



Grow 19

**Safeguarding Adults at Risk
Policy**

Key Contact Personnel in College

Nominated Board Member with Responsibility for the policy:

Shobha Ravindra

Designated Safeguarding Lead: Matthew Jones

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This policy will be reviewed following any concerns and/or updates to national and local guidance or procedures.

Introduction and Ethos

Grow 19 is a Further Education provider and all those directly connected (staff, Trustees, parents, families and learners) have an essential role to play in making it safe and secure. Grow 19 recognises our moral and statutory responsibility to safeguard and promote the welfare of all young people and adults at risk.

Grow 19 recognises the importance of providing an ethos and environment within college that will help learners to be safe and feel safe. In our college learners are respected and encouraged to talk openly.

Our college's core safeguarding principles are:

- We are an important part of the wider safeguarding system.
- It is our responsibility to safeguard and promote the welfare of learners.
- All learners regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All learners have a right to be heard and to have their wishes and feelings taken into account.
- All our staff understand safe professional practice and adhere to our safeguarding policies.

The ethos of the college is to value and respect each learner and member of staff. Learners are encouraged to make decisions and choices for themselves and learn that their decisions are listened to, recognised and responded to by their peers, job coaches and tutors within their college community. Developing confidence, positive self-esteem and "giving learners a voice" enables learners to have the skills to better protect themselves in the wider world.

Grow 19 will not tolerate the abuse of adults in any of its forms and is committed to safeguarding adults, with care and support needs, from harm.

This policy outlines the steps Grow 19 will take to safeguard an adult with care and support needs if they are deemed to be at risk. This policy sets out the roles and responsibilities of Grow 19 in working together with other professionals and agencies in promoting the adult's welfare and safeguarding them from abuse, neglect and exploitation.

Grow 19 will ensure that decisions made will allow adults to make their own choices and include them in any decision making. Grow 19 will also ensure that safe and effective working practices are in place.

This policy is intended to support all staff and volunteers working within Grow 19 to understand their role and responsibilities in safeguarding adults. All staff and volunteers are expected to follow this policy.

The key objectives of this policy are for all employees and volunteers of Grow 19 to:

- have an overview of adult safeguarding
- be clear about their responsibility to safeguard adults

- ensure the necessary actions are taken where an adult with care and support needs is deemed to be at risk

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:

- Mental Capacity Act 2005 with Mental Capacity Amendments Bill 2019 including the Liberty protection Safeguards
- DfE guidance Keeping Children Safe in Education September 2025 (KCSIE)
- Working Together to Safeguard Children August 2023 (WTSC)
- Framework for the Assessment of Children in Need and their Families (2000)
- Kent and Medway Safeguarding Children Procedures (online)
- Care Act 2014 (adults at risk)
- Multi-Agency Safeguarding Adults Policy, Protocols & Practitioners Guidance for Kent & Medway, updated January 2024

Under the Human Rights Act 1998, everyone has the right to live free from abuse and neglect.

<https://www.equalityhumanrights.com/en/human-rights/human-rights-act>

Copies of this policy are available within Grow 19. The college will not tolerate the abuse of adults in the organisation. Staff and volunteers should be made aware of how this policy can be accessed.

Safeguarding adults at risk

Safeguarding adults is defined in Care and Support Statutory Guidance (October 2014) as protecting an adult's right to live in safety, free from abuse, neglect and exploitation. Under section 42 of the Care Act 2014, safeguarding duties apply to adults who:

- Have needs for care and support (whether or not they are receiving any services); and
- Are experiencing, or at risk of, abuse, neglect and exploitation; and
- As a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse, neglect or exploitation.

An adult is anyone aged 18 or over. Where someone is 18 or over but is still receiving children's services and a safeguarding issue is raised, the matter should be dealt with through adult safeguarding arrangements. For example, this could occur when a young person with substantial and complex needs continues to be supported in a residential educational setting until the age of 25.

Care and support needs is the combination of practical, financial and emotional support for adults who need extra help to manage their lives and be independent – including older people, people with a disability or long-term illness, people with mental health problems, and carers.

Care and support include the assessment of people's needs, provision of services and the allocation of funds to enable a person to purchase their own care and support. It could include care home, home care, personal assistants, day services, or the provision of aids and adaptations.

What is Safeguarding adults?

'Safeguarding means protecting an adult's right to live in safety, free from abuse, neglect and exploitation. It is about people and organisations working together to prevent and stop both the risks and experience of abuse, neglect or exploitation, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.'

Care and Support Statutory Guidance, Department of Health, updated July 2025

All adults should be able to live free from fear and harm. But some may find it hard to get the help and support they need to stop abuse.

An adult may be unable to protect themselves from harm or exploitation due to many reasons, including their mental or physical incapacity, sensory loss or physical or learning disabilities. This could be an adult who is usually able to protect themselves from harm but maybe unable to do so because of an accident, disability, frailty, addiction or illness.

Grow 19 adheres to following the six key principles that underpin safeguarding work (See Care Act guidance)

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

Grow 19 will not tolerate the abuse of adults. Staff and volunteers should ensure that their work reflects the principles above and ensure the adult with care and support needs is involved in their decisions and informed consent is obtained. Grow 19 should ensure that the safeguarding action agreed is the least intrusive response to the risk. Partners from the community should be involved in any safeguarding work in preventing, detecting and reporting neglect and abuse. Grow 19 should be transparent and accountable in delivering safeguarding actions.

What is Making Safeguarding Personal (MSP)?

MSP means a case should be person-led and outcome-focused. The individual should be involved in identifying how best to respond to their safeguarding situation by giving them more choice and control as well as improving quality of life, wellbeing and safety.

Grow 19 will not tolerate the abuse of adults and will ensure that adults are involved in their safeguarding arrangements and each individual is dealt with on a case by case basis. As adults may have different preferences, histories and life styles, the same process may not work for all.

Who do adult safeguarding duties apply to?

The Care Act 2014 sets out that adult safeguarding duties apply to *any* adult who:

- has care and support needs, and
- is experiencing, or is at risk of, abuse, neglect and exploitation.

- is unable to protect themselves from either the risk of, or the experience of abuse, neglect or exploitation because of those needs.

Who do I go to if I am concerned?

The lead DSL for safeguarding is Matthew Jones (Principal). There is one other DSL, Kirstie Hemingway (Head of satellite provision). All staff and volunteers should contact a DSL for any concerns/queries they have in regard to safeguarding adults and the concern must be recorded on Myconcern or a concern form if the online system is unavailable for any reason.

The DSL will be responsible to make decisions about notifying adult social services if required and consider alternative actions, where necessary and will keep a rationale for all decisions made. The DSL will also ensure that the safeguarding adults policies and procedures are in place and up to date. They will ensure a safe environment is promoted for staff and volunteers and adults accessing the college. The DSL will ensure they are up to date with their safeguarding training.

What should I do if I am concerned?

Staff and volunteers at Grow 19 who have any safeguarding concerns should:

1. Respond
2. Report
3. Record
4. Refer

In making a decision whether to refer or not, the designated safeguarding lead should take into account:

- (1) the adult's wishes and preferred outcome
- (2) whether the adult has mental capacity to make an informed decision about their own and others' safety
- (3) the safety or wellbeing of children or other adults with care and support needs
- (4) whether there is a person in a position of trust involved
- (5) whether a crime has been committed

The designated safeguarding lead will record the reasons for referring the concern or reasons for not referring on the Safeguarding Log.

Incidents of abuse may be one-off or multiple and may affect one person or more. Staff and volunteers should look beyond single incidents to identify patterns of harm. Accurate recording of information will also assist in recognising any patterns.

Confidentiality and Information Sharing

- Grow 19 recognises that all matters relating to safeguarding and protecting adults at risk are confidential. The Head of College or DSLs will only disclose information about a learner to other members of staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard young people and adults at risk.

- All staff must be aware that they cannot promise to keep secrets which might compromise the safety or wellbeing of the adult at risk.
- DfE Guidance on Information Sharing (May 2024) provides further detail.

Filtering and Monitoring

- Grow 19 will do all we reasonably can to limit learners exposure to online harms through Grow 19 provided devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.
- For further guidance see the Filtering and Monitoring Policy.

Complaints

- The college has a Complaints Procedure available to parents, learners and members of staff and visitors who wish to report concerns. This can be found on the Grow 19 website
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific Procedures for Managing Allegations against Staff policy.

Staff Induction, Awareness and Training

- The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the college's internal safeguarding processes.
- All staff members (including temporary staff) will receive training to ensure they are aware of a range of safeguarding issues.
- All staff members (including temporary staff) will receive regular safeguarding updates, at least annually.
- All staff members (including temporary staff) will be made aware of the colleges expectations regarding safe and professional practice via the staff Code of Conduct and Acceptable Use Policy.
- The DSL and Head of College will provide an annual report to the Board of Trustees detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.

Safe Working Practice

- All members of staff are required to work within clear guidelines on Safe Working Practice / the college's Code of Conduct.
- Staff should be aware of the college's Behaviour Management and Physical Intervention Policies, and any physical interventions must be in line with agreed policy and procedures.

- Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should adhere to the college's Acceptable Use policy.

Staff Supervision and Support

- Any member of staff affected by issues arising from concerns for a vulnerable adult's welfare or safety can seek support from the DSL.
- The induction process will include familiarisation with safeguarding responsibilities and procedures to be followed if members of staff have any concerns about an adult at risk safety or welfare.
- The college will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of our learners
 - All staff will be supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.

The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

Safer Recruitment

- Grow 19 is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
- The Board of Trustees, Principal and Head of College are responsible for ensuring that the college follows safe recruitment processes outlined within guidance.
- The Head of College will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- We advise all staff to disclose any reason that may affect their suitability to work with adults at risk including convictions, cautions, court orders, cautions, reprimands and warnings.
- Online searches may be done as part of due diligence checks on candidates.

Allegations Against Members of Staff and Volunteers

- Grow 19 recognises that it is possible for staff and volunteers to behave in a way that might cause harm to young people and adults at risk and takes seriously any allegation received. Such allegations should be referred immediately to the Principal or the Head of College, who will first contact the Local Authority Designated Officer (LADO) to agree further action to be

taken in respect of the young person or adult at risk and staff member. The LADO should be contacted within one working day. In the event of allegations of abuse being made against the Head of College then staff are advised that allegations should be reported to the Board of Trustees who will contact the LADO in the first instance. **In the event a crime is believed to have been committed, the police should be contacted in the first instance.**

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Head of College.
- Grow 19 has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, who also works with adults at risk; or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

When in doubt – consult

Safeguarding Adults at risk with Special Educational Needs and Disabilities

- Grow 19 acknowledges that learners with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse.
- Grow 19 will ensure that learners with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon. Learners with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the young person's disability and be aware that learners with SEN and disabilities may not always outwardly display indicators of abuse.

Training, awareness raising and supervision

Grow 19 ensures that all staff and volunteers receive training on safeguarding adults at risk who may be at risk of abuse. Those adults may report things of concern to staff or volunteers who should be equipped with the basic knowledge around safeguarding adults and be confident to identify that abuse is taking place and action is required. All staff and volunteers should be clear about the core values of Grow 19 and commitment to safeguarding adults at risk.

Prevent

Radicalisation and extremism of adults with care and support needs is a form of emotional/psychological exploitation. Radicalisation can take place through direct personal contact, or indirectly through social media.

If staff are concerned that an adult with care and support needs is at risk of being radicalised and drawn into terrorism, they should treat it in the same way as any other safeguarding concern.

For more information about Prevent see: <https://www.gov.uk/government/publications/prevent-duty-guidance>

Links

[Adult safeguarding for professionals - Kent County Council](#)

[Report adult abuse | Adult abuse and safeguarding | Medway Council](#)

The policy and procedures are reviewed annually by the Designated Safeguarding Lead.

Appendix 1

What are the types of safeguarding adults abuse?

The Care and Support statutory guidance sets out the 10 main types of abuse:

- Physical abuse
- Neglect
- Sexual abuse
- Psychological
- Financial abuse
- Discriminatory
- Organisational
- Domestic violence
- Modern Slavery
- Self-neglect

However, you should keep an open mind about what constitutes abuse or neglect as it can take many forms and the circumstances of the individual case should always be considered.

For more information, read section 14.17 of the Care and Support Statutory Guidance.

What are the possible signs of abuse?

Abuse, neglect and exploitation can be difficult to spot. You should be alert to the following possible signs of abuse, neglect and exploitation:

- Depression, self-harm or suicide attempts
- Difficulty making friends
- Fear or anxiety
- The person looks dirty or is not dressed properly,
- The person never seems to have money,
- The person has an injury that is difficult to explain (such as bruises, finger marks, 'non-accidental' injury, neck, shoulders, chest and arms),
- The person has signs of a pressure ulcer,
- The person is experiencing insomnia
- The person seems frightened, or frightened of physical contact.
- Poor attendance

- Inappropriate sexual awareness or sexually explicit behaviour
- The person is withdrawn, changes in behaviour

You should ask the person if you are unsure about their well-being as there may be other explanations to the above presentation.

Who abuses, neglects and exploits adults?

Abuse can happen anywhere, even in somebody's own home. Most often abuse takes place by others who are in a position of trust and power. It can take place whether an adult lives alone or with others. Anyone can carry out abuse or neglect, including:

- partners;
- other family members;
- neighbours;
- friends;
- acquaintances;
- local residents;
- people who deliberately exploit adults they perceive as vulnerable to abuse;
- paid staff or professionals; and
- volunteers and strangers

Appendix 2

Adult Safeguarding Response Framework (Multi-Agency Safeguarding Adults Policy, Protocols and Practitioner Guidance for Kent and Medway, 2025)

A Safeguarding Concern begins a process of gathering facts, assessment of the concern and adult's needs and wishes; and a risk assessment to decide if a statutory or non-statutory enquiry should take place and within any organisation, an employee or volunteer must alert their line manager or designated officer:

