



Title:	Safeguarding Policy
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Learning4Life-GY

Adult Safeguarding Policy

1. Purpose

Learning4Life-GY is committed to safeguarding adult learners, staff and volunteers from abuse and neglect. This policy reflects the Care Act 2014 and current Care and Support Statutory Guidance, the Mental Capacity Act 2005 and Code of Practice, Human Rights Act 1998, Equality Act 2010, Domestic Abuse Act 2021, Modern Slavery Act 2015, UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025, together with NEL Safeguarding Adults Board procedures and Making Safeguarding Personal principles.

2. Scope

This policy applies to:

- All staff, governors, trustees, and volunteers at Learning4Life-GY
- All adult learners (aged 18+) who engage with our programmes and services
- Any adult who may be at risk of harm in connection with Learning4Life-GY activities
- Safeguarding duties apply to an adult who meets the Care Act section 42 criteria. Concerns about another adult who does not meet those criteria will still be considered under relevant welfare, criminal, employment, equality, health and safety or organisational procedures.

3. Definitions

An **adult at risk** is defined by the Care Act 2014 as someone who:

- Has needs for care and support (whether or not the local authority is meeting those needs),
- 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 abuse or neglect or the risk of it.

4. Key Principles

Learning4Life-GY's safeguarding practice reflects the **six principles of the Care Act 2014**:

1. **Empowerment:** Adults are supported to make their own decisions and give informed consent.
2. **Prevention:** We act before harm occurs, recognising early signs of risk.
3. **Proportionality:** Responses are the least intrusive, appropriate to the level of risk.
4. **Protection:** We take swift action to protect those most in need.
5. **Partnership:** We work with NELC, health, police, and community partners to achieve the best outcomes.
6. **Accountability:** We are open, transparent, and clear about roles and responsibilities.

5. Types of Abuse

Staff must be alert to the following forms of harm:

- **Physical abuse** – hitting, slapping, misuse of medication, restraint
- **Domestic abuse** – physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological, emotional or other abuse, including technology-facilitated abuse, between people aged 16 or over who are personally connected
- **Sexual abuse** – rape, assault, sexual harassment, exposure to sexual acts
- **Psychological abuse** – threats, intimidation, coercion, harassment, isolation
- **Financial or material abuse** – theft, fraud, scams, coercion concerning money or property, misuse of benefits, possessions or accounts, and online or technology-enabled financial exploitation
- **Neglect** – failure to meet basic needs (food, medication, care)
- **Discriminatory abuse** – harassment, unequal treatment or denial of services linked to a protected characteristic under the Equality Act 2010, including race, disability, sex, gender reassignment, sexual orientation, religion or belief, age, pregnancy or maternity, and marriage or civil partnership
- **Organisational abuse** – neglect or poor care in an institutional setting

- **Modern slavery** – trafficking, forced labour, domestic servitude
- **Self-neglect** – hoarding, unsafe living conditions, refusal of essential care
- **Online and technology-facilitated abuse** may cut across several categories, including stalking, harassment, impersonation, image-based abuse, coercive control, fraud, hate abuse and misuse of monitoring or assistive technology.

6. Roles and Responsibilities

- **Designated Safeguarding Lead (DSL):** Kylie Bramley
- **Deputy DSL:** Georgina Tait

The DSL is responsible for:

- Receiving and responding to adult safeguarding concerns
- Liaising with NELC Adult Social Care Single Point of Access (SPA)
- Maintaining secure records on CPOMs
- Supporting staff through referrals and safeguarding enquiries

7. Raising a Concern

Staff and volunteers must report promptly where they know or reasonably suspect that an adult is experiencing, or is at risk of, abuse or neglect. The DSL will consider the adult's views and desired outcomes, immediate safety, capacity, coercion, risk to others, criminal offences and whether the Care Act section 42 criteria may be met. Staff do not investigate allegations themselves or delay referral while seeking proof.

- Is experiencing or at risk of abuse or neglect
- Is unable to protect themselves from harm
- Is self-neglecting in a way that causes significant risk to health or others

Immediate Actions:

- If the adult is in **immediate danger**, call **999**.
- Report to the DSL or Deputy DSL as soon as possible.
- Record the concern clearly and factually in CPOMs.
- **Preserve relevant evidence without confronting the alleged source of risk. Where a crime may have been committed, contact the police as appropriate; use 999 for immediate danger and 101 for non-emergency advice.**

Referral Route:

- Contact - Designated Safeguarding Lead Learning4Life-Gy: Kylie Bramley 01472 240440 Safeguarding mobile 07985598783
- Contact - **NELC Adult Social Care SPA** (24/7) on **01472 256256** or email **focus@nhs.net**
- For written referrals, email **Kylie.bramley@learning4life-gy.co.uk** (Mon–Fri 8:30–17:00).
- **The local authority decides whether a section 42 enquiry is required and who should undertake it. Learning4Life-GY will cooperate with enquiries,**

protection planning and any Safeguarding Adults Review under section 44 of the Care Act, preserve records and implement agreed actions and learning.

8 Mental Capacity & Consent

We apply the Mental Capacity Act 2005. Capacity is presumed and assessed only where there is reason to doubt it; it is specific to the particular decision and time. An adult is not treated as lacking capacity merely because they make an unwise decision. All practicable support must be provided before concluding that capacity is lacking. Any act or decision for a person who lacks capacity must be in their best interests and be the least restrictive option.

- Record capacity assessments, best-interests decisions and the evidence and rationale for them; consult relevant family, attorneys, deputies and professionals as appropriate
- Recognise that consent is not required to share information where there is another lawful basis and sharing is necessary and proportionate to protect the adult or others
- Consider whether coercion, undue influence, communication needs or executive-function difficulties affect the adult's ability to decide or act on a decision
- Request or support access to an independent advocate where the Care Act requires one because the adult would otherwise have substantial difficulty participating and has no appropriate person to support them
- Continue to follow the existing Deprivation of Liberty Safeguards and Court of Protection framework where applicable. Liberty Protection Safeguards are not yet in force in 2026; the policy will be reviewed when commencement and the revised Mental Capacity Act Code of Practice are confirmed

9. Information Sharing & Confidentiality

- Information will be shared lawfully, securely, accurately and proportionately under the UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025. Data protection law does not prevent necessary safeguarding sharing. The DSL will record what was shared, with whom, the lawful basis, purpose and rationale, including any decision not to share.
- Staff must not promise confidentiality to a learner.
- Safeguarding records will be stored securely, access-controlled and retained under the organisation's retention schedule. Records must be factual, distinguish observation from professional opinion and historic information, and include the concern, the adult's views and desired outcomes, decisions, rationale, actions and outcome.

10. Safer Recruitment & Training

- DBS checks will be obtained only at the level for which each role is legally eligible, following a documented role and regulated-activity assessment. Where a role is regulated activity with adults, the appropriate enhanced DBS check with Adults' Barred List information will be obtained. Learning4Life-GY will make a DBS referral where the statutory referral conditions are met and will not knowingly permit a barred person to engage in regulated activity.

- All staff and volunteers will receive role-appropriate adult safeguarding, mental-capacity, information-sharing and Prevent training at induction, with updates and refreshers at intervals determined by legal requirements, local Safeguarding Adults Board guidance, the organisation's risk assessment and lessons from practice. DSL competence will be maintained through more frequent role-specific development.
- Regular supervision will include safeguarding discussions.
- Safer recruitment is supported by ongoing vigilance: concerns about the conduct of staff, volunteers or contractors will be reported and managed promptly under the staff allegations, disciplinary and whistleblowing procedures, with referral to the police, local authority, DBS or professional regulator where required.

11. Escalation & Professional Challenge

Where staff disagree with decisions made by statutory agencies or feel concerns are not adequately addressed, they must use the **NELC Professional Disagreement/Escalation Procedure** (available at safernel.co.uk).

12. Monitoring & Review

The Senior Leadership Team and Governors will:

- Review safeguarding data at least termly
- Ensure lessons learned from cases inform future practice
- Review and update this policy annually or after any major safeguarding incident