Peopleton Brook Care Farm

ADULT SAFEGUARDING POLICY

Current review date	4 August 2026
Effective date	1st September
Next scheduled review	August 2027
Policy owner	Jake Payne, Business Manager
Adult Safeguarding Lead	DSL - Jo Garrad – jo@peopeltonbrookfarm.co.uk DDSL – Clarissa Saunders – clarissa@peopletonbrookfarm.co.uk
Approval	*Name/signature: Jake Payne Date: 4th August*

Prepared with regard to the Care Act 2014 statutory guidance, South Gloucestershire Safeguarding Adults Board procedures reviewed April 2026, and the Ofsted further education and skills inspection toolkit for use from 1 September 2026.

1. Policy statement

Peopleton Brook Care Farm (PBCF) is committed to protecting every adult's right to live and learn in safety, free from abuse, neglect and exploitation. Safeguarding is everyone's responsibility. We will maintain an open culture in which adult learners, participants, apprentices, staff, volunteers and visitors know how to raise a concern and trust that it will be taken seriously.

Our response will be person-led and outcome-focused in line with Making Safeguarding Personal. We will listen to the adult, support informed choice and control, make reasonable adjustments, act promptly and use the least intrusive response compatible with safety. We will work with the local authority, police, health services, commissioners, employers, placement providers and other partners when appropriate.

The Care Act 2014 places the statutory duty to make a safeguarding enquiry on the local authority. PBCF's role is to recognise and report concerns, take immediate protective action within its control, preserve evidence, share relevant information, cooperate with enquiries and learn from incidents. We will not wait for certainty or for the Care Act threshold to be confirmed before seeking advice or offering support.

Children and transition

Anyone under 18 is safeguarded under PBCF's Safeguarding and Child Protection Policy and current statutory child-protection guidance.

For mixed-age groups and young people approaching 18, both child and adult services may need to work together. Turning 18 must not create a gap in support.

2. Scope

This policy applies to:

- all adults aged 18 or over who learn, train, work, volunteer, receive support, visit or otherwise participate in PBCF activities;
- all employees, agency and sessional staff, trustees, volunteers, students on placement, contractors, subcontractors, employers and visitors; and
- activity on PBCF premises and elsewhere, including farm work, one-to-one activity, transport, work placements, trips, off-site provision, outreach, online learning and digital communications connected with PBCF.

Safeguarding concerns may arise inside or outside PBCF, may be current or historic, and may involve a member of staff, another learner, a family member, a carer, a professional, a stranger or an organisation. The policy also applies when information about a person's conduct outside work indicates that they may pose a risk to adults with care and support needs.

3. Adult safeguarding principles

PBCF will apply the six Care Act safeguarding principles in all settings, including education and training:

- **Empowerment:** support people to make their own decisions and give informed consent.
- **Prevention:** act early and help people understand risks and how to seek help.
- **Proportionality:** use the least intrusive response appropriate to the risk.
- **Protection:** provide support and representation for those in greatest need.
- **Partnership:** work with the adult, communities and agencies to prevent and respond to harm.
- **Accountability:** be clear, transparent and answerable for decisions and actions.

3.1 Making Safeguarding Personal and learner voice

- Ask the adult what they want to happen and record their desired outcomes at the earliest safe opportunity.
- Explain options, likely consequences and limits to confidentiality in a way the adult can understand.
- Use accessible formats, communication support, interpreters, advocacy and reasonable adjustments where needed.

- Keep the adult involved, review their wishes as circumstances change and tell them what can be shared about the outcome.
- Seek feedback after safeguarding activity and use it to improve practice.

4. Definitions and forms of abuse

Adult with care and support needs / adult at risk: for the Care Act safeguarding duties, an adult aged 18 or over who (1) has needs for care and support, whether or not those needs are being met; (2) is experiencing, or is at risk of, abuse or neglect; and (3) because of those needs is unable to protect themselves from the abuse or neglect or its risk.

Safeguarding concern: information indicating that an adult may be experiencing, or at risk of, abuse, neglect or exploitation. PBCF raises concerns; the local authority decides whether a statutory section 42 enquiry or another response is required.

Abuse and neglect: may be a single act, repeated acts, omission or organisational practice; may be deliberate or unintentional; and may occur in person or online. Exploitation is a common feature. Categories include:

- Physical abuse — assault, inappropriate restraint, misuse of medication or physical sanctions.
- Domestic abuse — physical, sexual, psychological, emotional or economic abuse; coercive or controlling behaviour; stalking; non-fatal strangulation; forced marriage and so-called 'honour'-based abuse.
- Sexual abuse and exploitation — sexual activity without valid consent, pressure, harassment, exposure, sexual photography or image-based abuse.
- Psychological or emotional abuse — threats, intimidation, humiliation, isolation, coercion, cyberbullying or unreasonable withdrawal of support.
- Financial or material abuse — theft, fraud, scams, coercion about money or property, misuse of benefits, possessions, bank accounts, wills or powers of attorney.
- Modern slavery — trafficking, forced labour, slavery or domestic servitude.
- Discriminatory abuse — harassment, unequal treatment, hate incidents or abuse connected with a protected characteristic or perceived difference.
- Organisational abuse — neglect, poor professional practice or harmful systems, cultures and routines in an organisation or service.
- Neglect and acts of omission — failing to meet health, care, emotional, physical, educational or support needs, or withholding necessities.
- Self-neglect — behaviour such as neglecting health, hygiene or surroundings, including hoarding. This requires an individual, proportionate response and may not always lead to a section 42 enquiry.

Other patterns may include mate crime, cuckooing, county lines, criminal exploitation, grooming, radicalisation, online fraud, abuse by a carer, and adult-to-adult or peer abuse. A label is not required before a concern is reported.

5. Legal, local and education-sector framework

This policy is informed by, and will be applied consistently with, the following as relevant to PBCF's activities:

- Care Act 2014 (especially sections 42 to 46) and Care and Support Statutory Guidance, chapters 7 and 14;
- Mental Capacity Act 2005 and its Code of Practice;
- Human Rights Act 1998 and Equality Act 2010;
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025;
- Domestic Abuse Act 2021, Modern Slavery Act 2015, Sexual Offences Act 2003 and relevant criminal law;
- Safeguarding Vulnerable Groups Act 2006, Protection of Freedoms Act 2012 and current Disclosure and Barring Service guidance;
- Counter-Terrorism and Security Act 2015 and current Prevent duty guidance, where PBCF is within scope or delivering for a specified authority;
- South Gloucestershire Safeguarding Adults Board Multi-Agency Policy and Multi-Agency Procedures reviewed April 2026;
- Ofsted's Further education and skills inspection toolkit for use from 1 September 2026, where applicable; and

- CQC fundamental standards and notification requirements where PBCF delivers a regulated activity.

The exact statutory, regulatory and contractual duties depend on the service, funding and registration in place. The Business Manager will obtain specialist advice if applicability is unclear.

6. Governance, roles and responsibilities

6.1 Business Manager and those responsible for oversight

- Set an open, person-centred safeguarding culture and ensure sufficient leadership, staffing, supervision and resources.
- Approve and review this policy; assure themselves that it is understood, followed and effective.
- Ensure safer recruitment, role-appropriate checks, staff conduct arrangements and effective management of concerns about people in positions of trust.
- Review safeguarding themes, response times, learner feedback, training, referrals and lessons learned while protecting confidentiality.

6.2 Adult Safeguarding Lead

- Be the first point of advice and coordinate PBCF's response, without preventing any person from contacting the local authority or police directly.
- Make or support prompt referrals, consult the adult wherever safe, coordinate immediate risk management and cooperate with multi-agency enquiries.
- Maintain secure, accurate and separate safeguarding records, including decisions and their rationale.
- Provide or arrange role-relevant training, supervision, briefings and updates; review practice after incidents.
- Escalate professional disagreements when a response does not adequately manage risk.

6.3 All staff, volunteers and contractors

- Stay alert to signs, disclosures, patterns and changes in behaviour, attendance, presentation or wellbeing.
- Respond calmly, take immediate action to preserve life or prevent serious harm, and report concerns without delay.
- Record facts accurately, distinguish fact from opinion and cooperate with safeguarding, police, regulatory or employment processes.
- Maintain professional boundaries, complete required training and challenge poor or unsafe practice.

Contact	Details
Adult Safeguarding Lead	Jo Garrad jo@peopletonbrookfarm.co.uk
Deputy Safeguarding Lead	Clarissa Saunders clarissa@peopletonbrookfarm.co.uk
South Gloucestershire First Contact Team	01454 868007 (Monday-Friday, 9am-5pm) CSODesk@southglos.gov.uk
Emergency Duty Team	01454 615165 (out of hours and weekends)
Police	999: immediate danger or crime in progress 101 or police online reporting: non-emergency crime

7. Prevention and safe education practice

- Learners and participants receive accessible information at induction and appropriate refreshers about expected behaviour, healthy relationships, consent, online safety, scams, exploitation, Prevent risks, how to report and where to get independent help.
- Reporting routes are visible, accessible and offer alternatives to the named lead. Adults can report verbally, in writing, through an advocate or by any reasonable communication method.
- Risk assessments consider the individual and activity, including farm machinery and animals, lone or one-to-one working, transport, intimate or personal support, off-site visits, work placements, online delivery and access to personal information.
- Work-placement, employer, subcontractor and partner arrangements set safeguarding expectations, confirm appropriate checks, identify contacts and provide a clear route for learners to report concerns. PBCF remains alert to concerns even where activity is off site.
- Staff use approved systems and professional accounts for communication. Personal devices must not be used to photograph, film or record adults for PBCF purposes unless an authorised exception, lawful basis, risk assessment and consent process are in place.
- PBCF uses proportionate online-safety controls and education. Staff act on cyberbullying, sexual or criminal exploitation, image-based abuse, fraud and other digital risks.
- Where the Prevent duty applies, PBCF maintains a proportionate risk assessment, suitable staff training and a clear route for concerns about susceptibility to radicalisation.

8. Responding to a concern or disclosure

Act immediately where necessary

Call 999 if anyone is in immediate danger, seriously injured, requires urgent medical help, or a crime is in progress. Give first aid within competence and preserve evidence.
For a suspected non-emergency crime, use 101 or police online reporting. A police report does not replace an adult safeguarding concern, and vice versa.

1. **Recognise:** notice a disclosure, injury, behaviour, pattern, unsafe practice, unexplained absence or other indicator. Do not require proof.
2. **Respond:** listen without judgement, take the person seriously, ask only open questions needed to clarify immediate safety, and explain what you will do next.
3. **Report:** tell the Adult Safeguarding Lead immediately. If the lead is unavailable, implicated or delay would increase risk, contact the Deputy, Business Manager, local authority or police directly.
4. **Record:** as soon as possible record the date, time, place, people present, exact words where possible, observations, injuries, actions, the adult's wishes, consent, capacity considerations and who was informed. Sign and date the record.
5. **Refer and protect:** the lead will consider immediate safety, the adult's desired outcomes, consent, capacity, risks to others and local thresholds, then seek advice or refer promptly. The local authority decides whether a section 42 or other enquiry is required.
6. **Review:** continue proportionate support and risk management, follow agreed multi-agency plans, record feedback and escalate if the response is not adequate.

Staff must not:

- promise secrecy or tell the adult that nothing will be shared;
- conduct their own investigation, seek a confession, repeatedly question the adult or ask leading questions;
- confront the person alleged to have caused harm, arrange mediation or alert them if this could increase risk or compromise evidence; or
- delay reporting while seeking more information, discussing the matter widely or waiting for a manager to return.

Normally, a concern is reported to the local authority covering the place where the abuse is alleged to have occurred. If there is doubt about the threshold or responsible area, the lead will call the South Gloucestershire First Contact Team for advice. Any concern may be reported; PBCF will not screen out a reasonable concern solely because it may not meet the section 42 threshold.

9. Consent, mental capacity and advocacy

9.1 Consent and information sharing

Wherever possible and safe, the adult's informed consent will be sought before a referral or sharing their information. A refusal will be explored respectfully, including whether the person is being coerced or intimidated. PBCF will explain any decision to share without consent unless doing so would increase risk.

Information may be shared without consent when there is a lawful and proportionate reason, including where:

- the adult lacks capacity for the specific decision and sharing is in their best interests;
- another adult or a child may be at risk, or an alleged perpetrator may pose a wider risk;
- there is an overriding public interest, a serious crime, risk to life or serious harm, coercion or duress;
- a statutory, court, contractual or regulatory duty requires disclosure; or
- seeking consent would increase risk, prejudice an investigation or cause unjustified delay.

The decision and rationale—whether information is shared or not—must be recorded.

9.2 Mental Capacity Act 2005

Capacity is presumed and is decision-specific and time-specific. PBCF will apply the five statutory principles:

- presume capacity unless it is established that the person lacks it;
- take all practicable steps to support the person to decide;
- do not treat an unwise decision as proof of incapacity;
- act or decide in the person's best interests if they lack capacity; and
- choose the least restrictive effective option.

Staff must not assume incapacity because of age, disability, diagnosis, communication style, appearance or behaviour. Complex assessments and best-interests decisions must be undertaken by appropriately competent people and documented.

9.3 Advocacy

PBCF will support the adult to access an advocate and will alert the local authority if the adult has substantial difficulty being involved in a safeguarding enquiry or review and there is no appropriate person to support them. The Care Act duty to arrange an independent advocate rests with the local authority when the statutory conditions are met.

10. Concerns about staff, volunteers or other people in positions of trust

Any allegation, low-level concern, boundary concern or information indicating that a staff member, volunteer, contractor, placement worker or other person in a position of trust may pose a risk must be reported promptly. This includes conduct at work or outside work, current or historic concerns, and relevant online or social-media behaviour. Seemingly minor concerns must be recorded so that patterns can be identified.

10.1 Reporting routes

- Concern about a staff member, volunteer or contractor: report to the Adult Safeguarding Lead and Business Manager.
- Concern about the Adult Safeguarding Lead: report to Deputy Safeguarding Lead Shani Payne and the Business Manager.
- Concern involving the Business Manager, both named leads, a conflict of interest, or a failure to act: contact South Gloucestershire First Contact Team directly and, if relevant, the police or regulator.
- A person may contact the local authority or police directly at any time. They do not need permission and must not be disadvantaged for raising a concern in good faith.

10.2 Management response

- Take immediate, proportionate steps to protect adults and preserve evidence. A temporary change of duties, supervision or suspension is a neutral risk-management measure, not a finding of guilt, and must be decided under employment procedures with appropriate advice.
- Consult the local authority People in Positions of Trust / adult safeguarding process where the concern may indicate a risk to adults with care and support needs, including relevant conduct outside work.
- Coordinate the timing and scope of internal fact-finding with adult social care, police, HR, commissioners and regulators. Police enquiries take precedence where criminal activity is suspected, but PBCF must continue necessary safeguarding and employment action.
- Treat the adult and the person subject to the allegation fairly, offer appropriate support, restrict information to those who need it and maintain a clear chronology and rationale for decisions.
- Complete the employment process even if the individual leaves. Consider professional-regulator, commissioner and CQC notifications where applicable.
- Make a DBS referral when the legal conditions are met—for example, where a person is removed from regulated activity and PBCF believes relevant conduct or the harm test is satisfied. A referral may still be required if the person resigns, retires or leaves before the process concludes.

11. Information sharing, confidentiality and records

Confidentiality is important but is not absolute. Data protection law permits necessary and proportionate safeguarding information sharing where there is an appropriate lawful basis. Staff must not allow uncertainty about data protection to cause unsafe delay; advice should be sought promptly.

Information sharing must be:

- **Necessary and proportionate:** share the minimum needed for the safeguarding purpose.
- **Relevant and adequate:** provide enough clear information for the recipient to act.
- **Accurate:** distinguish fact, observation, allegation and professional opinion; identify historic information.
- **Timely:** share early enough to prevent missed opportunities for support or protection.
- **Secure:** use approved channels and verify the recipient.
- **Recorded:** note what was shared or withheld, with whom, when, why, the lawful basis, consent and the decision-maker.
- Safeguarding records are kept separately from general learner or personnel files, access-controlled and linked through a confidential flag where appropriate.
- Records include the adult's voice and desired outcomes, capacity and consent considerations, risk assessments, referrals, advice, actions, outcomes and review dates.
- Retention and secure disposal follow PBCF's records-retention schedule, legal limitation periods and any direction from police, the local authority, commissioners or regulators. Relevant records are transferred securely when responsibility changes and lawful sharing is necessary.

12. Safer recruitment, conduct, training and supervision

- PBCF uses role descriptions, identity and right-to-work checks, employment history and gap exploration, references, qualification checks and proportionate online or other pre-employment checks in line with law and policy.
- DBS checks are obtained only at the level for which the role is legally eligible. Enhanced checks and adults' barred-list checks are not blanket requirements; barred-list information is requested only where the person will carry out regulated activity and the law permits it.
- Where required, PBCF maintains an accurate single central or equivalent record of pre-appointment checks and obtains written assurance for relevant staff in subcontracted or placement provision.
- Induction covers this policy, local reporting, professional boundaries, whistleblowing, online safety, information sharing, consent and capacity. Staff confirm they have read and understood the policy.
- All staff receive safeguarding updates at least annually and training proportionate to their role and risks. The Adult Safeguarding Lead receives advanced training and maintains current knowledge of local procedures, Making Safeguarding Personal and mental capacity.

- Supervision, appraisal and team learning are used to test understanding, discuss concerns, support wellbeing and identify unsafe practice. Training and competence are recorded and evaluated for impact, not attendance alone.

13. Whistleblowing, complaints and escalation

- Staff, volunteers, learners and participants may raise poor practice, misconduct, unsafe systems or a failure to act through PBCF's whistleblowing or complaints routes without fear of victimisation for a concern raised in good faith.
- If internal reporting is unsafe, ineffective or conflicted, the concern may be taken directly to South Gloucestershire Council, the police, a commissioner, CQC or another relevant regulator.
- Where PBCF believes an agency response leaves an adult at unacceptable risk, the Adult Safeguarding Lead or Business Manager will use the local Resolution of Professional Differences process and continue to escalate until there is a recorded, safe outcome.
- Complaints and safeguarding processes may run alongside each other. A complaint must never be used to delay or replace protective action.

14. Monitoring, learning and review

- The Business Manager and Adult Safeguarding Lead review safeguarding activity at least annually and after any serious incident, pattern, regulatory change or Safeguarding Adults Review relevant to PBCF.
- Assurance considers timeliness and quality of records and referrals, learner voice and outcomes, repeat concerns, equality impacts, placement and online risks, safer recruitment, staff confidence, training effectiveness and implementation of actions.
- Learning is translated into updated risk assessments, procedures, training and supervision. Information used for governance reporting is anonymised unless identification is necessary and lawful.
- This policy is reviewed at least annually. The next scheduled review is August 2027, but an earlier review will take place if legislation, statutory or local guidance, service delivery or safeguarding experience changes.

15. Related PBCF policies and official guidance

15.1 Related PBCF documents

- Safeguarding and Child Protection Policy
- Staff Code of Conduct and Professional Boundaries
- Whistleblowing Policy
- Complaints Policy
- Safer Recruitment / Recruitment and Selection Policy
- Data Protection, Records Retention and Information Security policies
- Online Safety, Acceptable Use, Photography and Personal Devices arrangements
- Risk Assessment, Lone Working, Transport and Work Placement procedures

15.2 Official sources checked for this review

Care and Support Statutory Guidance (updated 22 July 2025)
South Gloucestershire Safeguarding Adults Board Multi-Agency Procedures 2026
South Gloucestershire: concerned about an adult
Ofsted Further education and skills inspection toolkit for use from 1 September 2026
DBS eligibility guidance and legal duty to refer
Prevent duty guidance