

ZEN COMBAT ACADEMY LTD

SAFEGUARDING ADULTS POLICY AND PROCEDURES

Adult safeguarding arrangements for all Zen Combat Academy Ltd activities

Organisation	Zen Combat Academy Ltd
Policy title	Safeguarding Adults Policy and Procedures
Version	1.0
Issue date	21 September 2026
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Jurisdiction	England
Policy basis	Care Act 2014; current Care and Support Statutory Guidance; Mental Capacity Act 2005; Equality Act 2010; Data Protection Act 2018 / UK GDPR; and Devon safeguarding arrangements

This is a Zen Combat Academy Ltd policy. It is based on legislation and Government guidance applicable in England and local safeguarding arrangements in Devon.

1. Commitment to safeguarding adults

Zen Combat Academy Ltd is committed to creating and maintaining a safe, respectful and inclusive environment for adults who train, compete, volunteer, work, visit or otherwise take part in Academy activities. The Academy will take reasonable steps to prevent abuse, neglect, exploitation and poor practice and will respond promptly when concerns are identified.

This policy applies to directors, employees, coaches, instructors, volunteers, contractors, students, competitors, support workers and other persons acting on behalf of Zen Combat Academy Ltd. It also guides how the Academy responds when a concern arises outside the Academy but becomes known through our work.

Safeguarding is everyone's responsibility

No instructor, coach, employee or volunteer is expected to decide whether abuse has occurred. Their responsibility is to recognise concerns, respond safely, record what they know and report or refer the concern without delay. Where there is immediate danger or a serious medical emergency, call 999.

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2. Principles

Zen Combat Academy Ltd bases its adult safeguarding arrangements on the Care Act 2014 and the Care and Support Statutory Guidance. Adult safeguarding means protecting an adult's right to live in safety, free from abuse and neglect, while promoting wellbeing and taking account of the adult's views, wishes, feelings and beliefs.

Care Act principle	How Zen Combat Academy Ltd applies it
Empowerment	People are supported and encouraged to make their own decisions and give informed consent wherever possible.
Prevention	It is better to take action before harm occurs. The Academy will promote awareness, safer practice and early reporting.
Proportionality	The response should be the least intrusive response appropriate to the risk presented.
Protection	Adults in greatest need should receive appropriate support and representation.
Partnership	Safeguarding is strengthened by appropriate cooperation with the adult, carers, statutory services, police, health professionals and other relevant agencies.
Accountability	Roles, decisions and actions should be clear, recorded and capable of review.

Making Safeguarding Personal

Safeguarding should be person-led and outcome-focused. Wherever it is safe and practicable to do so, the adult will be asked what they want to happen, what outcome matters to them, what support they need to participate and how they would prefer information to be shared. The adult should be kept informed about decisions and actions that affect them.

The adult's wishes are important but are not the only consideration. Information may sometimes need to be shared without consent, for example where there is a serious risk of harm, risk to another adult or child, suspected serious crime, coercion or undue influence, a legal requirement, or where the adult lacks capacity for the relevant decision and sharing is necessary and lawful.

Wellbeing, equality and inclusion

Zen Combat Academy Ltd will respect personal dignity, physical and mental wellbeing, autonomy, relationships, participation in training and recreation, and protection from abuse and neglect. The Academy will make reasonable adjustments for disabled people where required by the Equality Act 2010 and will not assume that disability, neurodivergence, illness, communication difference or age automatically means that an adult lacks capacity or is unable to make decisions.

3. Legislation and statutory guidance

The policy is designed for Zen Combat Academy Ltd activities in England. It should be applied alongside current law, Government guidance and Devon multi-agency safeguarding arrangements. Key frameworks include:

Framework	Relevance
Care Act 2014	Provides the statutory adult safeguarding framework in England, including the local authority duty to make or arrange enquiries where the section 42 criteria are met.
Care and Support Statutory Guidance	Chapter 14 sets out adult safeguarding principles, abuse and neglect, information sharing, safeguarding enquiries, roles and responsibilities and allegations concerning people in positions of trust.
Mental Capacity Act 2005 and Code of Practice	Provides the framework for decision-making where a person may lack capacity for a specific decision. Capacity is presumed unless established otherwise.
Equality Act 2010 and 2026 Code of Practice	Protects people from unlawful discrimination and includes the duty to make reasonable adjustments for disabled people in relevant services.
Data Protection Act 2018 and UK GDPR	Govern the lawful, fair, necessary, proportionate and secure handling of personal and special category data.
Safeguarding Vulnerable Groups Act 2006, as amended	Provides the legal framework for barred lists and regulated activity, alongside the Protection of Freedoms Act 2012.
Sexual Offences Act 2003	Creates offences relating to sexual activity, exploitation and abuse, including offences where consent is absent or cannot lawfully be given.
Domestic Abuse Act 2021 and statutory guidance	Provides the statutory definition and framework for identifying and responding to domestic abuse.
Modern Slavery Act 2015 and statutory guidance	Provides the framework for modern slavery, human trafficking, forced labour and related exploitation.
Human Rights Act 1998	Supports respect for dignity, private and family life, freedom from degrading treatment and other fundamental rights.

Important legal distinction

Zen Combat Academy Ltd is not the statutory safeguarding authority. Devon County Council Adult Social Care and other statutory agencies decide whether statutory adult safeguarding enquiries or criminal investigations are required. Zen must recognise concerns, take immediate protective action within its control, record, report and cooperate with statutory services.

4. Definitions

Term	Meaning for this policy
Adult	A person aged 18 or over for the purposes of this policy.
Adult at risk	For Care Act safeguarding purposes: an adult who 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 because of those needs is unable to protect themselves from the risk or experience of abuse or neglect.
Care and support needs	Needs arising from or related to physical or mental impairment, illness, disability, age, neurodivergence or other circumstances that may require care or support. Having a disability or diagnosis does not by itself mean a person is an adult at risk.
Adult safeguarding	Protecting an adult's right to live in safety, free from abuse and neglect, while working with the adult to promote wellbeing and desired outcomes.
Abuse	A violation of an individual's human or civil rights by another person or persons. It can be a single act, repeated acts, deliberate or unintentional, and can occur in person or online.
Neglect	A failure to meet an adult's essential care, health or support needs, whether deliberate or through omission.
Capacity	The ability to make a particular decision at the time it needs to be made. Capacity is decision-specific and time-specific.
Consent	A freely given, informed and specific agreement. Consent can be withdrawn and should not be assumed from silence or previous participation.
Position of trust	A role in which a person has authority, influence, responsibility or access that could create a risk to adults with care and support needs if misused.
Poor practice	Behaviour that falls below expected standards or breaches policy or professional boundaries. Poor practice may create safeguarding risk and, if serious or repeated, may amount to abuse.

5. Types of abuse, neglect and exploitation

Abuse and neglect can occur in any setting, including homes, relationships, workplaces, online spaces, care settings, travel, changing facilities and sports or martial arts environments. More than one type may occur at the same time. The Care Act categories include:

Category	Examples / explanation
Physical abuse	Assault, hitting, slapping, pushing, kicking, inappropriate restraint, misuse of medication, inappropriate sanctions or other physical harm. In martial arts, consensual and properly supervised contact within agreed rules is not inherently abuse; deliberately exceeding agreed intensity, continuing after consent is withdrawn, or using contact to punish or humiliate may be abuse or serious poor practice.
Domestic abuse	Physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse between personally connected people, as defined by the Domestic Abuse Act 2021.
Sexual abuse	Rape, sexual assault, sexual harassment, inappropriate touching, exposure, sexualised comments, sexual photography, non-consensual sexual activity, exploitation or pressure to participate in sexual acts.
Psychological / emotional abuse	Threats, intimidation, humiliation, coercion, controlling behaviour, verbal abuse, isolation, harassment, bullying or deliberately undermining an adult's confidence or independence.
Financial or material abuse	Theft, fraud, scams, misuse of money or property, coercion concerning payments or purchases, exploitation of benefits or financial arrangements, or pressure to hand over money.
Modern slavery	Slavery, human trafficking, forced or compulsory labour, domestic servitude and related exploitation.
Discriminatory abuse	Abuse, harassment or unequal treatment linked to a protected characteristic or perceived difference, including disability, race, religion, sex, sexual orientation, gender reassignment, age or other protected characteristics.
Organisational abuse	Poor or abusive practice arising from the culture, systems, routines, leadership, policies or practices of an organisation rather than a single isolated incident.
Neglect and acts of omission	Ignoring medical, physical or support needs; failure to provide access to appropriate care or services; withholding necessities or support; failing to respond to known risks.
Self-neglect	A wide range of behaviour involving neglect of personal hygiene, health, safety or surroundings, including hoarding. A safeguarding response should be proportionate and person-centred.

Other relevant safeguarding concerns

- Online abuse, cyberbullying, stalking, harassment, sexual image abuse or exploitation through social media or messaging platforms.
- Forced marriage, so-called honour-based abuse and other forms of coercion or exploitation.
- Mate crime, where a person presents as a friend but exploits, harms or takes advantage of an adult.
- Radicalisation or exploitation linked to extremist violence may create safeguarding or criminal concerns and should be reported through appropriate police or statutory routes.

6. Signs and indicators of abuse and neglect

Indicators do not prove that abuse has occurred, and some may have innocent explanations. They should nevertheless be taken seriously where they cause concern, especially where there is a pattern, a change from normal behaviour or an explanation does not fit the circumstances.

- Unexplained or repeated bruises, burns, injuries or signs of restraint; injuries that are inconsistent with the account given; or lack of appropriate medical attention.
- An adult becoming unusually withdrawn, fearful, distressed, anxious, tearful, angry or reluctant to be around a particular person.
- Unexpected absence from classes, sudden loss of enjoyment, a noticeable drop in confidence, or being prevented from attending or socialising.
- Money, possessions, benefits or equipment going missing; unusual financial pressure; unexplained payments or debts.
- Deterioration in personal hygiene, clothing, nutrition, health or living conditions; significant unexplained weight change.
- Signs that reasonable support needs are being ignored, such as lack of rest breaks, hydration, medication support arrangements, communication support or agreed adaptations.
- An adult being repeatedly mocked, belittled, sexually harassed, discriminated against or isolated.
- Unwanted sexual messages, images, contact or sexualised behaviour directed at an adult.
- An adult appearing fearful of a partner, family member, carer, coach, support worker or another student, or having their communication or movement controlled.
- An adult directly disclosing abuse, neglect, exploitation or fear, or another person reporting concerns about them.
- Signs of self-neglect, severe hoarding, unsafe living conditions or inability to meet essential needs.
- In a martial arts setting, deliberate striking or force outside agreed training rules or intensity, unsafe restraint, coercion to continue after withdrawal of consent, or using contact or exercises to punish, humiliate or intimidate.

Do not investigate

A coach or volunteer should not question witnesses, confront the alleged person responsible, search devices, collect statements or attempt to determine whether abuse is proven. Preserve immediate evidence where relevant, record what was seen or heard, and pass the concern to the Safeguarding Lead or statutory services.

7. Good practice, poor practice and abuse in martial arts

Good practice

- Explain drills, levels of contact, sparring rules and safety expectations in a way the adult can understand.
- Seek consent for physical contact that is not obviously inherent in the agreed activity, and respect withdrawal of consent or requests to stop.
- Use the minimum physical intervention reasonably necessary for safety, coaching or first aid, and explain what is happening wherever practicable.
- Make reasonable adjustments and adapt communication, pace, environment and equipment to enable safe participation.
- Maintain appropriate professional boundaries in one-to-one coaching, transport, changing areas, messaging and social media.
- Where practicable, conduct one-to-one coaching in an observable or open environment and avoid unnecessary isolation.
- Respect privacy and dignity in changing and toilet facilities. Staff should not provide personal care unless specifically authorised, trained and the arrangement is risk assessed and agreed. Ordinarily personal care should be provided by the adult's carer or support worker.
- Record injuries, incidents and safeguarding concerns in accordance with Academy procedures.
- Treat all adults fairly and respectfully, regardless of ability, competitive level, disability or personal circumstances.

Poor practice or unacceptable behaviour

- Using degrading, threatening, discriminatory, sexualised or humiliating language or behaviour.
- Pressuring an adult to spar, grapple, be touched, be photographed or continue an activity after they have said no or asked to stop.
- Using excessive force, unsafe techniques, deliberate contact outside the agreed rules or unnecessary restraint.
- Using fitness exercises, contact or training tasks as retaliation, intimidation or humiliation. Conditioning may form part of legitimate training but must be safe, proportionate and not abusive.
- Ignoring an injury, communication need, disability-related adjustment, agreed support plan or medical restriction.
- Forming exploitative financial, sexual or dependency relationships with adults who may be at risk, or using a position of trust for personal gain.
- Spending unnecessary or excessive time alone with an adult where safer alternatives are available, particularly where the adult relies on the instructor for support.
- Accessing an adult's money, benefits, bank accounts, medication, property or personal information without a legitimate, agreed and authorised reason.
- Failing to report a serious concern, discouraging disclosure, retaliating against a person who raises a concern, or asking someone to keep safeguarding matters secret.

8. What to do if you have a concern

Immediate danger or medical emergency

If an adult is in immediate danger, a serious crime may be in progress, or urgent medical treatment is required, call 999 first. Take reasonable steps to protect the adult and others without putting yourself or others at additional risk.

If there is no immediate emergency:

1. Listen and take the concern seriously.
2. Ask what the adult wants to happen, where it is safe and appropriate to do so, and consider any communication support they need.
3. Do not promise secrecy. Explain that you may need to share information with the Academy Safeguarding Lead or statutory services to keep people safe.
4. Do not investigate, confront the alleged person responsible or ask leading questions.
5. Report the concern promptly to the Zen Combat Academy Ltd Safeguarding Lead or Deputy. If they are implicated or unavailable and delay would increase risk, report to another Director/senior manager not implicated and/or directly to Adult Social Care or police as appropriate.
6. Make a factual written record as soon as possible, using the adult's own words where relevant.
7. Preserve any relevant evidence that is already in your possession without carrying out your own investigation.

When to contact Adult Social Care or police

- There is reasonable cause to believe an adult who has care and support needs is experiencing, or at risk of, abuse or neglect and may be unable to protect themselves because of those needs.
- A serious crime is suspected, there is immediate danger, or evidence may need urgent police protection.
- Other adults or children may be at risk from the same person or situation.
- The adult may lack capacity for the relevant safeguarding decision and there is a significant risk of harm.
- There is coercion, undue influence, intimidation or another reason to believe the adult is not able to make a free decision about information sharing or safety.
- The concern involves a person in a position of trust and may indicate a risk to other adults with care and support needs.

9. How to respond to a disclosure or concern

- Stay calm and give the adult time to speak.
- Listen carefully and avoid interrupting unnecessarily.
- Use the adult's preferred communication method and consider whether they need an interpreter, communication aid, advocate or support person.
- Ask only questions needed to clarify immediate safety or basic facts. Avoid questions that suggest an answer.
- Acknowledge what they have said and explain what you will do next.
- Do not tell the adult that you will keep the information secret. Explain who may need to know and why.
- Do not make promises about outcomes, disciplinary action or criminal proceedings.
- If relevant, establish what outcome the adult would like from the safeguarding response.
- Write down what was said as soon as possible, using the adult's own words. Distinguish fact, observation, allegation and opinion.
- If there is a recent physical or sexual assault, consider the need to preserve forensic evidence and seek urgent police/medical advice rather than asking the person to clean clothing or devices.
- Report the concern to the Safeguarding Lead and, where required, to Adult Social Care or police.

If the concern is about an instructor, employee, volunteer or Director

The concern must still be reported. The Safeguarding Lead or an unimplicated senior person should consider immediate risk management, suspension or alternative duties where appropriate, reporting to Adult Social Care or police, and any DBS referral duty if the legal conditions are met. Do not conduct a disciplinary investigation in a way that could compromise a police or safeguarding enquiry.

10. Safeguarding adults flowchart

1. Concern identified

You see, hear or receive information about possible abuse, neglect, exploitation, poor practice or wider welfare concerns.

2. Immediate danger or urgent medical need?

YES: call 999, provide or obtain emergency assistance and take immediate proportionate protective action.
NO / NOT SURE: continue below.

3. Listen and establish the adult's wishes

Do not investigate. Use accessible communication. Explain that information may need to be shared for safeguarding. Consider mental capacity only in relation to the specific decision if there is a genuine reason to doubt it.

4. Report internally and record

Contact the Zen Combat Academy Ltd Safeguarding Lead / Deputy promptly and complete the Safeguarding Adults Incident Report Form. If the Safeguarding Lead is implicated, contact an unimplicated Director/senior manager and/or statutory services directly.

5. Decide on referral / advice

The Safeguarding Lead considers the Care Act safeguarding criteria, the adult's wishes and consent, risk to others, suspected crime, position-of-trust concerns and whether Adult Social Care, police, health services or another agency should be contacted.

6. Take proportionate protective action

Possible actions include risk controls within the Academy, temporary changes to duties or training arrangements, referral to Adult Social Care or police, support for the adult, DBS referral where legally required, and internal disciplinary action when appropriate and safe to proceed.

7. Record and review

Record decisions, reasons, consent or reasons for sharing without consent, referrals, advice received, actions and outcome. Review the safety plan and keep the adult involved wherever possible.

11. Recording and record keeping

A safeguarding record must be created as soon as practicable after a concern, disclosure or incident. Records may be important to Adult Social Care, police, the DBS, courts or internal disciplinary processes.

- Date, time and location of the concern or incident.
- Name and contact details of the adult, if known and appropriate.
- Exactly what was seen, heard or disclosed, using the adult's own words where possible.
- Names and roles of people involved or present.
- Any visible injuries or relevant contextual facts; do not photograph injuries unless there is a clear, lawful and necessary reason and appropriate authority.
- What the adult said they wanted to happen and whether consent to share was obtained.
- Any reason for believing the adult may lack capacity for the specific decision, and what support was offered to help them decide.
- Actions taken, who was contacted, advice received, decisions made and the reasons for those decisions.
- Any risk to other adults or children.
- The name and signature of the person making the record and the date/time the record was completed.

Records must distinguish fact, observation, allegation and professional opinion. Safeguarding records must be stored securely, access limited to people who have a legitimate need to know, and retention handled in accordance with Zen Combat Academy Ltd data protection and record-retention arrangements.

Confidentiality

Safeguarding information is confidential, but confidentiality is not absolute. Information should be shared only where lawful, necessary and proportionate, and only with those who need it for safeguarding, criminal justice, regulatory, legal or organisational purposes.

12. Mental capacity, consent and information sharing

Mental Capacity Act 2005 principles

- Assume an adult has capacity unless it is established otherwise.
- Take all practicable steps to support the adult to make the decision before concluding that they cannot.
- An adult is not to be treated as unable to decide merely because they make a decision others consider unwise.
- Any act or decision made on behalf of a person who lacks capacity must be in their best interests.
- Choose the least restrictive option that can achieve the required purpose.

Capacity is specific to the particular decision and the time it must be made. A person may have capacity for one decision but not another, and capacity may fluctuate. Zen staff should not make informal global judgements about capacity based on diagnosis, disability, anxiety, communication style or appearance.

Supporting decision-making

- Use plain language, visual information, demonstrations or other accessible formats.
- Allow extra time and choose a calmer or more suitable environment.
- Use the adult's preferred communication method, interpreter or communication support where appropriate.
- Consider whether a trusted support person or independent advocate would help, while ensuring the adult is not being coerced.
- Revisit the decision later if temporary factors such as distress, fatigue, medication effects or illness may affect decision-making.

Consent and information sharing

Where possible, the adult should be told what information may be shared, with whom and for what purpose. Consent should normally be sought for a safeguarding referral where the adult has capacity and no overriding reason requires sharing without consent.

Information may be shared without consent where there is a lawful basis and sharing is necessary and proportionate, including where:

- There is an immediate or serious risk of harm to the adult or another person.
- Other adults or children may be at risk.
- A serious crime is suspected or a criminal investigation requires disclosure.
- The adult lacks capacity for the relevant decision and sharing is in their best interests.
- Consent may have been withheld because of coercion, intimidation, undue influence or threats.
- There is a legal duty, court order, regulatory requirement or other lawful safeguarding basis for sharing.

The decision to share or not share must be recorded, including the reasons, what information was shared, with whom and when. Only information that is relevant, accurate, necessary and proportionate should be shared, using a secure method.

13. Roles and responsibilities

Role	Key responsibilities
Directors / senior management	Maintain the safeguarding framework; ensure roles and accountability are clear; support appropriate referrals and risk management; ensure allegations against staff are managed fairly and without compromising statutory enquiries; ensure policy review and training.
Safeguarding Lead	Receive concerns; assess immediate safeguarding action; seek advice from Devon Adult Social Care or police; support person-centred responses; coordinate records, referrals and internal safeguarding action; identify DBS referral duties where applicable; monitor follow-up.
Deputy Safeguarding Lead	Act when the Safeguarding Lead is unavailable or conflicted and support safeguarding arrangements.
Coaches / instructors / staff / volunteers	Follow this policy, maintain professional boundaries, recognise and report concerns, record accurately, cooperate with safeguarding action and complete required training.
All participants	Treat others with dignity and respect; follow Academy rules and codes of conduct; report concerns about safety, abuse, harassment, discrimination or poor practice.
Carers / support workers	Where involved, communicate agreed support needs and risk information that is necessary for safe participation, while respecting the adult's rights and confidentiality.

Allegations concerning a person in a position of trust

Where an instructor, employee, volunteer, contractor or other person working with adults with care and support needs may pose a risk of harm, Zen Combat Academy Ltd will take proportionate immediate risk-management action and seek advice from the relevant statutory service. The Academy will distinguish between a safeguarding allegation, a complaint, a conduct concern and a quality-of-practice issue, while recognising that these may overlap.

14. Safer recruitment and DBS checks

Zen Combat Academy Ltd will take reasonable steps to prevent unsuitable people from being placed in roles that create avoidable safeguarding risk. Recruitment and deployment decisions should consider the actual duties of the role rather than relying on job titles alone.

- Clear role descriptions, safeguarding expectations and supervision arrangements.
- Identity and reference checks appropriate to the role.
- Exploration of relevant employment or volunteering history and suitability where appropriate and lawful.
- DBS checks at the level for which the role is legally eligible. Zen will use current DBS eligibility guidance and will not request an Adults' Barred List check unless the role meets the legal criteria.
- Where a role involves regulated activity with adults, Zen will meet the responsibilities that apply to a regulated activity provider, including considering a DBS barring referral when the statutory conditions are met.
- Reassessment where duties materially change, because DBS eligibility may change with the activities performed.
- Induction covering safeguarding, professional boundaries, reporting routes, equality, confidentiality and emergency procedures.

DBS checks in sport - important

A coach working with an ordinary adult class is not automatically eligible for an Enhanced DBS check merely because they are a sports coach. Eligibility depends on the duties, the adults receiving the service and, for some categories, the frequency of the work. Disability-specific adult coaching may create eligibility for an Enhanced check in circumstances described by current DBS guidance. Each role must be assessed individually.

15. Supervision, support and training

- Staff and volunteers in relevant roles will receive safeguarding information at induction and refresher training appropriate to their responsibilities.
- The Safeguarding Lead and Deputy should undertake role-appropriate adult safeguarding training and maintain awareness of local Devon procedures.
- Coaches working regularly with adults who have disabilities, learning difficulties, communication needs or care and support needs should receive appropriate training in communication, inclusion, professional boundaries and reasonable adjustments.
- Supervision and management should provide opportunities to raise safeguarding concerns, review incidents, identify learning and address poor practice early.
- Staff will be reminded that safeguarding includes concerns arising outside the Academy when those concerns become known through Academy activities.
- Learning from incidents, complaints, safeguarding reviews and changes in law or guidance will be incorporated into policy, risk assessment and training.

16. Whistleblowing and complaints

Whistleblowing

Zen Combat Academy Ltd encourages staff, volunteers, students and others to raise concerns about dangerous, unlawful, abusive or unethical conduct. No person should be victimised for raising a genuine safeguarding concern in good faith. Where normal internal reporting is unsafe, inappropriate or has failed, concerns may be raised with the appropriate statutory or regulatory body.

Complaints

A complaint may identify poor practice, discrimination, harassment, unsafe coaching, boundary concerns or potential abuse. Complaints involving safeguarding must be treated as safeguarding concerns first, even if they are also managed under the Academy Complaints or Disciplinary Policy. A person should not be asked to use a complaints process where doing so would delay an urgent safeguarding response.

17. Related Zen Combat Academy Ltd policies

- Safeguarding Children Policy and Procedures
- Health and Safety Policy and centre risk assessments
- Equality, Diversity, Disability and Inclusion Policy
- Data Protection / Privacy Policy
- Complaints Policy
- Whistleblowing Policy
- Disciplinary Policy / Code of Conduct
- Social Media, Photography and Filming Policy
- Sparring and Grappling Policy
- First Aid and Emergency Procedures
- Safer Recruitment / DBS arrangements
- One-to-One Coaching / Lone Working arrangements
- Accident and Incident Reporting procedures

Where another policy conflicts with a safeguarding requirement, immediate safety and statutory safeguarding obligations take priority. The matter should then be reviewed by management so that policies are aligned.

18. Useful contacts

Emergency - immediate danger / serious crime / urgent medical need	999
Police - non-emergency	101
NHS - urgent medical advice where it is not a 999 emergency	111
Devon Adult Social Care - safeguarding concerns	0345 1551 007 (Mon-Thu 9:00-17:00; Fri 9:00-16:30)
Devon Emergency Duty Service - outside normal hours / bank holidays	0345 6000 388
Devon Safeguarding Adults Service email	adultsc.safeguardingadultservices-mailbox@devon.gov.uk
Devon Safeguarding Adults Partnership	www.devonsafeguardingadultspartnership.org.uk
Zen Combat Academy Ltd Safeguarding Lead	Name: _____
Safeguarding Lead contact	Telephone / email: _____
Zen Combat Academy Ltd Deputy Safeguarding Lead	Name: _____
Deputy contact	Telephone / email: _____

If the Safeguarding Lead or Deputy is implicated in the concern, do not report solely to that person. Contact another unimplicated Director/senior manager and/or Devon Adult Social Care or police, depending on the nature and urgency of the concern.

19. Monitoring, review and approval

This policy will be reviewed at least annually and sooner if there is a relevant change in legislation, Government guidance, DBS eligibility guidance, Devon safeguarding procedures, Academy activities, organisational structure or learning from a safeguarding incident or review.

The Safeguarding Lead should periodically test that staff know how to raise a concern, that contact details remain current, that safeguarding records are secure and that related policies remain aligned.

Approved by	
Role	
Signature	
Date approved	
Next review due	September 2027 or sooner if required

Appendix A. Safeguarding Adults Incident Report Form

Confidential safeguarding record

Complete as soon as possible. Record facts and the adult's own words. Do not investigate. Submit securely to the Zen Combat Academy Ltd Safeguarding Lead / Deputy. If they are implicated and there is risk, use an alternative senior route or contact statutory services directly.

Section 1 - details of the adult

Name of adult	
Date of birth / age (if known)	
Address (if relevant / known)	
Telephone / contact details	
Preferred communication method / support needs	
Carer / support worker details (if relevant and appropriate)	

Section 2 - person completing this form

Your name	
Role at Zen Combat Academy Ltd	
Telephone / email	
Date and time form started	
Who else is aware of the concern?	

Section 3 - details of the concern

Describe exactly what you saw, heard, were told or otherwise became concerned about. Include dates, times, locations, witnesses and the adult's own words where possible. Distinguish fact, observation, allegation and opinion.

Any visible injury, immediate medical concern or evidence already in your possession (do not investigate or search for evidence):

Section 4 - type(s) of concern

☐ Physical abuse	☐ Domestic abuse	☐ Sexual abuse
☐ Psychological / emotional abuse	☐ Financial / material abuse	☐ Modern slavery / trafficking
☐ Discriminatory abuse	☐ Organisational abuse	☐ Neglect / acts of omission
☐ Self-neglect	☐ Online abuse / harassment	☐ Forced marriage / honour-based abuse
☐ Mate crime / exploitation	☐ Poor practice / professional boundary concern	☐ Other

Section 5 - adult's views, wishes and consent

Have you discussed the concern with the adult? What do they say happened? What outcome do they want? What support do they need?	
Consent to share with Zen Safeguarding Lead	☐ Yes ☐ No ☐ Not discussed / not safe to discuss
Consent to make safeguarding referral	☐ Yes ☐ No ☐ Not yet known / not applicable
If not discussed or consent withheld, give reasons / risks	

Section 6 - mental capacity (only if relevant)

Do not complete this section merely because the adult has a disability, diagnosis or communication difference. Capacity should only be considered where there is a genuine reason to doubt the adult's ability to make the specific decision at the relevant time.

Specific decision being considered	
Reason there may be doubt about capacity	
Support provided to help the adult decide	
Was specialist / statutory advice sought?	
Outcome / next steps	

Section 7 - immediate action taken

Emergency services contacted?	☐ No ☐ Yes - details: _____
Adult Social Care contacted?	☐ No ☐ Advice only ☐ Referral made
Police contacted?	☐ No ☐ 101 ☐ 999 ☐ Other
Safeguarding Lead / Deputy informed?	☐ No ☐ Yes - name / time: _____
Immediate Academy risk controls	
Other adults or children potentially at risk?	☐ No ☐ Yes - details: _____
Details of actions, advice received, reference numbers and any follow-up agreed:	

Section 8 - declaration

Name	
Signature	
Date	
Time	

Office use - Safeguarding Lead review

Date / time received	
Received by	
Risk level / immediate actions	
Adult's desired outcome	
Consent status	
Decision to share / refer	
Legal / safeguarding basis if sharing without consent	
Agencies contacted and reference numbers	
Position-of-trust / DBS referral considerations	
Internal conduct / disciplinary action (if any)	
Follow-up date	
Outcome / closure rationale	
Safeguarding Lead notes / chronology:	

Appendix B. Mental Capacity and decision-making quick guide

The Mental Capacity Act 2005 is based on five core principles. In adult safeguarding, capacity must be considered in relation to the specific decision and at the time the decision is required.

1. Presume capacity unless established otherwise.
2. Provide all practicable support to help the person make the decision.
3. Do not treat a person as lacking capacity merely because they make an unwise decision.
4. Any decision made for a person who lacks capacity must be in that person's best interests.
5. Use the least restrictive option that can achieve the required purpose.

Can the person make the specific decision?

A person is unable to make a decision if, because of an impairment or disturbance in the functioning of mind or brain, they cannot do one or more of the following even after appropriate support:

- Understand the information relevant to the decision.
- Retain the information long enough to make the decision.
- Use or weigh the information as part of the decision-making process.
- Communicate the decision by any means.

Practical support before reaching a conclusion

- Use plain language or easy-read information.
- Use pictures, demonstrations or written prompts.
- Choose a quieter time or location.
- Allow more time and repeat information where helpful.
- Use an interpreter, communication aid or preferred support person where appropriate.
- Consider whether temporary distress, fatigue, pain, medication or illness is affecting the person at that time.

Do not make assumptions

Age, disability, autism, ADHD, learning disability, mental health history, dementia, acquired brain injury, communication difference, appearance or behaviour do not by themselves establish lack of capacity.

Appendix C. Consent and information-sharing decision record

Use this record when a safeguarding concern requires a deliberate decision about whether information should be shared outside the Academy, particularly where consent is absent, refused or unclear.

Adult / case reference	
Decision to be made	
Adult's views and desired outcome	
Does the adult have capacity for this decision?	
Consent to share?	☐ Yes ☐ No ☐ Not obtainable / unsafe to seek
If no, why?	
Risk to the adult	
Risk to other adults or children	
Suspected crime / legal duty / court requirement	
Coercion, undue influence or intimidation concerns	
Information proposed to be shared	
Recipient / agency	
Purpose of sharing	
Why sharing is necessary and proportionate	
Why a less intrusive option is insufficient	
Secure method of sharing	
Decision	☐ Share ☐ Do not share ☐ Seek further advice
Decision-maker and role	
Date / time	
Advice received / additional rationale / follow-up:	

Appendix D. Legislation and Government guidance references

Reference	Official source
Care Act 2014	www.legislation.gov.uk/ukpga/2014/23/contents
Care and Support Statutory Guidance - safeguarding chapter	www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance
Mental Capacity Act 2005	www.legislation.gov.uk/ukpga/2005/9/contents
Mental Capacity Act Code of Practice	www.gov.uk/government/publications/mental-capacity-act-code-of-practice
Equality Act 2010	www.legislation.gov.uk/ukpga/2010/15/contents
Equality Act 2010 Code of Practice for services, public functions and associations (2026)	www.gov.uk/government/publications/equality-act-2010-code-of-practice-for-services-public-functions-and-associations-2026
Data Protection Act 2018	www.legislation.gov.uk/ukpga/2018/12/contents
Safeguarding Vulnerable Groups Act 2006	www.legislation.gov.uk/ukpga/2006/47/contents
DBS checks in sport - working with adults	www.gov.uk/government/publications/dbs-guidance-leaflets/dbs-checks-in-sport-working-with-adults
Domestic Abuse Act 2021 statutory guidance	www.gov.uk/government/publications/domestic-abuse-act-2021
Modern slavery: how to identify and support victims	www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims
Devon Safeguarding Adults Partnership - reporting a concern	www.devonsafeguardingadultspartnership.org.uk/reporting-a-concern/

These links and references were checked when this version was prepared. Because legislation, statutory guidance, local procedures and DBS eligibility guidance can change, the Academy should check the current official version whenever a safeguarding decision depends on a legal or procedural requirement.