



Safeguarding Adults at Risk Policy and Procedure

Adopted on 06/11/19.....

The policy is to be reviewed in January 26 (Review every 12 months)

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

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1. Aims and Purpose of the Adults at Risk Safeguarding Policy

This policy aims to protect adults at risk from abuse, harm, neglect, and exploitation while upholding their right to live safely and with dignity. SkyWay is committed to fostering a safe, inclusive, and supportive environment where safeguarding practices are consistently applied across all areas of our work, enabling adults at risk to access services without fear of harm.

The purpose of this policy is to:

- Establish clear procedures for identifying, responding to, and preventing abuse or neglect.
- Define the roles and responsibilities of staff, volunteers, and partners in safeguarding adults at risk.
- Promote a person-centered approach that empowers individuals to make informed choices and maintain control over their lives.
- Ensure compliance with relevant legislation and statutory frameworks such as the Care Act 2014 and the Mental Capacity Act 2005.
- Embed a culture of vigilance, transparency, and accountability through ongoing training and supervision.
- Encourage collaboration with external agencies to provide effective support and protection.
- Raise awareness among adults at risk, their families, and the community about safeguarding processes and how to report concerns.

2. STATEMENT POLICY OF SAFEGUARDING ADULTS AT RISK

SkyWay is fully committed to safeguarding the welfare of all adults it works with by taking proactive steps to protect them from neglect or abuse. Our approach is rooted in the principle of empowerment, ensuring adults are the primary decision-makers in their safeguarding journey. We listen to their experiences, involve them in decision-making, and work in partnership with them to promote their well-being and protection.

This policy should be read in conjunction with the following SkyWay policies and procedures:

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- Safeguarding Children and Young People Policy
- Equity and inclusion Policy
- Health and Safety Policy
- Confidentiality Policy
- Data Protection Policy
- Complaints and Compliments Policy
- Staff Disciplinary Policies
- Young Volunteer and Peer Workers Procedures
- E-Safety Policy
- Trip and Residential Procedure
- Photography and Video Policy
- Anti-Bullying Policy
- Handling Incidents at Work procedure
- Staff Safeguarding Code of Conduct

- Whistleblowing Policy
- Safer Recruitment: Policy & Procedure
- Safer Recruitment: DBS & Update service Policy & procedure
- Safer Recruitment: Recruitment Policy & Procedure for applicants with a criminal record
- Safer Recruitment: Comprehensive Risk Assessment for DBS Checks and Recruitment Paperwork

Delivering on Our Commitment, SkyWay ensures effective safeguarding by:

- Listening to and valuing the voices of adults at risk.
- Offering equal protection from harm for all, regardless of personal characteristics or vulnerabilities.
- Conducting thorough staff and volunteer checks, including DBS and reference checks, before engagement.
- Providing continuous training, supervision, and mentoring to support safeguarding awareness.
- Maintaining robust safeguarding policies, procedures, and guidance to support best practices.
- Encouraging professional judgment focused on the best interests of adults at risk.
- Ensuring clear communication of safeguarding policies to staff, volunteers, and those we support.
- Empowering adults at risk to voice their concerns and providing them with accessible information on available support.
- Ensuring transparent communication about safeguarding actions taken, ensuring clarity unless doing so would increase risk.
- Recognising that, in some circumstances, engagement with carers or family members may not be appropriate for the adult's safety.
- Ensuring we handle allegations involving SkyWay staff or volunteers with sensitivity, fairness, and in accordance with relevant policies and legal frameworks.

Safeguarding is the shared responsibility of everyone involved with SkyWay, as outlined in the SkyWay Code of Conduct. This policy is part of a broader framework supporting adults at risk, with additional policies available in the SkyWay Staff Handbook.

3. SCOPE

This policy applies to all staff and volunteers employed by SkyWay, hereafter collectively referred to as 'staff' and partner organisations working directly with or on behalf of SkyWay and those hiring SkyWay's premises, hereafter collectively referred to as 'partners'

SkyWay staff and partners staff are expected to read this policy and understand the standards expected of them with regards to safeguarding. This policy will be reviewed annually to ensure it is up to date with the relevant legislation and best practice.

4. PRINCIPLES OF ADULTS AT AT RISK SAFEGUARDING

Adult safeguarding is the protection of an adult's right to live in safety, free from any type of abuse and/or neglect. It involves people and organisations working together to prevent and stop both the risks and experiences of abuse or neglect, while ensuring that the adult's well-being is promoted. Safeguarding also requires having regard for the person's views, wishes, feelings, and beliefs in deciding on any action to be taken.

Adults at risk of abuse may have additional support needs, making them more vulnerable to experiencing abuse and less able to protect themselves. The abuse of adults at risk

can have devastating effects on their physical, mental, emotional, social, and spiritual well-being, as well as impact children or others connected to them.

In this respect, safeguarding adults at risk is closely related to child protection work. Many adults at risk may have been victims or survivors of abuse and harmful experiences in childhood, which can impact their confidence, self-worth, and resilience, increasing vulnerability.

Safeguarding interventions should:

- Stop abuse or neglect wherever possible and prevent harm, reducing 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 over how they want to live.
- Promote an approach that focuses on improving the quality of life for the adults concerned.
- Raise public awareness so that communities, alongside professionals, play their part in preventing, identifying, and responding to abuse and neglect.
- Provide accessible information and support to help people understand different types of abuse, how to stay safe, and how to raise concerns about the safety or well-being of an adult.
- Address the root causes of abuse or neglect.

5. DEFINITIONS

For the purposes of this policy and procedures, the following terms are used:

Adult at Risk: An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (Care Act 2014 [England]). According to the Care and Support Statutory Guidance (2023), this definition includes individuals whose vulnerabilities arise from physical or mental impairments, illness, or other conditions that affect their capacity to protect themselves from harm.

Adult at Risk of Harm: A person aged 18 or over, whose exposure to harm through abuse, exploitation, or neglect may be increased by their:

a) Personal characteristics, which may include, but are not limited to, age, disability, special educational needs, illness, mental or physical frailty, or impairment/disturbance in the functioning of the mind or brain.

and/or

b) Life circumstances, which may include, but are not limited to, isolation, socio-economic factors, and environmental living conditions. These factors can heighten the individual's risk of being subjected to abuse or neglect.

Adult in Need of Protection: A person aged 18 or over whose exposure to harm through abuse, exploitation, or neglect may be increased by their:

a) Personal characteristics AND/OR

b) Life circumstances AND

c) Who is unable to protect their own well-being, property, assets, rights, or other interests; AND

d) Where the action or inaction of another person or persons is causing, or is likely to cause, harm.

The Care and Support Statutory Guidance (2023) provides a framework for identifying adults in need of protection, emphasizing the need for multi-agency collaboration to prevent harm and provide appropriate care and support.

Safeguarding: This describes the activity undertaken to protect adults at risk from abuse, harm, ill-treatment, and neglect. Safeguarding involves ensuring that individuals' rights to live free from abuse and neglect are upheld and promoting their well-being.

Abuse: The ill-treatment or abuse of an adult at risk. Abuse can occur through direct actions or the failure to act, knowingly allowing harm to take place. Abuse may take various forms, including physical, emotional, financial, or sexual harm, as well as neglect, exploitation, or discrimination.

6. LEGISLATIVE FRAMEWORK

Safeguarding and the Care Act 2014 (with 2023 Updates) The Care Act 2014 sets out the statutory framework for adult safeguarding and emphasizes the importance of Section 42 inquiries. These inquiries require local authorities to investigate cases where an adult is experiencing or at risk of abuse or neglect and unable to protect themselves due to their care and support needs.

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

- Empowerment – Personalisation and the presumption of person-led decisions and informed consent. This aligns with the Making Safeguarding Personal initiative, ensuring adults are central to decisions.
- Prevention – Acting before harm occurs.
- Proportionality – Ensuring responses are appropriate and the least intrusive according to the risk presented.
- Protection – Support and representation for those in greatest need.
- Partnership – Local solutions through services working with their communities.
- Accountability – Transparency and accountability in delivering safeguarding.

Under the Care Act 2014 (with updates in 2023), an adult at risk is defined as 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.
- Is unable to protect themselves from the risk or experience of abuse or neglect due to their care and support needs.

If these conditions are met, Section 42 of the Care Act places a duty on local authorities to make safeguarding enquiries. This framework, equivalent to Working Together to Safeguard Children for adults, provides a statutory basis for protecting vulnerable adults.

Mental Capacity Act 2005 and Lasting Power of Attorney The Mental Capacity Act 2005 (MCA) underpins safeguarding by ensuring that individuals who lack capacity are protected while supporting those who have capacity to make their own decisions. The Act places emphasis on Lasting Power of Attorney (LPA), allowing individuals to appoint someone they trust to make decisions on their behalf if they lose capacity in the future. This is crucial for safeguarding decisions, especially around financial and health matters.

Deprivation of Liberty Safeguards (DoLS) and Liberty Protection Safeguards (LPS) The Deprivation of Liberty Safeguards (DoLS), currently used to protect individuals in care settings who may be deprived of their liberty for their own safety, will be replaced by the

Liberty Protection Safeguards (LPS) in 2024. The LPS framework will extend protections to a broader range of settings, including domestic environments, and place greater emphasis on individual rights, ensuring that any deprivation of liberty is lawful, proportionate, and in the individual's best interests.

Equality Act 2010; The Equality Act 2010 is key to safeguarding as it ensures protection against discrimination, harassment, and victimisation of individuals based on characteristics such as age, disability, race, gender, and sexual orientation. Safeguarding interventions must ensure equal access to protection and support for all individuals, irrespective of their background or identity.

Modern Slavery Act 2015; The Modern Slavery Act 2015 is crucial for identifying and protecting adults at risk who may be victims of trafficking, forced labour, or exploitation. SkyWay's safeguarding procedures must consider the potential indicators of modern slavery and respond accordingly to safeguard vulnerable adults from such abuse.

For more information about key legislation and government initiatives related to adult safeguarding, visit:

[Ann Craft Trust - Safeguarding Adults Legislation](#)

7. CONSENT FOR ADULTS AT RISK

When working with adults at risk, obtaining their consent is fundamental to safeguarding practice. Wherever possible, individuals should be supported to make informed decisions about their own safety and wellbeing. If an adult lacks capacity to consent, decisions must be made in their best interests in line with the Mental Capacity Act 2005. In cases where there is significant risk of harm, disclosure may be necessary without consent, following legal and safeguarding guidelines.

In situations where consent is required, it is important for SkyWay staff or volunteers to:

- Support the adult at risk in making an informed decision without exerting undue pressure. The issue should be discussed thoroughly, providing the adult with all relevant information needed to make an informed decision, including who will be involved and the potential outcomes of their decision.
- Reassure the adult that their case will be handled professionally and sensitively under Safeguarding procedures. Any specific concerns they raise should be addressed.
- Do not conduct medical examinations, as these must be done by qualified clinical professionals.
- Respect the adult's privacy at all times. If visual evidence is required (e.g., in cases of hoarding), ask for permission before taking photographs and consult the Designated Safeguarding Lead.

Exceptions to Consent: There are four primary exceptions where action may be taken without the adult's consent:

- Risk to others: If other people (adults or children) are at risk of harm.
- Legal restriction or public interest: If there is a legal obligation or overriding public interest, such as in cases where reporting is necessary to prevent crime or protect others (e.g., Hate Crime, which must be reported under the Crime and Disorder Act 1998).
- Life-threatening risk: If the person is exposed to a life-threatening situation and is unreasonably withholding consent.
- Impaired capacity: If the adult lacks mental capacity or their decision-making is impaired in relation to the safeguarding issue.

In cases involving legal restrictions, such as those under the Mental Health Act 1983, or

when there is an overriding public interest, staff should act accordingly and seek advice from statutory services.

What to do if consent is withheld: If an adult at risk withholds consent and there are concerns about their safety, the Designated Safeguarding Lead should be informed immediately.

- If there are concerns about the adult's mental capacity, the DSL must seek advice under the Mental Capacity Act 2005, using the 2-stage test to assess capacity.
- SkyWay staff do not assess mental capacity directly but refer to suitable providers with the necessary skills. The DSL will contact relevant statutory agencies for guidance on conducting the mental capacity test.
- If the adult is assessed as lacking mental capacity, the DSL, in cooperation with relevant agencies, will make a decision in the best interests of the adult under the Mental Capacity Act 2005. All decisions must be fully documented and securely stored.
- If another person has legal decision-making powers (e.g., under a Lasting Power of Attorney or as a Welfare Deputy), they will normally make the Best Interests decision. If there is concern that this person is involved in the abuse, legal advice should be sought.
- If the adult has mental capacity and chooses to withhold consent, SkyWay staff must respect their decision unless there are public or legal interests involved. In these cases, all possible alternatives to minimise risk should be discussed, and the adult should be informed about where to seek help if they later change their mind.
- Staff must ensure that the decision to withhold consent is not influenced by coercion or intimidation.

All decisions and related information should be carefully recorded and stored securely.

Deprivation of Liberty Safeguards (DoLS)

The Deprivation of Liberty Safeguards (DoLS) is a legal procedure for protecting people who lack capacity to consent to their care and treatment, ensuring that their liberty is not deprived without lawful authority.

SkyWay staff will not assess mental capacity themselves but will refer to appropriate professionals. The following DoLS principles should be considered:

- Avoid depriving liberty whenever possible.
- Authorisation of DoLS should only occur if it is in the person's best interests and the only way to keep them safe.
- DoLS should be authorised for a specific treatment plan or course of action.
- DoLS should be used for the shortest possible time.

8. PERPETRATORS OF ABUSE

Abuse can be perpetrated by anyone in a position of trust or power, including but not limited to:

- Relatives and family members
- Professional staff and caregivers
- Paid care workers and volunteers
- Friends and neighbors
- Service users (e.g., in care settings)
- Strangers, who may target vulnerable individuals, particularly online

Abusers often exploit their position of trust, using manipulation, coercion, or deceit. Safeguarding measures must consider all potential abusers, including those who are close to the adult at risk, as well as strangers who may target them through emerging risks such as online abuse or modern slavery.

Radicalisation and Exploitation

Adults at risk may also be targeted by radicalisers who promote violence, especially through online platforms. The lead agency for coordinating protection from such risks is the local PREVENT partnership.

9. THE PREVENT DUTY

SkyWay understands its collective responsibility to protect people from becoming radicalised. The Prevent strategy has three specific strategic objectives: to respond to the ideological challenge of terrorism and the threat we face from those who promote it; to prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and to work with sectors and institutions where there are risks of radicalisation that we need to address.

As part of our overall safeguarding responsibility, SkyWay will ensure that the DSL, DDSL and other full time staff are trained in Prevent and understand their duty to report concerns to the Local Authority Prevent Team or in the event of immediate, high risk concern, the police.

10. MAKING SAFEGUARDING PERSONAL (MSP)

SkyWay is committed to Making Safeguarding Personal (MSP), an initiative focused on ensuring that safeguarding processes are person-centred and driven by the views, wishes, and needs of the adult at risk. In any disclosure or allegation of abuse, SkyWay will ensure that:

- The adult at risk is at the centre of decision-making. We will respect their autonomy and involve them in discussions about their safety and desired outcomes.
- We listen carefully to the adult at risk, helping them identify what will make them feel safer and discussing their concerns in a non-judgmental manner.
- We reach agreement with the adult on necessary steps by discussing available options and ensuring transparency if there are any areas of disagreement.
- We assess and manage risk by including the adult's perspective on how they wish to handle risks while ensuring that they understand the potential consequences of their decisions.
- We involve the adult as much as possible in making decisions regarding next steps and any potential referral to statutory agencies.

11. BALANCING AUTONOMY & SAFETY

If there is a significant risk to the individual or others, the adult's wishes may need to be reconsidered and possibly overridden to ensure their safety. This should always be done transparently, involving the adult as much as possible.

- Decision-making support should focus on outcomes the adult wishes to achieve, ensuring that the adult is aware of what is working well and what needs to improve.
- A risk-benefit analysis may be helpful when negotiating difficult decisions between the adult, their family carers, and practitioners.
- Additional support should be provided for individuals with special language, sensory, or communication needs to ensure they fully understand their options and the risks involved.

12. Risk Assessments and Multidisciplinary Teamwork

When assessing risk, SkyWay staff will work collaboratively with multi-disciplinary teams—such as health professionals, social workers, and legal advisors—to find the best outcomes for the adult at risk. This holistic approach ensures that all aspects of the person’s needs are considered, providing a well-rounded plan of action that prioritizes their safety and wellbeing.

13. SAFE RECRUITMENT OF STAFF (see also separate [Safer Recruitment Policies](#))

SkyWay understands the importance of ensuring that all staff working with adults at risk are safe and understand that staff are in a position of trust.

We will ensure:

- A robust recruitment process that deters and prevents people who are unsuitable to work with adults at risk from applying for or securing employment with SkyWay.

We will do this by:

- Making sure that all staff involved in the recruitment process understand the importance of ‘safe recruitment’
- Ensuring all advertisements set out our commitment and responsibilities to safeguarding and our intention to carry out pre-employment checks and vetting prior to employment
- Ensuring all shortlisted applicants provide full details and evidence of their employment history, qualifications and explanations for any gaps in employment
- Verifying professional qualifications, as appropriate
- Requesting that shortlisted applicants complete a self-declaration form detailing any unspent convictions, and pending investigations
- Carrying out an online search on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may want to explore with the candidate at interview
- Ensuring that all shortlisted applicants are sent a copy of this policy and the safeguarding policy
- Verifying applicants’ identity and right to work in the UK
- Carrying out the appropriate level of disclosure and barring service check (for those working in regulated activity, this will be an enhanced check with barred lists check)
- Verifying a candidate’s identity, as it is important to be sure that the person is who they claim to be. Best practice would be to check their birth certificate, where this is available
- Verifying the person’s right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then we will follow the advice on the GOV.UK website
- Ensuring that applicants from outside the UK undergo the same checks regarding identity, address and DBS as a UK applicant regardless of whether they have just arrived in the UK
- Ensuring that further checks as appropriate are made for UK applicants who have worked overseas. This might include a ‘criminal record check for overseas applicants’ or obtaining a letter from the professional regulating authority in the country in which the applicant has worked confirming that they have not imposed any sanctions or restrictions on the applicant and that they are suitable to work with adults at risk

- Requesting references from the most recent employer confirming that the applicant is 'safe to work with children and young people
- Validating those references with a follow up call where necessary and where further information may be needed
- Verifying the candidate's mental and physical fitness to carry out the role
- Following up gaps in employment at the interview
- Discussing at interview any areas of concern on the application form or CV
- Ensuring that any offers of employment are subject to satisfactory pre-employment checks and vetting
- Keeping a detailed register of all staff which will include details of the pre-employment vetting checks
- Ensuring that our recruitment procedures are regularly updated in line with changes in legislation and best practice

Ensuring that the administration of the selection process is user friendly and carried out to the highest professional standard. Please refer to the SkyWay Safer Recruitment Policies for more details.

14. ALLEGATIONS AGAINST THOSE IN A POSITION OF TRUST

The primary concern in the event of an allegation is to ensure the safety of the adult at risk. In all cases, action will be taken quickly, confidentially and professionally, and in accordance with legal requirements and internal policies with all parties clear that suspension is not an indicator of guilt, but a required part of a process.

When an allegation is made about a member of staff or volunteer at SkyWay, the DSL and CEO will meet to discuss the required action. In order that a full and fair investigation can be carried out, consideration must be given to suspending the member of staff. Where it is clear that a criminal offence may have occurred, the matter must be reported to the police.

Duty to Report Concerns Early:

- Even if the harm is not severe, concerns should still be reported to the appropriate safeguarding lead or external agencies to ensure proactive intervention.
- The **Care Act 2014** places a duty on local authorities to make safeguarding enquiries when an adult at risk:
 - Has care and support needs.
 - Is experiencing or at risk of abuse or neglect.
 - Is unable to protect themselves.

Types of Harm That Should Trigger Reporting:

Allegations against individuals working with adults at risk should be reported if they involve:

- **Physical harm:** Any form of assault, rough handling, or inappropriate restraint.
- **Emotional or psychological abuse:** Bullying, coercion, threats, or humiliation.
- **Financial exploitation:** Theft, fraud, coercion regarding finances.
- **Neglect:** Failing to provide essential care or support.
- **Sexual abuse:** Inappropriate or exploitative behavior.
- **Professional misconduct:** Breaching safeguarding policies or professional codes of conduct.

- **Breach of trust:** Misuse of position to exploit or harm an adult at risk.

Threshold Considerations:

When deciding whether an allegation meets the threshold for reporting, consider:

- **Credibility of the concern:** Is there enough evidence or reasonable suspicion?
- **Risk to others:** Could inaction result in further harm to other vulnerable individuals?
- **Repeated concerns:** A pattern of lower-level concerns may indicate a bigger issue.
- **Duty of care responsibilities:** Ensuring due diligence even if harm is not immediately evident

Liaison with Statutory Agencies:

- The DSL or CEO will liaise with statutory agencies such as the local authority, adult or child safeguarding boards, and the police, as necessary.
- SkyWay will work closely with these agencies to ensure that all safeguarding procedures are followed and that the individual involved is appropriately managed.

Disclosure and Barring Service (DBS) Updates:

- If the allegation results in the dismissal or resignation of the staff member or volunteer due to harm, or the risk of harm, to vulnerable individuals, SkyWay will make a referral to the DBS and Disclosure Scotland (where applicable).
- This process ensures that individuals posing a risk to vulnerable adults or children are appropriately barred from working with them in the future.

Where an allegation is made about a member of staff working for one of SkyWay's partners, or where a member of SkyWay's staff suspects an adult working for one of our partners of abusing an adult at risk, they must report these concerns to the DSL at the partner organisation and the DSL at SkyWay.

Where an allegation is made about SkyWay's DSL, the matter should be reported to the CEO or the Safeguarding Trustee and the Local Authority.

15. WHISTLEBLOWING POLICY(see policy)

Our organisation is committed to a culture of transparency and accountability. Staff and volunteers are encouraged to report any concerns about the abuse, neglect, or exploitation of adults at risk through our whistleblowing policy. Reports can be made confidentially and without fear of retaliation. All concerns will be taken seriously and investigated in line with safeguarding procedures and legal obligations.

16. SAFEGUARDING CODE OF CONDUCT (see separate document)

To support staff and to help them understand their safeguarding responsibilities, SkyWay have produced a Staff Safeguarding Code of Conduct which must be read and understood before commencing any activities with children and young people and adults at risk. All staff will be expected to follow this code of conduct.

17. ONLINE

SkyWay utilises online platforms to expand its reach and serve diverse communities. Many of our activities result in podcasts and online recordings. While the internet offers great opportunities, it also presents risks and challenges.

Our Beliefs:

- Everyone should be protected from online abuse.
- The internet should be a safe space for education and development with appropriate safeguards in place.

Our Responsibilities:

- Protect participants from potential online harm.
- Ensure online safety, whether using SkyWay's networks or personal devices.
- Educate participants about online risks and digital footprint protection.
- How We Ensure Online Safety:
- Provide staff with clear online conduct guidelines.
- Offer training and resources on online risks.
- Use secure platforms for online sessions.
- Encourage responsible and respectful online behavior.
- Report concerns to appropriate partners.
- Raise awareness about social media and emerging technologies.
- Develop procedures for responding to inappropriate behavior.
- Regularly update our information security measures.
- Secure login credentials and personal data.
- Obtain written consent for the use of images.

Responding to Online Abuse:

- Implement robust safeguarding procedures.
- Provide support for dealing with abuse, including cyberbullying, emotional abuse, and exploitation.
- Prioritize the needs of those affected.
- Regularly review and improve our response processes.

By maintaining these measures, we aim to create a safe and supportive online environment for all participants.

18. ROLES AND RESPONSIBILITIES

Safeguarding is everyone's responsibility and all staff involved in SkyWay's activities have a role to play. SkyWay will ensure that all staff understand their safeguarding responsibilities and how and who to report a concern to.

SkyWay have appointed a Designated Safeguarding Lead (DSL) and 2 Deputy Designated Safeguarding Leads (DDSL's) who will be responsible for managing safeguarding across the organisation.

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

Natalie Roast (DDSL) - 020 7729 6970 or 07973 364 082 natalie@skyway.london

Daniel Mussie (DDSL) - 020 7729 6970 or 07852 178 905 daniel@skyway.london

Vivien Taylor Trustee Lead - vivienctaylor@icloud.com

The DSL and DDSLs will be responsible for:

- Managing the referral of cases of suspected abuse or allegations to the relevant partners or agencies
- Liaising with partners' DSLs and ensuring that they are kept informed of any concerns raised about children and young people under their care
- Maintaining secure and accurate records of any safeguarding concern, referral, complaint or allegation
- Ensuring that they keep their own training and knowledge up to date by subscribing to safeguarding bulletins, for example, NSPCC updates, and networking with other DSLs and Local Authorities
- Communication of the policy and procedure to all relevant parties including but not limited to staff, partners and participants
- Ensuring that staff receive regular safeguarding updates appropriate to their roles
- Maintaining accurate and up to date employment records of all staff including references and DBS checks where it is confirmed that the member of staff is involved in regulated activity
- Ensuring that all permanent staff receive safeguarding training at induction and then every three years
- Maintaining safeguarding training records for all staff
- The safety of all participants, including when it becomes apparent that a child, young person or adult at risk is absent or missing from a session, without explanation and/or where there are concerns about their welfare
- Providing periodic reports to the senior team about safeguarding incidents or referrals as well as policy implementation
- Acting as a source of support, advice and expertise for staff

Partner organisations, such as schools and youth services will have DSLs in place and they should be the first point of contact where the concern involves a child, young person or adult at risk in their care.

The Safeguarding Trustee will be responsible for:

- The overall management and decision-making of the SkyWay Charity
- Ensuring that SkyWay operates in line with its purpose, complies with legal requirements, and acts in the best interests of its beneficiaries
- Ensuring that SkyWay complies with safeguarding laws and standards

19. SAFEGUARDING TRAINING

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

Staff and Volunteers

- Induction training: Safeguarding induction training must be completed within the first month of employment.

- Additional training: Relevant to the role and determined during induction.
- External training: All frontline staff and volunteers (or others as deemed appropriate) must complete external safeguarding training within 6 weeks of starting. Where possible, this should align with the borough they work in.

Peers

- Training for peers: Before starting work, peers must complete external safeguarding training and the SkyWay Safeguarding induction.
- Additional training: Will be provided as required by their role.

Trustees

- Trustees will attend a SkyWay Safeguarding Training course or complete the NSPCC online Safeguarding Training.

Ongoing Training and Development

- Internal and external training: Staff, peers, and volunteers will complete internal safeguarding training annually and external training biannually.

20. SAFEGUARDING TRANSITIONING YOUNG PEOPLE

For individuals in transition from childhood to adulthood, staff should refer to both the Safeguarding Children and Young People Policy and adult safeguarding procedures. Where a young person under 18 is involved, local children's safeguarding teams must be consulted (see the Young People Safeguarding Policy for further details).

21. HOW INFORMATION IS RECORDED

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

All allegations, complaints, or suspicions of abuse should be recorded as close as possible to the time of the incident using the Incident Disclosure Form. The details should be captured as accurately and comprehensively as possible. Any disclosures of abuse made by adults at risk must reflect exactly what was said. It is critical that staff record all discussions regarding consent and the decisions made concerning consent with the adult at risk.

Information must be passed on to the Designated Safeguarding Lead (DSL) as soon as possible, but no later than 24 hours. The DSL will document any decisions made and additional information gathered.

A detailed chronology of all contacts with the adult at risk, staff members, family members, and professionals (including attempts at contact) must be maintained.

Key points for record-keeping:

- Up-to-date and confidential storage: Records must be kept up to date and stored confidentially.
- Allegations against staff: These should be maintained in a separate file in a secure location.
- Storage on Google Drive: Records should be safely stored on the SkyWay Google Drive within the following directory: Admin Access > Safeguarding > Adults at Risk Safeguarding. Only Senior Managers have access to this.

- Staff-related records: Files related to a staff member should be stored in: CEO > Human Resources > Relevant Staff Members Folder > Safeguarding. Only the CEO can access this folder.
- Scanned documentation: Any physical documentation should be scanned and uploaded to the appropriate folders mentioned above.
- Retention of staff allegations: Copies of all allegations against staff members must be kept until they reach retirement age.

The individual concerned must be regularly updated on the process and any decisions made.

22. CONFIDENTIALITY

SkyWay holds personal information under strict legal and ethical obligations of confidentiality. SkyWay will not disclose information that identifies a person without their consent, unless required by law or safeguarding concerns (refer to section 7: Exclusions).

When an exception applies, SkyWay may be required to share information with local statutory agencies to protect adults at risk from harm.

We strive to balance privacy and safeguarding obligations, ensuring concerns are handled with care and respect.

Records relating to safeguarding investigations or concerns will be stored securely in a locked cabinet or in a password-protected file accessible only to relevant staff.

Please refer to the SkyWay Confidentiality Policy for more details.

23. POLICY DISSEMINATION

The safeguarding policy is communicated effectively to all stakeholders to ensure a shared understanding and consistent implementation. It is made available to all employees, volunteers, and relevant third parties through multiple channels, including the organisation's website, internal communication platforms, and staff handbooks. New staff and volunteers are provided with the policy as part of their induction process, accompanied by mandatory training to ensure they fully understand their responsibilities. Regular refresher sessions and updates are conducted to address any changes or reinforce key aspects of the policy. A hard copy of the policy is accessible in communal areas, and designated safeguarding leads are available to answer any questions and provide clarity on the policy's application. This comprehensive dissemination approach ensures the safeguarding policy is integrated into the organizational culture and practice.

APPENDIX 1: PROCEDURE FOR DEALING WITH CONCERNS AND DISCLOSURES

If a child, young person or adult at risk discloses to a member of SkyWay staff that they are being abused or at risk of abuse, the following actions should be taken.

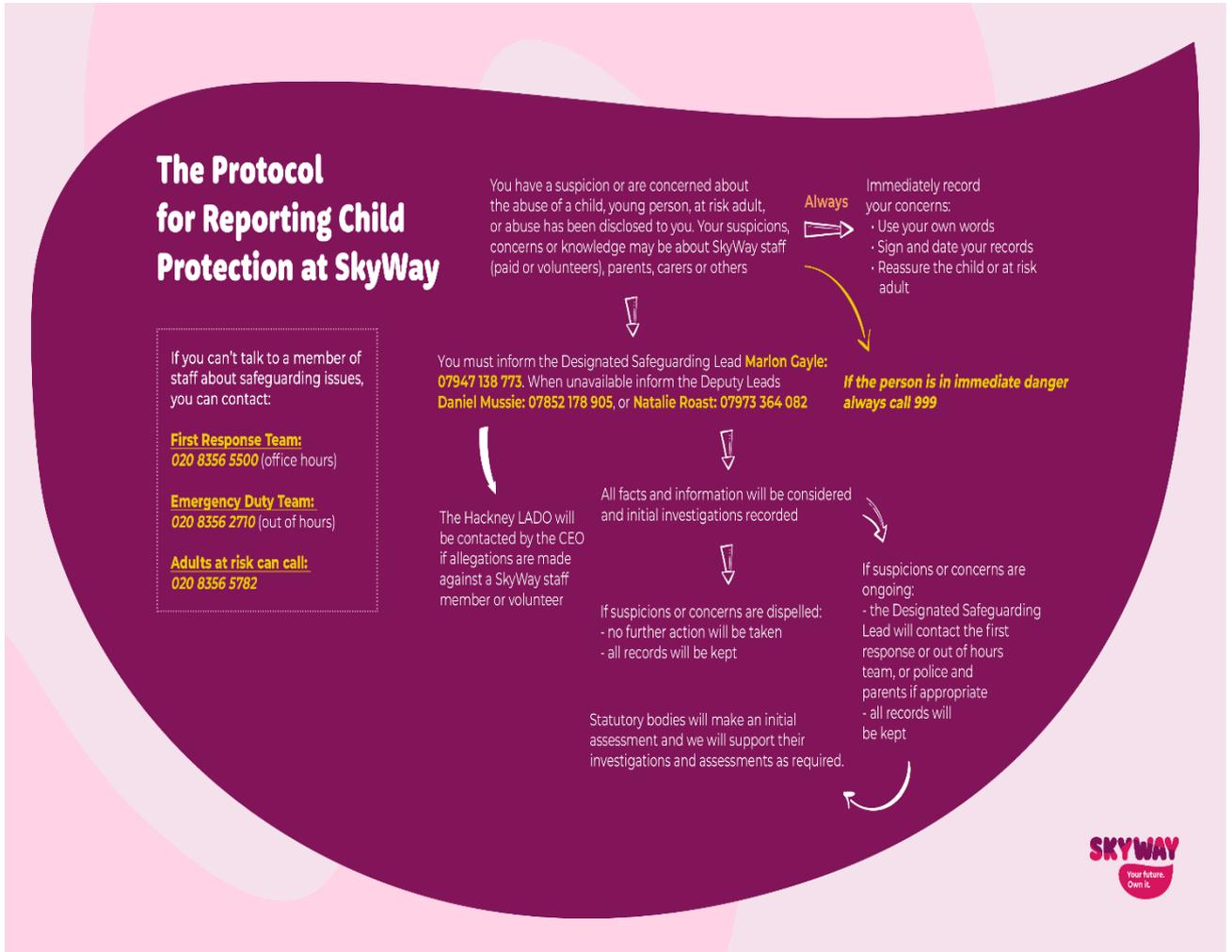
1. Remain calm and listen.
2. Do not judge.
3. Do not ask questions or interrogate, unless you need to clarify you have understood correctly what is being said.
4. Reassure the person that they have done the right thing by telling you.
5. Do not promise to keep secrets. Tell the person that you need to report this so that help can be arranged for them.
6. Make notes at the time or as soon as possible. Note main points carefully, including date, time, place, what the person said/showed you and any questions you may have asked.
7. Do not investigate the concerns or allegations yourself but report them immediately to the DSL/DDSL in the first instance and then SkyWay's DSL/DDSL.
8. Find out what the person would like to happen, but make them aware that you may have to act against their wishes (e.g. if they ask you not to disclose to anyone else)

If you are concerned about a child, young person or adult at risk because of something you have seen or heard, the following action should be taken.

1. Tell the DSL or DDSL as soon as you can.
2. Make written notes at the earliest opportunity.
3. Record facts accurately, legibly and sign/date notes as they may be required as evidence at a future date.
4. Complete SkyWay's **Incident Disclosure Form** and ensure this is sent to the DSL/DDSLs as soon as possible.
5. If the concern is of Female Genital Mutilation (FGM), then you must call the police straight away and then tell the DSL/DDSL.
6. Make sure that SkyWay's DSL/DDSL is informed as well so that they can follow up with the partner and escalate the matter if the concerns continue.

The DSL and/or DDSL will make a decision regarding further action. They may decide simply to record the concern and monitor the situation or signpost the person to further support. If the DSL/DDSL is concerned that the person is at risk of harm, they may refer the matter to Children's Service or Adult Services. If the person is at risk of immediate harm, then they will contact the police.

SKYWAY'S PROTOCOL FOR REPORTING CHILD PROTECTION CONCERNS



Appendix 2: Responding to Signs and Suspicions of Abuse – Key Considerations for Adults at Risk

All suspicions or allegations of abuse will be taken seriously, with steps taken to protect the adult while considering their views and wishes.

Staff/Volunteers Responsibilities

- **Involve the Adult in Conversations:** Wherever possible, the first step will be a conversation with the adult at risk to understand their views on whether abuse is occurring, what they wish to happen next, and their desired outcomes.
- **Conducting Conversations:** Conversations with the adult should always take place in a private setting, with the pace dictated by the adult at risk. Staff should avoid rushing or pressuring the adult, giving them time to express themselves and reflect on their situation.
- **Handling Sensitive Information:** During conversations, staff should discuss the risks involved with the adult, acknowledging that, as adults, they have the right to make decisions—even if staff believe they are unwise. This must always be balanced against the adult's safety.
- **Encouraging Action Without Forcing It:** If the adult indicates that they have been abused, staff should ask them what they would like to do next. Staff can suggest assistance and offer to take steps on the adult's behalf if they are hesitant. However, it is crucial to follow the adult's lead and avoid taking action without their consent unless there is a risk to their immediate safety.
- **Managing Consent:** If the adult does not consent to further action but staff remain concerned for their safety, they should seek advice from statutory services while ensuring that any intervention is proportionate to the level of risk.
- **Collaborating with Agencies:** Where the adult consents, SkyWay will collaborate fully with statutory and voluntary agencies. SkyWay staff will not conduct investigations on their own but will work with relevant professionals to ensure the best outcomes for the adult.
- **Emergency Response:** If staff believe the adult is in immediate danger, they should call 999 without delay.

APPENDIX 3: Incident & disclosure form

Confidential

This form should be completed whenever a young person reveals abuse and when abuse is suspected or considered including to record changes in behaviours which may be an indication of safeguarding concerns.

This form should also be completed to record any incidents whilst working with young people, such as incidents of violence or aggression.

All should be recorded as close as possible to the time of the incident. Details of the incidents should be recorded in as much detail and as accurately as possible. Any disclosures of abuse being made by children and young people should be a **reflection of what was actually said. Do not interpret any of the information, just record what was said or witnessed. Remember to speak to the safeguarding lead immediately.**

| | |
|---|--|
| Name of young person/ Adult at risk | Age: Ethnicity: SEND / Disability: Any other relevant characteristic (i.e gender identity, socio economic status) |
| Date and time of incident or disclosure | Date & Time form completed |
| Staff name and job role | Signature |

| |
|--------------------------------|
| Reasons for recording incident |
|--------------------------------|

| |
|--|
| |
|--|

Record the following as factually as possible:

| |
|------|
| Who? |
|------|

| |
|-------|
| What? |
|-------|

| |
|--------|
| Where? |
|--------|

| |
|-------|
| When? |
|-------|

| |
|-------------------------------------|
| How and Why may this have happened? |
|-------------------------------------|

| |
|---|
| Note ALL the actions taken, including the names of anyone to whom the information was passed. (include outside agencies parents/ carers) |
|---|

Names of parents or carers
Contact details of persons involved

| |
|--|
| Have parents been contacted & given consent for a referral if required? Yes / No |
|--|

Names, ages, contact details of any witnesses

Are any other young people potentially at risk?

This includes other children in the home or other young people in the area if it's a contextual safeguarding concern.

Any other relevant details?

Appendix 4: Main Categories of Abuse in Relation to Adults at Risk

Abuse or neglect can take various forms, ranging from single incidents to repeated actions that affect one or more individuals. SkyWay employees and volunteers must remain vigilant and aware of the indicators of abuse and neglect. Abuse can occur from anyone in a position of trust, including relatives, carers, professionals, friends, and strangers.

- **Physical Abuse** occurs when an individual's body is intentionally harmed or injured. This can include hitting, slapping, pushing, misuse of medication, or inappropriate restraint such as locking someone in a room or using excessive force.
Signs and indicators: Unexplained injuries, broken bones, bruises, clumps of hair missing, burns, or scald marks. Multiple injuries at different stages of healing may also be a red flag.
- **Domestic Violence** involves psychological, physical, sexual, financial, or emotional abuse between adults who are or have been intimate partners or family members. It includes so-called 'honour-based' violence.
Signs: Symptoms may overlap with other forms of abuse (e.g., physical injuries, emotional distress) and often occur in a pattern of controlling behaviour.
- **Modern Slavery:** Modern slavery includes human trafficking, forced labour, domestic servitude, and other forms of exploitation where individuals are controlled, coerced, or deceived into abusive situations.
Signs and indicators: Malnourishment, psychological distress, a withdrawn demeanor, lack of freedom of movement, no personal possessions, fear of law enforcement, and unfamiliarity with surroundings.
Emerging risk: Victims may also experience online recruitment or exploitation via digital platforms, making them vulnerable to remote forms of coercion.
- **Financial or Material Abuse:** This involves the illegal or improper use of a person's funds, property, or benefits. It may include theft, fraud, internet scams, or coercion concerning wills and financial transactions.
Signs: Unpaid bills, missing property, sudden or unexplained financial difficulty, and discrepancies between living conditions and financial resources.
- **Sexual Abuse:** Sexual abuse occurs when an individual is coerced into sexual activity they have not consented to, are incapable of consenting to, or have been pressured into. This includes rape, sexual assault, harassment, and subjection to pornography or unwanted sexual acts.
Signs and indicators: Bruising, pain, or discomfort in the genital area, bloodstains, sexually transmitted infections, and pregnancy in those unable to consent.
- **Neglect** involves the failure to meet an individual's basic needs, such as food, shelter, medical care, or emotional support. It can include failing to provide necessary health services, nutrition, or a safe environment.
Signs: Malnutrition, dehydration, poor hygiene, untreated medical conditions, and living in unsafe conditions.
- **Self-neglect** refers to a person failing or refusing to care for their personal hygiene, health, or living environment. This can range from hoarding to refusal of medical treatment or basic care.
Signs: Untidy or unsanitary living conditions, poor hygiene, untreated health problems, malnutrition, and signs of isolation.
Emerging risk: Mental health issues, particularly in isolation, are increasingly contributing to self-neglect, which may also be facilitated through digital neglect, such as lack of access to support via online platforms.
- **Psychological Abuse** involves emotional harm that results in a person feeling worthless, frightened, or controlled. It includes threats, intimidation, humiliation, verbal abuse, and coercive control, as well as modern forms of abuse like cyberbullying.

Signs and indicators: Anxiety, depression, low self-esteem, withdrawal from social interactions, and disturbed sleep.

- **Organisational Abuse** occurs when poor care or abuse is perpetuated by the systems, routines, and cultures of an institution, such as in care homes or hospitals. It may involve rigid routines, a lack of individual care, or neglect of residents' needs.
Signs: Poor care standards, lack of choice, insufficient staff training, neglect of individual needs, and inflexible procedures.
- **Discriminatory abuse** involves treating someone unfairly based on characteristics like race, gender, disability, sexual orientation, or religion. It may include verbal abuse, slurs, harassment, and unequal treatment in access to services or care.
Signs: Exclusion from services, verbal abuse, disrespect, poor service that doesn't meet personal needs, and systemic neglect based on discriminatory factors.
Intersectionality: Awareness of how race, gender, age, and other identities intersect is essential, as individuals may face compounded vulnerabilities. For example, women of color with disabilities may experience multiple layers of discriminatory abuse.

Appendix 5: Local Authority Contacts

SkyWay currently operates across three Local Authorities: Hackney, Islington, and Southwark.

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

Hackney

- **Safeguarding Adults:**
 - Tel: 020 8356 5782
 - Out of hours: 020 8356 2300
- **Mental Health - City and Hackney Crisis Services:**
 - Tel: 020 8432 8020 (24-hour crisis helpline)
- **Domestic Abuse Intervention Service:**
 - Tel: 0800 056 0905
- **Email:** adultprotection@hackney.gov.uk

Islington

- **For older people and adults with a physical disability, including older people with mental illness or impairment (aged 65+):**
 - Email: OPPD@islington.gov.uk
 - Tel: 020 7527 2299
- **For adults with mental illness or impairment (aged 18-65):**
 - Email: mentalhealth@islington.gov.uk
 - Tel: 020 7527 4800
- **For adults with a learning disability or living with autism:**
 - Email: learningdisabilities@islington.gov.uk
 - Tel: 020 7527 2299

Southwark

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

Please note: Always use the most current contact methods available for your area or situation. These details are subject to change; please verify via the respective Local Authority website if necessary.