

Safeguarding Adults at Risk Policy and Procedure

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

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

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

Table of Contents

Content
1. Aim and Purpose of the Adults at Risk Safeguarding Policy
2. Statement of Policy on Safeguarding Adults at Risk
3. Scope
4. Principles of Adults at Risk Safeguarding
5. Definitions
6. Legislative Framework
7. Consent for Adults at Risk
8. Perpetrators of Abuse
9. The Prevent Duty
10. Making Safeguarding Personal (MSP)
11. Balancing Autonomy & Safety
12. Risk Assessments and Multidisciplinary Teamwork
13. Safe Recruitment of Staff
14. Allegations Against Those in a Position of Trust
15. Whistleblowing Policy
16. Safeguarding Code of Conduct
17. Online Safety
18. Roles and Responsibilities
19. Safeguarding Training
20. Safeguarding Transitioning Young People
21. Recording Information
22. Confidentiality
23. Policy Dissemination
Appendix 1: Procedure for Dealing with Concerns and Disclosures
Appendix 2: Responding to Signs and Suspicions of Abuse – Adults at Risk
Appendix 3: Incident & Disclosure Form
Appendix 4: Main Categories of Abuse in Relation to Adults at Risk
Appendix 5: Local Authority Contacts

1. AIMS AND PURPOSE OF THE ADULTS AT RISK SAFEGUARDING POLICY

This policy is designed to protect adults at risk from abuse, harm, neglect, and exploitation while upholding their right to live safely, with dignity, and independence. SkyWay is committed to safeguarding adults at risk through proactive measures, responsive procedures, and a culture of vigilance.

This policy ensures compliance with current legislation and guidance, including:

- Care Act 2014 (incorporating 2023 statutory guidance updates, Sections 42–45, and SAB cooperation)
- Mental Capacity Act 2005
- Liberty Protection Safeguards (LPS) Implementation Framework
- Equality Act 2010
- Modern Slavery Act 2015
- Online Safety Act 2023
- Prevent Duty Guidance 2024
- Data Protection Act 2018 & UK GDPR
- Charity Commission Safeguarding Guidance (CC30, 2024)

Purpose of the Policy:

- Establish clear procedures for identifying, responding to, and preventing abuse, neglect, or exploitation.
- Define the roles and responsibilities of staff, volunteers, and partners in safeguarding adults at risk.
- Promote a person-centred approach that empowers individuals to make informed decisions and maintain control over their lives.
- Ensure compliance with relevant legislation, guidance, and best practice developments through 2025, including Online Safety Act 2023, Prevent Duty Guidance 2024, and LPS implementation framework.
- Embed a culture of vigilance, transparency, and accountability through ongoing training, supervision, reflective practice, and annual safeguarding audits and learning reviews.
- Encourage collaboration with statutory and non-statutory agencies to ensure effective safeguarding support.
- Raise awareness among adults at risk, their families, carers, and the wider community regarding safeguarding processes and reporting procedures.

2. STATEMENT OF POLICY ON 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 remain at the centre of all safeguarding decisions. 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 alongside other SkyWay policies and procedures, including:

- 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 Worker Procedures
- E-Safety Policy

- Trip and Residential Procedures
- Photography and Video Policy
- Anti-Bullying Policy
- Handling Incidents at Work Procedure
- Staff Safeguarding Code of Conduct
- Whistleblowing Policy (updated with Freedom to Speak Up / Protect guidance)
- Safer Recruitment Policies, including ROA 1974 exceptions 2024, SCR guidance, DBS checks, and comprehensive risk assessment

Delivering on Our Commitment:

- 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 in line with statutory requirements.
- 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 concerns, with accessible information on support services (Easy Read, translations, digital formats).
- Handling allegations involving SkyWay staff or volunteers with sensitivity, fairness, and in line with legal frameworks and organisational policies.
- Ensuring transparency in safeguarding actions unless disclosure would increase risk.
- Recognising that, in some circumstances, engagement with carers or family members may not be appropriate for the adult's safety.

Safeguarding is a shared responsibility, and all those involved with SkyWay are expected to adhere to the SkyWay Code of Conduct.

3. SCOPE

This policy applies to:

- All staff and volunteers employed by SkyWay (collectively referred to as 'staff')
- Partner organisations working directly with or on behalf of SkyWay
- Organisations or individuals hiring SkyWay's premises (collectively referred to as 'partners')

All staff and partners are required to read, understand, and adhere to this policy and the standards it sets out. The policy will be reviewed annually, incorporating findings from safeguarding audits, legislative updates, and LPS transition.

4. PRINCIPLES OF ADULTS AT RISK SAFEGUARDING

Adult safeguarding is about protecting an adult's right to live safely, free from abuse, neglect, or exploitation. Effective safeguarding considers the adult's views, wishes, feelings, and beliefs when deciding on any action.

Safeguarding interventions should:

- Prevent and stop abuse or neglect wherever possible.

- Support adults to make informed choices and maintain control over their lives.
- Focus on improving overall quality of life and well-being.
- Raise awareness in communities and among professionals to prevent, identify, and respond effectively to abuse and neglect.
- Provide accessible information and guidance on types of abuse, strategies to stay safe, and reporting procedures.
- Address underlying causes of abuse and neglect to prevent recurrence.

Emerging risks—including digital/AI abuse, cuckooing, scams, and contextual safeguarding—are considered in all interventions. Adults at risk may have additional support needs, increasing their vulnerability to abuse and reducing their ability to protect themselves.

5. DEFINITIONS

- **Adult at Risk:** A person aged 18 or over who is at risk of abuse or neglect due to their care and support needs (Care Act 2014, Statutory Guidance 2023). This includes individuals whose vulnerabilities arise from physical or mental impairments, illness, or other conditions affecting their capacity to protect themselves.
- **Adult at Risk of Harm:** A person whose likelihood of harm is increased by personal characteristics (e.g., age, disability, illness, frailty, mental or physical impairment) and/or life circumstances (e.g., isolation, socio-economic factors, environmental conditions).
- **Adult in Need of Protection:** A person unable to protect their well-being, property, or rights due to personal characteristics, life circumstances, and the action or inaction of another person, resulting in harm or risk of harm.
- **Safeguarding:** Activities undertaken to protect adults at risk from abuse, neglect, ill-treatment, or exploitation while promoting their well-being.
- **Abuse:** Ill-treatment or harm to an adult at risk, occurring through direct action or failure to act, including physical, emotional, financial, sexual abuse, neglect, exploitation, or discrimination.

6. LEGISLATIVE FRAMEWORK

SkyWay’s safeguarding responsibilities are guided by the following legislative frameworks:

Care Act 2014 (with 2023 updates, Sections 42–45):

- Establishes statutory adult safeguarding framework, including Section 42 inquiries for adults at risk.
- Key principles: Empowerment, Prevention, Proportionality, Protection, Partnership, Accountability.
- Adults at risk must be investigated if they are experiencing or at risk of abuse or neglect and unable to protect themselves.

Mental Capacity Act 2005 & Lasting Power of Attorney (LPA):

- Ensures protection for individuals lacking capacity while supporting those with capacity to make decisions.
- Emphasises LPA for appointing trusted decision-makers for future incapacity, critical for safeguarding around health and finance.

Deprivation of Liberty Safeguards (DoLS) & Liberty Protection Safeguards (LPS):

- DoLS protect individuals deprived of liberty in care settings.
- LPS (from 2024) expands protections to more settings, ensuring deprivation is lawful, proportionate, and in the adult’s best interests.

Equality Act 2010:

- Ensures protection against discrimination, harassment, and victimisation, guaranteeing equal safeguarding for all individuals.

Modern Slavery Act 2015:

- Protects adults from trafficking, forced labour, or exploitation.
- SkyWay's safeguarding procedures consider indicators of modern slavery and respond appropriately.

Online Safety Act 2023:

- Provides guidance for protecting adults from online harm.

Prevent Duty Guidance 2024:

- Protects against radicalisation, including Channel Panel processes and risk assessments.

Other Relevant Legislation & Guidance:

- Data Protection Act 2018 & UK GDPR
- Charity Commission Safeguarding Guidance (CC30, 2024)

SkyWay ensures all safeguarding practices comply with this legislative framework while promoting the well-being, safety, and dignity of adults at risk.

7. CONSENT FOR ADULTS AT RISK

Obtaining consent from adults at risk is a fundamental aspect of safeguarding practice. Wherever possible, individuals should be supported to make informed decisions about their own safety and wellbeing.

If an adult lacks capacity to give consent, decisions must be made in their best interests in line with the Mental Capacity Act 2005. In situations where there is a significant risk of harm, disclosure may be necessary without consent, following statutory and safeguarding guidance.

Supporting Informed Consent

When consent is required, SkyWay staff and volunteers must:

- Support decision-making: Help the adult at risk make an informed decision without undue pressure. Provide all relevant information, including who will be involved and the potential outcomes of their decision.
- Reassure the adult: Ensure the case will be handled professionally and sensitively under safeguarding procedures. Address any specific concerns raised by the individual.
- Avoid medical procedures: Staff should not conduct medical examinations, which must be performed by qualified clinical professionals.
- Respect privacy: Always safeguard the adult's privacy. Where visual evidence is required (e.g., hoarding cases), ask for permission and consult the Designated Safeguarding Lead (DSL) before taking any photographs.

Exceptions to Consent

Action may be taken without consent in the following circumstances:

1. Risk to others: If other adults or children are at risk of harm.
2. Legal or public interest: Where there is a statutory obligation or overriding public interest, such as preventing crime or reporting a hate crime under the Crime and Disorder Act 1998.

3. Life-threatening risk: If the adult is in a life-threatening situation and unreasonably withholds consent.
4. Impaired capacity: If the adult lacks mental capacity or their decision-making is impaired regarding the safeguarding concern.

In cases involving legal restrictions (e.g., under the Mental Health Act 1983) or overriding public interest, staff must act appropriately and seek guidance from statutory services.

Responding When Consent is Withheld

If an adult at risk withholds consent but there are safeguarding concerns, the DSL must be informed immediately:

- Mental capacity concerns: The DSL will seek advice under the Mental Capacity Act 2005, using the two-stage test to assess capacity.
- Referral to professionals: SkyWay staff do not assess capacity themselves but refer to qualified professionals. The DSL will liaise with statutory agencies to guide the assessment process.
- Lacking capacity: If the adult is assessed as lacking capacity, the DSL, in cooperation with relevant agencies, will make a best interests decision in accordance with the Mental Capacity Act. All decisions must be fully documented and stored securely.
- Legal decision-makers: If someone else has legal authority (e.g., Lasting Power of Attorney or Welfare Deputy), they will usually make the best interests decision. Legal advice must be sought if there is suspicion this person may be involved in abuse.
- Adults with capacity: If an adult has capacity and chooses to withhold consent, staff must respect their decision unless overriding public or legal interests apply. In such cases, all reasonable alternatives to minimise risk must be explored, and the adult informed of where to access support if they change their mind.
- Coercion-free decision: Ensure the decision to withhold consent is free from coercion or intimidation.
- Record-keeping: All decisions and related information must be carefully documented and stored securely (encrypted storage for 6 years).

Deprivation of Liberty Safeguards (DoLS) and Liberty Protection Safeguards (LPS)

DoLS provide a legal framework to protect individuals who lack capacity to consent to their care or treatment, ensuring their liberty is not restricted without lawful authority. SkyWay staff will refer to appropriate professionals for DoLS assessments. Key principles include:

- Avoid deprivation of liberty wherever possible.
- Authorisation should occur only if it is in the person's best interests and necessary to keep them safe.
- DoLS authorisation should relate to a specific treatment plan or course of action.
- Use DoLS for the shortest time necessary.
- Staff should prepare for the Liberty Protection Safeguards (LPS) transition, extending protections and ensuring proportionate, rights-based interventions.

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 neighbours
- Service users (e.g., in care settings)
- Strangers, including those targeting vulnerable individuals online

Abusers often exploit their position of trust through manipulation, coercion, or deceit. Safeguarding measures must consider all potential abusers, including both close contacts and strangers, as well as emerging risks such as online abuse, digital exploitation, modern slavery, cuckooing, and scams.

Radicalisation and Exploitation

Adults at risk may be targeted by radicalisers promoting violence, particularly via online platforms. The local PREVENT partnership is the lead agency for coordinating protection against such risks.

9. THE PREVENT DUTY

SkyWay recognises its responsibility to protect individuals from radicalisation. The Prevent strategy has three strategic objectives:

1. Respond to the ideological challenge of terrorism.
2. Prevent people from being drawn into terrorism, offering advice and support.
3. Work with sectors and institutions to address risks of radicalisation.

As part of its safeguarding responsibility, SkyWay ensures that the DSL, DDSLs, and relevant staff are trained in Prevent Duty 2024, including Channel Panel processes and risk assessments, and understand their duty to report concerns to the Local Authority Prevent Team, or to the police in cases of immediate high-risk concern.

10. MAKING SAFEGUARDING PERSONAL (MSP)

SkyWay is committed to Making Safeguarding Personal (MSP), ensuring that safeguarding processes are person-centred and guided by the views, wishes, and needs of the adult at risk.

When an adult discloses abuse or concerns, SkyWay will:

- Place the adult at the centre of decision-making, respecting their autonomy.
- Listen actively and discuss concerns in a non-judgmental manner.
- Reach agreement with the adult on necessary steps, ensuring transparency where there are disagreements.
- Assess and manage risk collaboratively, including the adult's perspective on handling risks.
- Involve the adult in decisions regarding next steps and referrals to statutory agencies wherever possible.

11. BALANCING AUTONOMY & SAFETY

In situations of significant risk, an adult's wishes may need to be reconsidered or overridden to ensure safety. This should always be done transparently and with the adult's involvement.

- Decision-making should focus on the outcomes desired by the adult, highlighting what is working well and areas for improvement.
- A risk-benefit analysis may support negotiation between the adult, family carers, and practitioners.
- Additional support should be provided for individuals with language, sensory, or communication needs to ensure understanding of options and risks.

12. RISK ASSESSMENTS AND MULTIDISCIPLINARY TEAMWORK

SkyWay staff will collaborate with multidisciplinary teams—including health professionals, social workers, and legal advisors—to provide holistic risk assessments. This approach ensures all aspects of the adult's needs are considered, prioritising safety and well-being.

13. SAFE RECRUITMENT OF STAFF

SkyWay ensures all staff working with adults at risk are safe and understand their position of trust.

Key recruitment measures include:

- Ensuring all recruitment staff understand safe recruitment practices.
- Including safeguarding commitment and pre-employment checks in job advertisements.
- Verifying employment history, qualifications, and explaining gaps.
- Checking professional qualifications and conducting online searches.
- Requiring self-declaration of unspent convictions and pending investigations.
- Conducting DBS checks, verifying identity, and right to work in the UK.
- Undertaking overseas checks where applicable.
- Requesting references from recent employers and validating them.
- Confirming mental and physical fitness for role.
- Keeping a detailed staff register of all pre-employment vetting checks.
- Regularly updating recruitment procedures in line with legislation and best practice, including ROA 1974 exceptions 2024 and SCR guidance.

Refer to the SkyWay Safer Recruitment Policy for full 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.

Additional Key Points:

- The safety of the adult at risk is the primary concern. Allegations must be handled quickly, confidentially, and professionally, with suspension being a precautionary measure, not an indicator of guilt.
- DSL and CEO review allegations to determine necessary action, including potential suspension.
- Police notification where criminal offences are suspected.
- Duty to report concerns early, even if harm seems minor.

Types of Harm Requiring Reporting:

- Physical harm, emotional/psychological abuse, financial exploitation, neglect, sexual abuse, professional misconduct, breach of trust.

Threshold Considerations:

- Credibility of concern, risk to others, repeated incidents, duty of care responsibilities.

Liaison with Statutory Agencies:

- DSL or CEO liaises with local authorities, safeguarding boards, and police.

DBS Referrals:

- Referrals will be made to DBS or Disclosure Scotland if dismissal/resignation occurs due to risk of harm.
- Allegations concerning partner organisation staff must be reported to both partner and SkyWay DSLs.
- Allegations concerning the DSL should be reported to the CEO, Safeguarding Trustee, and Local Authority.

15. WHISTLEBLOWING 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.

Key Points:

- Staff are supported to raise concerns in confidence.
- Updated guidance references Freedom to Speak Up and Protect frameworks.
- Reports include concerns about poor practice, misconduct, or abuse, including safeguarding failures.
- Concerns are handled professionally, promptly, and confidentially.

16. SAFEGUARDING CODE OF CONDUCT

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.

Key Points:

- Staff, volunteers, peers, and trustees must follow the code at all times.
- The code outlines professional boundaries, respectful communication, and ethical conduct.
- Any breaches must be reported to the DSL or CEO.

17. ONLINE SAFETY

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.

Key Contacts:

- 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

DSL and DDSL Responsibilities:

- 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.

Safeguarding Trustee Responsibilities:

- 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

19. SAFEGUARDING TRAINING

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

Staff and Volunteers:

- Induction: Safeguarding induction training must be completed within the first month of employment/volunteering.
- 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, aligned with the borough they work in where possible.

Peers:

- Training for peers: Before starting work, peers must complete external safeguarding training and the SkyWay Safeguarding induction.
- Additional training: 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 complete internal safeguarding training annually and external training biannually.
- Role-appropriate training: Peers and trustees receive tailored content, including NSPCC online training for trustees.

20. SAFEGUARDING TRANSITIONING YOUNG PEOPLE

For individuals in transition from childhood to adulthood, staff should reference both the Safeguarding Children and Young People Policy and adult safeguarding procedures.

Key Points:

- Consult local children's safeguarding teams for anyone under 18.

- Ensure smooth handover of safeguarding responsibilities when a young person reaches adulthood.
- Provide continuity of support, taking into account developmental, legal, and social changes.

21. RECORDING INFORMATION

The staff member(s) or volunteer(s) who receive a disclosure, or have a safeguarding concern, are responsible for recording all details accurately and comprehensively.

Key Points:

- Use the Incident Disclosure Form to capture all allegations, complaints, or suspicions of abuse as close to the time of the incident as possible.
- Disclosures by adults at risk must reflect exactly what was said.
- Record all discussions regarding consent and decisions made concerning consent with the adult at risk.
- Notify the DSL within 24 hours.
- Maintain a detailed chronology of all contacts with the adult at risk, staff, family members, and professionals (including attempts at contact).
- Storage:
 - Records must be up-to-date and stored confidentially.
 - Allegations against staff are maintained in a separate secure file.
 - Google Drive: Admin Access > Safeguarding > Adults at Risk Safeguarding (Senior Managers only).
 - Staff-related records: CEO > Human Resources > Relevant Staff Members Folder > Safeguarding (accessible only by CEO).
 - Scan and upload any physical documentation to the appropriate folders.
- Retention: Copies of all allegations against staff must be kept until retirement age or per legal requirements (minimum 6 years).
- 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).

Key Points:

- Information is shared only when legally required or necessary for safeguarding.
- Staff must respect privacy and confidentiality at all times.
- Breaches of confidentiality are treated as a serious matter and reported through safeguarding channels.
- When an exception applies, SkyWay may be required to share information with local statutory agencies to protect adults at risk from harm.
- 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.

Key Points:

- The policy is made available to all employees, volunteers, and relevant third parties through multiple channels, including:

- Staff handbooks and induction materials
 - SkyWay website and internal portals
 - Refresher training sessions
- New staff and volunteers receive the policy as part of their induction, accompanied by mandatory training to ensure they fully understand their responsibilities.
- Regular refresher sessions and updates address any changes or reinforce key aspects of the policy.
- Hard copies are available upon request, with DSLs providing guidance and clarification as needed.
- 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.

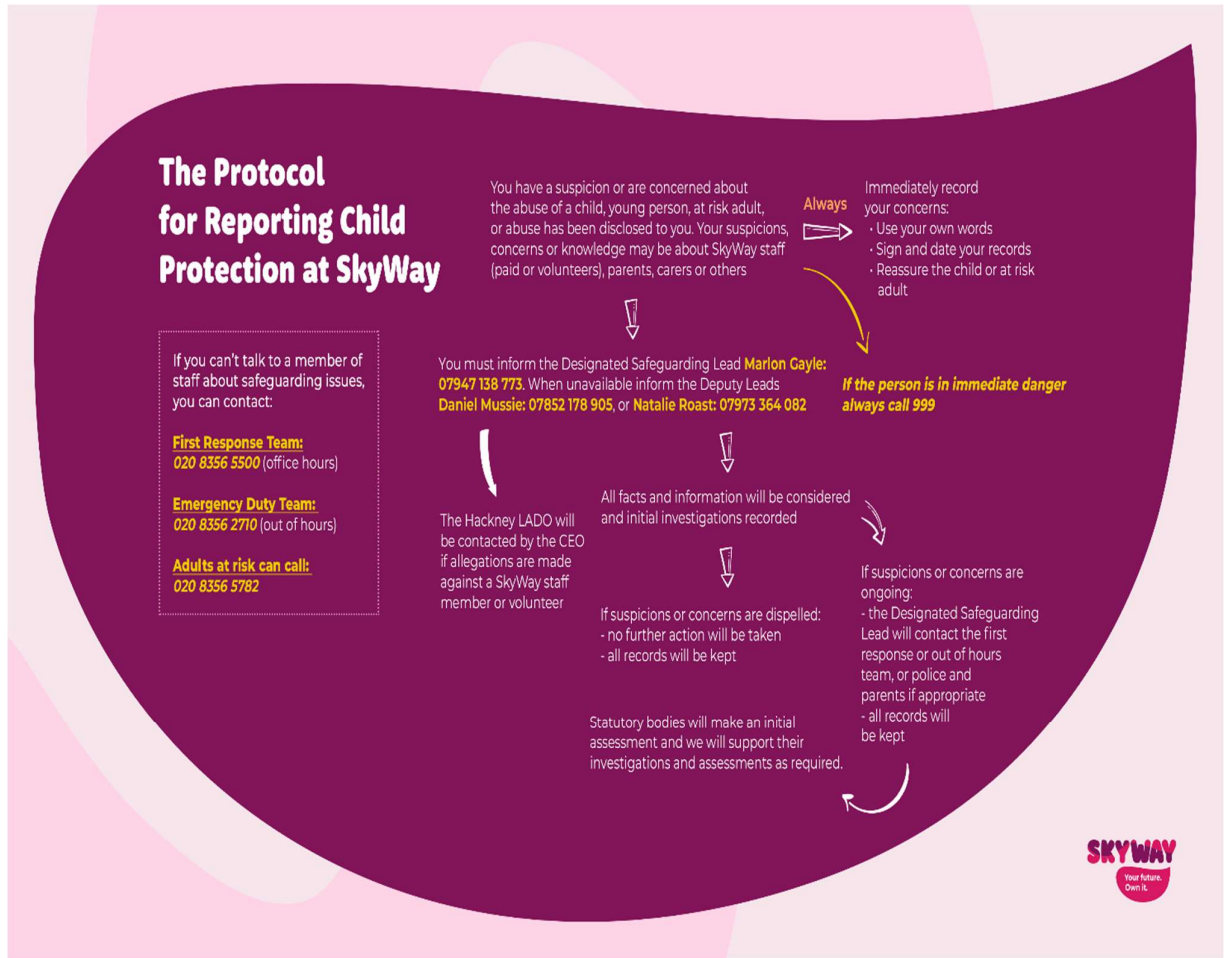
1. Remain calm and listen.
2. Do not judge.
3. Do not ask questions or interrogate, unless you need to clarify you have understood correctly what is being said.
4. Reassure the person that they have done the right thing by telling you.
5. Do not promise to keep secrets. Tell the person that you need 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 varied forms — from a single incident to repeated actions affecting one or more individuals. Staff and volunteers must remain vigilant and aware of the indicators of abuse and neglect. Abuse may come from anyone in a position of trust, such as relatives, carers, professionals, friends, or strangers.

Types of Abuse

• Physical Abuse

When someone’s body is intentionally harmed or injured. Examples include hitting, slapping, pushing, misuse of medication, or inappropriate restraint such as locking someone in a room or using excessive force.

Signs/Indicators: Unexplained injuries, broken bones, bruises, missing clumps of hair, burns, or scald marks. Multiple injuries at different healing stages may indicate concern.

• Domestic Violence

Includes psychological, physical, sexual, financial, or emotional abuse between adults who are or have been intimate partners or family members, including ‘honour-based’ violence.

Signs: Physical injuries, emotional distress, and patterns of controlling behaviour.

• Modern Slavery

Includes human trafficking, forced labour, domestic servitude, and other exploitation where

individuals are controlled, coerced, or deceived into harmful situations.

Signs/Indicators: Malnutrition, distress, withdrawn demeanour, lack of freedom, no personal possessions, fear of law enforcement, or unfamiliarity with surroundings.

Emerging Risk: Online recruitment or exploitation via digital platforms increasing remote coercion.

- Financial or Material Abuse

Illegal or improper use of a person's money, property, or benefits (e.g., theft, fraud, scams, or coercion around wills and financial matters).

Signs: Unpaid bills, missing possessions, unexplained financial difficulties, or lifestyle not matching income.

- Sexual Abuse

Involves coercion or pressure into sexual activity without consent or where consent cannot be given.

Signs/Indicators: Bruising or discomfort in the genital area, bloodstains, STIs, or pregnancy in someone unable to consent.

- Neglect

Failure to meet an individual's basic needs (food, shelter, medical care, emotional support).

Signs: Malnutrition, dehydration, poor hygiene, untreated medical conditions, or unsafe living environments.

- Self-Neglect

When a person fails or refuses to care for their hygiene, health, or living conditions (e.g., hoarding, refusal of medical care).

Signs: Untidy living conditions, poor hygiene, untreated health issues, or isolation.

Emerging Risk: Mental health challenges and digital exclusion contributing to neglect.

- Psychological Abuse

Emotional harm caused by threats, intimidation, humiliation, coercion, or verbal abuse.

Signs/Indicators: Anxiety, depression, low self-esteem, social withdrawal, or disturbed sleep.

- Organisational Abuse

Abuse resulting from poor systems, routines, or culture within institutions (e.g., care homes, hospitals).

Signs: Poor standards, lack of choice, inadequate training, or neglect of individual needs.

- Discriminatory Abuse

Unfair treatment based on characteristics such as race, gender, disability, sexual orientation, or religion.

Signs: Exclusion from services, disrespect, harassment, or unequal treatment.

Intersectionality: Recognising how multiple identities (e.g., race, gender, disability) can combine to increase vulnerability.

Appendix 5: Local Authority Contacts

SkyWay operates across local authority areas including Hackney Council, Islington Council, and Southwark Council. Below are the current safeguarding adult contacts.

Hackney

- Safeguarding Adults Team: 020 8356 5782 (Mon–Fri, 9 am–5 pm)
- Out of Hours / Emergency Duty Team: 020 8356 2300
- Domestic Abuse Intervention Service: 0800 056 0905 or 020 8356 4458/9
- Email: adultprotection@hackney.gov.uk

Islington

- Adult Social Care First Point of Contact: 020 7527 2299
- Out of Hours / Emergency Duty Team: 020 7226 0992
- Email for Safeguarding Concerns: via online form at islingtonsab.org.uk

Southwark

- Older People / Physical Disability (65+): 020 7525 3324
Email: OPPDContaktteam@southwark.gov.uk
- Mental Health (18–65): 020 7525 0088
Email: MHContact@southwark.gov.uk
- Learning Disabilities: 020 7525 2333
Email: LearningDisabilitiesDuty@southwark.gov.uk

Note: Always verify current details via each council's website or Safeguarding Adults Board, as contact numbers and emails may change.

