



Adult at Risk Safeguarding and Prevent Policy

1 Introduction

1.1 Purpose

This policy sets out CareTrade's approach to safeguarding and promoting the welfare of all vulnerable adults that access projects or services at CareTrade. It applies to all aspects of our work and to everyone working for CareTrade.

1.2 Background

This policy and its associated procedure are mandatory for everyone working for CareTrade, as they must be aware of their individual and collective roles and responsibilities in safeguarding and protecting adults at risk from abuse, neglect and being drawn into extremist activity such as terrorism or hate crime.

1.3 Link to Vision and Beliefs

CareTrade's belief is "... *that employment is the biggest single factor that will transform the life of an autistic person...*"

CareTrade's vision for the future is "*A world that embraces neurodiversity in the workplace and all autistic people lead a purposeful, working, life*"

This can only be attained if young people and adults are safeguarded and protected from abuse and neglect, where appropriate prevented from becoming at risk of abuse and being drawn into any terrorism related activity.

1.4 Roles within CareTrade, areas of responsibilities and training requirements

All staff and trustees have a responsibility to ensure that they are trained at an appropriate level in Safeguarding and Prevent. All staff are expected to complete the Smoothwall online safeguarding training annually. DSL's (Designated Safeguarding Lead) are expected to completed Level 3 training and then a top up every two years.

All staff, volunteers, agency staff and trustees who work for, or represent, CareTrade have a responsibility towards safeguarding and protecting the welfare of vulnerable adults that access projects or services provided by CareTrade from any form of abuse and being drawn into terrorism-related activity. It has become accepted terminology to refer to the person who initially raises the concern as **the alerter. The alerter can be anyone.** All staff are expected to report any concerns on Smoothwall Safeguarding system. When logging a concern staff should follow the flowchart for logging a concern

The DSL has a responsibility to follow up concerns on Smoothwall. The DSL's will have allocated learners/traineeships/participants/clients that they are responsible for with regards to Safeguarding and Prevent. The DSL should follow the DSL flow chart when following up on a concern on Smoothwall.

CARETRADE Designated Safeguarding Leads (DSLs)		
CareTrade – Lead DSL	Karen Edwards	CEO
The Autism Project – lead DSLs	Mark Finch	Head of Education & Learning
	Jemma Dear	TAP Manager
The Autism Project – deputy DSLs	Sandra Fergus	Employability Tutor
	Elvina Bunokaite	Senior Job Coach & Wellbeing Lead
Development Team - DSL	Judith Kerem	Development Director
Working Kitchen & Café - DSL	Aga Keeling	Kitchen & Café Manager

The Safeguarding Lead for the Trustees is Simon Eccles. Simon chairs the Educational Advisory Panel.

The CEO has overall responsibility for all safeguarding matters. He/she will also be required to offer consultation to the DSL/s on any matters which are seen as complex or challenging. The CEO will brief the Chair of Trustees, dependent on the level of seriousness of the concern.

The DSL/s and CEO have lead responsibility for ensuring all appropriate actions are taken and for providing staff, volunteers and trustees with the guidance required. The only occasion when one of them should not be informed of a concern is if they are themselves implicated in abuse; in such circumstances, staff will always go to the other above named senior member of staff.

2. Key Principles

- CareTrade recognises that safeguarding and promoting the welfare of adults at risk is everyone's responsibility, and that the best interests of the learner/participants/clients must be paramount.
- To work in partnership with the local Safeguarding Adults Boards and comply with the local multi-agency Safeguarding Adults Procedures.
- To work in partnership with outside professionals that support any learners/participants/clients that access projects or services provided by CareTrade
- We have a statutory duty to ensure that we safeguard and promote the welfare of adults at risk of harm in our care. We adopt a person-centred approach, which operates in the best interests of each learner/participant/client.
- The policy and procedures focus on how we recruit and train our staff, support our learners/participants/clients, make referrals, and deal effectively with allegations against staff.
- It incorporates a wide range of risks we need to safeguard against, including those related to the prevention of extremism.
- To achieve this the policy and procedure is reviewed annually.

- Raise awareness of issues relating to the welfare of adults at risk and the promotion of a safe environment for them to learn in the classroom or on work placement.
- Aid the identification of adults at risk of significant harm by following the Adult at Risk Safeguarding and Prevent procedure
- Establish procedures for reporting and dealing with allegations of abuse against members of staff.
- By following the safe recruitment of staff.
- All staff will receive appropriate training to familiarise them with CareTrade's Safeguarding Policy and Procedure, relevant statutory guidance, the safeguarding issues and their responsibilities therein.
- All staff undertake mandatory safeguarding and Prevent training as part of their induction process and continual professional development (CPD) on an annual basis.
- All TAP staff have read the OFSTED inspecting safeguarding 2019 document

3. Policy Statement

3.1 Equality

CareTrade will make sure that all learners/participants/clients have the same protection, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. CareTrade is committed to anti-discriminatory practice and recognises the additional needs of adults from minority ethnic groups and those with learning disabilities and/or difficulties and the barriers they may face, especially around communication.

3.2 CareTrade's Commitment to Safeguarding

- CareTrade is committed to the prevention of, and protection from, abuse and neglect of all learners/participants/clients
- CareTrade is committed to taking all necessary steps to stop abuse happening, whether that abuse is perpetrated by staff, volunteers, family members, members of the public or other learners/participants/clients
- CareTrade is committed to the prevention a learner/participant/client being drawn into any terrorism-related or gang-related activity.
- CareTrade staff will follow the safeguarding procedure for when reporting any concerns or incidents. Staff will log these concerns on Smoothwall.
- The DSL's will follow the DSL Safeguarding procedure when reporting any concerns of abuse, neglect or if a person is identified as being vulnerable to being drawn into terrorism-related activity by referring this onto the appropriate local authority.
- CareTrade has trained member of the senior staff in each team as DSL's. These members of staff are responsible to ensure concerns or incidents are reviewed in a timely manner and the necessary action is taken.
- CareTrade will inform, in an appropriate format, all learners/participants/clients that access either a CareTrade project or service, that CareTrade have a duty to contact the local authority Adult Safeguarding/ Prevent department if there are concerns that an adult at risk may be being abused, neglect or being drawn into any extremist or terrorism-related activity.

- CareTrade is committed to providing a curriculum that enables learners/participants/clients to learn to keep themselves safe and how to raise concerns if they do not feel safe in all aspects of their lives.
- CareTrade is committed to ensuring that adults at risk are given information, advice, and support in a form that they can understand and access.
- CareTrade has produced this policy in a user-friendly version for all learners/participants/clients to access.
- CareTrade is committed to working in partnership with parents/carers or any other outside professionals i.e., social workers or mental health team of the learner/participant/client, if they have given their consent, when this is required and appropriate.

3.3 Outcomes

Because of this policy and its procedures being followed:

- Learners/participant/clients at risk will be better protected from the impact of abuse, neglect, being drawn into terrorism-related or gang-related activity
- All CareTrade staff will take the necessary steps to safeguard and protect the rights of learners/participants/clients.
- Adult Safeguarding teams/Local Authorities/ Prevent departments will be contacted where appropriate.

3.4 Risk assessment

Should this policy and associated procedure be ignored or disregarded, the possible outcomes are:

- For any adults that have been identified at risk could be in further danger of more abuse, neglect or being drawn into any extremist/ terrorism-related or gang-related activity.
- For staff and volunteers – may be subject to inquiry, investigation internally or externally for failing to take appropriate steps, internally may then be subject to a disciplinary process.
- For the DSL, the CEO and Board of Trustees – possible inquiry and report from the Charities Commission and regulators or recommendation from local authorities to regulators.
- For CareTrade – possible risk of public scrutiny and ultimately risk of prosecution and/or additional inspections from regulators and ultimately deregistration. All of the above can lead to negative media attention and damage to the reputation of the charity

4. The Prevent Duty Requirements

4.1 CareTrade's Responsibility to Prevent

CareTrade is committed to helping prevent learners/participants/clients being drawn into terrorism which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. CareTrade fully understands it is a condition of funding that all further education and independent training providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

4.2 The Prevent Duty for Further Education Institutions in England and Wales July 201

In line with the Prevent Duty Guidance for Further Education Institutions in England and Wales (2015), and the Update Guidance for FE Colleges (2019) protecting learners/participants/clients from the risk of radicalisation is part of CareTrade wider safeguarding duties and is similar in nature to protecting young person from other forms of harm and abuse. Learners/participants/clients may be identified as vulnerable to radicalisation at any time during their time on a project or whilst being supported by a CareTrade member of staff on behaviour

The Channel framework of indicators which may provide triggers leading to engagement with a group, cause or ideology associated with terrorism may include:

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friend's involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

4.3 External Speakers and Events

- CareTrade is committed to ensure that it needs to balance its legal duties in terms of both ensuring freedom of speech and also protecting learner/participant/ client and staff welfare.
- CareTrade fully understands encouragement of terrorism and inviting support for a proscribed terrorist organisation are both criminal offences. CareTrade will not provide a platform for these offences to be committed.
- CareTrade also fully understands that when deciding whether or not to host a particular speaker, we will consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups.
- CareTrade will carry out a risk assessment for any planned events. The risk assessment will assess, and rate risks associated with any planned events, which provides evidence to suggest whether an event should proceed, be cancelled or whether action is required to mitigate any risk.
- CareTrade staff that would be involved in any planned events will have an awareness of Prevent as all staff receive annual training.
- CareTrade is fully aware and realises that the risk of radicalisation in institutions does not just come from external speakers. Radicalised learners/participants/clients can also act as a focal point for further radicalisation through personal contact with fellow learners/participants/ clients and through their social media activity. Where radicalisation happens off site, the learner /participant/ client concerned may well share his or her issues with other learners/participants/ clients. Changes in behaviour and outlook may be visible to staff.

4.4 Partnership

CareTrade is committed to working in partnership with:

- Southwark Prevent Education Officer: **Katharine Andrews**
- Southwark Prevent Programme Manager: **Ben Taylor**
- the DFE FE/HE Regional Prevent Co-Ordinator for London Counter-Extremism
Division: **Jennie Fisher**

Mark Finch the Head of Education & Learning and DSL for The Autism Project regularly attends Prevent forums/ meetings for the Southwark area. Information from these forums/ meetings is then shared with the rest of the CareTrade team.

As part of CareTrade Safeguarding and Prevent procedure reports are shared with both the EAP and board of trustees. EAP meetings happen 4 times a year and Trustees meet five time a year. The report includes states for both Safeguarding and Prevent concerns or incidents, any external referral made and if what measurements have been put in place to lower the risk of an incident happening again.

CareTrade works in partnership with two hospitals that learners access for work placements. These hospitals are GSTT and Whittington. CareTrade is aware of these hospitals Safeguarding and Prevent policies and procedures. CareTrade is also aware of the location of these hospitals and the risk these might cause the learner/participant/ client.

4.5 England's Current Threat Level for an Attack

Currently the threat to the UK (England, Wales, Scotland and Northern Ireland) from terrorism is substantial. **There are 5 levels of threat:**

- low - an attack is highly unlikely
- moderate - an attack is possible but not likely
- substantial - an attack is likely
- severe - an attack is highly likely
- critical - an attack is highly likely in the near future

The level is set by the Joint Terrorism Analysis Centre and the Security Service (MI5). Threat levels do not have an expiry date. They can change at any time as different information becomes available.

<https://www.mi5.gov.uk/threat-levels>

4.6 CareTrade's Location Risk and Contextual Concerns

CareTrade is committed to continue to keep up to date on the local contextual prevent issues. The following has been identified as current concerns for the areas that fall under CareTrade's services:

- CareTrade is aware of the increase in numbers of prevent referrals with young autistic people with mental health needs; however, most are due to fixation on material related to extremism.
- CareTrade is aware of the INCEL ideology, and all staff have attended INCEL training.
- CareTrade's office and classrooms are based in the Southwark area. CareTrade is aware that in Southwark currently there is a high referral for right wing extremist groups. CareTrade is also aware that in the Southwark area there has been an increase in stickers being displayed in the area from groups such as right-wing extremist, the IRA and anti-Israel groups.
- CareTrade works in partnership with GSTT hospital. GSTT has two locations which are Guys and St Thomas. Guys is located by London bridge and St Thomas is located by Westminster Bridge. Both hospitals are based in central London. CareTrade staff and learners/participants/ clients are aware that these locations are a high risk of a terrorist attack, this is due to past attacks that have happened near these locations.
- CareTrade works in partnership with the Whittington hospital. The hospital is in Archway North London. CareTrade staff and learners/participants/ clients are aware of the risks around prevent and that the threat for England is substantial.
- CareTrade's Working Kitchen is currently located in Greenwich London. CareTrade staff and learners/participants are aware of the risks around prevent and that the threat for England is substantial.
- CareTrade could place a learner/participant on a placement in any location in London. CareTrade staff and learners/participants are aware of the risks around prevent and that the threat for England is substantial.

Please see TAP's Prevent risk assessment for current measurements that are in place for the above.

4.7 CareTrade ICT Acceptable Use Policy

CareTrade's ICT Acceptable Use Policy states the following as being unacceptable use of CareTrade's ICT facilities:

- Any illegal conduct, or statements which are deemed to be advocating illegal activity

- Accessing, creating, storing, linking to, or sending material that is pornographic, offensive, obscene, or otherwise inappropriate (e.g., Terrorism or Radicalisation)

All staff, learners, participants and clients are required to complete an ICT acceptable use form stating that they adhere by the above. Any learners and staff who engage in any of the unacceptable activity that is listed in the form may have to return loaned CareTrade ICT equipment immediately and may face disciplinary action in line with CareTrade’s disciplinary, behaviour and conduct policies

5. Legislation and Regulation Requirements

5.1 The Care Act 2014

The Care Act 2014 places specific safeguarding duties with regard to an adult who has need for care and support and is experiencing or at risk of abuse or neglect. Because of those needs the adult is unable to protect themselves from either the risk, or the experience, of abuse or neglect.

The Care Act 2014 Section 14.2 states:

The safeguarding duties apply to an adult who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

5.2 Mental Capacity Act 2005

- **The presumption is that adults have mental capacity to make informed choices about their own safety and how they live their lives.**
- Issues of mental capacity and the ability to give informed consent are central to decisions and actions in Safeguarding Adults.
- All interventions need to consider the ability of adults to make informed choices about the way they want to live and the risks they want to take. This includes their ability:
 - To understand the implications of their situation.
 - To take action themselves to prevent abuse.
 - To participate to the fullest extent possible in decision making about interventions.
- The Mental Capacity Act 2005 provides a statutory framework to empower and protect people who may lack capacity to make decisions for themselves and establishes a framework for making decisions on their behalf. This applies whether the decisions are life-changing events or everyday matters.
- **All decisions taken in the Safeguarding Adults process must comply with the Act.** The Act says that: ‘... a person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or disturbance, in the functioning of the mind or brain’.

5.3 Other Core Legislations and Practices that relate to Safeguarding

CareTrade aims to meet all relevant legislative requirements and good practice in safeguarding. There are a number of statutory regulations which place a responsibility on CareTrade to protect adults at risk. This statutory framework includes the following:

- The Safeguarding Vulnerable Groups Act 2006
- The Protections of Freedom Act 2012
- The Health and Safety at Work Act 1974
- Moving and Handling Operations Regulations 1992 (2002)
- Human Rights Act 1998
- Sexual Offences Act 2004
- The Education Act 2002 requires that governing bodies of FE providers have a statutory duty to ensure we safeguard and promote the welfare of adults at risk
- Vulnerable Groups Act 2006 which sets out the type of activity in relation to adults at risk for which employers and individuals will be subject
- The Protection of Freedoms Act 2012 which changed the definition of Regulated Activity including who is eligible for a barred list check
- The Equality Act 2010
- SEN Code of Practice 2015
- The Education and Inspections Act 2006
- Achieving Best Evidence in Criminal Proceedings: Guidance for Vulnerable or Intimidated Witnesses, including Children, Home Office (2006)
- Information Sharing: Practitioners' guide. London: Department for Education and skills, Website: Use of Reasonable Force Advice for Head Teachers, Staff and Governing Bodies (DE 2011)
- The Regulated Activities Regulations 2014
- Disclosure and Barring Service 2012
- General Data Protection Act Regulations 2018 (GDPR)
- Keeping Children Safe in Education 2021

6. Staff Training for Safeguarding and Prevent

CareTrade is committed to ensuring all staff and volunteers, including those with designated responsibilities, have received appropriate levels of up-to-date Safeguarding and Prevent training.

- All staff are expected to refresh their Smoothwall safeguarding training and Prevent training annually.
- Designated Safeguarding Leads need to attain a level 3 and refresh/ update this qualification every two years by completing a refresher.
- Staff are expected to attend any other training that is relevant to meet the needs of a learner/ participant/ client and that will ensure they are fully safeguarded whilst accessing a project or service that CareTrade provides.

7. Definitions

Safeguarding - The term 'safeguarding adults at risk' covers both reactive adult protection and a preventative approach to keeping adults safe. Learners aged 18 and over are recognised as adults, in line with Safeguarding adults' legislation.

Designated Safeguarding Lead (DSL) - The designated safeguarding lead is the person appointed to take lead responsibility for adults at risk protection issues. To become a DSL the person must complete level 3 Safeguarding training. Within CareTrade there are 7 staff currently trained as designated safeguarding leads.

Adult at Risk - An adult aged 18 years or over 'who may need community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'. This definition is taken from the current Department of Health guidance to local partnerships.

Vulnerable adult - A vulnerable adult as a person who is aged 18 or over that is or may need community care services because of a disability (mental or other), age or illness and is someone who could be unable to look after themselves or protect themselves from harm or exploitation. This definition is taken from the Department of Health.

Peer-on-peer sexual abuse - Peer-on-peer sexual abuse is sexual abuse that happens between young people of a similar age or stage of development. It can happen between any number of young people and can affect any age group It can be harmful to the young person who display it as well as those who experience it.

Physical Abuse - This may involve hitting, shaking, throwing, poisoning, burning, scalding, misuse of medication, inappropriate use of restraint, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in an adult at risk.

Neglect - Neglect is the persistent or severe failure to meet an adult at risk's physical and/or psychological needs which can result in serious impairment of the health or development of the individual. It may also include neglect of, or unresponsiveness to, an adult's basic emotional needs.

Self-Neglect -Self-neglect is a condition affecting behaviour, where the individual refuses to attend to their personal care and hygiene, their environment or even refusal of care services offered to them.

Sexual Abuse and Exploitation - Sexual abuse involves an adult at risk being forced or coerced into participating in or watching sexual activity. It is not necessary for the adult at risk to be aware that the activity is sexual and the apparent consent of the adult at risk is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

Emotional Abuse - Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the adult at risk's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive cyber-bullying through electronic communications.

Financial Abuse - Where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone's pension, or just the constant borrowing of money and never returning it.

Honour-based Violence - Honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse and should be handled and escalated as such.

FGM mandatory reporting duty - From October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales.

Mandatory reporting duty applies to all regulated professionals (as defined in section 5B(2)(a), (11) and (12) of the 2003 Act) working within health or social care, and teachers. College teaching staff, including qualified teachers or persons who are employed or engaged to carry out teaching work, must report 'known' cases of FGM in girls aged under 18 to the police.

Forced Marriage - Forced marriage is a term used to describe a marriage in which one or both of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.

Prevent - The Prevent duty became law back in 2015. This is a duty on all educational providers to have due regard to preventing people being drawn into terrorism.

Radicalisation - Radicalisation refers to the process by which a person comes to support terrorism or other forms of extremism.

Extremism - Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Ideology - A system of ideas and ideals, especially one which forms the basis of economic or political theory and policy