



# **Adult Safeguarding Policy and Procedure Date: August 2025 Review date: August 2026**

Contents of this policy:

- Policy statement
- Recruitment and Selection
- Training and induction
- Staff responsibilities
- Reporting procedures
- Photo and social media policy
- Useful contacts
- Other points to note

## **Policy statement**

Organisation: Little Gate

### **Scope**

For the avoidance of doubt and unless expressly stated to the contrary any reference to Little Gate Supported Employment (LITTLE GATE), Little Gate Farm or the Charity should be treated as including Little Gate College and Little Gate and any reference to client/participant should be treated as including a Student of Little Gate College.

What we do within the organisation

Little Gate is an organisation for learning disabled adults and adults with autism, who we call 'trainees'. Trainees can be upwards of 19yrs. The aim of the project is to find our trainees paid jobs in the local community, through our supported employment program. The farm is where the employment training begins and trainees engage in a wide variety of activities, that include

woodland, animal care, horticulture and catering. These activities are used as a tool to build employment skills, and trainees will focus on key development areas, including confidence, communication, independence and work skills. When the trainee is ready and we have found a paid job they want to pursue, then we place a job coach with them in role, supporting them until they can do the job on their own.

Trainees can come from all walks of life and many ages. Disabilities can include complex needs, milder to more severe learning disabilities, Autism, Asperger's, Downs Syndrome & chromosomal disorders, communication difficulties and physical disabilities. Many of our trainees have been socially isolated, been targets of discrimination and abuse & are affected by the problems associated with poverty such as unemployment, poor housing, a culture of worklessness & simply a lack of money for basic items. In addition, many trainees also have mental health issues, including depression and anxiety, which again has led to more isolation and difficulty in engaging and thriving in life. We as an organisation, aim to help support our trainees in a safe and a secure environment, helping them to have less reliance on benefits,

improve their physical and mental health, help increase their social connections/friendship and find a sense of purpose.

While working with our trainees it is essential that we remain vigilant to signs of abuse. Even as adults, the trainees have different needs and vulnerability, meaning that there is an increased risk of abuse. Therefore, effective safeguarding is essential to ensure that our trainees are protected and are working and living in a safe environment.

Safeguarding is the action that is taken to promote the welfare of our vulnerable adults and protect them from harm.

**What Safeguarding means:**

- protecting vulnerable adults
- preventing neglect and harm to vulnerable adults health
- ensuring that the care provision of vulnerable adults is safe and effective
- taking action to enable all vulnerable adults to have the best lives and outcomes.

Effective adult safeguarding is part of the safeguarding process. It focuses on protecting vulnerable individuals from suffering or likely to suffer significant harm. This includes adult safeguarding procedures which detail how to respond to concerns of abuse.

**Definition of an Adult at Risk**

**An Adult at Risk is a person aged 18 years or over: "Who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation" (Who Decides - The Lord Chancellors Department 1997)**

**Legislation**

The Care Act 2014 is a major step forward in safeguarding adults who are experiencing or are at risk of abuse or neglect, and are unable to protect themselves.

- Learning disabled adults can be abused in families, institutional settings or, more rarely, by trainees.
- Abuse is caused by someone inflicting harm or knowingly not preventing harm
- There is an increased vulnerability to learning disabled adults, because they are more dependent and have less control over their lives and are often cared for by others

Little Gate Farm follows the guidelines, laid down within the Care Act 2014 These include:

- Taking action to identify and prevent abuse from happening
- Responding appropriately when abuse has or is suspected
- Ensuring that the agreed safeguarding procedures are followed at all times
- Providing support, advice and resources to staff in responding to adult safeguarding issues.

- Ensuring staff are aware of their responsibilities and attend regular training

This policy has regard to KCSIE updated in September 2025, and should be read alongside Part 1 and Annex A and B of that document, and the following statutory regulations:

- The Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012
- Criminal Exploitation of children and vulnerable adults: County Lines Guidance - DfE 2017
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Serious violence duty: statutory guidance, Home Office 2022
- Domestic Abuse, Home Office 2022
- Prevent duty guidance for Further Education Institutions England and Wales 2023

- The Education Act 2002
- The Sexual Offences Act 2003
- The Equality Act 2015
- The Mental Capacity Act 2005
- Special Education Needs and Disability Code of Practice 2015
- Female Genital Mutilation Act
- No Secrets

## **Prevent**

Little Gate has a Prevent Policy in place to ensure that people who use our services are safe. If any member of staff or volunteer is concerned that a child, young person or vulnerable adult is at risk of being radicalised they should report it to their Designated Safeguarding Lead immediately following the procedures set in the Safeguarding Procedures.

## **Allegations Against Staff**

If you have concerns about a member of staff, or an allegation is made about a member of staff posing a risk of harm to students, speak to the CEO or if they are unavailable speak to the Designated Safeguarding Lead (DSL) for that area. If the concerns/allegations are about a DSL, speak to the CEO and if the CEO is unavailable speak to the Named Trustee (Maxine Leigh) with overall responsibility for Safeguarding. If the concerns/allegations are about the CEO speak to the Named Trustee (Maxine Leigh) with overall responsibility for safeguarding. In these latter cases (allegation about a DSL or the CEO) the CEO or Named Trustee will carry out the actions in the place of the Designated Safeguarding Lead

We may consult with the Local Authority Designated Officer regarding allegations against team members. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services.

Relevant support will be provided for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. The DSL will inform the parents or carers of the client, where appropriate, involved about the allegation if consent has been gained from the client. If consent is not given the DSL will need to consider what is in the best interests of the client and liaise with social care services and/or the police if applicable.

Little Gate will refer to the DBS, anyone who has harmed a child or adult or poses a risk of harm to a child or adult, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended. Guidance on how to notify DBS via an online form can be found by the below link <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#online-referral-form-andregistering-for-a-digital-account>

## **Duty to Safeguard Adults**

Everyone has the right to live their lives free from violence and abuse. This right is underpinned by the Human Rights Act (1998)

These rights include:

- the Right to life
- the Right to Freedom from torture (including humiliating and degrading treatment)
- the Right to family life' (one that sustains the individual)

## **Mental Capacity**

The assumption is that adults have the mental capacity to make informed choices about their own safety and how they lead their lives, however, issues of mental capacity and the ability to give informed consent are central to decisions and actions in Safeguarding Adults. Interventions need to take into account the mental capacity of an individual to make informed choices about the way they want to live and the risks they want to take. Mental capacity is time and decision specific, meaning a person may be able to make some decisions but not others at a particular time.

## **Confidentiality**

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the client is the overriding concern. The degree of confidentiality will be governed by the need to protect the client. The client must be informed at the earliest possible stage of the disclosure that the information will be passed on. Discussions of the case must only be with the appropriate member of staff and any discussion must be private and shared on a need-to-know basis. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of clients. Little Gate is committed to protecting the rights and privacy of individuals, including clients, the team and others, in accordance with the General Data Protection Regulations (GDPR) set out in the Data Protection Act 2018 that allows for disclosure of personal data where this is necessary to protect the vital interests of clients. Please refer to Little Gate GDPR Policy

## **Low Level Concerns**

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the organisation to refer to the local authority.

Examples of such behaviour could include:

- being over friendly with children/adults
- having favourites

- adults taking photographs of children/adults on their mobile phone
- engaging with a child/adult on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language.

Little Gate has a Low-Level Concerns Procedure which is managed by the DSL (Charity Oversight & Child Protection).

## **Recognising abuse and procedures**

### The main types of abuse

1. Physical abuse
2. Domestic violence or abuse
3. Sexual abuse
4. Psychological or emotional abuse
5. Financial or material abuse
6. Modern slavery
7. Discriminatory abuse
8. Organisational or institutional abuse
9. Neglect or acts of omission
10. Self-neglect

### **Physical abuse**

#### Types of physical abuse

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g. opening a window and removing blankets) Involuntary isolation or confinement
- Misuse of medication (e.g. over-sedation) Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g. tying someone to a chair) Possible indicators of physical abuse
- No explanation for injuries or inconsistency with the account of what happened Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

### **Domestic violence or abuse**

#### Types of domestic violence or abuse

- psychological
- physical
- sexual
- financial
- emotional.

Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage.



- Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:
- acts of assault, threats, humiliation and intimidation harming, punishing, or frightening the person isolating the person from sources of support exploitation of resources or money
- preventing the person from escaping abuse regulating everyday behaviour.

## Possible indicators of domestic violence or abuse

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones Verbal abuse and humiliation in front of others
- Fear of outside intervention Damage to home or property
- Isolation - not seeing friends and family Limited access to money

## Sexual abuse

### Types of sexual abuse

- Rape, attempted rape or sexual assault Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment Sexual photography or forced use of pornography or witnessing of sexual acts Indecent exposure

### Possible indicators of sexual abuse

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases Pregnancy in a woman who is unable to consent to sexual intercourse
  - The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
  - Incontinence not related to any medical diagnosis
  - Self-harming
  - Poor concentration, withdrawal, sleep disturbance
  - Excessive fear/apprehension of, or withdrawal from, relationship
  - Fear of receiving help with personal care
  - Reluctance to be alone with a particular person

**In addition, it would be a clear breach of trust for any member of staff to have a sexual relationship with a client over the age of 18.**

## Psychological or emotional abuse

### Types of psychological or emotional abuse

- Enforced social isolation - preventing someone accessing services, educational and social opportunities and seeing friends

- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

#### Possible indicators of psychological or emotional abuse

- An air of silence when a particular person is present Withdrawal or change in the psychological state of the person Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

#### **Financial or material abuse**

##### Types of financial or material abuse

- Theft of money or possessions Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading- eg. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

#### Possible indicators of financial or material abuse

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- The person allocated to manage financial affairs is evasive or uncooperative The family or others show unusual interest in the assets of the person Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person

- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

### **Modern slavery**

#### Types of modern slavery

- Human trafficking Forced labour Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography Forced to work to pay off debts that realistically they never will be able to

#### Possible indicators of modern slavery

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers Fear of law enforcers

Further Home Office information on identifying and reporting modern slavery

### **Discriminatory abuse**

#### Types of discriminatory abuse

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic Substandard service provision relating to a protected characteristics

#### Possible indicators of discriminatory abuse

- The person appears withdrawn and isolated Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

## **Organisational or institutional abuse**

### Types of organisational or institutional abuse

- Discouraging visits or the involvement of relatives or friends Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care Abusive and disrespectful attitudes towards people using the service Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids Not taking account of individuals' cultural, religious or ethnic needs Failure to respond to abuse appropriately
- Interference with personal correspondence or communication Failure to respond to complaints

### Possible indicators of organisational or institutional abuse

- Lack of flexibility and choice for people using the service Inadequate staffing levels
- People being hungry or dehydrated Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items Lack of adequate procedures
- Poor record-keeping and missing documents Absence of visitors
- Few social, recreational and educational activities Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet Absence of individual care plans
- Lack of management overview and support

## **Neglect and acts of omission**

### Types of neglect and acts of omission

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes Failure to administer medication as prescribed Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs Not taking account of educational, social and recreational needs Ignoring or isolating the person
- Preventing the person from making their own decisions Preventing access to glasses, hearing aids, dentures, etc. Failure to ensure privacy and dignity

## Possible indicators of neglect and acts of omission

- Poor environment - dirty or unhygienic
- Poor physical condition and/or personal hygiene Pressure sores or ulcers
- Malnutrition or unexplained weight loss Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication Uncharacteristic failure to engage in social interaction Inappropriate or inadequate clothing

## **Self-neglect**

### Types of self-neglect

- Lack of self-care to an extent that it threatens personal health and safety Neglecting to care for one's personal hygiene, health or surroundings Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs Inability or unwillingness to manage one's personal affairs

### Indicators of self-neglect

- Very poor personal hygiene Unkempt appearance
- Lack of essential food, clothing or shelter Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance Hoarding
- Collecting a large number of animals in inappropriate conditions Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury

## **Online Safety and Filtering/Monitoring**

Little Gate recognises that online safety risks apply equally to vulnerable adults. Adults with learning disabilities or autism may be particularly vulnerable to exploitation, radicalisation, scams, misinformation, disinformation, conspiracy theories, grooming and inappropriate contact online.

### To mitigate these risks:

- Staff will receive training on recognising online harms, including fraud, scams, misinformation/disinformation, radicalisation and sexual or financial exploitation.
- Little Gate will ensure appropriate filtering and monitoring systems are in place across IT and internet use, in line with statutory expectations.
- Trainees will be supported to develop their understanding of safe and appropriate online behaviour, including privacy, consent, and recognising risky situations.



## Recruitment, Selection, Induction and Training – Adults

### Safer Recruitment Training

Little Gate Farm follows the guidance set out in Keeping Children Safe in Education (KCSIE 2025) and applies the same safer recruitment principles to roles working with vulnerable adults. We are committed to ensuring that staff, volunteers, apprentices and contractors are safe, suitable, and competent to work in a safeguarding environment.

All staff will:

- Complete thorough safeguarding training, including understanding the indicators of abuse and neglect in adults.
- Agree and sign up to Little Gate's Adult Safeguarding and Protection Procedures.
- Complete safeguarding, Prevent, and equality and diversity training, including annual refresher training.
- Implement robust recruitment procedures and checks to ensure that reasonable steps are taken not to appoint a person who is unsuitable to work with adults, is disqualified, or who does not have the necessary skills and experience.
- Keep and maintain a Single Central Record (SCR) of recruitment and vetting checks.
- Ensure that the terms of any contract require individuals to follow all safeguarding procedures and promote the safeguarding culture of Little Gate Farm.
- Pre-employment Checks

The following checks will be undertaken before any appointment is confirmed:

- Completed application form.
- Full employment history, including explanation of any gaps.
- Face-to-face interview to assess suitability.
- At least two satisfactory references, one from the most recent employer.
- Verification of the candidate's identity.
- Online and social media searches of shortlisted candidates.
- Satisfactory enhanced DBS check (with Adults' Barred List where applicable).
- Proof of right to work in the UK.
- Verification of relevant qualifications (if required for the role).
- Successful completion of induction and probationary periods.

### Roles and Responsibilities

- The CEO and Designated Safeguarding Leads (DSLs) are responsible for ensuring effective policies and procedures are in place, applied consistently, and supported by regular training.
- Little Gate operates safe recruitment procedures and applies appropriate checks on all staff and volunteers who work with adults.
- All staff, volunteers and contractors are responsible for complying with safeguarding policies and promoting the welfare of adults at all times.
- Advertising and Applications
- Little Gate supports equal opportunity practice across all aspects of recruitment.
- Recruitment will be objective and based on skills, qualifications, motivations, abilities, attitude, and potential.
- Applications must be submitted on Little Gate's standard application form.
- Any gaps in employment history must be explained and will be explored at interview.
- Providing false information will result in the application being rejected or, if already appointed, dismissal.
- References



- References must be obtained before the candidate starts work.
- One reference must be from a current or most recent employer.
- References will be scrutinised for safeguarding concerns and followed up if unclear.
- Any past disciplinary or safeguarding allegations will be considered on a case-by-case basis, balancing risk and relevance to the role.
- Self-Declaration of Convictions
- All applicants (including volunteers) must declare all criminal convictions, spent, unspent or pending.
- Disclosures will not automatically prevent employment but will be considered alongside DBS results and relevance to the role.

## **Interview and Selection Process**

The selection process may include:

- Face-to-face interview.
- Practical workshop or observed activity with trainees (always supervised). Trainee feedback will be considered.
- Written activity.

## **Personal File Records and Single Central Record**

Little Gate Farm retains the following information for each staff member, in both their personal file and in the Single Central Record:

- Application form.
- Interview notes.
- Two references.
- Induction record.
- Proof of identity.
- Qualifications (if relevant).
- Right to work in the UK.
- Enhanced DBS certificate number and barred list check (where applicable).
- Evidence of agency/contractor checks where relevant.
- Record of safeguarding induction and confirmation staff have read Part 1 of KCSIE 2025 (and Annex B if applicable).
- Record of annual and bi-annual refresher training.
- The SCR is maintained and updated regularly and is available for inspection by regulators (e.g., Ofsted, CQC, Local Authority).

## **Training and Induction**

- All staff, volunteers, apprentices and contractors will undergo safeguarding induction and ongoing training. This will include:
  - Reading and understanding Part 1 and Annex A/B of KCSIE 2025.
  - Understanding Little Gate's values, aims, structure and services.
  - Recognising the signs and indicators of abuse in adults.
  - Knowing how to report safeguarding concerns and who to report to (including urgent and out-of-hours procedures).
  - Understanding staff responsibilities and professional boundaries.

- Understanding safe working practices, including social media, photography, storage and use of promotional materials.
- Embedding a culture of vigilance and responsibility for safeguarding.
- Frequency of Training:
- DSLs: external training with bi-annual refreshers.

All staff:

- E-learning in induction (Safeguarding Adults and Children, Prevent, Equality & Diversity).
- Internal training on policies, procedures and recognising abuse during induction.
- Sign to confirm they have read and understood KCSIE 2025 and subsequent updates.
- Annual online refresher training.
- Bi-annual in-person refresher training on Little Gate's safeguarding processes (with an online test for those unable to attend).

### **Ofsted Compliance**

Little Gate acknowledges the need to comply with the safeguarding and safer recruitment requirements of **Ofsted**, given the mixed age group of our services. This includes ensuring:

- Robust safer recruitment checks (as detailed in the Single Central Record).
- Evidence of safeguarding training for all staff and volunteers.
- Ongoing monitoring and quality assurance of safeguarding practice.

### **Single Central Record – Adults**

The Single Central Record (SCR) for adults will mirror the detail of the children's SCR to ensure consistency across the organisation. For each staff member, it will include:

- Application form and employment history.
- Two references (including most recent employer).
- Proof of identity.
- Right to work in the UK.
- Enhanced DBS certificate number and Adults' Barred List check (where applicable).
- Verification of qualifications (where required).
- Record of safeguarding induction and confirmation they have read Part 1 and Annex A/B of KCSIE 2025.
- Record of ongoing safeguarding training and dates of refreshers.
- Evidence of checks for agency/contractor staff.
- Section 128 check (for management roles, where relevant).

### ***Training and induction***

All staff, volunteers, apprentices will undergo effective safeguard training within their induction period. This will include reading and understanding Part 1 and Annex A and B of KCSIE 2025, ensure that all employees know the values of Little Gate, the purpose, services and structure. It will allow all staff to understand the process of reporting any safeguarding issues and who should be informed and to fully read and understand the safeguarding policy. How often will training occur:

- The designated lead safeguarding officer: External DSL training course, followed by bi-annual refresher, (external training course).

- All staff (including the safeguarding team)
  - ▶ Completion of e- learning in induction (Safeguarding children and vulnerable adults, through the East Sussex learning portal, or suitable alternative).
  - ▶ Internal processes and procedural training, including signs of abuse on induction
  - ▶ Sign to confirm they have read and understood KCSIE2025 and all updates to that guidance
  - ▶ All staff will repeat the online e -learning annually and all staff will attend internal procedures training (must be attended in person bi annually. An online process training with test will also be mandatory, for those who can't make live training).

Staff will learn the following:

- Little Gate values, aims, structure and services
- Signs of abuse and how to recognise the indicators
- The process to follow if abuse is suspected, reporting procedures
- Staff responsibilities
- Social media/ photos/ storage promotional footage and permission and photo misuse
- concepts of safeguarding and how they relate to your job
- Safe working practices by employees at Little Gate
- Safeguarding policies
- All staff should clearly understand the need to maintain appropriate professional boundaries in their dealings with vulnerable adults,
- An ongoing culture of vigilance should be maintained

### **Training – Additional Content**

In addition to the induction and refresher programme already outlined, training for all staff will also cover:

- How to take a disclosure safely (what to do / what not to do).
- Low-level concerns vs. harm threshold, and when to escalate.
- Accurate, concise record-keeping using CPOMS, with attention to chronology.
- Case studies relevant to adult safeguarding, including financial exploitation, coercive control, and online abuse.

### **Safeguarding Awareness for Trainees**

As part of our safeguarding approach, Little Gate will support trainees to understand safeguarding risks that may affect them. This will include awareness sessions and workshops on:

- Safe relationships and consent.
- Online safety and recognising exploitation.
- Financial safety and avoiding scams.
- How to report concerns and who to talk to if they feel unsafe.

This ensures that safeguarding is not only embedded in staff practice but also actively empowers trainees to protect themselves.

## ROLES AND RESPONSIBILITIES

### Board of Trustees

Trustee bodies are accountable for ensuring the organisation has effective policies and procedures in place in line with local and national guidance, and for monitoring compliance with them. Neither the Trustee Body nor individual trustees have a role in dealing with individual child or adult protection cases or the right to know the detail of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff or investigating a complaint brought to their attention).

The Board ensures:

- Little Gate meets the statutory responsibilities set out in Keeping Children Safe in Education (DFE 2023) and Working Together to Safeguard Children (DFE 2018).
- Safeguarding policies are reviewed at least annually by the full Board and available to third parties via the website.
- There are named Designated Safeguarding Leads. Trustees will ensure that these people have the appropriate status and authority within the organisation to carry out the duties of the post. They will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children. There are colleagues trained to provide cover for the role.
- The procedures are in keeping with the LSCP for dealing with any allegations made against any adult working within or on behalf of Little Gate.
- There is a nominated Trustee who is the case manager for managing any allegations against the Chief Executive Officer and Designated Safeguarding Leads.
- Little Gate follows safer recruitment procedures, including the statutory pre-employment checks on all staff working with vulnerable people.
- There is effective analysis of safeguarding data including bullying, attendance, behaviour logs, incidents of sexual violence or harassment, clients taken off roll, the views and progress and participation of vulnerable students.
- There are clear systems and processes in place to identify and respond to issues of sexual violence, sexual harassment or harmful sexualised behaviours between clients, including a curriculum designed to specifically address sexual harassment, online abuse, sexual violence and issues of consent in an appropriate way.

### CEO

The CEO will ensure:

- There is a listening culture within the organisation where both staff and clients are able to raise concerns about poor or unsafe practices.
- Referrals are made to the Disclosure and Barring Service and/or the Teaching

Regulation Agency as appropriate.

- They liaise with the Local Authority Designated Officer where an allegation is made against a member of staff.
- They liaise with the "case manager"- and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- Refer cases where a person is dismissed or left due to risk/harm to a child or adult at risk to the Disclosure and Barring Service as required; and
- They liaise with the DSL's in respect of any concerns raised about staff or volunteers which do not meet the harm threshold and are dealt with by means of the low level concerns policy or procedure.
- The DSL's have a job description in keeping with the requirements of Keeping Children Safe in Education (DFE 2023) and that sufficient time, training and support are allocated to this role, including the appointment of colleagues able to deputise for the DSL who have undertaken the same training.
- The curriculum provides opportunities to help clients stay safe including when online. Clients should be aware of the support available to them.
- The PSHE / safeguarding curriculum is appropriately sequenced to ensure clients are taught about key issues in a planned and age/stage appropriate way, building on previous knowledge as they move through their programmes.
- They quality assure the child and vulnerable adults protection practices including the auditing of safeguarding records and the supervision of the safeguarding team to ensure that actions and decisions are reviewed appropriately and that staffs emotional needs are met.
- The organisation meets its responsibilities under the Prevent Duty (see Prevent Policy) including ensuring there are reasonable checks made on visiting speakers and monitoring and filtering is in place across IT systems.

The Designated Safeguarding Professional lead:

The role of the Lead is to:

- Ensure staff working with vulnerable adults are recruited safely -enhanced DBS checks and references are in place
- Staff have training on adult safeguarding, as part of their induction and have regular training thereafter
- Ensure staff and volunteers have regular supervision
- Ensure Little Gate has robust record keeping and safe and secure storage of information
- Ensure Little Gate has policies and procedures for raising concerns about acts of wrong doing or malpractice in the workplace (whistleblowing)
- refer cases of suspected abuse to the local authority children's/adult's social care as required;
- support staff who make referrals to local authority children's/adult's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a crime may have been committed to the Police as required. The NPCC

document [When to call the Police: Guidance for colleges and colleges](#) can support with this.

We believe that safeguarding is the responsibility of all staff at Little Gate, both through the proactive measures outlined above and through sharing any concerns with the appropriate DSL:

Hannah Briars (DSL – Charity Oversight & Child Protection Lead)

Natasha Chissell (DSL – College)

Gemma Mogford (DDSL – College & Supported Apprenticeships)

Andrea Randall-Smith – (DDSL – CEO)

Niki Ashley (DDSL – Farm)

Sam Anderson (DDSL – Supported Employment)

Jo Rainsbury (DDSL – Young Rangers & Education)

### *Storage of material*

Little Gate must:

- know the reason why we are keeping records about children and/or adults (for example, because they relate to protection concerns)
- Assess how long we need to keep the records for
- Have a plan for how and when the records will be destroyed - retention period
- To keep personal information secure,
  - ▶ compile and label files carefully
  - ▶ keep files containing sensitive or confidential data secure and allow access on a 'need to know' basis

***If you are keeping records for protection reasons, you don't necessarily need to get consent from the adults concerned.***

- Keep an accurate record, using the standard Little Gate reporting forms that Little Gate use for both adult and child safeguarding concerns.
  - ▶ the date and time of the incident/disclosure
  - ▶ the date and time of the report
  - ▶ the name and role of the person to whom the concern was originally reported and their contact details
  - ▶ the name and role of the person making the report (if this is different to the above) and their contact details
  - ▶ the names of all parties who were involved in the incident, including any witnesses
  - ▶ the name, age and any other relevant information about the individual who is the subject of the concern (including information about their parents or carers and any siblings)
  - ▶ what was said or done and by whom
  - ▶ any action taken to look into the matter
  - ▶ any further action taken (such as a referral being made)
  - ▶ Make sure the report is factual. Any interpretation or inference drawn from

what was observed, said or alleged should be clearly recorded as such. The record should always be signed and dated by the person making the report.

### **Records retention and storage guidelines**

- ▶ Storage of adult protection records, whether your adult protection records are electronic or paper-based, they need to be kept confidential and stored securely.
- ▶ Electronic files should be password protected and stored on computers with protection against hackers and viruses.
- ▶ Information about child or adult protection concerns and referrals should be kept in a separate protection file for each trainee, rather than in one 'concern log'.
- ▶ The protection file should be started as soon as you become aware of any concerns.
- ▶ Safeguarding files will be stored away from their general files/application files
- ▶ If you need to share records (within your own organisation or externally), make sure they are kept confidential.
- ▶ If your staff and volunteers use their personal computers to make and store records, you need a clear agreement to ensure the records are stored securely. This will occur in safeguard training during staff inductions. If the person responsible for managing your child and adult protection records leaves your organisation, make sure you appoint somebody to take over their role and arrange a proper handover.
- ▶ Where clients leave the college (including for in year transfers) the College DSL will ensure their child/adult protection file is transferred to the new educational provider as soon as possible, and within 5 days for an in- year transfer or within the first 5 days of the start of a new term. The file will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained.
- ▶ In addition to the child/adult protection file, the DSL will also consider if it would be appropriate to share any information with the new educational provider in advance of a student leaving to help them put in place the right support to safeguard the child/vulnerable adult and help the student thrive in the new setting.

### ***Retention periods***

- All safeguarding records will be storage for 7 years after the individual has passed away, this is in line with the policies from Adult Social Care.
- If the Little Gate closes as an organisation, arrangements will be made to transfer these documents to the appropriate adult social care team.

We will not store copies of criminal records (DBS) check certificates unless there is a dispute about the results of the check.

### ***Destruction of safeguarding documentation***

When disposing of any safeguarding documentation, the information must be shredded. At the same time any electronic versions of the record must be purged.

If your organisation or part of an organisation is closed down, you must make arrangements for the

ongoing management of records. This includes the review, retention and disposal of records.

### **Reviewing your protection records retention and storage policy**

Little Gate will review our safeguarding policy, which includes, records retention and storage, annually, to make sure it is effective and continues to comply with current legislation and guidance. This will be carried out as part of a wider review of safeguarding policies and procedures.

Summary key points to consider:

Staff must consider the following questions when developing or reviewing protection records retention and storage elements of the safeguarding policy.

- Is our record-keeping in line with data protection principles?
- What records will we retain and for what purpose?
- How will the records be stored and who will have access to them?
- How long should we retain records for?
- Do we need to follow any statutory requirements about the retention of our records?
- What arrangements do we need to destroy them?
- Do our local safeguarding agencies provide guidance on record retention and destruction that we are expected to follow



## Reporting Procedures - adult

Abuse or safeguarding issue is discovered or suspected

- Conversation with the client
- Find out their desired outcomes.
- Do not promise that it will remain confidential between you and them. The trainee must understand that if you feel abuse is happening, then you will escalate it.

If staff are suspected or implicated in a safeguarding, then consult DSL and CEO immediately.

CEO -Andrea Randall- Smith 07902750542

DSL-01797 260580

Board of trustees – [mleightdc@gmail.com](mailto:mleightdc@gmail.com)

Where either one are implicated, contact the board of trustees immediately.

If you do not feel this is dealt with swiftly or properly, contact adult social care immediately.

Is the client in immediate danger?  
Has a crime been committed?

Yes

Tell your Designated safeguarding lead (DSL) or Deputy DSL **immediately**.

If they are not present inform your manager, who will act immediately. If none are present, then **you** must act **immediately. This may include 111 or 999.**

No

Tell your Designated safeguarding lead (DSL) or Deputy DSL **immediately**. This can be via call or in person. If emailing, you must ensure they have received it- see contacts page 16

**Safeguarding team 01797 260580** - Hannah Briars (DSL – charity and farm) Natasha Chissell (DSL – College), Gemma Mogford (DDSL – college, work and thrive, apprenticeships)

Andrea Randall-Smith (DDSL and staff accusations), Nik i Ashley (DDSL - farm) Sam Anderson (DDSL – supported employment)

Abuse is suspected

Inform the social worker if known:

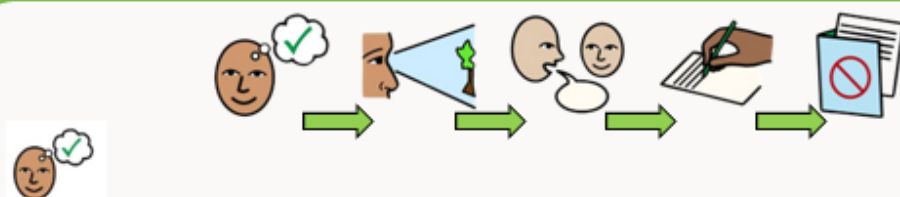
Learning disability team - 01424 724900  
Neighbourhood support team - 01424 724444  
Transitions- 01323 466166

If no social worker, or if adult social care are closed,

In some cases where the safeguarding is a minor concern, where the adult has the mental capacity and the adult is not at risk, then a decision may be made to log the incident and record a chronological order of events. Over time, this may get to a point where it needs to be escalated to adult social care and/or the social worker made aware.

Small concerns may include minor neglect such as not brushing teeth, coming in dirty clothes to the farm, not washing hair regularly, that may not be a safeguarding in themselves, but could build up a larger picture over time, which may then be reported as a safeguarding

# Safeguarding steps



## Be aware of the signs of abuse

Make sure that you are familiar with the signs of abuse; an overview of these signs is included on Little Gate's [Adult Safeguarding Policy](#) and [Safeguarding Children and Young People Policy](#)



## Look out for worrying signs

| Signs                                          | Example                                                         |
|------------------------------------------------|-----------------------------------------------------------------|
| You see something                              | A bruise                                                        |
| The person says something that gives you pause | "I didn't sleep well because we don't have a mattress any more" |
| The person discloses something                 | "Can I talk to you in private please?"                          |



## Tell your designated safeguarding lead

This can be in person or on the phone. You can give the details in writing, via CPOMS, but you must speak to someone directly.

If you are not able to make contact with a safeguarding lead, inform your manager, who will act immediately. If no manager is available you must act immediately.

- **For adults** - Adult social care: 0345 60 80 191
- **For children** - where appropriate, call parents/carers first
- **For children** - Single point of advice team: 01323 464222
- **Where there is immediate risk** - **call 999**

If it is a small concern that is not a safeguarding in itself but may build up to form a bigger picture, this information can be recorded and shared with a designated safeguarding lead when they become available.



## Record your observations

All concerns should be recorded on CPOMS: [littlegate.cpoms.net](http://littlegate.cpoms.net)

As stated above, you must speak to someone verbally in addition - do not just rely on CPOMS



## Keep it confidential

Safeguarding concerns must only be discussed with safeguarding leads.

# Safeguarding

is everyone's responsibility

## Safeguarding Team

### Charity oversight

Hannah Briars is Little Gate's main Designated Safeguarding Lead and the charity's Child Protection Lead.



**Hannah Briars**

07498 585488

01797 260580 (ext. 1)

### College - Aspire, Futures ready and supported apprentices

Call 01797 260 580 (ext. 3) or their work mobiles



**Natasha Chissell - DSL**

07498 585937



**Gemma Mogford -  
DDSL**

07498 583299

### CEO, Deputy Designated safeguard lead (DDSL), & staff accusations



For accusations against members of staff, please call

**Andrea Randall-Smith** - 07902 750542

### Farm, work and thrive and Supported Employment

Call 01797 260 580 (ext. 1 or 2) or their work mobiles



**Niki Ashley DDSL**

07494 731607



**Sam Anderson DDSL**

07894 963100

### Accusations against staff

For accusations against Andrea, or whistleblowing

**Maxine Leigh** - Trustee  
07899 652318 [mleightdc@gmail.com](mailto:mleightdc@gmail.com)

- If a staff member has concerns relating to a vulnerable adult, they should

immediately discuss it with the DSL, or if they are not available a senior member of staff.

- Concerns must always be given the highest priority.
- It is the responsibility of the DSL and team to decide upon an appropriate action and they will inform members of staff of the outcome.
- The staff member who has raised the concern must complete a report of the conversation or concerns held, care should be taken to write facts as accurately as possible and give as much information as possible.
- Internal records of concern will be kept in an individual client's protection file, made for that individual, and consulted if further concerns are raised.
- Matters relating to safeguarding will be treated with confidentiality and shared on a need to know basis only.

#### Helpful ideas:

- Remain calm
- Reassure if distressed
- Let them know you will help
- Listen carefully if any information is given
- Take what is said seriously
- What to avoid:
- Doing nothing
- Mischief
- Delaying help
- Don't take sole responsibility, consult someone else, in particular the designated safeguarding lead.
- Don't show distaste or shock
- Don't speculate about what may have happened
- Don't make negative comments
- Don't make promises you can't keep
- Don't express disbelief
- Don't ask leading questions e.g. did your                      do that?
- Don't tell the pupil off e.g. Why didn't you tell me before?
- Don't agree to keeping information secret

If any conflict between the needs of the vulnerable adults, and those of the carers arise, the needs of the vulnerable adult, must be put first. However, it is crucial to try to maintain our relationships with parents/carers during any Safeguarding process, although clearly this has sensitivities and potential demands. Prioritising the vulnerable adult, does not prevent us from giving support to parents and showing them compassion.

#### Low-Level Concerns

Little Gate operates a **Low-Level Concerns Policy**, which applies to all staff and volunteers. This includes any behaviour towards **children or vulnerable adults** that:

- Is inconsistent with the Staff Code of Conduct.
- Creates discomfort or undermines trust, even if not causing actual harm.
- May indicate poor boundaries or misuse of a position of trust.

Examples include overfamiliarity, having “favourites,” secretive behaviour, using personal devices to take photos of trainees, or inappropriate comments.

All staff must report low-level concerns to Andrea Randall Smith. These will be recorded, reviewed, and monitored to ensure patterns of behaviour are identified and addressed.

- Due to the close professional relationship with vulnerable adults, staff are also vulnerable to allegations. These accusations may be false, malicious or misplaced. They may also be true. On the extremely rare likelihood that this happens all concerns should be taken directly to the CEO. If the allegations are against the CEO, Lead Trustee for Safeguarding will be contacted.

#### **Allegations Against Staff – Adults**

- Where an allegation or safeguarding concern relates to **a child**, the Local Authority Designated Officer (LADO) will be contacted.  
Where an allegation or safeguarding concern relates to **a vulnerable adult**, the Designated Safeguarding Lead will refer the matter to **Adult Social Care** and, where necessary, the police.
- In all cases, if a staff member is removed or resigns due to safeguarding concerns, a referral will be made to the **Disclosure and Barring Service (DBS)** in line with legal duties.

become necessary. The DSL should be informed, as soon as possible, following the need for another member of staff to make a referral.

### **Decision Not to Report**

There may be an occasion whereby a Safeguarding concern is not reported immediately. In these instances, the Manager dealing will liaise with the DSL or in their absence the CEO/Trustee with Safeguarding responsibility and disclose full facts regarding the matter. An internal safeguarding log will be kept detailing the decisions and plan which needs to include reviews of decisions made.

### ***Useful contacts***

Contact Adult social care on 0345 60 80 191, without delay.

- Learning disability team -01424 724900
- Neighbourhood support team - 01424 724444
- Transitions -01323 466166

### ***Safeguarding Team at Little Gate***

| Safeguarding role                                                                                                       | Name                 | Contact                                                 |
|-------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------|
| Designated Safeguarding Lead – Charity Oversight & Child Protection Lead                                                | Hannah Briars        | 01797 260580 – Option 1<br>Work mob: 07498585488        |
| Designated Safeguarding Lead – College                                                                                  | Natasha Chissell     | 01797 260580 – Option 3<br><br>Work Mobile: 07498585937 |
| Deputy Designated Safeguarding Lead – Supported Employment                                                              | Sam Anderson         | 01797 260580 - Option 2<br>Work Mobile:07894963100      |
| Deputy Designated Safeguarding Lead - Farm                                                                              | Niki Ashley          | 01797 260580 – Option 1<br>Work Mobile :07494731607     |
| Deputy Designated Safeguarding lead<br>College, work and thrive and supported apprenticeships (adults and young people) | Gemma Mogford        | 01797 260580 – Option 3<br>Work Mobile: 07498583299     |
| Accusations against staff<br><br>Deputy Designated Safeguarding Lead - CEO                                              | Andrea Randall-Smith | 01797 260580<br>Work Mobile: 07902750542                |

In an emergency call 999

If no social worker, or if Adult Social Care are closed, call the emergency line on: 0345 6080191

#### Other contacts

- Adult Social Care, 87-89 London Rd, St Leonards of Sea, East Sussex, TN37 6DH 01424 724444

- Community Learning disability Team, 4<sup>th</sup> Floor, Cavendish House, Breeds Place, Hastings, TN34 3AA 01424 724900; Minicom: 01323 466630 Fax: 01323 466567 Text: 07797 878111 Email: [socialcaredirect@eastsussex.gov.uk](mailto:socialcaredirect@eastsussex.gov.uk)

|                   |                                                                                   |                      |         |
|-------------------|-----------------------------------------------------------------------------------|----------------------|---------|
| Signed by trustee |  | MAXINE LEIGH         | 29/1/24 |
| Signed by CEO     |  | ANDREA RANDALL-SMITH | 29.1.24 |

| Reviewed by | Date | Changes made | Next review date |
|-------------|------|--------------|------------------|
|             |      |              |                  |
|             |      |              |                  |
|             |      |              |                  |
|             |      |              |                  |
|             |      |              |                  |



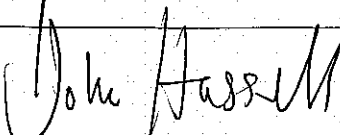




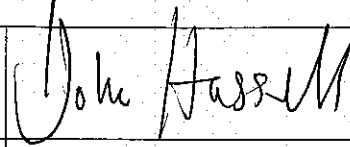






|                   |                                                                                     |                      |               |
|-------------------|-------------------------------------------------------------------------------------|----------------------|---------------|
| Signed by trustee |  | JOHN HASSELL         | On to 28.4.25 |
| Signed by CEO     |  | ANDREW RANDALL-SMITH | 28.4.25       |

| Reviewed by     | Date    | Changes made      | Next review date |
|-----------------|---------|-------------------|------------------|
| A Randall-Smith | 16.9.25 | KCSIE 2025 update | April 2026       |
|                 |         |                   |                  |
|                 |         |                   |                  |
|                 |         |                   |                  |
|                 |         |                   |                  |

|                   |                                                                                     |                      |                 |
|-------------------|-------------------------------------------------------------------------------------|----------------------|-----------------|
| Signed by trustee |  | JOHN HASSELL         | Date<br>28.4.25 |
| Signed by CEO     |  | ANDREW RANDALL-SMITH | 28.4.25         |

| Reviewed by     | Date    | Changes made      | Next review date |
|-----------------|---------|-------------------|------------------|
| A Randall-Smith | 16.9.25 | KCSIE 2025 update | April 2026       |
|                 |         |                   |                  |
|                 |         |                   |                  |
|                 |         |                   |                  |
|                 |         |                   |                  |