SAFEGUARDING ADULTS AT RISK

COLLEGE, SUPPPORTED LIVING & ADULT COMMUNITY LEARNING

DATE APPROVED:	16 September 2026	**DATE OF NEXT REVIEW:**	September 2027
POLICY OWNER(S):	Director of Adult Learning Assistant Director (Supported Living) – Registered Manager		
DESIGNATION:	College, Supported Living & Adult Community Learning		
APPROVED BY:	Board of Trustees		

Purpose of policy	To provide all staff, learners, residents and parents/carers with an understanding of what safeguarding is.
Links to other policies	• Statement of Policy: Safeguarding • Safeguarding and Child Protection Policy (School and Sixth Form) • Safeguarding and Child Protection Policy (Children's Homes) • Safeguarding Adults at Risk Policy (Windhill) • Restraint Reduction Policy • Learner Voice Policy • Equality, Equity, Diversity and Inclusion Policy • Safer Recruitment Policy • Speaking Up Policy (Whistleblowing) • Communications, Email and Internet Security Policy • Admissions Policy • Unexpected Death Policy • Expected Death Policy • Prevent Policy

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1. PURPOSE

St Elizabeth's Centre ('the Charity') is committed to keeping safe all those in our care. As part of our on-going commitment, this policy is underpinned by a number of internal policies and procedures alongside local and national policy.

The Charity's guiding principle for Safeguarding is 'See It, Stop It, Report It'. This clearly defines the expectations of all staff working with or on behalf of our Charity, in the College, Supported Living and Adult Community Learning:

See It – If you see or hear something that you are not comfortable with or that just doesn't feel right, 'Trust Your Gut' and….,

Stop It – Intervene and ask those involved to step away. Ensure that the learner, resident or adult at risk is safe and supported, then……,

Report It – 'Don't Delay' - Immediately report what you have seen to the Designated Safeguarding Lead.

If for any reason you cannot report to the Designated Safeguarding Lead, then report the incident to a member of the Executive Team or (if a College learner is involved) the nominated governor for Safeguarding.

2. SCOPE

Part 1: Policy Introduction

Safeguarding children and adults at risk is of paramount importance. Adult Education and Social Care provisions have a duty of care to take such steps that are reasonable to ensure that the adults at risk are safe. The Charity is committed to safeguarding and promoting the welfare and safety of all adults at risk who live at St Elizabeth's Centre or who attend our College and Community Learning Hub across the 365-day provision we provide.

This Policy applies to all staff, Trustees, Governors and Health and Care Quality Committee members, who work with or for St Elizabeth's College and Supported Living Services (Centenary Close), Adult Community Learning Service temporary staff, volunteers, carers, families and visitors. All have a legal responsibility to take seriously any vulnerable adult concerns that come to their attention and follow the guidance given.

We have set out in our Safeguarding and Child Protection Policy (School and Sixth Form) the policy and procedures that govern how we safeguard those who attend our Sixth Form and are under the age of 18.

Our Safeguarding Adults at Risk Policy and Procedure (Windhill) sets out the policy and procedures that apply to those adults at risk who live in our supported living accommodation based at Windhill.

Our Safeguarding and Child Protection Policy and Procedure (Children's Homes) sets out the policy and procedures that govern how we safeguard those who are under 18 and live in our Children's Homes.

The Charity's College and on site Supported Living Services work in parallel to each other providing both learning opportunities and care. Within the College and the Supported Living service on site the majority of staff undertake a dual role within the College and the learners' own homes. Adult Community Learning staff predominantly work within that service but do from time-to-time work in other departments.

Robust recruitment processes are in place to ensure all staff are fit to work with adults at risk.

The Charity recognises that it has a duty to help learners/ residents and staff to realise their responsibilities (through guidance, support and training), eliminate or reduce risk and avoid situations (where possible) where abuse or neglect might be alleged.

This Policy uses the guidance from 'Safeguarding Adults at Risk', the Hertfordshire Multi-Agency Policy, Procedure and Practice for working with adults at risk of abuse or neglect in Hertfordshire.

The Charity follows its local Restraint Reduction Policy, Learner Voice Policy and Equality, Equity, Diversity and Inclusion Scheme when dealing with bullying, harassment, violence or aggression.

Learners/residents/adults who have concerns about other learners or residents/adults, or the behaviour of adults towards them, can use this Policy to ensure they are heard.

Learners / residents / adults will be given an easy read version of the Policy at the beginning of their tenancy. Day learners will be given a copy at the beginning of their College placement. All will be invited to comment either individually or in learners/ resident forums.

1.1: Definitions

In this Policy, an 'Adult at Risk' means an adult (a person over the age of 18) who:

- Has needs for care and support,
- Is experiencing, or is at risk of, abuse or neglect, and
- As a result of those needs is unable to protect himself against the abuse or neglect or the risk of it

(s 42 Care Act 2014).

This may mean that they have a reduced ability to protect themselves from abuse or neglect. This can be as a result of a learning or physical disability, a physical or mental illness chronic or otherwise (including an addiction to alcohol or drugs); or a temporary or permanent reduction in physical or mental capacity.

1.2: Principles

The policy and procedures are based on **The Six Principles of Safeguarding** that underpin all adult safeguarding work.

Empowerment	Adults are encouraged to make their own decisions and are provided with support and information.	I am consulted about the outcomes I want from the safeguarding process, and these directly inform what happens.
Prevention	Strategies are developed to prevent abuse and neglect that promotes resilience and self-determination	I am provided with easily understood information about what abuse is, how to recognise the signs and what I can do to seek help.
Proportionate	A proportionate and less intrusive response is made balanced with the level of risk.	I am confident that the professionals will work in my interest, and only get involved as much as needed.
Protection	Adults are offered ways to protect themselves, and there is a coordinated response to adult safeguarding.	I am provided with help and support to report abuse. I am supported to take part in the safeguarding process to the extent to which I want and to which I am able.
Partnerships	Local solutions through services working together within their communities	I am confident that the information will be appropriate shared in a way that takes into account its personal and sensitive nature. I am confident that agencies will work together to find the most effective responses for my own situation.
Accountability	Accountability and transparency in delivering a safeguarding response	I am clear about the roles and responsibilities of all those involved in the solution to the problem.

1.3: Overall Aims

The Charity, through the College, Supported Living, Centenary Close and Adult Community Learning services, works to ensure that all our learners, residents and adults have a safe and stimulating environment in which they can fulfil their potential and we are committed to safeguarding the welfare of our vulnerable those adult residents and learners who are adults at risk.

The aim of this policy is to ensure that:

- All Trustees, Governors, Committee members, staff, learners, tenant's parents, families and carers understand what safeguarding is.
- All Trustees, Governors, Committee members and staff are familiar with and understand this Safeguarding Policy is and know how to apply it when safeguarding matters arise:
- All those who use St Elizabeth's Centre are aware of this Safeguarding Policy;
- The Charity applies a person centred and co-ordinated approach to safeguarding.

It is the responsibility of everyone at the Charity to take all reasonable steps to safeguard and protect the rights, health and wellbeing of all young people and adults in our care.

- Policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for earlier review date
- The learners/residents irrespective of their protected characteristics have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a learner/resident is at risk of harm

We take an **'it can happen here'** approach where safeguarding is concerned.

Victims of harm should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

1.4: Statutory and Regulatory Framework

The Care Act 2014 sets out a clear framework for how all concerned parties should protect adults at risk of abuse of neglect.

The Safeguarding Vulnerable Groups Act 2006 ('the Act') sets out the type of activity covered by the Act in relation to children and vulnerable adults. The Disclosure and Barring Service (DBS) was established in 2009 to protect children and vulnerable adults. The Act defines the scope of the Disclosure and Barring Scheme. It provides that certain activities in relation to children and

vulnerable adults are regulated. This is known as 'regulated activity'. All aspects of the Charity's College and Supported Living Services will undertake some sort of regulated activity, from helping learners with their finances to assistance with personal hygiene.

The Heath & Social Care Act 2008 (Regulated Activities) Regulations 2014 outlines the "fit and proper persons test" and the "duty of candour" for providers, Regulation 13 is relevant to safeguarding in that it mandates a "zero–tolerance approach to abuse, unlawful discrimination and unlawful restraint".

The UK GDPR and Data Protection Act (2018) safeguard privacy and wellbeing. This legislation requires providers and employers to protect any data of a personal and sensitive nature.

Other relevant legislation the Charity will adhere to includes:

- Human Rights Act 1998
- KCSIE 2026 and annual updates
- The GDPR and Data Protection Act (2018)
- Working together to Safeguard Children 2023

This policy is aligned with the Hertfordshire Safeguarding Adults Board: Multi-Agency Safeguarding Adults Policy and Procedures.

1.5: Equalities Statement

When carrying out our safeguarding responsibilities we will consider our duties under the Equality Act 2010. These general duties include:

- Eliminate discrimination, harassment, victimisation and other conduct that is prohibited by the Equality Act 2010.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

1.6: Roles and Responsibilities

Safeguarding and promoting the welfare of children, young people and adults is the responsibility of everyone associated with the Charity, including our Trustees, Governors, Committee members, staff and volunteers. Everyone who comes into contact with adults at risk, their families and carers, has a role to play in identifying concerns, sharing information and taking prompt action.

All staff including volunteers and part time staff are responsible for monitoring, recording and reporting the wellbeing of learners and any allegations or indicators of abuse.

At St Elizabeth's College, Adult Community Learning and on site Supported Living we have identified an organisational structure for safeguarding adults at risk and the responsibilities of staff in safeguarding the individual when an allegation has been made or abuse is suspected. This is attached at Appendix A. The chart also describes the action to be taken when a safeguarding concern arises.

Appendix A takes guidance from the Hertfordshire Safeguarding Adults Board: Multi-Agency Safeguarding Adults Policy and Procedures which is available and accessible to staff online and via a QR code which is promoted in adult education, living and community settings.

1.7: Role of the Designated Persons

St Elizabeth's College, Adult Community Learning and on-site Supported Living services have designated people responsible for the safeguarding of learners and residents. The role of these staff is to receive any allegations and reports of abuse and to guide and support staff, residents and learners involved. The Designated team should be informed of any safeguarding matters relating to learners in their care:

Deputy Head of College	Education (Designated Safeguarding Lead)
Deputy Head of Adult Community Learning	Community Hub and Vocational Learning

Director of Adult Learning	Education (Designated Safeguarding Lead)

In the absence of the designated person contact should be made with the Registered Manager of Supported Living who has overall responsibility for the Care Agency's safeguarding provision. For any matters relating to the College and Adult Community Learning, the Director of Learning should be contacted.

The Charity realises that frontline staff, (RLSA's, DCSW's and LSA's and Lecturers and Leads) are more likely to receive allegations or notice indicators of abuse due to the amount of time they spend with the learners, residents and adults at risk. The flow chart at Appendix A is based on this, but any member of staff who first receives the disclosure or notices an indication of abuse regardless of position within the College, Adult Community Learning and all areas of Supported Living must follow the steps set out in Appendix A.

Subcontractors must be informed of this Policy and deal with any concerns reported to them by contacting the Designated Person with responsibility for the adult at risk within St Elizabeth's College and Supported Living (Centenary Close), Adult Community Learning.

1.8: Training

All staff, managers, Trustees, Governors and Health and Care Quality Committee members will undergo training so that they are fully aware of this policy and their responsibilities, including but not limited to: on line safeguarding training, face to face safeguarding training, attendance at meetings, through bulletins and updates, newsletters and external training and PREVENT training. Additionally, all academic staff will undertake annual KCSIE training:

KCSIE 2026

An audit of the e-safety training needs of all staff will be carried out regularly.

1.9: The Role of Governance in Safeguarding

The Board of Trustees, on the recommendation of the Education Committee, College Governing Body and Health & Care and Quality Committee will:

- Ensure there is an effective safeguarding policy in place;
- Ensure safer recruitment practice is followed;
- Ensure the College and on site Supported Living Services and Adult Community Learning have procedures for dealing with allegations against members of staff;
- Designate a member of staff with overall responsibility for safeguarding;
- Access relevant safeguarding training, including PREVENT.
- Devise and implement a PREVENT Risk Assessment and PREVENT Policy
- Review any SUIs reported and ensure that any necessary learnings are actioned.

PART 2: TYPES OF ABUSE, NEGLECT AND EXPLOITATION

2.1: Definitions of Abuse

Abuse is defined under the following categories: Physical, Domestic, Sexual, Psychological, Financial/material, Modern Slavery, Discriminatory, Organisational, Neglect and acts of omission, and Self-neglect. These categories overlap and an abused child/adult does frequently suffer more than one type of abuse.

Physical Abuse	Physical injuries which have no satisfactory explanation, or abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child/adult.
Domestic Abuse	Domestic abuse can also involve the abuse of an 'adult at risk'. Abuse involves any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those that have been intimate partners or family members regardless of gender or sexuality.

Sexual Abuse	Involves forcing or enticing a child /young person/adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware what is happening. The activities may involve physical contact including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving looking at or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways or grooming in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children/adults.
Psychological or Emotional Abuse	Psychological, or emotional abuse, includes the use of threats, fears or bribes to negate an adult at risk's choices. Including the maltreatment of a person such as to cause severe and adverse effects on their development. It may involve conveying that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children/young people/adults. These may include interactions that are beyond a person's developmental capability as well as overprotection and limitation of exploration and learning or preventing from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing.
Financial Abuse	The inappropriate use of a person's funds or resources, including theft, withholding money, inappropriate or unsanctioned use of a person's money or property or the entry of an adult at risk into

	financial contracts or transactions that they do not understand, to their disadvantage.
Modern Slavery	Modern Slavery encompasses human trafficking, domestic servitude and forced labour.
Discriminatory Abuse	Abuse targeted at a perceived vulnerability or on the basis of prejudice including racism or sexism, or based on a person's impairment, origin, disability, age, illness, sexual orientation or gender
Organisational Abuse	Organisational abuse happens when the routines in use force residents or service users to sacrifice their own needs, wishes and preferred lifestyle to the needs of the institution or service provider.
Neglect/Acts of Omission	Neglect can be both physical and emotional. This includes persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing or shelter (including exclusion from home or abandonment): protect from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs.

2.2: Recognising Abuse

Abuse can be:

- Physical
- Neglect (act of omission)
- Sexual abuse or exploitation
- Financial / material (misuse of money, club cards, benefits, personal property)
- Psychological/emotional
- Institutional or organisational
- Discriminatory in nature
- Pressure ulcers
- Cyber abuse

- Online abuse
- Domestic abuse
- Honour based abuse – FGM and Forced Marriage
- Up skirting

Abuse is behaviour towards a person that either deliberately or unknowingly causes harm to an adult at risk or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or' doing something that causes harm.

Abuse can be a one-off incident or something that is repeated.

Staff are responsible for the identification of abuse and referral to the appropriate authorities via the service's designated persons.

Type of Abuse	**Actions**	**Indicators**
Physical Abuse	Assault, hitting, slapping, pushing, kicking, misuse of medication, inappropriate restraint, force-feeding, or causing physical harm.	Unexplained injuries, bruises, burns, fractures, frequent accidents, fear of certain people, flinching when approached, repeated hospital visits, or delays in seeking medical treatment.
Sexual Abuse	Rape, sexual assault, sexual harassment, inappropriate touching, exposure to sexual acts or materials, coercion into sexual activity, or sexual activity without consent.	Bruising or injuries around intimate areas, sexually transmitted infections, pregnancy, difficulty walking or sitting, fear of specific individuals, withdrawal, changes in behaviour, or inappropriate sexualised behaviour.
Psychological Abuse	Threats, intimidation, humiliation, verbal abuse, bullying, controlling	Low self-esteem, anxiety, depression, withdrawal from social activities, fearfulness,

	behaviour, coercion, isolation, harassment, or preventing contact with others.	loss of confidence, changes in mood or behaviour, reluctance to speak openly, or excessive deference to another person.
Financial Abuse	Theft, fraud exploitation. Pressure in connection with financial transactions, misuse or misappropriation of property, possessions or benefits.	Unpaid bills, basic needs not being met. Lack of money on a day to day basis.
Organisational Abuse	Poor care standards, lack of positive responses to complex needs. Rigid routines. Inadequate staffing. Insufficient knowledge base within service.	Inability to make choices or decisions. Agitation if routine broken. Disorientation. Patterns of challenging behaviour.
Discriminatory Abuse	Racist, sexist, or that based on a person's disability. Other forms of harassment, slurs or similar treatment. Failure of agencies to ensure staff receive adequate anti-discrimination practice training.	Low self-esteem. Withdrawal. Depression. Fear. Anger.
Modern Slavery	Encompassing slavery, human trafficking, forced labour and domestic servitude	
Self-Neglect	A wide range of behaviour, neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.	
Radicalisation	Being drawn into acts of terrorism including support for extremist ideas that are part of terrorist ideology.	

Online Abuse	Categorised in four areas of risk: context, contact, conduct and commerce. Online safety is considered when planning the curriculum and through filtering and monitoring of IT systems.	
Domestic Abuse	A pattern or behaviour in any relationship / an incident of controlling, coercive, threatening, degrading and violent behaviour including sexual violence or abuse between those aged 16 or over, who are or have been intimate partners or members regardless of their gender or sexuality.	
Honour Based Abuse (FGM and Forced Marriage)	Procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons.	
Upskirting	A criminal offence against predominantly women and girls when someone takes a picture under a person's clothing without their permission.	

2.3: Responding to an allegation of abuse

Any suspicion, allegation or incident of abuse must be reported to the designated Duty Manager / Person in Charge immediately. If this is not possible, a member of the Senior Management Team must be notified (see Appendix A – Section 12).

2.4: Responding to suspicions/indicators or actual abuse

St Elizabeth's College, Adult Community Learning and on site Supported Living Service recognises its legal duty to work with other agencies in safeguarding adults at risk and in responding to abuse. All members of staff involved with adults at risk have a responsibility to be mindful of issues related to vulnerable adult safety and welfare and a duty to report and refer any concerns however "minor" they appear to be, this includes any suspected or witnessed misuse of ICT equipment.

When abuse is suspected, or concerns are raised regarding a vulnerable adult's wellbeing, the member of staff will complete an Incident Report Form via CPOMS Web and if necessary attach a body map to the form. This must be given to the Deputy Manager/Registered Manager/On Call Manager (if out of hours) immediately. In suspected cases of abuse the Registered Manager/Head of College must report the concerns to East Hertfordshire Adult safeguarding team or the 0 – 25 safeguarding team. **For further guidance on completing reporting process and forms consult the Charity's policy on Reporting Serious and Untoward Incidents.**

In cases where it is deemed that at person lacks capacity to make informed decisions about his/her own care and treatment, parents/carers have a right to be informed about any concerns about the vulnerable person's welfare or any action taken to safeguard and promote the welfare of the adult at risk, providing this does not compromise the vulnerable adult's safety. Where there are possible concerns about a vulnerable adult's safety, unconditional confidentiality cannot be guaranteed and should not be offered. Guidance from the East Hertfordshire Adult safeguarding team or the 0-25 Safeguarding Team must be sought before disclosing information.

The Charity has adopted a Prevent Policy which sets out how staff must deal with any concerns related to the risk of any individuals being drawn into terrorism.

Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on certain bodies, in the exercise of their functions to have 'due regard to the need to prevent people from being drawn into terrorism. For further information, please follow the hyperlink: https://www.gov.uk/government/publications/prevent-duty-guidance

IT IS NOT THE RESPONSIBILITY OF COLLEGE, ADULT COMMUNITY LEARNING, AND SUPPORTED LIVING CARE STAFF TO INVESTIGATE A SAFEGUARDING CONCERN UNLESS THEY ARE GIVEN THE GO AHEAD AND INSTRUCTIONS FROM THE HERTS 0-25 SAFEGUARDING TEAM or ADULT SAFEGUARDING TEAM.

This procedure reflects the guidance in the Charity's "Speaking Up Policy (Whistle blowing)" section 6 – How to raise a concern.

Any suspicions or allegations of actual abuse of an adult at risk must be reported to the Registered Manager/On Call Manager (if out of hours) or Head of College immediately.

On being notified of any such matter, the Registered Manager/On Call Manager/Head of College shall:

- Take such steps as he / she considers necessary to ensure the safety of the person in question and any other person who might be at risk.
- Report the matter to the Director of Adult Learning and Director of Business Development
- Ensure that a report of the matter is completed (on an incident reporting form via CPOMS Web) by the person who reported the original concern/incident. If the complaint is made against any member of the Senior Management Team or a designated safeguarding coordinator, then either the Director of Adult Learning or Director of Business Development must deal with the complaint
- If the complaint is made against the Director of Adult Learning and / or Director of Business Development then the Chief Executive must be notified immediately. The Chair of the Education Committee must be informed immediately about any complaint against the Head of College or Director of Adult Learning, and the Chair of the Health & Care Quality Committee must be immediately notified of any complaint against the Director of Business Development.

2.5: Record Taking

A full record shall be made as soon as possible on the Charity's reporting portal CPOMS setting out the nature of the allegation and any other relevant information including:

- The date
- The time
- The place where the disclosure of information took place
- The place where the alleged abuse happened
- Your name and the names of others present
- The name of the complainant and, where different, the name of the vulnerable adult who has allegedly been abused
- The nature of the alleged abuse
- A description of any injuries observed
- The account which has been given of the allegation
- Relevant body maps or photographs if appropriate.

2.6: Record Keeping

The Registered Manager / Head of College and Deputy Head of Adult Learning will retain the central record of all incident report forms and safeguarding records. This will include:

- The formal report via the software CPOMS (web)
- Entries on the central tracker
- Any notes, memoranda or correspondence dealing with the matter
- Any other relevant material

Copies of reports, notes etc. will be kept securely locked at all times, but will be shared in accordance with the Charity's Data Protection Policy.

2.7: Guidance for Designated Managers

The designated manager must immediately discuss the matter with the 0-25 Safeguarding Team or Hertfordshire Adult Safeguarding team to determine whether it is a Safeguarding

matter. (NB: The Local Authority Safeguarding Team is responsible for coordinating action in adult cases, including liaison with police).

If it is agreed to be a Safeguarding matter, a written record of the date and time of the report will be made. The report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the local authority 0-25 Safeguarding Team or Adult Safeguarding team within 24 hours. If consent has not been given by the young person / adult, the designated safeguarding coordinator will discuss with the Local Authority what action will be taken to inform the parents / carers of the adult at risk; a note of that conversation should be made. **The nominated member of staff must notify the Head of College or the Registered Manager or the Deputy Head of Adult Community Learning as soon as practicable and in any event within 2 hours of the initial concern arising.**

Note: The Local Authority will need to assess the situation and will want to work with the adult at risk in determining what could or should happen next. They will want to respect the vulnerable adult's wishes and feelings provided no one is at immediate risk of harm.

The mental capacity of the adult at risk and their ability to give informed consent for an enquiry to be made under these procedures is a significant but not the only factor in deciding what action to take. If a crime has been committed then consent is not required and the incident must be reported immediately.

If the adult at risk is fully aware of what could happen, they can:

- Choose whether they want to speak now or have time to think about it
- Be as informed as possible regarding the implications of passing on this information

If the complainant is the adult at risk, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must be avoided as the use of leading questions can cause problems for the subsequent investigation and any court proceedings.

2.8: Reporting 'Notifiable Events' to the Care Quality Commission

The Registered Manager will need to complete and send a statutory notification or under the authority of the Registered Manager the designated person will complete the statutory notification form.

Comprehensive guidance on how to complete these forms, when to complete them and descriptors of notifiable events can be found on www.CQC.org.uk. Key points to keep in mind are:

- Statutory notification forms are kept in the Supported Living office and can also be found on College Data under Safeguarding. When appropriate the Head of College will apply regulated procedures to report to Ofsted. Supported Living services can also report directly onto the CQC portal.
- The notification will be sent via the CQC notification e-mail address. All details are coded and individuals are given ID codes to protect confidentiality. HSCA_notifications@cqc.org.uk
- The regional contact address is: East Region, Care Quality Commission, Citygate, Gallowgate, Newcastle upon Tyne, NE1 4PA
- Or alternatively telephone: 03000 616161
- Copies of the forms are stored electronically by the Administration support assistant to the Registered Manager.

2.9: Learner and Resident Support

St Elizabeth's College, Adult Community Learning and Supported Living service (Centenary Close) will be proactive and take positive steps to inform learners, residents and adults of their rights to safety and protection and the options available to express their fears or concerns. This will be in the following formats:

Learner Support: Education

The curriculum will embed safeguarding welfare, health and safety and the PREVENT agenda.

Learners access monthly meetings in the supported living setting and also meet regularly within the Learner Council. The Adult Community Learning service holds regular meetings with individual adults. Safeguarding is a standard agenda item at all these events.

Feedback from learners, residents and adults informs the development of this policy.

The Charity promotes the use of individual's social workers and independent advocates to promote choice and rights for learners, residents, and adults unable to communicate their needs/concerns effectively.

The Charity has one policy for Compliments/Complaints, Grumbles and Worries and this is available in easy read.

Support for Learners, Residents and Adults During and after an Incident

All services across the Charity will endeavour to support learners, residents and adults following any incidents of abuse and will follow guidance and instruction from the local 0-25 Safeguarding Authority. Learners, residents and adults are entitled to and have available in house and external counselling services. This will be offered after any allegation even if the allegation has not been upheld.

2.10: Confidentiality and Information Sharing

The Registered Manager or Head of College or On Call Manager will instruct staff on what to tell stakeholders in relation to allegations and suspicions of abuse. The Registered Manager or On Call Manager will take guidance from the 0-25 Safeguarding Team in relation to this. The 0-25 Safeguarding Team is available Monday to Friday during normal working hours. Staff must take immediate steps to safeguard the individual and inform Senior Leaders if out of hours.

Adults at risk enquiries, investigations and conferences can only be successful if professional staff share and exchange all relevant information. That information must be treated as

confidential at all times and staff will be bound by the ethical and statutory codes that cover confidentiality and the UK General Data Protection Regulation (UK GDPR)

Disclosure of confidential personal information without the consent of the person providing it may take place when justified by the particular circumstances relating to the relevant incident. Problems around the disclosure of information can be avoided if the consent of the individual is obtained, preferably in writing, so long as they have mental capacity.

Disclosure may be necessary in the public interest where a failure to disclose information may expose another to risk of death or serious harm.

All those providing information should take care to distinguish between fact, observation, allegation and opinion. It is important that, should any information exchange be challenged in respect of a breach of confidentiality or, for example, as a breach of the Human Rights Act, the information can be supported by evidence.

Information must be adequate, relevant and not excessive in relation to the purpose for which it is held and must be held no longer than is necessary for that purpose.

Each agency is responsible for maintaining their own records on work with adults at risk protection cases. The Charity has a Records Retention Policy that sets out how long records shall be kept and when they may be destroyed.

2.11; Post Incident Support for Staff

The Charity will endeavour to support staff following any incidents of abuse and follow guidance and instruction from the local safeguarding authority. Staff are entitled to, and have available, in house and external counselling services. These services will be offered to staff involved during an investigation and after an investigation, if the allegation has not been upheld. Support for staff is also available through the workplace option.

2.12: Young People and Transition from Children's Services

This policy applies to safeguarding of anyone aged 18 years or over. However, the Charity's Children's Services support people from 0-25 years so any safeguarding concerns raised for adults aged 18-25 will be dealt with by the 0-25 Safeguarding Team. For those over 25 years of age, the adult safeguarding team manage concerns raised. Where a vulnerable young person aged 18 or over is known or suspected to be at risk of abuse, and is receiving services, the Charity will create a transition plan to move the individual from children's to adult services. In this instance, a Safeguarding Adults process should be initiated as part of that transition. The Admissions Policy contains further information about how transitions between the services are managed.

We recognize that matters relating to children who are questioning their gender can be complex and require a highly sensitive, evidence-informed approach. In alignment with Keeping Children Safe in Education (KCSIE) safeguarding frameworks, our organisation is committed to fully supporting staff by providing clear decision-making pathways and training. Staff members are not expected to navigate these matters in isolation; Members of staff must not adopt any changes relating to social transition unless led by the designated safeguarding lead (DSL) and in partnership with the child's parents or carers. We ensure our personnel are trained to handle disclosures non-judgmentally, manage confidentiality appropriately, and immediately escalate requests—such as changes to names, pronouns, or facilities access—to the DSL team. Our priority is to protect staff from undue pressure while fostering a respectful environment that balances the individual welfare of the child with wider statutory safeguarding obligations, fairness, and safety.

2.13: Online Safety & Guidance

The Charity will ensure that the IT infrastructure and network is as safe and secure as is reasonably possible and that policies and procedures referred to within this policy are implemented. The Director of Adult Learning reviews updates through KCSIE (Keeping Children

Safe in Education) and provides this information to the Head of IT to be reflected in policy development and review.

All IT users will be provided with a username and password by the IT Department who will keep an up to date record of users and their usernames.

Online Safety in Education

Online safety is a focus in all areas of the curriculum and staff should reinforce safe practice in the use of ICT across the curriculum.

- In sessions where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where learners, residents and adults are allowed to freely search the internet, e.g. using search engines, staff must be vigilant in monitoring the content of the websites the young people visit.
- The Charity has policies in place covering Filtering and Monitoring and reviews access of and to online searches monthly.

It is accepted that from time to time, for good educational reasons, learners residents and adults may need to research topics (e.g. racism, drugs, and discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Head of IT (and other relevant person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so must be auditable, with clear reasons for the need.

Promotion of Online Safety

Online safety will be reinforced as part of a planned programme of learning or tutorial activities or key worker sessions.

Learners will be taught in all lessons to be critically aware of the materials and content they access online and will be guided to validate the accuracy of information.

Rules for use of ICT systems and internet will be posted in all rooms and displayed on log-on screens.

Staff should act as good role models in their use of ICT, the internet and mobile devices.

2.14: Use of Digital & Video Images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners instant use of images that they have recorded themselves or downloaded from the internet. However, staff, learners and adults need to be aware of the risks associated with sharing images and with posting digital images on the internet.

Those images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. The Charity through the Sixth Form and College will inform and educate users about these risks and will implement this policy to reduce the likelihood of the potential for harm.

When using digital images, staff should inform and educate learners, residents and adults about the risks associated with the taking, use, sharing, publication and distribution of images. In particular, they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites. Updates in relation to KCSIE will be applied to online safety.

Staff are allowed to take digital and video images to support educational aims, but must follow this Policy concerning the sharing, distribution and publication of those images. Those images should only be taken on the Charity's equipment. Personal equipment of staff must not be used for such purposes. Secure portal applications can be used within the policy, for example NOAA app.

Care should be taken when taking digital / video images to ensure that learners, residents and adults are appropriately dressed and are not participating in activities that might bring the individuals themselves or the Charity into disrepute.

Learners residents and adults must not take, use, share, publish or distribute images of others without their permission.

Photographs published on the website, or elsewhere that include learners, adults and residents will only be used following confirmation of consent. (see section 30.9).

Full names of learners residents or adults will not be used anywhere on a website or blog, particularly in association with photographs.

If learners residents or adults are deemed not to have capacity to consent, written permission from parents or carers will be obtained before photographs are published on the intranet or shared within the Charity or on its website or in other promotional materials.

Email

The Charity's e-mail service may be regarded as safe and secure and is monitored. Staff, learners, residents and adults should therefore use only the Charity's email facilities.

Users need to be aware that e-mail communications may be monitored.

Users must immediately report to the nominated person, in accordance with this Policy, the receipt of any e-mail that makes them feel uncomfortable, is offensive, threatening or bullying in nature and must not respond to any such email.

Any digital communication between staff and learners or adults or parents or carers must be professional in tone and content. These communications may only take place on the Charity's official (monitored) systems. Personal email addresses, text messaging or public chat / social networking programmes must not be used for these communications.

Learners residents and adults will be taught and supported to develop understanding about email safety issues, such as the risks attached to the use of personal details. They will also be

taught strategies to deal with inappropriate emails and be reminded of the need to write emails clearly and correctly and not to include any unsuitable or abusive material.

All learners will have their own log in to ensure filtering and monitoring security is maximised.

Unsuitable / inappropriate activities

Some internet activity, e.g., accessing child abuse images or distributing racist material is illegal and is banned from the Charity and all organisational ICT systems. Other activities, e.g. Cyber-bullying are banned and could lead to criminal prosecution.

Staff must refer to the BYOD Policy in regard to their use of applications in the workplace. The Charity believes that the activities referred to in the following section would be inappropriate in a college, residential or adult learning context and that users should not engage in these activities on or offsite when using the Charity's equipment or systems.

Please see the Communications, Email and Internet Security Policy for further guidance.

Responding to Incidents of Misuse

It is hoped that all members of staff will be responsible users of ICT, who understand and follow this policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, deliberate misuse.

If members of staff suspect that misuse might have taken place, but that the misuse is not illegal it is essential that correct reporting procedures are followed.

Use of Technology

All staff must apply the following policies in relation to use of technology:

- BYOD
- Filtering and Monitoring

- IT Password
- Email Etiquette
- DPO
- Retention
- Safer Recruitment
- Speaking Up

2.15: Safecall

The Charity implemented the Safecall Service in July 2025 as an addition / alternative route to whistleblowing. Safecall is an independent, external, secure and confidential service that allows individuals to report any concerns or misconduct in the workplace. This includes:

- Unethical behaviour
- Fraud
- Unresolved safeguarding issues, unsafe care
- A criminal offence
- A failure to comply with legal obligation or regulatory requirements
- A miscarriage of justice
- Unresolved health and safety concerns
- Damage to the environment
- Deliberate concealment of any of the above
- or other inappropriate conduct

Anyone reporting an incident can be assured that their concerns will be fully addressed. All calls are treated with the utmost confidentiality by independent staff who will not disclose the identity of anyone making a report to the Charity without consent.

How to use Safecall

Call the hotline facility: 0800 915 1571

Callers are put in contact with an operator who is trained to receive calls regarding concerns in the workplace which cannot be addressed any other way. Calls are not recorded, and the

individual making the call will be asked if they wish to be named or remain anonymous. The operator will log the report.

Make an online report at: www.safecall.co.uk/report

Individuals are able to log in and create a report. When making a report, it is best to provide as much detail as possible to help with a robust and fair investigation.

PART 3: SUMMARY

St Elizabeth's College and on site Supported Living Services and Adult Community Learning take seriously their duty of care and will be proactive in seeking to prevent adults at risk becoming the victims of abuse or neglect. We will do this in a number of ways:

- Through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds;
- By identifying roles and responsibilities of members of the Health Care Quality Committee, Board of Governors, Senior Management and staff;
- By informing adults at risk of their rights to be free from harm and encouraging them to talk to staff if they have any concerns;
- Through the ongoing programme of support, at an appropriate level to promote self-esteem, social inclusion and address the issue of the protection of vulnerable adults in the wider context (see Learner Support);
- By identifying and acting upon allegations or indicators of abuse at the earliest opportunity and in accordance with the timeframe outlined by Hertfordshire County Council (our Host Authority);
- By following safer recruitment good practice including DBS checks for all staff. (set out in the Charity's Safer Recruitment policy);
- By ensuring the curriculum develops knowledge of the rights and responsibilities of young people and adults and equips them with a greater understanding of safeguarding;
- By developing a comprehensive training package focusing on safeguarding issues including PREVENT.

PART 4: MONITORING AND REVIEW

Once approved by the Board of Trustees following review by the Health & Care Quality Committee and Education Committee, the College Leadership Group will review and monitor the policy and procedures on an annual basis and will recommend and implement approved changes where necessary. A revised version of the policy will be submitted to the Board of Trustees on an annual basis to ensure that any identified deficiencies or weaknesses have been dealt with without delay.

The impact of the policy will be measured using data collected in relation to reported safeguarding incidents and outcomes.

All members of staff are required to familiarise themselves with all processes and procedures set out in this policy.

- **DSL –** Designated Safeguarding Lead
- **DDSL –** Deputy Designated Safeguarding Lead
- **CQC –** Care Quality Commission
- **Safecall –** The Charity's independent, confidential whistleblowing reporting line
- **Adult at Risk –** An adult (a person over the age of 18) who has needs for care and support, is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it (s.42 Care Act 2014)

Review: annually

Date created: September 2011

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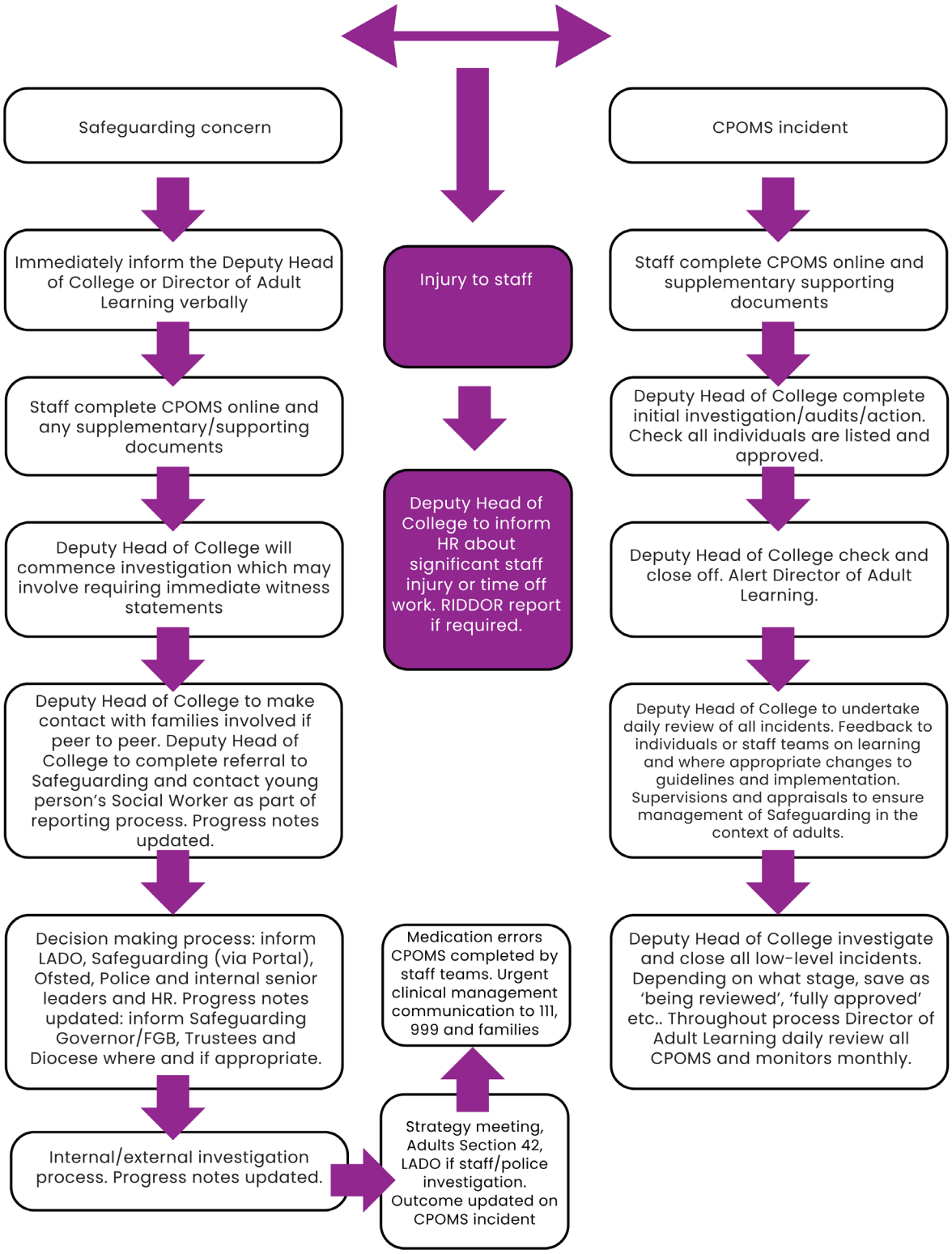
Date	Approved by	Added to policy log
April 2020	Trustee Board	Yes
July 2022	Trustee Board	Yes
September 2023	Trustee Board	Yes
August 2024	Trustee Board	Yes
17 September 2025	Trustee Board	Yes
16 September 2026	Trustee Board	Yes

Appendix A: College Incident Reporting Pathway