



Safeguarding Adults at risk policy

Adopted in May 07.....

The policy is to be reviewed in Jun 20 (Review every 6 months)

The name of the designated person is. PM.....

1. Purpose and Aim

Statement of policy on safeguarding

SkyWay is fully committed to safeguarding the welfare of all adults it works with, by taking all reasonable steps to **protect them from neglect or abuse. SkyWay champions a person centered approach to safeguarding adults and recognises that the adult is the decision maker.** Staff and volunteers will at all times, show respect for and understanding of the rights, safety and welfare of the adults at risk we work with and conduct themselves in a way that reflects the ethos of SkyWay.

We do this by:

- Valuing and listening to them
- Ensuring that paid staff and volunteers do not work for SkyWay until they have been fully checked including DBS and references
- Ensuring that all paid staff and volunteers are carefully selected, checked prior to commencing work, trained and supervised
- Assessing carefully all risks that adults at risk may encounter and taking all necessary steps to minimise and manage such risks
- Disseminating information about SkyWay's policies and procedures for safeguarding to adults at risk, their families and carers and our staff and volunteers
- Adults at risk know how to voice concerns or complaints about anything they are not happy with
- Giving adults at risk and workers information about what we do and what can be expected from us

As stated in the SkyWay code of conduct, it is the responsibility of everyone involved with SkyWay to adhere to the safeguarding adults at risk policies and procedures.

This policy is part of a range of measures to support adults at risk. All the relevant policies and procedures can be found in the SkyWay staff Handbook.

Introduction

This policy outlines our approach to safeguarding adults at risk and is written in accordance with the Care Act 2014, and statutory care and support guidance 2015.

- It will be reviewed, added to, or modified every 6 months and any changes will be ratified by at least 3 Trustees. Copies and subsequent amendments will be made available to all employees and volunteers.
- The success of this policy depends on the active support of all employees to achieve its objectives.

2. What is adult safeguarding?

Adult Safeguarding is protecting an adult's right to live in safety, free from any type of abuse and/or neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, whilst at the same time making sure that the adult's wellbeing is promoted. This includes having regard to the person's views, wishes, feelings and beliefs in deciding on any action.

Safeguarding interventions should:

- stop abuse or neglect wherever possible prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- Safeguard adults in a way that supports them in making choices and having control about how they want to live promote an approach that concentrates on improving life for the adults concerned
- Raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult; and address what has caused the abuse or neglect.

3. Safeguarding and the Care Act 2014

There are six key principles contained in the Care Act, which underpin the SkyWay practice when working with adults at risk:

1. Empowerment – personalisation and the presumption of person-led decisions and informed consent
2. Prevention – it is better to take action before harm occurs
3. Proportionality – proportionate and least intrusive response appropriate to the risk presented
4. Protection – support and representation for those in greatest need
5. Partnership – local solutions through services working with their communities
6. Accountability – accountability and transparency in delivering safeguarding

The Care Act sets out the statutory framework for adult safeguarding and was implemented in April 2015. The Act outlines a duty to consider the physical, mental and emotional wellbeing of people needing care with an emphasis on prevention. The Care Act brings in stronger regulatory powers, including prosecution where necessary.

Under the Care Act an adult at risk is considered to be someone aged 18 years or over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs);
- 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.

If these conditions are met then section 42 of the Care Act places a duty on the local authority to ensure that enquiries are made.

4. Categories of abuse & signs and indicators

The following are the 10 main categories of abuse in relation to adults at risk, incidents may be one off or multiple and could affect one person or more.

All SkyWay employees or volunteers should be aware of the indicators and look out for signs and indicators of abuse and neglect.

1. **Physical abuse** is an individual's body being injured or hurt due, for example, to assault, hitting, slapping or pushing. It can also be the wrong use of restrictive practices

Examples could be the misuse of medication or using inappropriate restraint such as locking someone in a room, tying them to a chair or using inappropriate physical sanctions. Injuries that are unexplained or haven't been treated. There could be a number of injuries of different ages and in different places

Signs and indicators of physical abuse could include: Broken bones, bruises, unexplained loss of clumps of hair, bite, burn or scald marks

2. **Domestic violence** is any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality. It includes psychological, physical, sexual, financial and emotional abuse, and so-called 'honour-based' violence

Signs of domestic violence can be any of those relating to the different types of abuse or neglect that can occur in any incident

3. **Modern slavery** – this encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

Signs of physical or psychological abuse. Malnourished or unkempt, appearing withdrawn. Rarely allowed to travel on their own, seem under the control and influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. Few or no personal belongings or documents. They avoid eye contact, appear frightened or hesitant to talk to strangers and law enforcers

4. **Financial or material abuse** is the use of a person's funds and belongings without their permission. This could be theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection to wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits

Signs of Financial or material abuse could include: bills not being paid, loss of assets such as a house being sold and the money from the sale disappearing, expenditure higher than the living conditions suggest, not having enough food or clothing

5. **Sexual abuse** is when a person becomes involved in sexual relationships or activities that they do not want to be involved in. They may have said that they do not want to be involved or they may be unable to give consent. Sexual abuse includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting to

Signs of sexual abuse could include: Pain, sores and bruising around the inner thighs and genital, anal or breast areas. Bloodstained underwear. Pain and discomfort when walking or sitting. Sexually transmitted infections and pregnancy are indicators for sexual activity and can indicate abuse if the person does not have the capacity to provide consent

6. **Neglect** is also known as the 'omission to act' or 'failure to act'. It is a failure to meet the basic needs of the individual. It includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational

services and the withholding of the necessities of life, such as medication, adequate nutrition and heating

7. **Self-neglect** is the term used to refer to those who fail or refuse to take care of their own basic needs. Neglecting to care for one's personal hygiene, health or surroundings can include a wide range of behaviours such as hoarding

Signs of neglect by others and self-neglect are similar. They include: malnutrition, dehydration, bedsores, dirty clothing and bedding and taking the wrong dosage of medication

8. **Psychological abuse** results in a person feeling worthless, unloved or uncared for. It includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Signs and indicators of psychological abuse can include anxiety, lack of confidence, low self-esteem and disturbed sleep

9. **Organisational abuse** happens where services provided are focused on the needs of the organisation. For example, not providing choice over mealtimes or when someone can go to bed because this is easier for the organisation. It includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home or in relation to care provided in one's own home. This may range from one-off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, processes, policies and practices of the organisation

Signs and indicators of organisational abuse can include: Poor care standards, rigid routines, lack of staff learning, development and support

10. **Discriminatory abuse** refers to an individual or group being treated unequally because of characteristics identified in the Equality Act 2010. It involves ignoring a person's values, beliefs and culture and includes forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion

Signs and indicators of discriminatory abuse can include: Poor service that does not meet the person's needs, verbal abuse and disrespect and exclusion of people from activities and/or services

In addition, adults may be at risk of exploitation by radicalisers who promote violence. The lead agency for co-ordinating enquiry and protection is the local PREVENT partnerships:

- LONDON BOROUGH OF HACKNEY: 0208 356 8104 prevent@hackney.gov.uk
- LONDON BOROUGH OF ISLINGTON: 020 7527 3018

Who could be an abuser?

The person who is responsible for the abuse is often well known to the person abused and could be:

- relatives and family members
- professional staff
- paid care workers
- volunteers
- other service users
- neighbours
- friends and associates, and
- stranger

5. Making Safeguarding Personal (MSP)

SkyWay is committed to making safeguarding personal. This is a local government initiative to put the person at the centre of the safeguarding process. As part of any disclosure or allegation of abuse we will ensure that there is a focus on understanding the views of the adult and their desired outcomes and ensure that the adult at risk is the decision maker and that they have control over the process being undertaken

- we will listen carefully to the adult at risk and help them identify what will make them feel safer
- we will try to reach agreement with the adult at risk about what needs to happen, through discussing options available to them and be open and transparent about any disagreements
- we will discuss risk with the adult and their views on how to manage risk
- we will make sure that the adult at risk is involved as much as possible in making decisions about next steps and any potential referral to statutory agencies

However it should be noted that if there is a significant risk to the person and or others, then the person's wishes may have to be renegotiated and possibly overridden.

Ensure that the support provided on decision making focuses on the outcomes the person wishes to achieve, what is working in their lives and what is not.

A balance sheet approach may be helpful in looking at the risks and benefits of any decision. There may be areas of disagreement between people, their family carers and practitioners, needing negotiation and support.

Attention and additional support may be necessary to meet the needs of those with special language and sensory need.

6. How to respond to signs and suspicions of abuse

All allegations of abuse will be taken seriously and appropriate steps will be taken taking into account the views of the adult at risk

Staff / Volunteers

- If any member of SkyWay is concerned that abuse may occur or has occurred they must refer the matter immediately to the Designated Safeguarding Leads who will decide on next steps and whether or not to report the matter further. If it is felt that further investigation is necessary in order to protect the adult, the matter may be referred to the statutory agencies
- Wherever possible the first steps will be a conversation or further conversation with the adult at risk to identify their views on whether abuse is occurring and their views on next

steps and their preferred outcome

- A Designated Safeguarding Lead will decide who is the most appropriate person to discuss the allegation with the adult. This will be based on factors such as: the allegation; the staff member's experience; and the relationship with the adult. The Designated Safeguarding Lead in many instances may be the most appropriate person
- The appropriate staff member will receive support if necessary so that they feel prepared for the conversation
- Any conversation with an adult should be conducted in a private setting and staff should ensure that the conversation moves at the pace of the adult at risk
- SkyWay staff / volunteers during conversations should discuss risk with the adult and acknowledge that as adults, although staff may feel they are making unwise decisions, it is their right to make such decisions (this must always be balanced with safety of the adult)
- Staff should acknowledge that it can be very difficult for an abused or neglected person to talk about what's been happening to them. So unless there is a concern for their immediate health and safety and vital to act straight away, staff should give them time to think about what they'd like to do
- Staff should not promise the adult that they would not tell anyone what they've heard. If an adult is being abused or neglected, it's important to find help for them and stop the harm. Staff should stay calm while the person is talking, even if they are upset by what they have heard, as becoming upset may cause them to become more upset themselves and stop sharing information about the abuse
- If during the conversation it seems clear that the adult at risk has been abused or neglected, staff should ask them what they'd like to do. Inform them of who would be able to help them and suggest that they could seek some help on their behalf if they wanted or if it's difficult for them to do so themselves. It's important that staff listen to what the adults at risk say and not to charge into action if this isn't what they want
- Designated Safeguarding Leads should be kept up to date with all conversations and will make the final decision as to whether statutory agencies should be contacted
- SkyWay acknowledges that weighing the requests of the adult at risk with the potential safety needs can be difficult and there are different factors to consider (See section 7 consent below), therefore if staff are concerned about the adult at risk when consent has not been given, they should contact the relevant adult statutory services for advice and support
- Where consent is given SkyWay will collaborate fully with the statutory and voluntary agencies concerned with adult abuse. The organisation will not conduct investigations on its own

If at any time a member of staff is concerned that the adult at risk is in immediate danger they should always call 999.

7. Consent

Where consent is concerned it is important for the SkyWay staff member or volunteer to:

- support the adult at risk to make an informed decision, although undue pressure should not be exerted on the adult at risk to change their mind. The issue should be discussed fully and he/she should be given all the relevant information available in order to make an informed decision, including who will be involved and the various possible outcomes which might result from their decision
- reassure the adult at risk that their case would be dealt with sensitively and professionally

- under Safeguarding procedures and any specific concerns that they raise should be addressed
- ensure that you DO NOT conduct any medical examinations as these are only to be undertaken by qualified clinical professionals.
- Respect at all times, the privacy of the adult concerned. Taking photographic evidence is not advised, however, should a situation where a visual representation would add to the whole body of evidence (e.g. hoarding example), ask for permission first and also refer to your Safeguarding Lead.

Exceptions

There are four potential exceptions to the general rule outlined above which are:

1. If other people appear to be at risk of harm (adults or children)
2. If there is a 'legal restriction' or an overriding public interest
3. If the person is exposed to life threatening risk and they are unreasonably withholding their consent
4. If the person has impaired capacity or decision making in relation to the safeguarding issues and the withholding of consent

A 'legal restriction' in this context means that there may be exceptional circumstances where an adult at risk makes a decision or intends to act in a way that is unlawful or where their care needs to be addressed under the Mental Health Act 1983.

An 'overriding public interest' refers to a situation where it is essential to share information in order to prevent a crime or to protect others from harm (e.g. 'Hate Crime' – which we have a statutory responsibility to report). This is supported by the Crime and Disorder Act 1998.

What to do if consent is withheld

In all cases where an adult at risk is withholding consent and there are concerns about his/her welfare, a Designated Safeguarding Lead should be contacted.

If the adult at risk appears to lack mental capacity or to have impaired mental capacity in relation to the issue of consent, the Designated Safeguarding Lead should seek advice and support to assess the person's mental capacity using the 2 stage test as defined in the [Mental Capacity Act 2005](#).

It is SkyWay's policy that staff / volunteers at SkyWay would not assess the person's mental capacity and would always refer onto a more suitable provider who would have the skills to do so. Initially the Designated Safeguarding Lead should contact the relevant statutory agency and seek advice and support and the most appropriate referral point for the test to be completed.

If the person is assessed as lacking mental capacity, then the decision as to whether to contact statutory agencies must be made by Designated Safeguarding Lead in the person's best interests in terms of the [Mental Capacity Act 2005](#) and in cooperation with the relevant organisations.

Please note that the reasons for making this decision should be fully documented with all records kept safe at all times.

In the event that another person has legal decision making powers in relation to welfare decisions (i.e. under a Lasting Power of Attorney or has been given the status of Welfare Deputy by the Court of Protection), then they will normally be the person to make the Best Interests decision. However, if there are concerns that the person with such powers may be involved in the suspected abuse, legal advice should be sought at an early stage.

If the adult at risk is considered to have mental capacity in relation to a decision about giving or withholding consent, he/she has the right to withhold consent to the use of Safeguarding Adults procedures – except in very specific circumstances as outlined above in exceptions

Where abuse is suspected and - (if the adult at risk has capacity and does not consent to a referral and there are no public or vital interest considerations) in spite of the fact that they have been given all the information and reassurances described above - if the adult at risk continues to

withhold his/her consent to the implementation of Safeguarding Adults procedures, all other alternatives for minimising risk should be considered in discussion with the adult at risk, the individual should be given information about where to get help if they change their mind or if the abuse or neglect continues and they subsequently want support to promote their safety.

SkyWay staff must assure themselves that the decision to withhold consent is not made under undue influence, coercion or intimidation.

All information related to consent and decisions made should be recorded and stored. (see how information will be recorded)

Deprivation of Liberty Safeguards (DoLS)

The Deprivation of Liberty Safeguards is the procedure prescribed in law when it is necessary to deprive the liberty of someone who lacks capacity to consent to their care and treatment in order to keep them safe from harm. Final decisions about what amounts to a deprivation of liberty are made by courts.

It is SkyWay's policy that staff / volunteers at SkyWay would not assess the person's mental capacity and would always refer onto a more suitable provider who would have the skills to do so with the safeguarding Lead at all times.

The following DoLS safeguards guidelines regarding deprivation of liberty should be considered:

- DoLS should be avoided whenever possible
- DoLS should only be authorised in cases where it is in the relevant person's best interests and the only way to keep them safe
- DoLS should be only for a particular treatment plan or course of action
- DoLS should be for as short a time as possible

8. Designated Safeguarding staff

SkyWay has a trained Designated Safeguarding Lead.

Where there is concern that abuse may have occurred, the Designated Safeguarding Lead must be informed verbally and by email.

- **Marlon Gayle (Safeguarding Lead) - 020 7729 6970 or 07947 138 773**
marlon@skyway.london

In the case of the Designated Safeguarding Lead being unavailable, the CEO should be contacted.

- **Natalie Roast (CEO) - 020 7729 6970 or 07973 364082 Natalie@skyway.london**

SkyWay also has a Trustee that leads on safeguarding; if you would prefer to contact him directly please email him on the e-mail below

- **Nick Archard (Trustee) - should you need to contact Nick, please contact the office on 0207 729 6970 and his details will be shared**

Or go direct to the local borough's **vulnerable adult first response team** (see appendix 1 for contact details).

The Designated Safeguarding Leads have the following core areas of responsibility:

- Receive and record information from anyone who has concerns
- Assess the information promptly and carefully, clarifying or obtaining more information when necessary
- Consult initially with the adult's social care teams
- Make a formal referral when required to a statutory agency or the police
- Be point of contact for adult's social care teams if and when required
- Ensure all information received and recorded is stored confidentially and securely in line with the SkyWay Confidentiality Policy and this policy.

The SkyWay Safeguarding Adults at risk policy works in conjunction with the Safeguarding Children and Young People Policy, where people are in the process of transition and under 18 years old, staff should refer to the local children safeguarding teams (See young people safeguarding policy for further details)

9. How to respond to allegations of abuse against people in a position of trust including SkyWay staff or volunteers

If you have a suspicion or concern about any staff (paid or volunteer) working at SkyWay or any other people working in a position of trust (which could put other adults at risk or young people at risk of abuse), you should inform the Designated Safeguarding Lead or if more appropriate Natalie Roast (CEO) on 020 7729 6970 or Natalie@skyway.london. The CEO should be informed in all cases by the Designated Safeguarding Lead.

The CEO or Designated Safeguarding Lead will then:

- Contact the Local Statutory Services to inform them of any allegations against a professional or request a consultation (see appendix 1 for contact details). Contact will be made immediately or within 24 hours
- Contact the Chair of SkyWay Trustees to inform them of the allegations
- If necessary, contact the police
- Work with the statutory agency to investigate the allegations (where appropriate)

If allegations are made concerning staff or volunteers of SkyWay a thorough investigation will be carried out and where appropriate staff or volunteers may be suspended from duty using the Disciplinary Policy.

Where a worker or volunteer has been dismissed or removed from work due to harm or risk of harm to a referral will be made to the Disclosure and Barring Service.

The police may be contacted as deemed necessary.

10. How information will be recorded

The staff member(s) / volunteer(s) who were disclosed to, or are concerned, are responsible for recording all details of the incident / disclosure.

All allegations, complaints or suspicions of abuse should be recorded as close as possible to the time of the incident on the incident disclosure form. Details of the incidents should be recorded in as much detail and as accurately as possible. Any disclosures of abuse being made by adults at risk should be a reflection of what was actually said. It is vitally important that staff record all discussions regarding consent and decisions made regarding consent with an adult at risk.

Information should be passed on as soon as possible but within 24 hours to the Designated Safeguarding Lead, who will make notes of any decisions made and subsequent information.

A chronology should be kept of all contact with the adult at risk / staff member / family and other professionals plus all attempts at contacting.

- Records should be kept up to date and stored confidentially
- Records and allegations against a member of staff should be kept in a separate file in a secure place
- Records should be stored safely on the *SkyWay Google drive within Admin Access / Safeguarding / A Adults at risk Safeguarding* which can only be accessed by Senior Managers
- Records relating to a member of staff should be filled on the *SkyWay Google drive / CEO / Human resources / relevant staff members folder / Safeguarding*. Only the CEO has access to this folder
- Any written documentation should be scanned and uploaded into the above files
- Copies of all allegations against a member of staff should be kept until they reach retirement age

The person concerned should be kept up to date about the process and any decisions to be taken as a result of it.

11. Confidentiality

SkyWay holds personal information under strict legal and ethical obligations of confidentiality. SkyWay must not use or disclose information that is given to us in confidence in a form that might identify a person without their consent. The same principle applies to staff and volunteer records.

However there are important exceptions to this rule (see section 7: exclusions).

Where an exclusion to this rule applies then SkyWay may have to share information with local statutory agencies to protect adults at risk from abuse.

It is our intention to respect the privacy of adults at risk, their parents, carers and our staff and we will always aim to use a balanced approach when dealing with concerns.

Records pertaining to safeguarding adults investigations or concerns will be stored in a locked cabinet or in a password encrypted file, accessible only to the SkyWay staff allocated to the case.

Please refer to the Confidentiality Policy for more information.

12. Safe Recruitment

Our standards for recruitment are in line with minimum standards for CHSCB recruitment and are as follows:

1. All those working or seeking to work with children or adults at risk, whether in a paid or voluntary capacity, will be properly recruited, trained and supported and will be subject to whatever supervision is appropriate.
2. SkyWay has a recruitment policy in place that includes explicit reference to safeguarding
3. SkyWay includes a generic statement within every job description attached to a job involving contact or work with children or adults at risk that outlines the organisational expectation of the post-holder
4. All SkyWay staff / volunteers undertake the appropriate level of training and are

- responsible for ensuring that they understand and work within this policy
5. All SkyWay job descriptions define the nature of safeguarding supervision a post-holder will receive
 6. All those working or seeking to work with children and adults at risk, whether in a paid or voluntary capacity, will be asked to declare whether they have any criminal convictions or whether certain types of orders of the civil courts have been made against them and whether they have caused significant harm to a child or adult at risk or put a child or adult at risk of significant harm.
 7. SkyWay completes a DBS check at enhanced level (or reviews the update service) for every new member of staff / Volunteer / Trustee who works directly with, or has regular contact with, children and adults at risk, based on levels of contact
 8. SkyWay conducts repeat checks annually on every member of staff who works directly with, or has regular contact with children and adults at risk – through the Update Service
 9. SkyWay takes up a minimum of 2 references, one of which must be from the most recent employer
 10. SkyWay ensures that a nominated person receives and can evidence that they have received safe recruitment training and refreshes this whenever the law in this context changes
 11. SkyWay will also check that partner organisations supplying Adults at risk, volunteers or workers for projects have the required checks before commencing work or joint projects

Please refer to the SkyWay Safer Recruitment Policy for more detailed information

13. Safeguarding training at SkyWay

All SkyWay staff, peers, volunteers and trustees will be given appropriate safeguarding training.

Staff and volunteers

- Staff and volunteers are required to complete the SkyWay Safeguarding induction training within the first month of their employment
- Additional safeguarding training will be given relevant to the position in which they are working or volunteering, a decision on this will be made during induction.
- All frontline staff and volunteers (or others deemed appropriate) will complete an external safeguarding training within 6 weeks. Where possible staff will attend a course to inform them of the requirements of the borough they work in.

Peers

- As part of their peer programme, peers will always complete an external safeguarding training course, before commencing work or volunteering. Peers will complete the SkyWay Safeguarding induction training with their manager. Additional safeguarding training will be given relevant to the position in which they are volunteering / working in

Trustees

- Trustees will attend a SkyWay Safeguarding Training course or will be required to complete the NSPCC online Safeguarding Training

Ongoing training and development

- Staff / Peers and volunteers will complete internal Safeguarding training annually and complete external Safeguarding training bi-annually
- Additional training throughout the year will be completed as necessary in relation to changes in current guidance

- Designated Safeguarding Leads will complete Training for Safeguarding Leads, their deputies and managers or equivalent course (at Level 3) this will be updated every 2 years
- SkyWay sets aside a minimum of 4 internal group training days per year, these days are often used to update staff of new safeguarding information or changes in current guidance

All training is recorded and tracked in the annual SkyWay Training Plan.

- All front line staff, managers and Designated Safeguarding Leads have safeguarding as a standard agenda item as part of their monthly supervision
- Safeguarding is also a standard agenda item in the SkyWay Team Meetings, held every 2 weeks and as part of the Trustee Meetings every 6 weeks

14. SkyWay working practices and code of behaviour

All staff and volunteers are encouraged to demonstrate exemplary behaviour when working with or around adults at risk.

All SkyWay staff, volunteers, children and adults at risk adhere to the following code of conduct:

SkyWay Code of Conduct

It is the responsibility of everyone involved with SkyWay Charity to always behave responsibly:

- Treat **everyone** with respect and dignity
- Respect and be sensitive to individual beliefs, faiths and religions
- Encourage and promote diversity
- Be a good role model
- Respect other's right to privacy
- Do not judge or make assumptions
- Treat everyone fairly and show tolerance and respect to all
- Trust and value each other
- Take advantage of and become involved in activities and events provided
- Uphold confidentiality of information
- Assess all situations for risk and dangers
- Take appropriate action to respond to any allegations, suspicions or concerns about abuse
- Provide opportunities to talk about concerns
- Create an environment that allows everyone to challenge any inappropriate attitudes or behaviour
- Show respect and care towards the building, equipment and surrounding external areas
- Respond appropriately to concerns and complaints
- Adhere to relevant policies and procedures and **uphold this code of conduct**

Working Guidelines

As part of the induction process all frontline staff, peers and volunteers are required to sign up to the SkyWay '*How to behave, working with young people and vulnerable adults guidelines*'. These guidelines were created to ensure that we maintain a high standard of safe and professional youth work.

Staff are required to sign up to show their commitment to working in a positive way with young people and adults at risk.

Physical Contact

Staff and volunteers should not have unnecessary physical contact with child, young person or vulnerable adult. There may, however, be occasions when physical contact is unavoidable or positively desirable or necessary for safety reasons, for example:

- Providing reassurance for a distressed person
- When teaching sports such as gymnastics or swimming
- When working with a person with a disability who requests such assistance
- Administering first aid

Wherever possible there should be an attempt to ask the person to agree to such contact. Where appropriate, staff should explain their actions. This should be conducted openly and ideally with another member of staff or volunteer present. Staff should be aware of their positioning so that, where possible, others can clearly see the assistance being given.

Staff and volunteers should avoid doing things of a personal nature that the person can do themselves.

In very rare circumstances staff may need to make physical contact with a young person or adult at risk for their own or other's safety (see *SkyWay handling incidents at work procedure*).

15. Considerations for Activities specific to SkyWay Adults at risk

SkyWay takes into consideration a number of specific activities to safeguard adults at risk and makes reference to them in the following policies and procedures:

Whistleblowing

SkyWay encourages staff to bring forward genuine concerns within the workplace and to report any wrongdoing of which they are aware, ie 'whistleblowing'

Use of photographic, video recording, image recording and phone camera use

SkyWay is committed to protecting adults at risk from the misuse of photographic and video images of themselves, taken whilst they attend SkyWay

Trips, tours and Residential

SkyWay is committed to keeping adults at risk safe whilst on trips and residential. We do this in a number of ways including using procedures in the Front Line Staff Manual. SkyWay also uses a Residential and Trip procedure to ensure all aspects of health and safety and safeguarding are adhered to

Internet Safety

SkyWay recognises that it is important to consider the safety of adults at risk when they have access to the internet whilst taking part in activities at SkyWay

Health and safety

SkyWay Charity works to the principles of the The Health and Safety at Work Act 1974 which places a statutory duty on all employers to ensure, so far as is reasonably practicable, the safety, health and welfare of all its employees at work and other people who may be affected by their activities, inclusive of adults at risk, volunteers, members of the public

Young Peers and Volunteers

SkyWay is committed to recruiting adults at risk from the local community to gain employability experience in a variety of settings through the Peer Programme. This can often include previous service users. Peers are identified, supported and trained by SkyWay staff.

SkyWay sees the Peer Worker programme as a developmental pathway for adults at risk from leadership, volunteering and work experience working towards a Peer Worker position.

SkyWay acknowledges that there will always be a level of risk in this method, SkyWay has therefore created the SkyWay Young Volunteer & Peer Workers Procedure to support staff in considering and minimising those risks.

Complaints

If anyone connected with SkyWay is unhappy with the service they have received they are encouraged to speak with a member of staff, if this does not resolve the problem they should make a formal complaint in writing as per the SkyWay Complaints policy and procedure. If they would prefer to speak to someone they should contact Marlon Gayle on 020 7729 6970

Appendix 1

Local Authority Contacts

Currently SkyWay operates across 2 Local Authorities: Hackney and Islington.

The following are the relevant contact details if you have Safeguarding concerns regarding adults at risk:

Hackney

Vulnerable Adults

Safeguarding Adults	020 8356 5782
Out of hours:	020 8356 2300
Mental Health - City and Hackney Crisis Services (24 hour crisis helpline)	020 8432 8020
Domestic abuse intervention service	0800 056 0905

Southwark

Vulnerable Adults

To report a concern about an adult with care and support needs who is experiencing or is at risk of abuse or neglect, contact Southwark Adult Social Care. There are a number of ways you can do this:

- For older people and adults with a physical disability, including older people with a mental illness or impairment (if aged over 65):
 - E: OPPDContactteam@southwark.gov.uk
 - T: 020 7525 3324
- For adults with a mental illness or impairment (aged 18-65):
 - E: MentalHealthDivisionASC@southwark.gov.uk
 - T: 020 7525 0088
- For adults with a learning disability or living with autism:
 - E: LearningDisabilitiesDuty@southwark.gov.uk
 - T: 020 7525 2333

