide agreed care or support.
Self-neglect	Severe or persistent neglect of personal hygiene, health, nutrition, accommodation or environment; hoarding; refusal of essential support; unsafe living conditions; behaviour that places the adult or others at significant risk.
Sexual abuse	Unexplained genital or anal pain, injury, bleeding or infection; torn or stained clothing; sexualised behaviour or language that is out of character; reluctance to be alone with a particular person; distress linked to personal care, touch or specific locations.
Psychological or emotional abuse	Fear, distress, withdrawal, low self-esteem, anxiety, changes in sleep or appetite, isolation, reluctance to speak freely, being controlled or prevented from seeing others, intimidation, humiliation or evidence of coercive control.
Financial or material abuse	Unexplained lack of money, unpaid bills, unusual withdrawals, missing possessions, sudden changes to financial arrangements, pressure about property or inheritance, someone else controlling access to money, benefits, devices or accounts.
Discriminatory abuse	Harassment, exclusion, unequal treatment, degrading language, hate incidents, refusal of reasonable adjustments, denial of cultural or religious needs, or abuse linked to protected characteristics or perceived difference.
Organisational abuse	Rigid routines, unsafe staffing, poor record keeping, lack of privacy, disrespectful or discriminatory cultures, poor medication or financial procedures, failure to respond to

	concerns, excessive control, repeated poor practice or neglect in an organised setting.
Domestic abuse	Fear of a partner or family member, isolation, controlling behaviour, financial control, threats, unexplained injuries, accommodation insecurity, technology-facilitated monitoring, coercion, stalking, harassment or repeated crisis linked to relationships.
Modern slavery	Appearing controlled by others, lack of access to documents or money, poor living conditions, unexplained travel, fearfulness, reluctance to talk, debt bondage, excessive working hours, malnourishment, untreated health needs or signs of coercion.
Online, technology-facilitated and AI-enabled abuse	Distress linked to online contact, threats to share images, impersonation, cyberbullying, harassment, stalking, AI-generated or manipulated images, fraud, grooming, coercion, pressure to share personal information or sudden changes in online behaviour.
Radicalisation and extremism	Increasing isolation, fixation on extremist material, abrupt changes in views or behaviour, online grooming, association with extremist networks, expressions of support for terrorism or concern that the adult is being coerced, exploited or drawn into terrorism.

Appendix 2: Adult Safeguarding Contacts and Referral Routes

Contact / route	Details	When to use
Designated Safeguarding Lead	Laura Williams, Assistant Principal Student Experience and Support	All adult safeguarding concerns, advice, referrals and escalation.
Deputy Designated Safeguarding Leads	Paul Spearritt, Vice Principal Curriculum and Quality Kay Murray, Safeguarding Manager	Safeguarding advice, urgent escalation and support when the DSL is unavailable.
Safeguarding Governor	Mike Gorton, via the Head of Governance	Governance oversight and escalation routes where appropriate.
Operation Encompass Key Adults	Laura Williams and Kay Murray	Notifications and safeguarding coordination linked to Operation Encompass.
Cheshire East adult safeguarding	Adult Social Care / safeguarding advice: 0300 123 5010 Emergency Duty Team: 0300 123 5022 outside office hours and bank holidays Professionals should use the Cheshire East online adult safeguarding reporting form.	Adult safeguarding concerns where Cheshire East is the relevant local authority.
Other local authority adult safeguarding routes	Cheshire West and Chester: online Adult Safeguarding Concern form; Community Access Team 0300 123 7034 where an individual cannot complete the form; Emergency Duty Team 01244 977277 outside office hours.	Adult safeguarding concerns where the adult lives in, receives services from, or is ordinarily resident in another local authority area.

	Stoke-on-Trent Adult Social Care: 0800 561 0015; professionals should use the online professional referral form for non-emergency referrals. Staffordshire Adult Safeguarding Referral Line: 0345 604 2719; Emergency Duty Service 0345 604 2886 outside office hours.	
Child safeguarding / Integrated Front Door	Cheshire East Integrated Front Door / Family Help Front Door: 0300 123 5012	Concerns involving a child or young person under 18, or where adult and child safeguarding concerns overlap.
Local Authority Designated Officer	01270 685904 / 01606 288931	Allegations against an adult working with a child or young person under 18.
Police	Emergency: 999 Non-emergency: 101	Immediate danger, suspected crime, urgent welfare risk or police advice.
Prevent / Channel / Cyber Prevent	College first point of contact: Designated Safeguarding Lead / College Prevent Single Point of Contact. Cheshire East Prevent / Channel: use the current online Prevent referral route on the Cheshire East Council “Preventing violent extremism” page. Anyone can make a referral. Cyber Prevent referrals: Cyber.Prevent@nwrocu.police.uk Immediate threat or emergency: 999; non-emergency police advice: 101.	Concerns about radicalisation, susceptibility to terrorism, extremist influence, online radicalisation or cyber-related Prevent risk.

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