



# Phoenix College

## Safeguarding Adults: Policy & Procedures

Safeguarding is everyone's responsibility, if you see or hear anything whilst visiting our college that you feel should be reported for the safety of our students, then please contact the

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## **1. The Policy Statement**

All Students at Phoenix College have the right to a positive educational experience in a happy, safe, secure environment; the policy outlines strategies to ensure this.

We will ensure the safety of our students by rigorously implementing the following policy.

This policy relates to all staff, professionals, volunteers, tutors and visitors.

## **2. DBS Checks**

All staff, regular volunteers and contractors including trustees at Phoenix Autism Trust must be subject to DBS checks through the Disclosure & Barring Service. All volunteers who have unsupervised access with students must also be subject to a DBS check through the Disclosure & Barring Service. Checks will also include the Adults Barred List.

Volunteers will be required to read and sign a code of conduct document before working with students.

## **3. Adopting Safe Recruitment Procedures**

All paid staff and volunteers who are entrusted with the care of our students have the full range of pre-employment checks.

Safer recruitment procedures apply to staff and volunteers who have regular contact with students in the course of their duties; as part of this, references are taken for all staff.

Some volunteers (e.g. Kaleidoscope Saber, instructors, Health etc.) are DBS checked by their source organisation).

Staff who take part in recruitment have had safer recruitment training.

## **4. Induction and Training for Staff and Volunteers**

Staff training on safeguarding will be revisited on a regular basis. All staff and volunteers are given details of this policy as part of their induction. All staff and volunteers are required to participate in training courses on safeguarding adults at risk. There is an annual review of this policy with all staff.

From this training staff and volunteers can recognise signs of abuse and know the appropriate reporting systems for this. All staff receive guidance on how to respond to disclosures of abuse.

All new staff and volunteers are adequately supervised and their progress is reviewed as part of the CPD process.

There is a confidential single central record for those students at risk in the terms of the 2014 Care Act which is kept on Databridge.

## 5. General Supervision

We ensure that all projects and all staff are adequately supervised.

## 6. Personal Care

Staff will make ongoing assessments of each student's level of independence when carrying out personal care routines, such as going to the toilet. All records of physical support while carrying out personal care will be recorded by staff on Databridge.

Students will be put into one of three categories in order to identify which level of support they require:

1. Fully Independent (unsupervised).
2. Requires verbal prompts (supported by 1 member of staff).
3. Requires physical prompts (supported by 2 members of staff).

These categories will only be known to staff so as to avoid the potent of stigmatizing some students.

As with all college activities, staff will promote independence when supporting students to carry out personal care routines.

## 7. Types and indicators of abuse and neglect

*(Taken from The Pan London Multi-Agency Adult Safeguarding Policy & Procedures)*

### **Physical abuse:**

Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions. In extreme circumstances unlawful or inappropriate use of restraint may constitute a criminal offence. Restraint covers a wide range of actions. It includes the use of active or passive means to ensure that the person concerned complies. Restrictive interventions are defined as: 'deliberate acts on the part of other person(s) that restrict an individual's movement, liberty and /or freedom to act independently in order to;

- Take immediate control of a dangerous situation where there is a real possibility of harm to the person or others if no action is undertaken; and
- End or reduce significantly the danger to the person and others; and
- Contain or limit the persons freedom for longer than is necessary'.

If restrictive interventions are carried out for any other purpose than those listed above,

concerns should always be escalated through safeguarding procedures.

**Domestic abuse:**

The Home Office defines domestic abuse as: any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial, emotional abuse and ‘honour’ based violence.

Honour Based Violence (HBV) is committed when families feel that dishonour has been brought to them. It will usually be a criminal offence and referring to the Police must always be considered. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community. Some victims of HBV may contact the Police or other organisations for help themselves. But many others are so isolated and controlled that they may be unable to seek help. Adult safeguarding concerns that may indicate HBV include domestic abuse, concerns about forced marriage, enforced ‘house-arrest’ and missing persons reports.

Forced Marriage is a term used to describe a marriage in which one or both parties are married without their freely given consent or against their will. A forced marriage differs from an arranged marriage in which both parties consent to the assistance of a third party in identifying a spouse. In a situation where there is a concern that an adult is being forced into a marriage that they cannot consent to, there will be an overlap between action taken under the forced marriage provisions and adult safeguarding processes.

If an adult safeguarding concern is raised about HBV or forced marriage, Police should be contacted as urgent action may need to be taken and they (in co-ordination with other relevant specialised organisations) have the necessary expertise to help manage the risk.

**Sexual abuse:**

Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual assault and sexual acts to which the adult has not consented or was pressured into consenting. Sexual exploitation involves situations, contexts and relationships where adults at risk receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, gifts, money, affection) as a result of them performing sexual acts (and/or another/others performing such acts on them). Sexual exploitation affects men as well as women. People who

are being exploited may not always perceive such behaviours as exploitation. In all cases those exploiting the adult at risk have power over them by virtue of their position, gender, age, physical strength, intellect, economic situation or other resources. There is a distinct inequality in the relationship.

**Psychological abuse:**

Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, unreasonable and unjustified withdrawal of services or supportive networks.

**Financial or material abuse:**

Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements including in connection with wills, property, inheritance or financial transactions and the misuse or misappropriation of property, possessions or benefit. An adult at risk may be persuaded to part with large sums of money/life savings. Such concern should always be reported to the Police and if relevant, local Trading Standards for further investigation. Local Trading Standards should be involved in the work of Safeguarding Adults Boards. Where this abuse is perpetrated by someone with authority to manage the adult at risk's finances, the Office of the Public Guardian should be informed (in relation to Deputies/Attorneys) or the DWP (for Appointees)

Such abuse may take the form of a 'Mate Crime'. The Safety Net Project define this as occurring 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual'. Mate Crime is often difficult for the Police to investigate due to its sometimes ambiguous nature but should be reported to the Police who will decide as to if a criminal offence has been committed. Mate Crime is committed by someone the adult knows and often happens in private. In recent years there have been several Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

**Modern slavery:**

This type of abuse encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Serious and organised crime gangs make significant amounts of money from human trafficking. They exploit the social, cultural and financial vulnerabilities of the victim. They control almost all aspects of the victim's life with little regard for their welfare and health. However, adults who are enslaved are not always subject to trafficking. Someone is in slavery if they are forced to work through physical or mental threat, owned or controlled by an 'employer' (usually through abuse or threat of abuse), dehumanised and treated as a commodity (bought & sold as 'property'), physically constrained or has restrictions placed on his/her freedom of movement. Since 2015, specific authorities have had a duty to notify the Home Office of any individual suspected as a victim of slavery or human trafficking.

**Discriminatory Abuse:**

This includes harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion. Examples of discriminatory abuse may include; denying access to communication aids, not allowing access to an interpreter, signer or lipreader. Harassment or deliberate exclusion on the grounds of a protected characteristic. Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic. Substandard service provision relating to a protected characteristic (SCIE 2015) Some forms of discriminatory abuse may also constitute a Hate Crime – defined by the Crown Prosecution Service as "Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity." There is no legal definition of hostility so the Police and CPS use the everyday understanding of the word which includes ill-will, spite, contempt, prejudice, unfriendliness, antagonism, resentment and dislike.

**Organisational abuse:**

This includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

**Neglect and acts of omission:**

This includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services and/or the withholding of the necessities of life, such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly where the adult at risk lacks the mental capacity to assess risk for themselves.

**Self-neglect:**

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It should be noted that self-neglect may not always prompt a section 42 enquiry. An assessment should be made on a case by case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

**8. [Radicalisation](#)**

Prevent is part of the Government's counter-terrorism strategy CONTEST and aims to safeguard and provide support to divert vulnerable individuals at risk from being radicalised or groomed into supporting terrorist activity, before any crimes are committed. Radicalisation is comparable to other forms of exploitation, such as grooming and Young person Sexual Exploitation. It is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Radicalisation is a process rather than an event, and there is no single profile or pathway by which someone can be drawn into terrorism.

**Reporting suspected extremism and / or radicalisation**

Students may become susceptible to radicalisation through a range of social, personal and environmental factors. When a member of staff has concerns that a Student may be at risk of radicalisation, they should contact the DSL and/or DDSLs/Prevent Lead as they would for any other young person protection procedure. The safeguarding team will contact the family and relevant agencies, such as the Local Prevent Officer, to express concerns and offer support. If concerns persist, the case will be referred by the DSL/DDSL to the Social Inclusion Panel (SIP) using a CAF form and following the referral route below. If in doubt REFER!

All current staff will attend training on recognising and responding to the risk of radicalisation and

extremism and the role of professionals. This will be delivered by the Local Prevent Officer and/or College Prevent Lead. New staff will receive training as part of their induction. Training will be revisited regularly.

### **Visitors & Guest Speakers**

Speakers materials, including weblinks, are assessed by the member of staff who has organised the visit before materials are shared with/presented to students.

How the college addresses the issue of radicalisation through the curriculum and other activities:

- Politics & Culture Course
- British values are imbedded into all planning
- Appropriate discussion in a supportive environment
- E-safety and being safe online sessions
- Rewarding positive behaviour
- Positive engagement with the community
- Access to youth clubs and holiday schemes
- Maintaining good relationships with parents
- Prevent Duty training is delivered to all staff annually delivered by the Local Prevent Officer.
- Students take part in explicit Prevent workshops each year.
- Local Police Officers give talks in college to all students each year. This builds positive relationships, further pathways for referral, and autism awareness for the local police force.

### **Safeguarding, extremism and radicalisation**

Phoenix Autism Trust is aware of the need to safeguard our Students from extremism, radicalisation and intolerance to diversity, including views justifying political, religious, sexist or racist violence. Extremism is defined by the Government in the Prevent Strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

### **Recognising Extremism – early indicators may include:**

- Showing sympathy for extremist causes.
- Glorifying violence.
- Evidence of possessing illegal or extremist literature.
- Advocating messages similar to illegal organisations such as “Muslims against Crusades” or



other extremist groups such as English Defence League.

- Out of character changes in dress, behavior and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent).
- Secretive behavior

## 9. Safeguarding & The Curriculum

### - 9.1 Prevent Duty

At our college, we are fully committed to addressing **radicalisation and extremism** through a comprehensive programme of study. Our approach encompasses both **discrete sessions** dedicated to these topics, as well as **a broad range of subjects** that equip students with **transferable knowledge and skills** relating to safeguarding, which is directly relevant to the Prevent duty. To ensure a well-rounded understanding, students actively engage in **workshops** facilitated by college staff and **local prevent duty officers** on an annual basis. These sessions provide **explicit instruction** on terms such as radicalisation and extremism. Furthermore, **our curriculum integrates knowledge and skills** that empower students to **navigate and avoid situations** that could lead to such issues. For instance, our Digital World Course educates students about **online safety**, while our Keeping Safe Course focuses on managing **positive relationships** and **conflict resolution**. Moreover, our Politics & Culture curriculum delves into critical topics such as **equality, diversity, and the rule of law**. By embedding these concepts throughout our courses, we aim to equip students with **a holistic understanding of safeguarding** and the essential skills necessary to address and prevent radicalisation and extremism effectively.

### - 9.2 Safeguarding Informing the Curriculum

The **safeguarding team** meets each month to review ongoing cases and **analyse data and reports** relating to **safeguarding, behaviour, and attendance**. This analysis enables the team to **identify specific issues** that may warrant **targeted curriculum interventions**. In response, the curriculum team amends or creates curriculum maps, planning, and lesson plans to **integrate opportunities within the curriculum** that **address these identified concerns** with our students. By aligning the curriculum to address these issues directly, we aim to **proactively address and support our students'** needs in a structured and purposeful manner. This **collaborative effort** ensures that **our curriculum remains responsive and adaptable** to the evolving safeguarding requirements of our student body.

### - 9.3 Online Safety

Our approach to promoting online safety education is characterized by a combination of **explicit, focused sessions** and a commitment to **embed safeguarding throughout the curriculum**. This approach effectively equips students with a diverse range of **transferable knowledge and skills** essential for maintaining **personal safety**. For instance, in our **Digital World** course, students engage in **practical exercises** involving communication via webcams, chatrooms, social media platforms, mobile phones, and streaming services. These lessons are structured to emphasise appropriate modes of communication and instil an understanding of the boundaries regarding sharing personal information online. Our Keeping Safe course expands on this foundation by exploring **crucial concepts such as consent, seeking assistance and adapting communication** strategies to suit different audiences. In addition, our tutorial sessions provide students with **a daily opportunity to identify and regulate their emotions** using the zones of regulation, enabling the development of effective self-regulation strategies. Committed to ensuring the utmost protection for neurodiverse individuals, our staff undergo annual training facilitated by the **local Prevent team**, which focuses specifically on the unique risks and vulnerabilities that neurodiverse people may face in the digital realm. Through these measures, we aim to empower our students with the **necessary knowledge, skills, and resilience** to navigate the online world confidently and securely.

## **10. Student Absence**

Whenever a student is absent from college, Office Staff will contact the family just after 09:00 to find out the reason for the absence; this information is then recorded on Databridge.

An attendance report is created for each monthly safeguarding meeting. This information is reviewed by the DSL and DdSLs at the meeting. If a student's attendance drops below 90%, this would trigger a cause for concern, and where indicated, reported for statutory intervention in accordance with the pan-London procedure.

Should a student be absent for longer than two days without being able to contact them or their family, a safeguarding concern will be raised.

## **11. Acceptable Internet Usage and E-safety:**

Phoenix Autism Trust recognises that the internet, and access to it via a range of technologies, is an attractive and increasingly integral feature of a young person's learning and entertainment. It recognises too that in enabling access to this invaluable resource it has a duty to ensure students are safe from the following:

- Inappropriate content in a range of forms and across technologies,
- Bullying and harassment of any kind,
- Crime and anti-social behaviour in and out of college.

Please refer to the Anti-Bullying Policy, as part of the wider safeguarding agenda, which outlines how we will ensure our Students are prepared to deal with the safety challenges that the use of technology brings.

## **12. Safeguarding Team Meetings**

The safeguarding team (DSL and DDSLs) attend a monthly safeguarding meeting; the safeguarding trustee is also invited to these meetings in order to provide a second opinion and adequate oversight.

The agenda for the safeguarding team meetings is as follows:

- Review minutes from previous meeting.
- Discuss all open safeguarding cases/concerns, agree actions and record on Databridge (forward to Social Services as necessary)
- Attendance report and analysis
- Behaviour report and analysis

The efficiency of referring and reporting concerns to social care has been improved by having our link social workers for the college (Shade Buraimoh/ Natalie Lopez) added to Databridge.

Using information gathered at the meeting, a monthly safeguarding report is forwarded to the safeguarding trustee.

## **13. Statutory definitions (Care Act 2014)**

In using this document, a number of phrases, wording or acronyms have been used. The following provides more information and, where necessary, a definition:

### **Adults at risk:**

- An adult who needs care and support (whether or not a local authority is meeting any of those needs)
- An adult who is experiencing, or at risk of, abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

The term replaces 'vulnerable adults'.

**Adult safeguarding** means protecting a person's right to live in safety, free from abuse and neglect.

**Adult safeguarding lead** is the title given to the member of staff in an organisation who is given the lead for Safeguarding Adults.

**Advocacy** is taking action to help people say what they want, secure their rights, represent their interests and obtain services they need.

**Appropriate Adult** is a specific role prescribed under the Police & Criminal Evidence Act 1984. The role of an appropriate adult is confined to instances where a police officer has any suspicion, or is told in good faith, that a person of any age may be mentally disordered or otherwise mentally vulnerable, in the absence of clear evidence to dispel that suspicion, the person shall be treated as a vulnerable adult and supported by an 'Appropriate Adult'.

**Appropriate individual** within this document an 'appropriate individual' is a person who supports an adult at risk typically but not exclusively in an advocacy role and is separate to an Appropriate Adult as described above. Borough Operational Command Unit (BOCU) the regional units of the Metropolitan Police based on the 32 London Boroughs.

**Alert** is a concern that an adult at risk is or may be a victim of abuse or neglect. An alert may be a result of a disclosure, an incident, or other signs or indicators.

**Alerter** is the person who raises a concern that an adult is being, has been, or is at risk of being abused or neglected. This could be the person themselves, a member of their family, a carer, a friend or neighbour or could be a member of staff or a volunteer or contractor.

**Alerting Manager** is the person within an organisation to whom the alerter is expected to report their concerns. They may also be the designated Safeguarding Adults lead within an organisation. It is the alerting manager who will in most cases make the referral and take part in the Safeguarding Adults process. At Phoenix Autism Trust the Principal of College is the **Alerting Manager (Safeguarding Adults Lead)** for Phoenix Autism Trust and as such has lead responsibility for responding to concerns about the abuse of adults at risk within Phoenix Autism Trust services. They have overall responsibility for all safeguarding.

**Best Interest** – is a principle in the Mental Capacity Act which states that any act done or decision made on behalf of an adult lacking capacity must be in their best interests. This can cover financial, health and social care decisions.

**Capacity** is the ability to make a decision about a particular matter at the time the decision needs to be made.

**Care setting** is where a person receives care and support from health and social care organisations. This includes hospitals, hospices, respite units, nursing homes, residential care homes, and day opportunities arrangements. Carer throughout these policy and procedures refers to a Family/Friend

**Carer** as distinct from a paid carer, who is referred to throughout as Support Worker. The Association of Directors of Adult Social Services (ADASS) define a carer as someone who 'spends a significant

proportion of their time providing unpaid support to a family member, partner or friend who is ill, frail, disabled or has mental health or substance misuse problems’.

**Case conference** is a multi-agency meeting held to discuss the outcome of the investigation and to put in place a protection or safety plan.

**CIDs (Criminal Investigation Departments)** are the units within the Metropolitan Police Service (MPS) that deal with the investigation of crime that requires investigation by a detective but does not come within the remit of Community Safety Units (CSUs) or other specialised units.

**Commissioning** is the cyclical activity, to assess the needs of local populations for care and support services, determining what element of this, needs to be arranged by the respective organisations, then designing, delivering, monitoring and evaluating those services.

**Community Safety Units (CSUs)** operate in every area in London with dedicated staff who receive special training in community relations, including local cultural issues. The CSUs will investigate the following incidents: domestic violence, homophobia, transphobia and racism, criminal offences where a person has been targeted because of their perceived ‘race’, faith, sexual orientation or disability.

**Concern** is the term used to describe when there is or might be an incident of abuse or neglect and it replaces the previously use term of ‘alert’.

**Consent** is the voluntary and continuing permission of the person to the intervention based on an adequate knowledge of the purpose, nature, likely effects and risks of that intervention, including the likelihood of its success and any alternatives to it.

**Contracting** is the means by which a process is made legally binding. Contract management is the process that then ensures that services continue to be delivered to the agreed quality standards.

**Deprivation of Liberties (DoL).** The Cheshire West Supreme Court ruling (2014) clarified and extended the test and definition for Deprivation of Liberty for adults. DoLs procedure is no longer confined to vulnerable people who are accommodated in hospital or care homes in circumstances that amount to a deprivation of their liberty and who lack the capacity to consent to the care or treatment they needed. A much greater number of service users are now included within the definition. DoL procedures and liberty protection is engaged if it is Imputable to the State, including a person’s home.

Without certification college staff are not permitted to deprive any person of their liberty in a manner that would qualify as DoL. If in doubt, the Local Authority would need to be formally consulted. It is important for the college to know if a student who is subject of a DoL certificate and which person or institution holds the certificate.

**Liberty Protection Safeguards (LPS), Mental Capacity Act 2005 (as amended)** are measures to protect people who lack the mental capacity to make certain decisions for themselves. This also relates to situations in which adults at risk are unlawfully restrained. In situations in which restraint may need to be used with an adult, the measures implemented must be in the best interests of the individual and the least intrusive response appropriate to the risk presented.

This will come into effect in April 2022 using the principles of the Mental Capacity Act 2005 (as amended), and apply to people in care homes or hospitals where they may be deprived of their liberty.

At present Mental Capacity Act 2005 Deprivation of Liberties still applies, with LPS to replace existing arrangements for DOLs shortly.

**Disclosure and Barring Service (DBS)** helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA).

**Duty social worker** is on duty at all times out of hours to meet urgent needs that cannot wait until the next working day. In the absence of a named social worker, the duty social worker is who is called in the case of an urgent matter. .

**EDO (emergency duty officer)** is the social worker on duty in the emergency duty team (EDT).

**EDT (emergency duty teams)** are social services teams that respond to out-of-hours referrals where intervention from the council is required to protect a young person or adult at risk, and where it would not be safe, appropriate or lawful to delay that intervention to the next working day.

**Enquiry** establishes whether any action needs to be taken to stop or prevent abuse or neglect, and if so, what action and by whom the action is taken. Previously this may have been referred to as a 'referral' Enquiry Lead is the agency who leads the enquiry described above.

**Enquiry Officer** is the member of staff who undertakes and co-ordinates the actions under Section 42 (Care Act 2014) enquiries.

**Equality Act 2010** legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. It sets out the different ways in which it is unlawful to treat someone.

**General Data Protection Regulation (GDPR)** is a legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Union (EU). The GDPR sets out the principles for data management and the rights of the individual, while also imposing fines that can be revenue-based. The GDPR came into effect across the EU on May 25, 2018 and its requirements are part of English law under the Data Protection Act 2018.

**Independent Domestic Violence Advisor (IDVA)** - Adults who are the subject of domestic violence may be supported by an IDVA. IDVAs provide practical and emotional support to people who are at the highest levels of risk. Practitioners should consult with the adult at risk to consider if the IDVA is the most appropriate person to support them and ensure their eligibility for the service.

**IMCAs (independent mental capacity advocates)** were established by the Mental Capacity Act 2005. IMCAs are a legal safeguard for people who lack the capacity to make specific important decisions, including making decisions about where they live and about serious medical treatment options. IMCAs are mainly instructed to represent people where there is no one independent of services, such as a family member or friend, who is able to represent the person.

**Independent Mental Health Advocate (IMHA)** - under the Mental Health Act 1983 certain people known as 'qualifying patients' are entitled to the help and support from an Independent Mental Health Advocate. If there is a safeguarding matter whilst the IMHA is working with the adult at risk, consideration for that person to be supported by the same advocate should be given.

**Independent Sexual Violence Advocate (ISVA)** - is trained to provide support to people in rape or sexual assault cases. They help victims to understand how the criminal justice process works and explain processes, for example, what will happen following a report to the police and the importance of forensic DNA retrieval.

**LGBT** is an acronym used to refer collectively to lesbian, gay, bisexual and transgender people.

**Making Safeguarding Personal (MSP)** is about person centred and outcome focussed practice. It is how professionals are assured by adults at risk that they have made a difference to people by taking action on what matters to people and is personal and meaningful to them.

**MAPPA (Multi-Agency Public Protection Arrangements)** are a set of arrangements to manage the risk posed by the most serious sexual and violent offenders (MAPPA-eligible offenders) under the provisions of sections 325 to 327B of the Criminal Justice Act 2003.

**Mental capacity** Refers to a person's ability to make their own choices and decisions. Under UK law, someone's capacity is judged according to the specific decision to be made, so a person may have sufficient capacity to make simple decisions but not more complicated ones.

**Natural justice** refers to the principles and procedures that govern the adjudication of an issue, which should be unbiased, without prejudice, and there is equal right to being heard.

**Person/organisation alleged to have caused harm** is the person/organisation suspected to be the source of risk to an adult at risk.

**Procurement** is the specific function to buy or acquire services which commissioners have duties to arrange to meet people's needs, to agreed quality standards, providing value for money to the public purse.

**Public Interest** - is the term used to refer to the right to override consent refusal from a person who qualifies as an at-Risk Adult, but has capacity where the public Interest is engaged, usually because other individuals' safety or welfare is at risk if no action is taken (Typically but not exclusively, sex offenders, those involved in sexual exploitation, or modern slavery or disability hate or mate crime).

**Public interest Test** refers to the test used under data protection legislation when deciding whether the public interest in disclosing information in order to protect a vulnerable adult justifies interfering with another individual's right to privacy.

**Referral** – an alert becomes a referral when it is passed on to a Safeguarding Adults referral point and accepted as a Safeguarding Adults referral.

**Registered Intermediaries (RI)** play an important role in improving understanding of the justice process for people who have communication difficulties. They help people to understand the questions that are put to them and to have their answers understood, enabling them to achieve best evidence for the police and the courts.

**Regulated Provider** is an individual, organisation or partnership that carries on activities that are specified in Schedule 1 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

**Safeguarding Adults** is used to describe all work to help adults at risk stay safe from significant harm. It replaces the term 'adult protection'.

**Safeguarding Adults coordinator** – this is the typical title of the manager in a local authority who supports the work of the Safeguarding Adults Partnership Board (SAPB) and advises on Safeguarding Adults cases in the borough. The role varies from borough to borough, and may have a different title.

**Safeguarding Adults Manager (SAM)** is the person who manages, provides guidance and has oversight of safeguarding concerns that are raised to the Local Authority.

**Safeguarding Adults lead** is the title given to the member of staff in an organisation who is given the lead for Safeguarding Adults. The role may be combined with that of alerting manager, depending on the size of the organisation.

**Sexual Assault Referral Centres (The Havens)** Havens are sexual assault referral centres (SARCs) in London for people who have been raped or sexually assaulted within the past 12 months. If the assault took place more than 12 months ago, the Haven can provide information and signpost people to other organisations. If a person has reported the rape or assault to the police, first they will organise the visit to the Haven. The Haven also takes self-referrals from people who do not wish to report to the police. Referrals are also accepted from professionals in London such as GPs, sexual health clinics and A&E departments. This service is available 24 hours a day, seven days a week. Adults are only offered appointments through consent and direct initial contact following referrals. Havens also offer follow-up medical and counselling care, including full health screening for sexually transmitted infections, a pregnancy test and emergency contraception. More information is available on item 25. Contact Details.

**Significant harm** is not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or an avoidable deterioration in, physical or mental health, and the impairment of physical, intellectual, emotional, social or behavioural development.

**Strategic Executive Information System (StEIS)** Reporting a Serious Incident must be done by recording the incident on this system, which facilitates the reporting of Serious Incidents and the monitoring of investigations between NHS providers and commissioners. More information is available on item 25. Contact Details.

**Strategy discussion** is a multi-agency discussion between relevant organisations involved with the adult at risk to agree how to proceed with the referral. It can be face to face, by telephone or by email.

**Strategy meeting** is a multi-agency meeting with the relevant individuals involved, and with the adult at risk where appropriate, to agree how to proceed with the referral.

**Team Teach** - provides training to staff groups in young person's and adult services and Health Care Trusts in behaviour supports and interventions. The training combines both theory and practice, emphasising the need for staff to show restraint rather than apply it. Providing a risk assessment structure to the selection of physical interventions that best allow the employer to provide a safer workplace for service users and staff.

**Victim Support** is a national charity, which provides support for victims and witnesses of crime in England and Wales. It provides free and confidential help to family, friends and anyone else affected



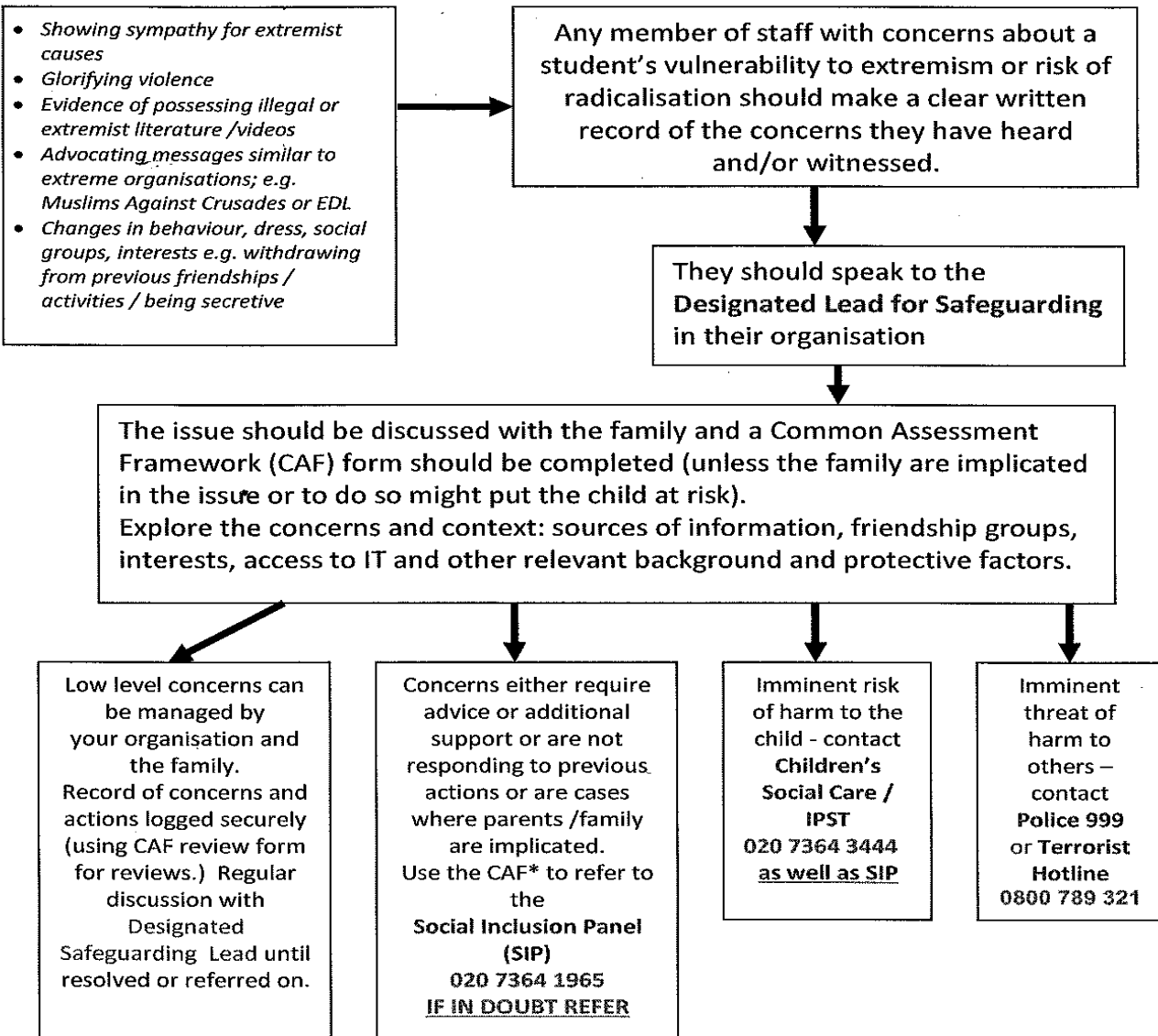
by crime, which includes information, emotional and practical support. Help can be accessed either directly from local branches or through the Victim Support helpline.

**Vital interest** is a term used in the Data Protection Act 1998 and General Data Protection Regulation to permit sharing of information where it is critical to prevent serious harm or distress or in life threatening situations.

**Wilful neglect or ill treatment** is an intentional or deliberate omission or failure to carry out an act of care by someone who has care of a person who lacks capacity to care for themselves. Section 44 of the Act makes it a specific criminal offence to wilfully ill-treat or neglect a person who lacks capacity.

Most adults that use Phoenix Autism Trust services are likely to fall within these definitions should they be at risk of abuse or neglect, generally, though not always, as a result of a lack of capacity within the meaning of the Mental Capacity Act 2005.

**Referral route for safeguarding concerns related to Radicalisation or Extremism**



*\*Although involving the family is best practice, you may share information (using a CAF) with other agencies (e.g. SIP) without consent and, if necessary, without the family's participation under the Crime and Disorder legislation which allows for information sharing to prevent crime..*

**If in doubt SHARE and REFER to SIP.**

*The Social Inclusion Panel (SIP) will advise on next steps and provide interventions. PREVENT interventions are voluntary so the family will be consulted and involved prior to further action.*

### 14. Copy of the Databridge Safeguarding Form

File ▾
Submit Form

Main Details --Select-- 0

Site

Stu. Status

Residential

---

Category

Student

Staff

Date of Event

Time of Event

Location

Status

Externally Reported

Duration (Mins)

Others Involved

Documents

Details

Actions

Date	Set By	For	Action	Comments	Start Date	Completed By Date	Completed
<input type="button" value="Add Action"/>							

File ▾
Submit Form

Actions

Date	Set By	For	Action	Comments	Start Date	Completed By Date	Completed
<input type="button" value="Add Action"/>							

Is this concern urgent?

Yes

Reported to

Action

Action taken

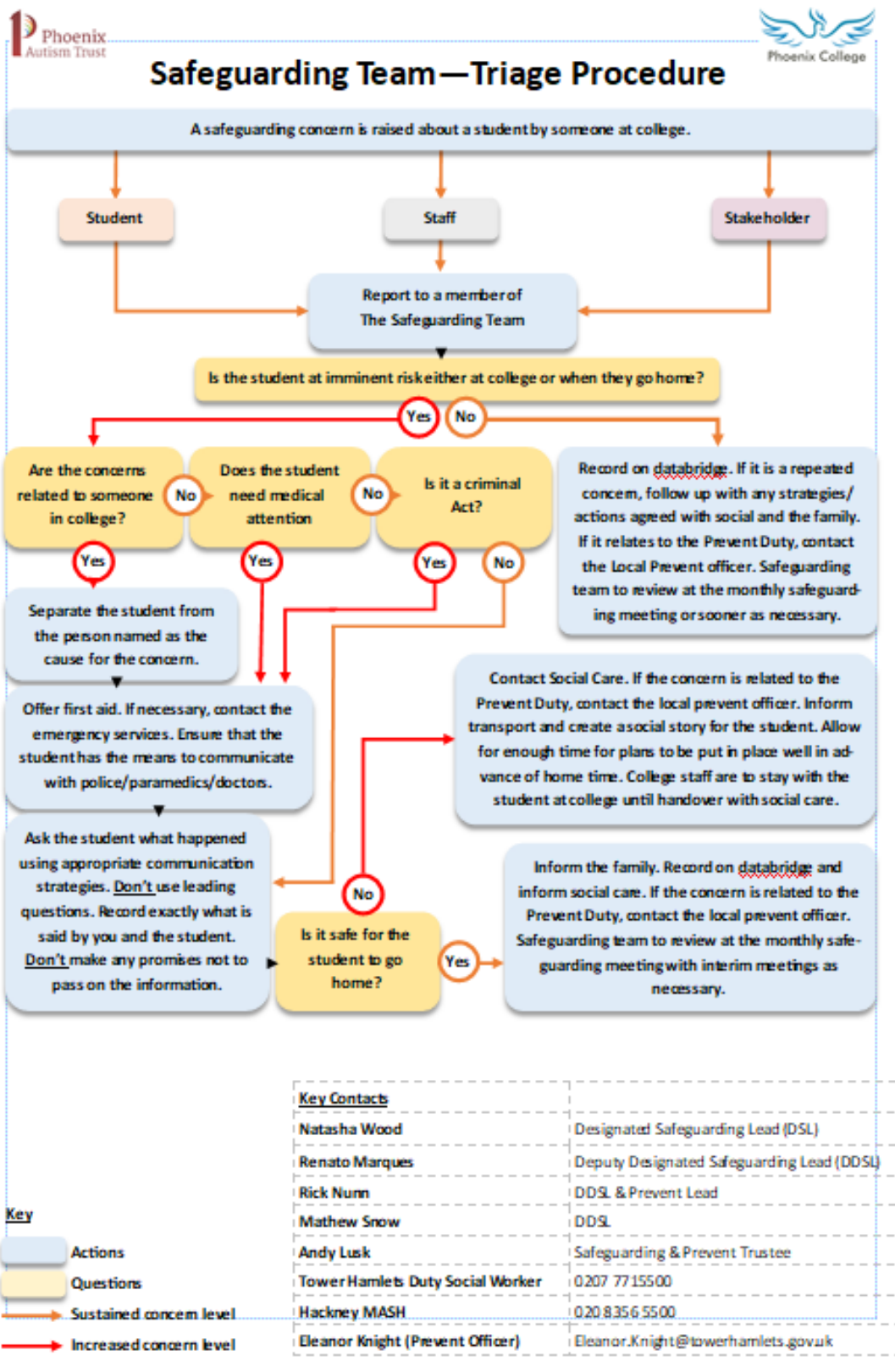
Attachment

File attached

Body Map

Add Male Body Map
Add Female Body Map
Remove Last Body Map

15. Safeguarding Team Triage Procedure



## 16. Legislation, Regulatory Requirements and Guidance

For Phoenix Autism Trust to meet their regulatory and statutory responsibilities, the following legislation and associated guidance are of significance (N.B. This is not an exhaustive list).

- The principle source (since 2015) is the Care Act 2014 (section 42). This defines abuse and sets out the statutory duties and the institutional responsibilities for those duties.
- The (Care Act) Care and Support Statutory Guidance provides the detail in relation to both the meaning of wellbeing and safeguarding. Chapter 14 sets out in detail the duties found in sections 42 to 47 and 68 of the Care Act 2014, including definitions of the aims and objectives of Adult safeguarding activity and a representative range of types of adult abuse and neglect.
- The London Multi-Agency Adult Safeguarding Policy and Procedures.  
<https://londonadass.org.uk/wp-content/uploads/2019/05/2019.04.23-Review-of-the-Multi-Agency-Adult-Safeguarding-policy-and-procedures-2019-final-1-1.pdf>
- Keeping Children Safe in Education  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1101454/Keeping\\_children\\_safe\\_in\\_education\\_2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf)
- SCIE (the social care institute for excellence) and NATSPEC has published a range of advice on Safeguarding, specifically guides on the care act 2014, and e learning resources on adult safeguarding.

Phoenix Autism Trust services that are regulated have to comply with service-specific regulations, which include ensuring there are measures in place for the prevention of abuse.

- Disclosure and Barring Service referral guidance

Also relevant:

- The protection of Freedoms act 2012 (because it defines the limits on DBS checking)
- The Mental Capacity Act 2005 (as amended) and the MCA Code of Practice 2007 (because it's the only complete source on best interests decisions, amongst a raft of related issues)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/921428/Mental-capacity-act-code-of-practice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/921428/Mental-capacity-act-code-of-practice.pdf)
- The regulated activities regulations 2014 (because it defines, broadly, when you must DBS check on employees)

## 17. Guidance on how to respond to disclosures of abuse

### **DO:**

- ✦ Treat any allegations extremely seriously and act at all times towards the young person as if you believe what they are saying.

- ✦ Tell the young person they are right to tell you.
- ✦ Reassure them that they are not to blame.
- ✦ Be honest about your own position, who you have to tell and why.
- ✦ Listen and accept what is being said without displaying shock or disbelief.
- ✦ Tell the young person what you are doing and when, and keep them up to date with what is happening.
- ✦ Take further action - you may be the only person in a position to prevent future abuse - tell your nominated person immediately.
- ✦ Write down everything said and what was done.

**DON'T:**

- ✦ Make promises you can't keep.
- ✦ Interrogate the young person - it is not your job to carry out an investigation. This will be up to the police and social services, who have experience in this.
- ✦ Cast doubt on what the young person has told you, don't interrupt or change the subject.
- ✦ Say anything that makes the young person feel responsible for the abuse.
- ✦ Do nothing - make sure you tell your nominated Designated Safeguarding Lead immediately - they will know how to follow this up and where to go for further advice.

## **18. Reporting Procedures**

a) ACT QUICKLY to obtain as much information as is reasonable and report all suspicions immediately to the DSL Natasha Wood, or in his absence to one of the DDSLs: Rick Nunn or Renato Marques.

b) DISCUSS URGENTLY with Natasha Wood (DSL) or any member of the safeguarding team. The Designated Safeguarding Lead (or a Deputy) will contact, where appropriate, the MASH (Multi-Agency Safeguarding Hub) to talk about the concerns and follow the procedures laid down in the Tower Hamlets Policy/ Hackney Policy/ Newham Policy.

c) RECORD CAREFULLY the circumstances and action taken on [databridge-pat.co.uk](http://databridge-pat.co.uk)

Include the date, time, place, nature of concern, all the facts e.g. observed injuries and bruises, the actual words of the student rather than translating into 'proper' words.

**Do NOT take photos of injuries and do NOT upload them to Databridge If another agency asks us to take a photo/video, you must check that there is permission from parents.**

REMEMBER that communication and speed are vital.

d) ALWAYS SHARE YOUR SLIGHTEST CONCERN.

Confidential records are held online by safeguarding team.

## 19. Whistle Blowing Procedure (PIDA Act 1998)

All staff, volunteers and governors must be vigilant and share concerns and report incidents. Whistle blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The following “Red Flag Behaviours” give indications of the kinds of situations which should be shared with a senior member of staff.

An adult who:

- Allows a Student/young person to be treated badly and/or pretends not to know it is happening
- Gossips/shares information inappropriately
- Demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- Dresses in a way which is inappropriate for the job role
- Does not treat Students fairly - demonstrates favouritism
- Demonstrates a lack of understanding about personal and professional boundaries
- Uses his/her position of trust to intimidate, threaten, coerce or undermine
- Appears to have an inappropriate social relationship with a Student or Students
- Appears to have special or different relationships with a Student or Students
- Seems to seek out unnecessary opportunities to be alone with a Student

Staff can refer, in confidence, to the DSL any safeguarding issues that they are concerned about. Other issues they can refer, in confidence, to any member of the Senior Management Team. If they do not feel that there is a satisfactory resolution to their concern they can refer to the Deputy Designated Safeguarding Lead (Rick Nunn & Renato Marques). If the member of staff is still not satisfied, then they can refer directly to Stewart Harris (Chair of Trustees).

Any concerns about Renato Marques, College Principal, should be referred to Stewart Harris, Chair of Trustees.

There is support in place for staff, contractors and volunteers who may be subject to allegations. This is through management or Union involvement.

## 20. Safe Environment

See Health and Safety Policy. Phoenix Autism Trust ensures that a safe environment is provided for all.

## 21. Insurance

Phoenix Autism Trust ensures that adequate insurance is in place for all activities.

## 22. Mobile phones and cameras

Staff members are allowed to bring their personal phones to college for their own use, but will limit such use to non-contact time when Students are not present. Staff members' personal phones will remain in their bags or lockers during contact time with Students.

Staff will not take pictures or recordings of Students on their personal phones or cameras.

We will not take photos of injuries and store them on our online safeguarding system.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the college.

Staff will use designated college mobile phones/ ipads/ devices to take pictures of students' progress and evidence of learning when out in the community.

## 23. Contact Details

### **The Designated Safeguarding Lead (DSL):**

Natasha Wood (Careers Lead) – [natasha.wood@phoenixcollege.london](mailto:natasha.wood@phoenixcollege.london)

### **Deputies in case of absence of above person (DDSL):**

Deputy Designated Safeguarding Leads (DDSLs):

Renato Marques (College Principal) - [renato.marques@phoenixcollege.london](mailto:renato.marques@phoenixcollege.london)

Rick Nunn (Curriculum Lead & Prevent Lead) - [rnnun@phoenixcollege.london](mailto:rnnun@phoenixcollege.london)

Andy Lusk (Safeguarding and Prevent Trustee) - [andylusk@hotmail.co.uk](mailto:andylusk@hotmail.co.uk)

Matthew Snow (Project Search Instructor) - [matthew.snow@phoenix.towerhamlets.sch.uk](mailto:matthew.snow@phoenix.towerhamlets.sch.uk)

### **Name of Group:**

Phoenix Autism Trust 0208 980 4740

Name and contact telephone number of designated persons responsible for implementing policy for the group: Renato Marques 0204 546 7710



**Social Services**

Safeguarding contact details:

**Tower Hamlets:**

Duty Number: 0207 771 5500

Email: [ldduty@towerhamlets.gov.uk](mailto:ldduty@towerhamlets.gov.uk)

**Hackney:** (they recommend emailing for quickest response)

Duty number: 0208 356 7444

Social care out of hours: 0208 356 2300

Tom Woods: 0208 356 3011/ [tom.woods@hackney.gov.uk](mailto:tom.woods@hackney.gov.uk)

Email: [learningdisabilitiesduty@hackney.gov.uk](mailto:learningdisabilitiesduty@hackney.gov.uk)

**Newham:** (they recommend emailing for quickest response)

Duty number:

Email: [accessto.adultsocialcareteam@newham.gov.uk](mailto:accessto.adultsocialcareteam@newham.gov.uk)

**Link social workers for College:**

Shade Buraimoh:

Email: [folashade.buraimoh@towerhamlets.gov.uk](mailto:folashade.buraimoh@towerhamlets.gov.uk)

Tel: 020 7771 5503 / 07957298484

**Natalie Lopez:**

Email: [natalie.lopez4@nhs.net](mailto:natalie.lopez4@nhs.net)

Tel: 07717855939

If a student has a designated social worker, contact them first.

**Tower Hamlets Prevent Officer**

Eleanor Knight - [Eleanor.Knight@towerhamlets.gov.uk](mailto:Eleanor.Knight@towerhamlets.gov.uk)

**Local Police Station**

Bow Road Police Station

111-117 Bow Rd, Bow, London E3 2AN

020 7230 1212

**Safeguarding: disclosure and barring**

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

**The Havens**

<http://www.thehavens.org.uk/about-us/>

**(StEIS) NHS**

<https://improvement.nhs.uk/resources/steis>