

Title	Safeguarding Adults Policy and Procedures
Cross References	External: • Care Act 2014 • Care and Support Statutory Guidance (adult safeguarding) • Mental Capacity Act 2005 and Code of Practice • Human Rights Act 1998 • Data Protection Act 2018 and UK GDPR • Domestic Abuse Act 2021 • Modern Slavery Act 2015 • Equality Act 2010 Internal: • Child Protection and Safeguarding Policy • Online Safety Policy • Staff Code of Conduct • Safer Recruitment Policy • Managing Allegations Against Staff Policy • Data Protection and Privacy Policy • Whistleblowing Policy
Date	October 2026

1. Policy Statement

Apricot Online Ltd is committed to safeguarding adults from abuse, neglect and exploitation. This policy combines Apricot's former Safeguarding Adults Policy and Safeguarding Adults Procedures into one practical document so that staff can identify a concern, understand the principles that apply and follow the required response without moving between separate documents.

Apricot Online is an online alternative education provider. Adult safeguarding may arise in relation to learners aged 18 or over, parents/carers, staff or other adults encountered through remote provision. Concerns may become apparent through live lessons, telephone or email contact, changes in engagement, disclosures, written communication, background sounds or activity in the home, or information shared by a commissioner or another professional.

Apricot adopts a zero-tolerance approach to abuse and neglect and a person-centred approach to safeguarding. The adult's wishes, desired outcomes, rights, dignity and capacity will be considered alongside the need to protect them or others from harm.

2. Purpose and Scope

This policy applies to all staff, contractors and others working for or on behalf of Apricot Online. It explains the legal and practice framework, the forms of abuse and neglect staff may encounter, and the procedure to follow when an adult safeguarding concern arises.

For adult safeguarding in England, the principal framework is the Care Act 2014. Where an adult is located elsewhere in the UK, the DSL will identify and follow the relevant local statutory framework and safeguarding referral route.

3. Who is an Adult at Risk?

Under the Care Act 2014 safeguarding duties apply where an adult has needs for care and support (whether or not the local authority is meeting those needs), is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves from the abuse or neglect or the risk of it.

Not every adult who experiences harm will meet this statutory definition. Apricot will still respond appropriately to welfare, safety or criminal concerns and will seek advice where the threshold is unclear.

4. Principles of Adult Safeguarding

- Empowerment - support people to make their own decisions and give informed consent wherever possible.
- Prevention - act before harm occurs where possible.
- Proportionality - use the least intrusive response appropriate to the risk.
- Protection - provide support and representation for those in greatest need.
- Partnership - work with the adult, commissioners, local authorities, police and other relevant agencies.
- Accountability - ensure decisions, actions and responsibilities are clear and recorded.

5. Making Safeguarding Personal

Adult safeguarding should be person-led and outcome-focused. Staff should listen to what matters to the adult, support them to understand their choices and involve them in decisions wherever it is safe and lawful to do so. An adult's decision not to pursue a particular action should be respected where they have capacity, unless there is an overriding reason to act, for example risk to another person, a serious crime, coercion, public interest or a legal duty.

6. Mental Capacity and Consent

Apricot will presume that an adult has capacity unless there is reason to doubt it. Capacity is decision-specific and time-specific. Staff must not assume lack of capacity because of disability, diagnosis, age, communication style or because a person makes a decision others consider unwise.

Where capacity is in doubt, the DSL will seek appropriate professional advice. Decisions made on behalf of a person who lacks capacity must follow the Mental Capacity Act 2005, including best-interests and least-restrictive principles.

7. Types of Abuse and Neglect

- Physical abuse.
- Domestic abuse, including coercive or controlling behaviour.
- Sexual abuse and sexual exploitation.
- Psychological or emotional abuse.
- Financial or material abuse, including scams and online fraud.
- Modern slavery, trafficking and forced labour.
- Discriminatory abuse.
- Organisational abuse.
- Neglect and acts of omission.
- Self-neglect.

Abuse may be a single incident or repeated, deliberate or unintentional, and may occur in a person's home, care setting, community or online. It may be perpetrated by a family member, partner, friend, carer, professional, stranger or another person at risk.

8. Indicators in an Online Setting

- a disclosure of abuse, neglect, coercion, exploitation or fear;
- unexplained changes in attendance, engagement, communication or behaviour;
- another person controlling or monitoring the adult's communication;
- concerning background sounds, threats, arguments or evidence of distress during a live session;
- references to being denied food, medication, money, heating, care or access to services;
- unexplained financial pressure, scams or coercion to transfer money;
- sexual, threatening or exploitative online contact;
- significant deterioration in self-care or living conditions;
- repeated inability to speak privately or sudden disconnection when sensitive matters arise;
- any combination of smaller concerns which creates a wider safeguarding picture.

9. Roles and Responsibilities

9.1 All Staff

- Recognise that adult safeguarding is everyone's responsibility.
- Report concerns promptly to the DSL/DDSL.
- Listen without investigating or asking leading questions.
- Record facts, the adult's own words and relevant online context accurately.
- Respect confidentiality while understanding that safeguarding information may need to be shared.
- Call emergency services where there is immediate danger or urgent medical need.

9.2 Designated Safeguarding Lead

- Assess adult safeguarding concerns and immediate risk.
- Establish, where safe and appropriate, the adult's views, wishes and desired outcomes.
- Consider consent and mental capacity.
- Seek advice from the local authority safeguarding adults team/MASH, police or other agencies where required.
- Make referrals where the statutory threshold is met or where action is otherwise necessary to protect a person.
- Liaise with commissioners and other professionals on a need-to-know basis.
- Ensure decisions, rationale, referrals and outcomes are recorded securely.
- Coordinate internal action where a staff member or contractor may pose a risk.

10. Procedure: Responding to a Concern or Disclosure

1. Ensure immediate safety. If there is imminent danger, serious injury or urgent medical need, contact emergency services and alert the DSL immediately.
2. Listen calmly. Do not promise secrecy, investigate, confront the alleged person causing harm or ask leading questions.
3. Establish only the information necessary to understand the immediate concern. Where appropriate, ask the adult what they want to happen and whether they consent to information being shared.
4. Record the concern promptly using Apricot's safeguarding reporting arrangements. Include date, time, context, the adult's own words, observations and any relevant online information.
5. Report to the DSL/DDSL without delay. Serious concerns require immediate verbal contact as well as a written record.

6. The DSL will consider risk, the Care Act criteria, capacity, consent, risk to others, possible criminality and the need for statutory advice or referral.
7. The DSL will communicate next steps to relevant people on a need-to-know basis and maintain appropriate contact with the adult where safe.
8. Actions and outcomes will be reviewed until the concern is appropriately concluded or transferred to the relevant statutory agency.

11. When Information May Be Shared Without Consent

Where an adult has capacity, their consent should normally be sought before a safeguarding referral. Information may nevertheless need to be shared without consent where there is a legal requirement or overriding safeguarding reason, including serious risk to the adult or another person, risk to a child, suspected serious crime, coercion affecting free choice, risk posed by a person in a position of trust, or another substantial public-interest reason. The rationale must be recorded.

12. Police and Local Authority Referrals

The DSL will contact the police where a crime may require urgent police action or where immediate protection is needed. Adult safeguarding referrals should normally be made to the safeguarding adults team for the local authority area in which the adult lives. Apricot will use current local referral routes rather than relying on historic contact details within this policy.

If a child is also at risk, Apricot's Child Protection and Safeguarding Policy must be followed immediately in parallel.

13. Concerns About Staff, Contractors or People in Positions of Trust

Where the person alleged to have caused harm works for or on behalf of Apricot, the concern must be reported to senior leadership and managed under the appropriate disciplinary, contractual, allegations or low-level concerns process alongside any adult safeguarding referral. Internal action must not obstruct a police or local authority investigation.

14. Information Sharing and Record Keeping

Safeguarding records must be factual, timely, secure and separate from routine educational records where appropriate. Records should include the concern, adult's views, capacity/consent considerations, advice sought, decisions and rationale, referrals, communications, actions and outcomes. Information will be shared only where necessary and proportionate for safeguarding, legal or operational purposes.

15. Online Safety and Adult Safeguarding

Adult safeguarding concerns may arise through scams, online financial abuse, coercive control, stalking, harassment, sexual exploitation, impersonation, deepfakes or other technology-facilitated abuse. Staff must follow the Online Safety Policy and report any safeguarding dimension to the DSL.

16. Recruitment, Training and Professional Conduct

Apricot uses safer recruitment and appropriate vetting arrangements for relevant roles. Staff receive safeguarding information and training appropriate to their responsibilities and must follow the Staff Code of Conduct. Training will include the particular challenges of identifying harm where contact is remote and visual information may be limited.

17. Partnership Working

Apricot will work with commissioning organisations, local authorities, police, health services and other relevant agencies. A commissioner relationship does not prevent Apricot from making a direct referral where delay could place an adult or another person at risk.

18. Complaints, Whistleblowing and Escalation

Anyone who believes an adult safeguarding concern has not been handled appropriately should escalate it to senior leadership. Staff may use Apricot's Whistleblowing Policy where necessary. A complaint process must not delay safeguarding action.

19. Monitoring and Review

This policy and procedure will be reviewed at least annually and sooner where legislation, guidance, organisational arrangements or learning from a case requires change. Adult safeguarding concerns and themes may be reviewed by senior leadership to improve practice while maintaining appropriate confidentiality.

Appendix 1 - Staff Quick Guide

- Immediate danger? Call 999 and alert the DSL.
- Listen; do not investigate.
- Do not promise confidentiality.
- Record the adult's own words and relevant context.
- Ask what the adult wants to happen where safe and appropriate.
- Report promptly to the DSL/DDSL.
- Do not contact the alleged person causing harm yourself.
- If a child may also be at risk, follow child safeguarding procedures immediately.
- The DSL will decide on local authority/police referral and information sharing.
- Record decisions and outcomes.

Appendix 2 - Key Internal Contacts

Designated Safeguarding Lead: Jodie Phillips, Operations Director

Deputy Designated Safeguarding Lead: Amy Smith, Managing Director

External adult safeguarding contacts vary according to the adult's local authority area and will be checked at the time of referral.

Authorised by: Jodie Phillips, Operations Director

Date: October 2026

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