



Safeguarding Adults Policy

Version: 2.0

Policy Owner: Andy Robinson, Director and Designated Safeguarding Lead

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1. Purpose

1.1 Statement of Commitment

Insight2Excellence Ltd is committed to creating coaching relationships that are safe, respectful, compassionate, inclusive and empowering.

Safeguarding is fundamental to good coaching. It is not simply about responding to abuse or neglect; it includes recognising when an adult may be at risk, promoting wellbeing, respecting people's rights and choices, and taking appropriate and proportionate action where there is a concern that someone may be experiencing or be at risk of harm.

Insight2Excellence works primarily with adults. Some clients may have circumstances that increase their vulnerability or may have care and support needs, including disability, learning difficulties, autism, mental-health difficulties, trauma, caring responsibilities or involvement with health or social-care services.

Having a disability, diagnosis or particular life circumstance does not, in itself, mean that a person is an adult at risk of abuse or neglect.

Every client has the right to be treated with dignity and respect, to have their voice heard, to make their own decisions wherever possible and to receive coaching in an environment that promotes safety and wellbeing.

Insight2Excellence is committed to responding to safeguarding concerns lawfully, proportionately, compassionately and without unnecessary intrusion.

2. Scope

This policy applies to:

- adults who access coaching through Insight2Excellence;
- prospective clients where safeguarding concerns arise during contact;
- relevant family members, carers or other people encountered during coaching;
- the Director of Insight2Excellence; and
- any future associate coaches, employees or representatives.

Insight2Excellence currently provides coaching primarily to adults.

If Insight2Excellence begins providing services directly to children or young people under 18, this policy will be reviewed before those services commence and appropriate child safeguarding arrangements will be established.

As Insight2Excellence currently operates as a sole-practitioner service, Andy Robinson is the Designated Safeguarding Lead (DSL).

Where a safeguarding matter is complex, uncertain or beyond the coach's competence, the DSL will seek advice from an appropriate safeguarding professional or statutory service.

3. Legal and Professional Framework

This policy is informed by relevant UK legislation, statutory guidance and professional standards, including:

- Care Act 2014;
- Care and Support Statutory Guidance;
- Mental Capacity Act 2005 and its associated principles and Code of Practice;
- Human Rights Act 1998;
- Equality Act 2010;
- Domestic Abuse Act 2021;
- Data Protection Act 2018;
- UK GDPR;
- Safeguarding Vulnerable Groups Act 2006, where applicable;
- Protection of Freedoms Act 2012, where applicable;
- relevant Disclosure and Barring Service requirements, where applicable;
- relevant local safeguarding arrangements;
- Association for Coaching Global Code of Ethics; and
- Universal Coaching Alliance Code of Professional Conduct and Ethics.

The Care Act's six safeguarding principles are used as a framework for adult safeguarding practice. These are:

1. Empowerment
2. Prevention
3. Proportionality
4. Protection
5. Partnership
6. Accountability

These principles support a person-centred approach in which the individual's wishes and desired outcomes are considered wherever possible.

4. Safeguarding Principles

Empowerment

People should be supported to make their own informed decisions wherever possible.

The coach will seek to understand:

- what the person wants to happen;
- what matters to them;
- what support they would like; and
- how they wish to be involved in decisions.

Prevention

Action should be taken to reduce the likelihood of abuse or neglect occurring or escalating.

Coaching may support confidence, self-awareness, self-advocacy and recognition of unhealthy or unsafe situations, but the coach will remain within the appropriate scope of coaching.

Proportionality

The least intrusive response appropriate to the level of risk should normally be used.

The existence of a safeguarding concern does not automatically mean that every available agency must be contacted.

Protection

Where an adult is experiencing or is at risk of abuse or neglect and requires protection, appropriate action will be taken.

Partnership

Safeguarding is strengthened when appropriate organisations and professionals work together.

Where necessary, the coach will seek advice from relevant safeguarding professionals or statutory services.

Accountability

Safeguarding decisions should be recorded, reasoned and capable of appropriate professional scrutiny.

5. The Role of the Coach

Insight2Excellence provides coaching.

Coaching is not:

- therapy;
- counselling;
- medical treatment;
- social work;
- advocacy;
- crisis intervention; or
- case management.

However, coaching conversations may take place during periods of significant change, stress or vulnerability, and clients may disclose information that raises safeguarding concerns.

The coach's responsibility is to:

- create a psychologically safe and respectful coaching relationship;
- remain professionally curious and attentive;
- recognise indicators that an adult may be experiencing or be at risk of harm;
- listen without judgement;
- respond appropriately to safeguarding concerns;
- seek advice when necessary;
- make referrals where required or appropriate;
- maintain accurate and proportionate records; and
- work within the limits of professional competence.

The coach is not responsible for conducting safeguarding investigations.

6. Recognising Safeguarding Concerns

Safeguarding concerns may arise through:

- direct disclosure;
- observation;
- changes in behaviour or presentation;

- information provided by another person;
- information received from another professional; or
- circumstances that reasonably cause concern about an adult's safety or wellbeing.

Concerns may relate to:

- physical abuse;
- emotional or psychological abuse;
- sexual abuse;
- financial or material abuse;
- neglect;
- self-neglect;
- domestic abuse;
- coercive or controlling behaviour;
- discriminatory abuse;
- organisational abuse;
- modern slavery;
- exploitation;
- online abuse;
- harassment or intimidation; or
- other circumstances in which an adult may be experiencing or be at risk of significant harm.

A client may also raise concerns about another adult who may be at risk.

The presence of a mental-health difficulty, disability, neurodivergence or other personal characteristic does not automatically constitute a safeguarding concern. The relevant circumstances and level of risk will be considered.

7. Responding to Safeguarding Concerns

Where a safeguarding concern arises, the coach will use the following approach.

Notice

Remain attentive to information, behaviour or circumstances that may indicate abuse, neglect, exploitation or significant risk.

Listen

Allow the person to speak without unnecessary interruption, judgement or disbelief.

The coach will:

- remain calm;
- take the disclosure seriously;
- avoid making promises that cannot be kept; and
- explain relevant limits to confidentiality where appropriate.

Clarify

The coach may ask open and non-leading questions where necessary to establish immediate safety or understand what action may be required.

The coach will not:

- conduct an investigation;
- interrogate the person;
- seek evidence unnecessarily;
- attempt to establish whether an allegation is true; or
- confront an alleged perpetrator where doing so could increase risk.

Consider Immediate Risk

The coach will consider whether:

- someone is in immediate danger;
- emergency assistance is required;
- urgent medical attention is required;
- the person can remain safely where they are; or
- another immediate protective action is necessary.

Record

Relevant factual information will be recorded as soon as reasonably practicable.

Consult

Where appropriate, the coach will seek advice from:

- Adult Social Care;
- the local safeguarding adults service;
- the police;
- relevant healthcare or safeguarding professionals;
- the coaching supervisor; or
- another appropriate professional or statutory service.

Refer

Where a safeguarding referral is required or appropriate, it will be made without unnecessary delay.

8. Immediate Danger and Emergency Situations

If the coach reasonably believes that someone is at immediate risk of serious harm, emergency assistance will be sought without unnecessary delay.

Depending on the circumstances, this may include contacting:

- Police;
- Ambulance Service;
- appropriate emergency healthcare services; or
- relevant local authority emergency safeguarding services.

Protection from immediate serious harm takes priority over maintaining ordinary confidentiality.

Where information must be shared without the person's consent, the coach will seek to ensure that the information shared is necessary, relevant and proportionate to the safeguarding or emergency purpose.

Where it is safe and appropriate to do so, the person will be informed about what information is being shared and why.

9. Confidentiality and Information Sharing

Confidentiality is fundamental to effective coaching but is not absolute.

Clients will be informed about the limits of confidentiality as part of establishing the coaching relationship.

Information may need to be shared without consent where, for example:

- there is a legal requirement or lawful authority to disclose it;
- there is an appropriate safeguarding basis for sharing information;
- there is a serious and imminent risk of harm;
- sharing is necessary to protect someone's vital interests; or
- disclosure is otherwise permitted by law.

The coach will consider the person's wishes and consent wherever possible.

However, consent will not always be required before safeguarding information can lawfully be shared. Data protection law does not prevent appropriate information sharing to safeguard people where a valid lawful basis exists.

Only information that is necessary and proportionate for the relevant purpose should normally be shared, and it should be shared securely with an appropriate recipient.

The decision to share or not share information should be recorded, including the rationale where appropriate.

Further detail is contained within the Confidentiality & Privacy Policy and Data Protection Policy.

10. Mental Capacity and Consent

Insight2Excellence respects an adult's autonomy and right to make their own decisions.

Where there is concern that an adult may have difficulty making a particular decision, the principles of the Mental Capacity Act 2005 will be considered where relevant.

The existence of a disability, diagnosis, mental-health difficulty or communication difference does not in itself mean that a person lacks capacity.

Where appropriate, the coach will:

- support the person to understand relevant information;
- allow appropriate time for decision-making;
- consider communication needs;
- avoid making assumptions about capacity; and
- seek appropriate professional advice where capacity is genuinely in question.

The coach is not responsible for undertaking formal capacity assessments unless appropriately qualified and specifically engaged to do so.

11. Domestic Abuse and Coercive Control

The coach recognises that safeguarding concerns may arise in situations involving:

- domestic abuse;
- coercive or controlling behaviour;
- stalking;
- financial control;
- isolation;
- threats;
- intimidation; or
- other forms of abuse within intimate or family relationships.

The coach will avoid actions that could inadvertently increase risk, particularly where another person may monitor the client's communications, finances, devices or movements.

Where appropriate, the coach will seek specialist safeguarding or domestic-abuse advice.

12. Online Coaching and Safeguarding

Safeguarding considerations apply equally to online and telephone coaching.

The coach will:

- use appropriate professional communication channels;
- maintain appropriate privacy and confidentiality;
- remain alert to signs of distress, coercion, intimidation or unsafe circumstances;
- consider whether the client appears able to speak privately;
- consider the client's location where this is reasonably necessary to respond to an emergency; and
- follow the same safeguarding principles as for face-to-face coaching.

Where an immediate safeguarding or emergency concern arises during an online session, the coach may need to contact an appropriate emergency or safeguarding service.

The coach will not assume that an online environment is safe simply because the client is physically elsewhere.

13. Safeguarding Concerns Involving the Coach

If a safeguarding concern or allegation relates to the coach, the matter will be treated seriously and managed independently wherever reasonably practicable.

The coach will:

- prioritise the safety and wellbeing of the person concerned;
- avoid investigating the allegation personally;
- seek appropriate external safeguarding advice;
- cooperate with any relevant statutory or professional investigation;
- consider whether coaching should be paused or transferred; and
- maintain appropriate confidentiality while recognising that information may need to be shared.

Where the concern relates to a future associate coach, employee or representative, appropriate action will be taken to protect clients while the matter is considered.

14. Safeguarding Concerns Involving Another Professional

Where a concern relates to another professional, organisation or person in a position of trust, the coach will consider whether the matter should be referred to an appropriate safeguarding, regulatory, professional or statutory body.

The coach will not attempt to resolve serious safeguarding allegations privately where doing so could place someone at further risk.

15. Recording Safeguarding Concerns

Safeguarding records will be:

- factual;
- timely;
- accurate;
- objective;
- proportionate;
- securely stored; and
- retained in accordance with applicable data protection and retention requirements.

Records should distinguish clearly between:

- what was directly observed;
- what the person said;
- what another person reported;
- professional observations; and
- professional judgements or decisions.

Where appropriate, records should include:

- date and time;
- location or communication method;
- who was present;
- what was disclosed or observed;
- relevant immediate-risk information;
- action taken;
- advice sought;
- information shared;
- with whom it was shared;
- the rationale for significant decisions; and

- any follow-up required.

Only information relevant and necessary to safeguarding will be recorded.

Safeguarding records will be handled in accordance with the Data Protection Policy and Confidentiality & Privacy Policy.

16. Information Sharing and Data Protection

Safeguarding information is particularly sensitive and will be handled with care.

The coach will:

- identify an appropriate lawful basis before sharing personal information where required;
- share only information that is necessary and proportionate;
- verify the identity and authority of the recipient where practicable;
- use secure communication methods;
- document significant information-sharing decisions; and
- comply with the Data Protection Policy.

The ICO confirms that information can be shared lawfully where there is a valid reason and that safeguarding situations can justify urgent information sharing. It also emphasises necessity, proportionality and secure transmission.

17. Professional Supervision and External Advice

Safeguarding decisions can be complex.

The coach will use professional supervision to:

- reflect on safeguarding practice;
- identify potential blind spots or assumptions;
- consider ethical dilemmas;
- review professional boundaries;
- support appropriate decision-making; and
- maintain professional competence.

Where a safeguarding concern requires specialist advice, supervision will not be treated as a substitute for contacting an appropriate safeguarding or statutory service.

Where there is uncertainty about whether a matter meets a safeguarding threshold, the coach will seek appropriate advice rather than simply taking no action.

18. Safeguarding Training and Professional Development

The coach will maintain appropriate safeguarding knowledge and competence for the services provided.

This includes:

- maintaining current awareness of safeguarding principles;
- undertaking appropriate safeguarding training;
- keeping informed about relevant local safeguarding arrangements;
- engaging in professional supervision;
- reflecting on safeguarding practice; and
- updating this policy when legislation, guidance or professional expectations change.

Training and professional development will be proportionate to the nature and scale of Insight2Excellence's services.

19. Safeguarding and Professional Boundaries

Professional boundaries are an important safeguarding measure.

The coach will maintain clear boundaries concerning:

- physical contact;
- communication;
- social media;
- personal disclosure;
- gifts;
- financial relationships;
- dual relationships;
- home visits;
- online communication; and
- contact outside coaching sessions.

Further requirements are set out in the Professional Boundaries Policy and Lone Working Policy.

20. Complaints and Safeguarding Concerns

A client may raise a concern or complaint about safeguarding practice.

Safeguarding concerns will not be dismissed simply because a client also wishes to make a complaint.

Where a complaint itself raises a potential safeguarding issue, safeguarding considerations will take priority over the ordinary complaints timetable where necessary to protect someone from harm.

The Complaints Procedure sets out the wider process for raising and responding to complaints.

No client will be disadvantaged or victimised for raising a genuine safeguarding concern.

21. Safeguarding and Ending Coaching

Coaching may need to be paused or ended where:

- safeguarding risks cannot be appropriately managed within coaching;
- the client's needs fall outside the safe scope of coaching;
- continuing would create unacceptable risk;
- professional boundaries cannot be maintained; or
- another form of support is more appropriate.

Where appropriate, the coach will discuss alternative support or referral.

Ending coaching does not remove any continuing safeguarding, confidentiality or information-management responsibilities.

22. Local Safeguarding Arrangements

Insight2Excellence will maintain awareness of the safeguarding arrangements relevant to the areas in which it operates.

For clients based in Somerset, relevant safeguarding information and referral arrangements are provided through Somerset's adult safeguarding services and the Somerset Safeguarding Adults Board.

Because contact details and referral arrangements can change, current local-authority information will be checked at the time a referral is required rather than relying solely on static contact details contained in this policy.

23. Professional and Legal Accountability

Insight2Excellence recognises that safeguarding is both an ethical and legal responsibility.

The coach will:

- act within professional competence;
- comply with relevant legislation;
- maintain appropriate professional insurance;
- cooperate appropriately with statutory safeguarding processes;

- maintain accurate records;
- respect confidentiality while recognising its limits;
- seek advice when necessary; and
- learn from safeguarding incidents and concerns.

This policy does not create statutory duties beyond those that apply to Insight2Excellence under the law. It sets out the professional safeguarding standards and procedures adopted by the organisation.

24. Review and Learning

This policy will be reviewed annually or sooner if:

- legislation changes;
- statutory safeguarding guidance changes;
- local safeguarding arrangements change;
- professional guidance changes;
- a safeguarding incident or concern identifies a need for improvement;
- supervision identifies a material learning point;
- Insight2Excellence expands its services; or
- children or young people become part of the service.

Following a significant safeguarding concern, consideration will be given to:

- what happened;
- whether the response was appropriate;
- what worked well;
- whether any harm occurred;
- whether further action is required;
- whether professional advice was sufficient;
- whether policies or procedures should change; and
- what learning should be incorporated into future practice.

Next scheduled review: September 2027.