



Safeguarding & Prevent Policy

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Safeguarding & Prevent Policy

1. Purpose

The purpose of this policy is to provide guidance to all staff, volunteers, and the wider CareTrade community to ensure that safeguarding is effective and embedded within the organisation's everyday practices. This also includes CareTrade's commitment to fostering an approach to safeguard individuals against any extremist ideology.

2. Definitions

Safeguarding is defined as

- 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

Prevent is defined as

- 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.

Extremism is defined as the promotion or advancement of an ideology based on violence, hatred, or intolerance, that aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2).

Please see **appendix 1** for more definitions related to Safeguarding and Prevent

3. Scope

This policy outlines CareTrade's approach to recruiting and training staff, supporting learners/participants/clients, making referrals, and handling safeguarding allegations, including those involving staff. It informs all staff, visitors, and trustees about various risks, including those related to preventing extremism. The policy raises awareness of issues concerning the welfare of adults at risk and promotes a safe learning environment, whether in the classroom or on work placements.

It assists in identifying adults at risk of significant harm by adhering to the Adult at Risk Safeguarding and the Prevent Duty. The policy clearly defines procedures for reporting and addressing abuse allegations against staff and details CareTrade's safe recruitment process for all staff members.

Furthermore, it outlines the Safeguarding & Prevent training provided to all CareTrade staff during induction and on an annual basis as part of their continual professional development (CPD). To ensure effectiveness, the policy is reviewed and updated annually by the policy owner.

This policy ensures that all learners/participants/clients receive equal protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity. It highlights CareTrade's commitment to anti-discriminatory practices and acknowledges the unique needs of adults from minority ethnic groups and those with learning disabilities and/or difficulties, particularly regarding communication barriers.

Expected outcomes if the Safeguarding and Prevent policy and procedures are effectively followed by all staff:

- I. Learners/participants/clients at risk will be better protected from the impact of abuse, neglect, and being drawn into terrorism-related or gang-related activities.
- II. All CareTrade staff will take the necessary steps to safeguard and uphold the rights of learners/participants/clients.
- III. Adult Safeguarding teams, Local Authorities, and Prevent departments will be contacted appropriately by the designated DSL (Designated Safeguarding Lead) when necessary.

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

- I. For any **learners/participants/clients** 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.
- II. 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.
- III. 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.
- IV. 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. CareTrade's Safeguarding & Prevent Principles

- I. Safeguarding and promoting the welfare of adults at risk is everyone's responsibility.
- II. The best interests of the learner/participants/clients must be paramount.
- III. CareTrade adopts a person-centered approach, operating in the best interests of each learner/participant/client accessing projects/services at CareTrade.
- IV. We support learners/participants/clients in understanding how to keep themselves safe and how to raise concerns if they feel unsafe in any aspect of their lives.
- V. CareTrade will safeguard any learner/participant/client against abuse, whether perpetrated by staff, volunteers, family members, members of the public, or other learners/participants/clients.
- VI. CareTrade is committed to effectively preventing any learner/participant/client from being drawn into terrorism-related, extremist ideologies, or gang-related activities.
- VII. All staff are expected to collaborate with outside professionals who support any learners/participants/clients accessing projects/services provided by CareTrade.
- VIII. All our DSLs (Designated Safeguarding Leads) are trained and collaborate with local Safeguarding Adults Boards, complying with local multi-agency Safeguarding Adults Procedures.
- IX. This policy is available in a user-friendly format for learners/participants/clients and others to access

5. Safeguarding & Prevent Roles and Responsibilities

Role/s	Responsibilities
Everyone	<ul style="list-style-type: none"> • Can raise a safeguarding/ prevent concern • Complete training as necessary
All staff	<ul style="list-style-type: none"> • To follow the Safeguarding and Prevent Procedure flow chart on page 2 when raising or logging a safeguarding/ prevent concern
DSLs/ DDSLs	<ul style="list-style-type: none"> • To follow up safeguarding/ prevent concerns for their allocated learners/traineeships/participants/clients • Should follow the DSL/DDSL flow chart in the Safeguarding and Prevent Procedure when following up on a safeguarding/ prevent concerns. • Ensure all appropriate actions are taken and for providing staff, volunteers and trustees with the guidance required.
Head of Education & Learning	<ul style="list-style-type: none"> • Will report to the EAP on any external referrals made related to TAP • Will update this policy and procedure annually
CEO	<ul style="list-style-type: none"> • To offer consultation to the DSL or DDSL on any matters which are seen as complex or challenging • Will report to the board of Trustees on all external referrals made
Educational Advisor Panel	<ul style="list-style-type: none"> • To advise the Head of Education with any Safeguarding concerns
Board of Trustees	<ul style="list-style-type: none"> • To be notified of any external safeguarding reports made by CareTrade

As part of CareTrade's Safeguarding and Prevent commitment, reports are shared with both the EAP and Board of Trustees. EAP meetings occur four times a year, while Trustees convene four or five times annually. These reports submitted to the EAP or Board of Trustees will contain anonymized data regarding Safeguarding and Prevent concerns or incidents, any external referrals made, and measures implemented to mitigate the risk of recurrence.

CareTrade will inform all learners/participants/clients accessing CareTrade projects or services, in an appropriate format, about its duty to contact the local authority Adult Safeguarding/Prevent department if concerns arise regarding potential abuse, neglect, or involvement in extremist or terrorism-related activities by an adult at risk.

CareTrade is dedicated to collaborating with parents/carers or any other relevant outside professionals, such as social workers or mental health teams, of the learner/participant/client, provided consent is obtained when necessary and appropriate.

6. CareTrade's Partnerships & Safeguarding

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.

GSTT Safeguarding Adults Declaration

<https://www.guysandstthomas.nhs.uk/resources/publications/statutory/safeguarding-adults-declaration.pdf>

Whittington Safeguarding children and young people

<https://www.whittington.nhs.uk/default.asp?c=25385>

Whittington Safeguarding Vulnerable adults

<https://www.whittington.nhs.uk/default.asp?c=10894>

7. Statutory Frameworks

The Care Act 2014

The Care Act 2014 places specific safeguarding duties about 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.

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'.

Please see **appendix 2** for other core Legislations and Practices that relate to Safeguarding & Prevent

8. The Prevent Duty

CareTrade is dedicated to preventing learners/participants/clients from being influenced by terrorism, encompassing both violent and non-violent extremism. Non-violent extremism, which can create an environment conducive to terrorism and propagate views exploited by terrorists, is also addressed.

The Autism Project fully acknowledges that compliance with relevant legislation and statutory responsibilities associated with education delivery and learner safeguarding is a condition of funding for all further education and independent training providers.

Aligned with this commitment, The Autism Project operates in accordance with the Prevent Duty Guidance for Further Education Institutions in England and Wales (2015), as well as the Updated Guidance for FE Colleges (2019). Protecting learners/participants/clients from the risk of radicalization is integrated into CareTrade's broader safeguarding duties and parallels safeguarding against other forms of harm and abuse affecting young people.

The **Prevent Lead** for The Autism Project is The Head of Education & Learning. (please see appendix 2)

Please click on the link below to access the government prevent duty guidance:

<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible>

Please see **appendix 3** for the Channel framework and Statutory Prevent Guidance for Further Education 2015

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Location Risk and Contextual Concerns

CareTrade aims to protect learner/ participants from the risk of radicalisation, as part of our wider safeguarding duties and duty to promote the spiritual, moral, social, and cultural development of them by having the following measurements in place against the following risks:

Risks	Measurements in place
<ul style="list-style-type: none"> • Autistic people with additional mental health needs are at higher risk of developing extremism ideology views including INCEL, far right-wing • Within Southwark where CareTrade is based there are known groups such as right-wing extremist groups, the IRA and anti-Israel groups. • Within London there is a higher risk of a terrorist attack due to it being the capital city • 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. 	<ul style="list-style-type: none"> • Create a safe space for learners to discuss sensitive topics, including terrorism and extremism • Have measurements in place to protect learners from harmful online content, including setting up appropriate filtering and monitoring systems • Having a robust safeguarding procedure in place that identifies adults at risk • Engage with our local boroughs risk assessment to determine the potential risk of individuals being drawn into terrorism in the local area • Promoting the fundamental British values in the curriculum

England’s Current Threat Level for an Attack

Currently (May 2024) the threat to the UK (England, Wales, Scotland, and Northern Ireland) from terrorism is **substantial**.

There are 5 levels of threat:

1. low - an attack is highly unlikely
2. moderate - an attack is possible but not likely
3. substantial - an attack is likely
4. severe - an attack is highly likely
5. 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>

9. CareTrade ICT and Safeguarding

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

On-line Safety

CareTrade will endeavor to both filter all internet use to ensure and maintain the safety of staff, learners, participants, and clients.

Staff and students must follow the Online Safety Policy and agree to the relevant Acceptable Use Policy.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, learners/ participants may be familiar with generative chatbots such as ChatGPT and Google Bard.

CareTrade recognises that AI has many uses, including enhancing teaching and learning, and helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose individuals to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real. CareTrade will treat any use of AI to access harmful content or harassment to individuals in line with this policy and the TAP Learner Conduct policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being for sessions/ workshops.

Filtering and Monitoring

CareTrade has in place a filtering system that block access to harmful sites and content for any learner/ participant.

The Autism Project has in place a monitoring system that will identify when a user accesses or searches for certain types of harmful content CareTrade devices.

TAP DSLs can access the monitoring report, this will be downloaded once a term and reviewed within the safeguarding audit. Any concerns will be recorded and action appropriately.

10. Safer Recruitment

CareTrade's Safer Recruitment Policy outlines how CareTrade follow the safer recruitment guidelines when recruiting at each stage of the process.

Staff involved in the recruitment process are trained in safer recruitment.

Our priority is the safety and welfare of our learners, participants, clients and staff.

Safe recruitment of staff is the first step to safeguarding and promoting the welfare of our learners. CareTrade and The Autism Project are committed to safeguarding and promoting the welfare of all our learners and beneficiaries and expect all staff and volunteers to share this commitment.

Please refer to the safer recruitment policy for more information.

11. Training Requirements

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 CareTrade staff, volunteers, and trustees are expected to refresh their Safeguarding training and Prevent training annually and attend inhouse safeguarding/ prevent related training throughout the year.

All The Autism Project staff are also expected to attain the following training annually, as part of their Safeguarding and Prevent:

1. Peer on peer abuse
2. FGM training
3. County lines training
4. Incel training
5. Read any safeguarding and prevent updates from Keeping Children Safe in Education, Department of Further Education or Ofsted (if published)

CareTrade DSL's need to attain a level 3 and refresh/ update this qualification every two years by completing a refresher.

All staff, volunteers, and trustees have a responsibility to ensure that they are trained at an appropriate level in Safeguarding and Prevent.

All staff will need upload their certificates onto Breathe to evidence this training has been attained each year.

Staff will also be instructed by their line managers if they need 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.

12. Link to other policies

- Equality and Diversity
- ICT acceptable use
- Safer Recruitment
- Online Safety
- Learner Conduct
- Health and Safety

13. Monitoring arrangements

This policy will be reviewed annually by the Head of Education. At every review, it will be approved by the Educational Advisor Panel.

Appendix 1.

Definitions

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.

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.

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

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

Incel - A member of an online community of young men who consider themselves unable to attract women sexually, typically associated with views that are hostile towards women and men who are sexually active.

Appendix 2

Other Core Legislations and Practices that relate to Safeguarding & Prevent

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:

1. The Safeguarding Vulnerable Groups Act 2006
2. The Protections of Freedom Act 2012
3. The Health and Safety at Work Act 1974
4. Moving and Handling Operations Regulations 1992 (2002)
5. Human Rights Act 1998
6. Sexual Offences Act 2004
7. 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
8. 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
9. The Apprenticeships, Skills, Children and Learning Act 2009 (as amended)
10. The Protection of Freedoms Act 2012 which changed the definition of Regulated Activity including who is eligible for a barred list check
11. The Equality Act 2010
12. SEN Code of Practice 2015
13. The Education and Inspections Act 2006
14. Achieving Best Evidence in Criminal Proceedings: Guidance for Vulnerable or Intimidated Witnesses, including Children, Home Office (2006)
15. 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)
16. The Regulated Activities Regulations 2014
17. Disclosure and Barring Service 2012
18. General Data Protection Act Regulations 2018 (GDPR)
19. Keeping Children Safe in Education 2022
20. Prevent Duty Guidance for Further Education Institutions in England and Wales July 2015

Appendix 3

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

Statutory Prevent Guidance for Further Education (2015) summarises requirements in terms of the following key areas:

- external speakers and events
- partnerships
- risk assessment and action plan
- staff and student training
- welfare and pastoral care and IT Policies