

# WYE DEAN WELLBEING CIC

## Safeguarding Policy and Procedures

Version 4 | 2026

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*A not-for-profit Community Interest Company*  
Company Registration No. 13270562

### Revision Record

Version	Description	Date
1	Initial Policy	2023
2	Updated — DBS and communication sections	2024
3	Third draft — interim review	December 2025
4	Full revision — Care Act 2014, adult safeguarding principles, PIPOT, referral criteria, mandatory training	2026

Signed: Michael Swambo      Director, Wye Dean Wellbeing CIC

## 1. Purpose and Principles

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Wye Dean Wellbeing CIC is committed to ensuring that all adults (18+) involved in our projects, events, and participation activities feel safe and secure at all times. This policy sets out our approach to safeguarding adults and children, the responsibilities of those working on behalf of the organisation, and the procedures to follow when concerns arise.

The Directors of Wye Dean Wellbeing hold overall responsibility for safeguarding and for promoting the welfare of children and adults at risk. If any person involved in Wye Dean Wellbeing activities becomes concerned about the welfare of an adult at risk, they must take appropriate action in line with the procedures outlined in this policy.

### We acknowledge that:

- The welfare of adults at risk is paramount in all the work we do and in all decisions we take.
- All adults, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, have an equal right to protection from all forms of harm or abuse.
- Some adults may be more vulnerable due to previous experiences, levels of dependency, communication needs, or additional support needs.
- Working in partnership with carers, families, and other agencies is essential in promoting welfare and safeguarding.
- Adults at risk have the right to make their own decisions wherever possible, and our approach is guided by the principles of the Mental Capacity Act 2005 alongside the Care Act 2014.

## 2. Legal Framework

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This policy is informed by and compliant with the following legislation, statutory guidance, and recognised best practice frameworks.

### Care Act 2014

The Care Act 2014 is the principal legislation governing adult safeguarding in England. It places a statutory duty on local authorities to:

- Make enquiries, or cause others to do so, where they reasonably suspect that an adult with care and support needs is experiencing, or at risk of, abuse or neglect (Section 42).
- Establish a Safeguarding Adults Board (SAB) to coordinate local safeguarding arrangements.
- Conduct Safeguarding Adults Reviews (SARs) where an adult with care and support needs dies or suffers serious harm as a result of abuse or neglect.

Under the Care Act 2014, an adult safeguarding duty is triggered where an adult: (1) has needs for care and support; (2) is experiencing, or is at risk of, abuse or neglect; and (3) as a result of those care and support needs is unable to protect themselves from the risk of, or the experience of, abuse or neglect.

## Supporting Legislation and Guidance

- Mental Capacity Act 2005 — including the Deprivation of Liberty Safeguards (DoLS) and Liberty Protection Safeguards (LPS).
- Human Rights Act 1998 — upholding the right to life (Article 2) and protection from inhuman or degrading treatment (Article 3).
- Equality Act 2010 — ensuring no adult is discriminated against in the provision of safeguarding support.
- Data Protection Act 2018 / UK GDPR — governing the processing of personal data in safeguarding contexts.
- Children Act 1989 and 2004 — underpinning child safeguarding duties.
- Working Together to Safeguard Children (2023) — statutory guidance on multi-agency child safeguarding.
- Care and Support Statutory Guidance (2014, updated 2023).
- Gloucestershire Safeguarding Adults Board (GSAB) and Gloucestershire Safeguarding Children Partnership (GSCP) procedures.

### 3. Six Principles of Adult Safeguarding

The Care Act 2014 and the accompanying statutory guidance set out six key principles that underpin all adult safeguarding work. Wye Dean Wellbeing CIC is committed to embedding these principles across all its safeguarding practice.

Principle	How We Apply It
<b>Empowerment</b>	People are supported and encouraged to make their own decisions and give informed consent. We support individuals to understand the choices available to them and their right to refuse intervention.
<b>Prevention</b>	It is better to take action before harm occurs. We work to raise awareness of safeguarding risks, promote safe environments, and address concerns early before they escalate.
<b>Proportionality</b>	The least intrusive response appropriate to the risk presented. Any actions or interventions taken are proportionate to the level of risk and the wishes of the adult concerned.
<b>Protection</b>	Support and representation for those in greatest need. Adults at risk are provided with appropriate protection and advocacy, particularly where they may be unable to protect themselves.
<b>Partnership</b>	Local solutions through services working with communities. We work collaboratively with statutory agencies, partner organisations, and communities to safeguard adults effectively.
<b>Accountability</b>	Accountability and transparency in delivering safeguarding. We maintain clear lines of responsibility, record decisions, and are transparent in how we carry out our safeguarding duties.

#### Making Safeguarding Personal (MSP)

Wye Dean Wellbeing is committed to the Making Safeguarding Personal approach — ensuring that safeguarding is person-led and outcome-focused. We engage individuals in conversation about how best to support them, focusing on the outcomes they want whilst ensuring their safety and wellbeing. An adult's wishes are central to any safeguarding response.

## 4. Types of Abuse and Neglect

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Under the Care Act 2014, ten categories of abuse are recognised in relation to adults. All persons working on behalf of Wye Dean Wellbeing should be able to identify indicators of the following:

- Physical abuse — including hitting, slapping, pushing, kicking, misuse of medication, and inappropriate restraint.
- Domestic violence — including psychological, physical, sexual, financial, and emotional abuse; and honour-based violence.
- Sexual abuse — including rape, indecent exposure, sexual harassment, and inappropriate photography.
- Psychological or emotional abuse — including threats of harm, humiliation, bullying, coercive control, and isolation.
- Financial or material abuse — including theft, fraud, exploitation, and misuse of property or benefits.
- Modern slavery — including trafficking, forced labour, and domestic servitude.
- Discriminatory abuse — including abuse based on race, gender, disability, sexual orientation, religion, or age.
- Organisational or institutional abuse — including neglect and poor practice in care or support settings.
- Neglect and acts of omission — including failure to provide access to appropriate health, care, or support.
- Self-neglect — including an adult's neglect of their own personal hygiene, health, or surroundings.

## 5. Criteria for an Adult Safeguarding Referral

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A safeguarding referral to the local authority must be made when all three of the following criteria under Section 42 of the Care Act 2014 are met:

**Section 42 Criteria — all three must apply:**

1. The person is aged 18 or over.
2. The person has needs for care and support (whether or not the local authority is currently meeting those needs).
3. The person is experiencing, or is at risk of, abuse or neglect AND as a result of their care and support needs is unable to protect themselves.

Where there is uncertainty, always seek advice from Gloucestershire Adult Social Care before deciding not to refer.

### Additional Triggers for Referral

A referral should also be made — regardless of whether all Section 42 criteria are strictly met — where:

- There is an immediate risk to life. In an emergency, always call 999 first.
- A crime may have been committed — contact the police (999 emergencies; 101 non-emergencies) as well as the local authority.

- There are concerns about the safety of other adults or children in the same situation.
- A person has capacity but requires information, advice, or support to keep themselves safe.

### Who Can Make a Referral?

Any member of staff, volunteer, Director, or member of the public can make a safeguarding referral. Within Wye Dean Wellbeing, concerns must be reported immediately to the Designated Safeguarding Lead (DSL) or a Director, who will contact the local authority. In their absence, any member of staff may make a direct referral without delay.

### How to Make a Referral

Gloucestershire Adult Social Care — Safeguarding Referral  
Telephone (Mon-Fri, 8am-6pm): 01452 426 868  
Out of Hours: 01452 614 194

Online referral form and further resources are linked in Section 12 of this policy.  
If the adult is in immediate danger, always call 999 first.

### Information to Include in a Referral

- Full name, date of birth, and address of the adult at risk.
- Nature of the concern — what has happened or is happening, when, and where.
- Whether the adult has given consent to the referral, or reasons why consent was not obtained.
- The adult's care and support needs and how these affect their ability to protect themselves.
- Details of the alleged abuser (if known), including name, address, and relationship to the adult.
- Whether other adults or children may be at risk.
- Any immediate safety actions already taken.
- Name and contact details of the person making the referral.

## 6. Commitment and Responsibilities

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Wye Dean Wellbeing CIC is committed to the following safeguarding responsibilities across all its activities:

- Protect adults at risk from harm and abuse.
- Provide a clear procedural guide for all those working on behalf of the organisation.
- Apply this policy to all Directors, paid staff, volunteers, and students. Failure to comply may result in disciplinary action or exclusion from the organisation.
- Ensure partner organisations providing coaching, mentoring, or related services have appropriate safeguarding policies and procedures in place before engaging their services.
- Require any adult with safeguarding concerns to act immediately in line with this policy.
- Ensure all adults with a regular role in activities hold a current Enhanced DBS check.
- Nominate a Designated Safeguarding Lead (DSL) and ensure they are clearly identified to participants.

- Protect all adults involved in Wye Dean Wellbeing activities from behaviour they find uncomfortable or inappropriate.
- Prohibit practitioners from meeting individually with an adult at risk outside of organised and properly risk-assessed activities.
- Ensure all physical contact is appropriate, necessary, and proportionate to the needs of the individual.
- Encourage all participants to raise concerns and be confident they will be listened to.
- Ensure full risk assessments are completed in line with the Health and Safety Policy and made available as required.
- Keep personal details of adults at risk secure, with access limited to nominated Directors and shared strictly on a need-to-know basis, in compliance with UK GDPR.

## 7. DBS and Requirements for Those Working with Vulnerable Adults

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Any adult working directly with vulnerable adults on behalf of Wye Dean Wellbeing must:

- Complete an Enhanced DBS check (with Barred List check where applicable) through the CIC before commencing activities.
- Maintain DBS status through the DBS Update Service, where applicable.
- Provide evidence of DBS clearance if obtained elsewhere, with online access granted for verification.
- Provide two referees to support their application.
- Declare any criminal convictions relating to the abuse of adults at risk (exempt from the Rehabilitation of Offenders Act 1974 where legally applicable).

Where volunteers are provided through a partner organisation, Wye Dean Wellbeing will require sight of the organisation's safeguarding policy and written confirmation of individual DBS clearance before that person begins working with adults at risk.

Individuals assisting on a one-off basis will not be required to meet all of the above requirements but must sign a Safeguarding Declaration and remain supervised at all times by an approved CIC representative.

## 8. Social Media and Communication

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- Practitioners and Directors must use organisational email and social media accounts only when communicating on behalf of Wye Dean Wellbeing.
- Images will not be shared on social media or other platforms without explicit written consent from the individual(s) featured (or from parents/carers where applicable).
- Some projects may use WhatsApp for organisational purposes only. These groups are restricted to staff and key volunteers and are used solely for sharing information and updates — not for casework or safeguarding communications.
- Safeguarding concerns must never be communicated via social media, WhatsApp, or personal channels. They must always be reported directly to the DSL or a Director.

## 9. Procedures for Suspected or Alleged Abuse

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If abuse is suspected or alleged within Wye Dean Wellbeing activities, the following procedures apply immediately.

### Allegations Made by an Adult at Risk

If an adult participant discloses abuse:

- Listen carefully and without judgement. Do not ask leading questions or press for detail beyond what is freely offered.
- Explain that the information may need to be shared with a responsible person to keep them safe.
- Report the concern immediately to the DSL or Director with safeguarding responsibility, who will assist in completing a disclosure record.
- Parents, guardians, or carers must be informed as soon as it is safe and appropriate to do so — unless doing so would put the individual at further risk.
- The individual accused of abuse will be asked to withdraw from all activities pending investigation.
- A referral will be made to Gloucestershire Adult Social Care in line with the criteria set out in Section 5.
- The accused individual will be kept informed of the process and timescales, unless doing so would compromise the investigation.

### Concerns About the Behaviour of an Adult

- Report the concern immediately to the DSL or Director responsible for safeguarding.
- Complete the disclosure form with appropriate support.
- The individual concerned may be asked to step away from activities while the matter is investigated.
- External advice will be sought from the local authority as appropriate.
- The matter will be resolved in line with both safeguarding and HR/disciplinary procedures.

## 10. Allegations Against Staff and Volunteers — Including PIPOT

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Wye Dean Wellbeing takes all allegations against members of staff, volunteers, Directors, or contractors with the utmost seriousness. This section applies where there is an allegation or concern that a person working on behalf of the organisation has:

- Behaved in a way that has harmed, or may have harmed, an adult at risk or a child.
- Possibly committed a criminal offence against, or related to, an adult at risk or a child.
- Behaved towards an adult at risk or a child in a way that indicates they may not be suitable to work with vulnerable people.

### Immediate Actions

- The matter must be reported immediately to the most senior Director available. If the allegation is against the DSL, it must be reported to the next most senior Director.
- The individual subject to the allegation will be informed as soon as possible, unless doing so would jeopardise any investigation or place anyone at further risk.

- The individual will be suspended from all activities on a precautionary basis, pending investigation. Suspension is not a disciplinary measure and does not imply guilt.
- A written record of the allegation and actions taken must be made immediately and stored securely.

### **Referral to the Local Authority — Person in a Position of Trust (PIPOT)**

Where a member of staff, volunteer, or Director is alleged to have abused, exploited, or neglected an adult at risk in the context of their role, this must be considered as a Person in a Position of Trust (PIPOT) concern and referred to the local authority.

**A Person in a Position of Trust (PIPOT) is someone who holds a position of power or authority over an adult at risk — including paid staff, volunteers, Directors, contractors, and students on placement — and who may have used that position to abuse, exploit, or neglect the adult.**

The local authority has a duty to consider whether a PIPOT referral is required as part of any Section 42 safeguarding enquiry, and may also make a referral to the Disclosure and Barring Service (DBS) or a relevant professional regulatory body.

Wye Dean Wellbeing will:

- Make a referral to Gloucestershire Adult Social Care — Adult Safeguarding Team immediately, and no later than the same working day on which the allegation is received.
- Co-operate fully with any Section 42 enquiry or police investigation.
- Not conduct an internal investigation in parallel that could prejudice any statutory enquiry.
- Consider making a referral to the DBS where a person is dismissed, or would have been dismissed, as a result of safeguarding concerns (this is a legal duty under the Safeguarding Vulnerable Groups Act 2006).
- Refer to any relevant professional regulatory body (e.g. Social Work England, NMC, HCPC) where the individual holds a professional registration.
- Maintain accurate records of all actions taken, decisions made, and their rationale.

### **HR and Disciplinary Process**

Any HR or disciplinary process will only commence once statutory enquiries are complete and the relevant authorities confirm it is appropriate to do so. The safeguarding process always takes precedence over internal disciplinary procedures.

### **Allegations Against the Designated Safeguarding Lead or a Director**

Where an allegation is made against the DSL, another Director will take the lead on safeguarding and will make the referral to the local authority directly. If all Directors are implicated or unavailable, the Gloucestershire Safeguarding Adults Board should be contacted directly for advice on independent oversight.

## 11. Training Requirements

Wye Dean Wellbeing CIC recognises that effective safeguarding requires all staff and volunteers to have appropriate knowledge and skills. Safeguarding training is a mandatory requirement for all those working on behalf of the organisation, reflecting both statutory expectations and recognised good practice.

### Mandatory Training — All Staff and Volunteers (minimum requirement):

Adult Safeguarding Awareness — Half day — On commencement and every 3 years  
 Child Safeguarding Awareness — Half day — On commencement and every 3 years

Both modules are mandatory as a condition of involvement with Wye Dean Wellbeing activities. This reflects good practice and the dual nature of our work with adults and young people. No member of staff or volunteer should undertake unsupervised work with people at risk before completing both modules.

The full training framework is set out in the table below:

Role	Training	Duration	Requirement	Responsible
All Staff & Volunteers	<b>Adult Safeguarding Awareness</b>	Half day	Mandatory — on commencement and every 3 years	DSL / Director
All Staff & Volunteers	<b>Child Safeguarding Awareness</b>	Half day	Mandatory — on commencement and every 3 years	DSL / Director
Designated Safeguarding Lead	<b>DSL Award / Refresher</b>	Full day	Every 2 years	External provider
Directors & Project Leads	<b>Safeguarding Levels 1 &amp; 2</b>	As required	Renewal every 3 years	External provider
Directors & Project Leads	<b>Emergency First Aid at Work</b>	Full day	Renewal every 3 years	External provider
All Staff & Volunteers	<b>Additional Awareness (autism, MCA etc.)</b>	As required	Ongoing CPD	DSL / Director

### Training Delivery and Recording

- The DSL is responsible for maintaining a training record for all staff and volunteers, including dates of completion and renewal due dates.
- Training certificates must be provided to the DSL and stored securely.
- The DSL will ensure training is booked in advance of expiry, with a minimum of three months' notice.
- Where a member of staff is unable to complete training within the required timeframe, they must be supervised by a trained colleague until the training is completed.

## 12. Council Policies, Referral Forms, and Key Resources

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Wye Dean Wellbeing CIC operates primarily within the Forest of Dean district, which falls under Gloucestershire County Council's statutory safeguarding responsibilities. Key contacts and links are provided below.

### Adult Safeguarding — Gloucestershire County Council

Gloucestershire Adult Social Care is the lead authority for adult safeguarding enquiries under Section 42 of the Care Act 2014.

- Telephone (Monday-Friday, 8am-6pm): 01452 426 868
- Out of Hours Emergency: 01452 614 194
- [Adult Safeguarding — Gloucestershire County Council](#)
- [Report a Safeguarding Concern Online \(Adults\)](#)

### Gloucestershire Safeguarding Adults Board (GSAB)

The GSAB coordinates multi-agency adult safeguarding arrangements across Gloucestershire, including policies, guidance, training, and Safeguarding Adults Reviews.

- [Gloucestershire Safeguarding Adults Board](#)
- [GSAB Policies and Procedures](#)
- [GSAB Training Resources](#)

### Child Safeguarding — Gloucestershire

- Children's Services Front Door: 01452 426 565
- Emergency Out of Hours: 01452 614 194
- [Gloucestershire Safeguarding Children Partnership \(GSCP\)](#)
- [Report a Concern About a Child — Gloucestershire](#)

### PIPOT and DBS Referrals

- Employers and organisations have a legal duty to refer to the DBS where a person is dismissed or removed from working with vulnerable groups due to safeguarding concerns.
- [Make a DBS Referral \(GOV.UK\)](#)

### National Safeguarding Resources

- [Care Act 2014 — Legislation.gov.uk](#)
- [Care and Support Statutory Guidance \(DHSC\)](#)
- [Disclosure and Barring Service \(DBS\)](#)
- [Making Safeguarding Personal — LGA](#)
- [Mental Capacity Act Code of Practice](#)

### 13. Recording and Information Sharing

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All safeguarding concerns, disclosures, referrals, and actions must be recorded in writing promptly and accurately. Records should be:

- Factual and objective — record what was said, seen, or done, not personal opinion or interpretation.
- Dated and signed by the person completing the record.
- Stored securely, with access limited to the DSL, Directors, and those with a strict need to know.
- Retained in accordance with Wye Dean Wellbeing's data retention policy and UK GDPR requirements.

Information may be shared without consent where there is a risk of serious harm, where a crime may be occurring, or where sharing is necessary to protect the adult or others. The principle of proportionality applies — share only what is necessary, with those who need to know, for the purpose of keeping people safe. Always seek advice from the DSL or Director before sharing information externally without consent.

### 14. Review and Approval

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This policy is reviewed annually, or sooner where there is a change in legislation, statutory guidance, or a significant safeguarding incident. The Directors of Wye Dean Wellbeing CIC are responsible for ensuring this policy remains current and is communicated to all staff and volunteers.

Next scheduled review: 2027

Signed:  Michael Swambo  Director, Wye Dean Wellbeing CIC	Date: 25/03/2026  Wye Dean Wellbeing CIC
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