

National Autistic Society Adult Safeguarding Policy

Reference Number	SO-0195
Version Number	1.0
Date of Issue	June 2026
Policy Owner	Assurance and Compliance
Policy Lead	Safeguarding Lead
Next Review	June 2028

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1. Purpose

Our aim at the National Autistic Society is to ensure that the welfare of adults at risk of abuse or neglect is paramount, in line with the laws and guidance in place in England, Northern Ireland and Wales. This particularly includes the Care Act 2014 (England), the Adult Safeguarding Prevention and Protection in Partnership Policy 2015 (Northern Ireland) and the Social Services and Wellbeing Act 2014 (Wales).

We seek to ensure that the whole organisation understands their personal and collective responsibilities in relation to adults at risk and have clear policies and procedures that allow them to report and respond to any concerns or incidents.

This policy has been developed with regard for regulatory requirements to reduce the opportunity for harm, abuse and neglect and to ensure positive action when concerns are identified.

This policy provides guidance for staff working in England, Wales and Northern Ireland to promote the prevention of harm, report harm and take action to protect adults at risk, from abuse or neglect. The procedures for reporting concerns and protecting adults at risk must be applied in accordance with the local authority or trust procedures where the adult at risk is located.

2. Scope

This policy applies to anyone working on behalf of the National Autistic Society in **England, Northern Ireland and Wales**, including senior managers and the Board of Trustees, paid staff, volunteers, sessional workers, agency staff and students.

This policy applies to:

- Adult residential care services in England, Northern Ireland and Wales.
- Adult supported living services in England, Northern Ireland and Wales.
- Adult outreach and community support services in England, Northern Ireland and Wales.
- Social groups, programmes, and activities taking place in England, Northern Ireland and Wales.
- National Programmes services/activities involving adults at risk, including but not limited to helplines, support services, branches and fundraising in England, Northern Ireland and Wales.
- Any other services operated by the National Autistic Society which relate to or involve adults at risk in England, Northern Ireland and Wales.

This policy **does not** apply to:

- Services or teams only operating in Scotland.
- Concerns about adults at risk living in Scotland.

- Where concerns about the safety or wellbeing of staff or volunteers, these should be addressed through HR, Volunteer Managers, and/or the Health and Safety Team.

This policy is overarching and, together with the other policies and procedures relating to child protection and the rest of the United Kingdom, overrides all other organisational policies and procedures.

3. Glossary and Definitions

Safeguarding

The Social Care Institute for Excellence (SCIE) defines Safeguarding as protecting an adult's right to live in safety, free from abuse and neglect. It involves people and organisations working together to prevent and stop risks of abuse while promoting wellbeing and empowering individuals.

In the National Autistic Society, we use the term 'Safeguarding' across the four nations of the United Kingdom in which the National Autistic Society operates.

People we Support

The term 'people we support' is used in our adult services to refer to people receiving direct care or support from a National Autistic Society Adult Service. This includes residential care, supported living services, community services and outreach. This policy encompasses safeguarding responsibilities towards people we support in our adult services but also members of the public and people accessing different teams or services across the organisation.

Staff

Staff refers to anyone working or volunteering on behalf of the National Autistic Society including senior managers, the board of trustees, paid staff, volunteers, sessional workers, agency staff and students.

4. Introduction

The National Autistic Society works to empower autistic people to take control of their own lives, make their own choices, build capacity, and reduce risk. However, it also recognises that people can be at risk of being harmed.

Protection from harm is a shared responsibility across agencies as set out in National Safeguarding Legislation (as set out at Section 5) and local multi-agency guidance. The expectation for all vulnerable adults in our communities is that they are free from any preventable harm or exploitation.

It is a priority of National Autistic Society to support and protect any individual who comes into contact with our organisation, and the safeguarding and promoting of their interests and wellbeing is of paramount concern.

We believe that autistic people have the right to live their lives free from any form of harm and we expect all staff to know what action to take if they observe, suspect, or have reported to them possible harmful incidents; and to support them in complaining about instances of harm or neglect.

We believe that:

- People coming into contact with our organisation should never experience harm, abuse or neglect of any kind.
- We have a responsibility to promote the welfare of all people coming into contact with our organisation, to keep them safe, and to practise in a way that protects them.

We recognise that:

- The welfare of people coming into contact with our organisation is paramount in all the work we do and in all the decisions we take.
- Working in partnership with people coming into contact with our organisation, the people important to them such as their families and carers, as well as with other agencies is essential in promoting their welfare.
- All people we support, regardless of age, disability, gender reassignment, race, ethnicity, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm, abuse or neglect.
- Some autistic people are additionally vulnerable because of the impact of previous experiences, their level of support needs, communication needs or other issues.
- Extra protections may be needed to keep people that we support who are additionally vulnerable safe from abuse. These should be appropriate, proportionate and the least restrictive.

5. Legal Framework

This policy has been developed based on legislation, policy and guidance that seeks to protect adults at risk in England, Northern Ireland and Wales. The basis of all legislation is the Human Rights Act 1998, which sets out the rights, freedoms, and protections of people across the United Kingdom. This policy should be read in conjunction with the key pieces of legislation in bold for each nation as a minimum.

England

- **The Care Act 2014.**
- Mental Capacity Act 2005 and Mental Capacity (Amendment Act) 2019 (including introduction of Deprivation of Liberty Safeguards (DOLS)).
- Safeguarding Vulnerable Groups Act 2006.

- Health and Social Care Act 2012.
- Equality Act 2010.
- Human Rights Act 1998.
- Data Protection Act 2018.
- Public Interest Disclosure Act 1998.
- Domestic Abuse Act 2021.
- Immigration Act 2016.
- Fraud Act 2006.
- Protection from Harassment Act 1997.
- Serious Crime Act 2015.
- Mental Health Act 1998.
- Sexual Offences Act 2003.

Northern Ireland

- **The Northern Ireland Adult Safeguarding Prevention and Protection In Partnership Policy Document 2015.**
- Safeguarding Vulnerable Groups (Northern Ireland) Order 2007.
- Protection of Freedoms Act 2012.
- Human Rights Act 1998.
- The Mental Capacity Act (Northern Ireland) 2016.
- Mental Health (Northern Ireland) Order 1986.
- The Domestic Abuse and Civil Proceedings Act (Northern Ireland) 2021.
- The Health and Personal Social Services (Quality, Improvement and Regulation) (Northern Ireland) Order 2003.
- The Sexual Offences (Northern Ireland) Order 2008.

Wales

- **Social Services and Well Being (Wales) Act 2014.**
- Wellbeing of Future Generations (Wales) Act 2015.
- Human Rights Act 1998.
- Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.
- Serious Crime Act 2015.
- Domestic Abuse Act 2021.

- Mental Capacity Act 2005 and Mental Capacity (Amendment Act) 2019 (including introduction of Deprivation of Liberty Safeguards (DoLS)).
- Data Protection Act 2018.
- Protection from Harassment Act 1997.
- Fraud Act 2006.
- Equality Act 2010.
- Immigration Act 2016.
- Mental Health Act 1998.
- Sexual Offences Act 2003.

6. Related Documents

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents. These are all available on SharePoint and will be introduced to staff and volunteers during induction and training. These documents include:

Adult Services

- Adult Safeguarding Procedure (England, Northern Ireland and Wales).
- Adult Services Safeguarding Report Form.
- Adult Services Escalation Protocol.
- Adult Services Reporting Guidance.
- Financial Safeguarding Policy.
- Use of Restrictive Practice in NAS Services Policy.

National Programmes and Corporate Services

- National Programmes Safeguarding Reporting Flowchart.
- National Programmes Safeguarding Report Form.
- National Programmes Safeguarding Guidance.
- Corporate Services Safeguarding Flowchart.

All

- Whistleblowing Policy.
- Data Protection Policy.
- Safer Recruitment Policy and Guidance for National Autistic Society Schools & Services.
- Recruiting and Managing Volunteers Policy.
- Artificial Intelligence Policy.
- Staff Code of Conduct.

7. Safeguarding and Mental Capacity

England and Wales

The National Autistic Society adheres to the five statutory principles outlined in the Mental Capacity Act 2005 and safeguarding in England and Wales:

- **The presumption of capacity** - Every adult that we support has the right to make their own decisions and must be assumed to have capacity to do so unless it is proved otherwise. This means that you cannot assume that someone cannot make a decision for themselves just because they are autistic, have a particular medical condition or disability.
- **Individuals being supported to make their own decisions** - A person must be given all practicable help before anyone treats them as not being able to make their own decisions. This means you should make every effort to encourage and support people to make the decision for themselves. If lack of capacity is established, it is still important that you involve the person as far as possible in making decisions.
- **Unwise decisions** - People have the right to make decisions that others might regard as unwise or eccentric. You cannot treat someone as lacking capacity for this reason. Everyone has their own values, beliefs and preferences which may not be the same as those of other people.
- **Best interests** - Anything done for or on behalf of a person who lacks mental capacity must be done in their best interests.
- **Least restrictive option** - Someone making a decision or acting on behalf of a person who lacks capacity must consider whether it is possible to decide or act in a way that would interfere less with the person's rights and freedoms of action, or whether there is a need to decide or act at all. Any intervention should be weighed up in the particular circumstances of the situation.

Summary of principles adapted from:

<https://www.scie.org.uk/mca/introduction/mental-capacity-act-2005-at-a-glance>

Northern Ireland

The National Autistic Society adheres to the five statutory principles laid out in the Mental Capacity Act (Northern Ireland) 2016 and safeguarding:

No-one should be treated as lacking capacity unless proven they do - A person who is thinking about carrying out a deprivation of liberty must not misinterpret the first Principle as requiring them to presume or assume that the person has capacity or that the person lacks capacity. The Principle places the onus on a person intending to carry out the deprivation of liberty to have properly established a person's capacity. However, the starting point when establishing capacity should be that the person has capacity.

No assumptions can be made - This Principle forbids any assumptions based merely on any condition that the person has or any other characteristics of the person. Such a condition or characteristic may be a disability, age, appearance, physical or mental illness or anything else. Just because a person presents symptoms of a condition that often, or sometimes, can suggest a person lacks capacity cannot be used as the reasoning for establishing or concluding that the person lacks capacity.

Help and support must be provided – This principle requires that anyone who is considering whether a person lacks capacity must consider and provide all practicable help and support to allow the person to make their own decision. No determination of lack of capacity can be made until all practicable help and support has been provided. This helps individuals to play as big a role as possible in the decision-making process to retain as much autonomy as possible.

No assumptions can be made because of unwise decisions - All persons have their own wishes, feelings, beliefs and values. No one should be assumed to lack capacity just because they make a decision that to others may appear unwise. This applies even if family members, friends, health and social care staff or others are unhappy with the decision. Unwise decisions are even allowed if the decision is one that could have negative effects on the person making the decision.

All acts and decisions must be made in the person's best interests - The person determining best interests is required, so far as is practicable, to encourage and help the person to participate as fully as possible in the decision-making process. Special regard must be given to the person's values and beliefs, and past and present wishes and feelings. The person determining best interests must also consult with others and take into account their views as to what would be in the best interests of the person who lacks capacity. The person determining best interests must also have regard to any less restrictive alternatives to the proposed deprivation of liberty.

Summary of principles from: <https://www.health-ni.gov.uk/mca-principles>

8. Capacity and Consent

It is inevitable that there will be times when an adult that we support, who has capacity, decides to accept a situation that may be perceived as potentially harmful. If they do not have capacity, it may be that their legal deputy chooses to make this decision on their behalf. This is a decision that they have the right to make, **unless:**

- Other people are being put at risk (for example, letting friends who are abusive or exploitative into a shared living environment, where they may put other residents at risk).
- A child is involved.
- The alleged perpetrator is also an adult at risk.
- A serious crime has been committed.

- There are allegations against staff or people in a position of responsibility.
- Coercion is involved.

In these situations, we would have a duty to act and report concerns.

In regard to the Data Protection Act 2018 and The General Data Protection Regulations 2018, please note these do not supersede safeguarding concerns, therefore you are able to share concerns about safeguarding with the National Autistic Society Safeguarding Team. It may be necessary to share information about the person with capacity outside your organisation without their consent, if other people's safety is potentially at risk. If this is the case, advice should be sought from the National Autistic Society Safeguarding Team. If information needs to be shared without consent, if as long as it does not increase the risk to the person, they should be informed that you will share their information, and why. You should also:

- Explore the reasons for their objections and find out what their concerns are.
- Explain why you are concerned about them and why you think it is important to share the information.
- Tell them who you would like to share it with and why.
- Explain what the benefits may be to the person of sharing information about them.
- Discuss the potential consequences of not sharing the information.
- Reassure them that their information will not be shared with anyone who does not need to know.

Unwise Decisions

A person is not to be treated as unable to make a decision merely because they make an eccentric/unusual or unwise decision. When supporting adults with capacity who may be making decisions we consider unwise, we should consider:

- Supporting the person to weigh up the risks and benefits of different options.
- Making sure that they are aware of the level of risk and possible outcomes.
- Agreeing on the level of risk they are taking.
- Offering to arrange an advocate or peer supporter for them, if they would like this.
- Offering support for them to build their confidence and self-esteem, if it appears relevant.
- Recording every detail of your assessment of the person's capacity and of your conversations with them about the potential risks posed by their chosen actions.
- Reviewing the situation regularly.
- Making sure that they understand where they can go if they want to seek help in the future.

- Trying to build trust and using professional skills and the relationship you have with the person to make it possible for them to better protect themselves, encouraging them to continue the conversation with other people who they trust, such as family members, friends and other professionals

9. Responsibilities

Staff and volunteer responsibilities in relation to safeguarding include:

- Assessing the situation and ensuring the immediate safety and wellbeing of the adult at risk.
- Remaining calm and trying not to display any signs of shock or disbelief to the adult at risk. Listening carefully to the adult at risk and demonstrate understanding.
- Establishing the viewpoint, thoughts and wishes of the adult at risk in relation to the concerns.
- Explaining to the adult at risk what information will be shared with whom and why.
- If a crime has possibly been committed, maintaining any relevant evidence and reporting the possible crime to Police.
- Clearly record the incident/ allegation using the actual words of the adult at risk, what the staff member has seen and the actions they have taken.
- Following organisational procedures for reporting concerns and incidents.

If a staff member/volunteer observes or is made aware of a concern about harm to an adult at risk they have a professional responsibility to bring this to the immediate attention of their manager or appropriate senior staff and/or the National Autistic Society Safeguarding Team as set out in local procedure. A concern could be any instance where harm, abuse or neglect is suspected, has occurred, is occurring, or is at risk of occurring.

It is, however, **everyone's** responsibility to report concerns regarding any adult who is, or who appears to be, at risk of harm.

Where abuse is suspected within our residential, supported living, and community services, the National Autistic Society will seek to ensure that the appropriate authorities are notified at the earliest opportunity, depending on the severity and urgency of the situation. This may include contact with the Police to determine if a criminal offence has been committed.

Concerns about harm to an adult at risk will be reported to the relevant and appropriate external agencies which may include:

- Police, via 101 or 999.
- The Local Authority or Trust Safeguarding Team.
- Regulators of Social Care (CQC England, RQIA Northern Ireland, CIW Wales).

- Professional registration bodies.
- The adult's allocated social worker, care manager, or otherwise their commissioning authority or trust (where relevant).

It is the responsibility of adult protection agencies such as Social Work Services and the Police to make enquiries (proactive and reactive) and to carry out appropriate investigations in order to establish:

1. Whether or not an adult is at risk from harm or suspected harm; and, if so,
2. Which, if any, of the protective measures available in terms of the legislation are most appropriate to an adult at risk's individual circumstances.

All teams and services must have be aware of their current local multi-agency safeguarding guidelines, and these must be followed.

If a team or service is not satisfied with the response (or lack of response) from external agencies, this should be challenged and/or escalated in accordance with the appropriate local procedures. The National Autistic Society Safeguarding Team will support with this.

All National Autistic Society staff and volunteers have a responsibility:

Safe Culture	Recording and Reporting
• To provide a safe environment for everyone, including adults at risk. • To follow this policy and ask questions if not sure about any aspect of this policy. • To seek to ensure that their training is up to date. • To be aware that abuse and neglect do happen; to always remain alert to the possibility of abuse and ready to act upon information that you receive or signs of abuse or neglect you see or hear about. • To be aware of the early warning signs of potential abuse or neglect situations and the possible signs of abuse and neglect.	• To notify a Service Manager/Volunteer Manager and/or the National Autistic Society Safeguarding Team if there is any reason to be concerned that an adult at risk is being harmed. • To seek to ensure good communication of observations are made in writing. • To maintain a professional confidential approach to any concerns identified. • To challenge or report any practice that does not fit with organisational values.

Team or Service Managers have additional responsibilities to:

Safe Culture	Recording and Reporting
• To build a strong safe culture in the team or service, where people coming into contact with our organisation are listened to, respected and involved in decision making. • To seek to ensure that the day-to-day operation of the team or service is arranged and delivered to keep every person safe and to protect each person effectively from harm. • To seek to ensure that all decisions made to keep a person safe are done so in accordance with the principles of incapacity. • To seek to ensure that staff have the training and skills to identify and act upon signs that an adult is at risk of harm. Seek to ensure that staff skills in adult protection are developed, refreshed and recorded in the workforce plan. • To manage risks that people coming into contact with our organisation may post to one another (peers). • To ensure that agreed plans for support and risk management are followed by staff.	• To seek to ensure all concerns about harm or risk of harm are reported in line with legislation, policy and procedure.

National Autistic Society Heads of Service have additional responsibilities to:

Safe Culture	Recording and Reporting
• To seek to ensure all relevant staff are aware of this policy, receive appropriate training are aware of the services' local procedures to support safeguarding and follow this policy and procedures. • To seek to ensure safe recruitment practices are always followed.	• To seek to ensure effective reporting to the Safeguarding Team and relevant Director as and when required.

• To seek to ensure appropriate duty of care to staff and volunteers and minimise the stress inherent in the investigation process. • To seek to ensure that Team and Service Managers are equipped with the appropriate skills to support and manage safeguarding procedures in their service.	
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National Autistic Society Directors have additional responsibilities to:

Safe Culture	Recording and Reporting
• To ensure that there are sufficient and appropriate measures in place to safeguard the people we support in our services. • To seek to ensure that resources are available to seek to ensure that staff have skills, knowledge and understanding necessary to keep those we support safe.	• To act on any trends / themes or significant incidents that are identified.

The National Autistic Society Safeguarding Lead has additional responsibilities to:

Safe Culture	Recording and Reporting
• To take leadership responsibility for the Charity's safeguarding arrangements. • To promote a culture of listening to those we support and taking account of their wishes and feelings, both in individual decisions and the development of services. • To seek to ensure there are clear whistleblowing procedures and a culture that enables concerns to be shared addressed, in doing so promoting the welfare of all those coming into contact with our organisation. • To seek to ensure safer recruitment practices and ongoing safe working	• To report to the relevant subcommittee of the Board of Trustees and the Independent Safeguarding Board. • To seek to ensure there are clear escalation policies for staff to follow when concerns are not being addressed within their service or by other agencies.

practices are followed by all teams and services. • To chair the Risk Escalation Panel. • To promote a culture of safety, equality, and protection within services.	
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The National Autistic Society Safeguarding Team has additional responsibility:

Safe Culture	Recording and Reporting
• To seek to ensure this policy and procedure's arrangements are effectively supported and implemented, based on adherence to compliance requirements and a strong, shared culture of safety. • To take a lead operational role in developing and reviewing the policies and procedures relating to keeping adults and children safe to ensure they reflect any internal changes in practice or revised statutory guidance. • To support the Risk Escalation Panel process alongside the Safeguarding Lead. • To act as mentor to fellow staff in managing complex concerns.	• To advise on safeguarding concerns and support National Autistic Society staff and volunteers in their interaction with the local statutory safeguarding partners and other external professionals. • To seek to ensure there are clear escalation policies for staff to follow when concerns are not being addressed within their service or by other agencies. • To report relevant data to the Safeguarding Lead, Managing Director of Adult Services, Managing Director of National Programmes, and Director of Assurance and Compliance. • To identify and escalate significant incidents of harm to the Safeguarding Lead and/or relevant Director. To ensure effective recording of incidents and maintaining a centralised safeguarding database.

The Trustee nominated to be Safeguarding Lead Trustee has additional responsibilities:

Safe Culture	Recording and Reporting
• To attend meetings of the Independent Safeguarding Board (ISB) as Board (trustee) representative.	• To raise relevant safeguarding issues to the full Board, where not appropriate for the sub-committee chairs to raise.

• To support the chairs of relevant board sub-committees with understanding the issues, findings and recommendations discussed at the ISB. • To work alongside the Chair of the Independent Safeguarding Board to help Board ensure a safe culture within the organisation, which should include: ○ Creating the right culture. ○ Champion safeguarding at Board level. ○ Attend relevant training events and conferences. ○ Support other trustees in developing their individual and collective understanding of safeguarding. ○ Attend meetings, activities, projects to engage with staff, volunteers and beneficiaries to understand safeguarding on the ground.	• To seek to ensure that the organisation's risk register reflects current safeguarding risks, controls and measures to manage the risks. • To present their own report to the chair of the ISB who will present an annual report to the Board, identifying trends and any areas of concern. • To ensure that matters relating to safeguarding are on the Board and Committee agendas and help trustees understand and challenge the reports.
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10. Processes for Concerns or Disclosures of Harm

Staff may become aware of concerns about harm in different ways. A concern may be a direct disclosure by the adult at risk, or a concern raised by staff or volunteers, others using the service, a carer or member of the public, or an observation of the behaviour of the adult at risk, or the behaviour of another.

Further details of the process for managing concerns about adults at risk are in the Procedure, but key principles are highlighted below.

All staff must comply with local authority or trust multi-agency Safeguarding Procedures for the area where the adult lives. Failure by a member of staff to report actual or reasonably suspected harm will be treated as a disciplinary offence.

Responding to Harm

1. Ensure the immediate safety of the adult at risk, such as by:
 - Intervening in the situation, assessing for first aid, contacting emergency services if necessary.

2. Ensure the immediate safety of other people we support in the service.
 - Such as where there is an allegation against a member of staff, ensuring that member of staff does not come into contact with any other people we support.
3. Report the harm in line with local reporting procedures, taking into account the adult at risk's views and communication.
4. Make a written record of the observed harm as soon as possible once the situation has been made safe.

Third Party Disclosure

If staff hear about an incident of harm from a third party (this is when someone else tells them about what they have heard or seen happen to a vulnerable adult at risk), they should encourage the third party to report it themselves or help them to report the facts of what they know. If the third party is not able to do this or staff are not sure that they have done so, staff should report the concern themselves. Staff have a responsibility to ensure that any possible harm they become aware of is appropriately acted upon and that the adult at risk is protected.

11. Allegations Against Staff (Including Trustees or Volunteers)

Any allegation that a member of National Autistic Society staff, volunteer, or trustee has harmed or possibly harmed an adult at risk must be reported to the appropriate service management and National Autistic Society Safeguarding Team Safeguarding Team as soon as possible. Where relevant, this report should only be made once the person or people we support have been made safe.

If there are concerns or an allegation against the service manager, this should be reported to the relevant Senior Manager within the National Autistic Society and to the National Autistic Society Safeguarding Team.

All staff have access to SafeCall as an alternative independent whistleblowing method to raise a concern about a member of staff. SafeCall can be contacted confidentially via phone: 0800 915 1571 or email: nas@safecall.co.uk. (See also Whistleblowing section).

The allegation should be assessed for any immediate actions necessary to protect the person or people we support, and shared with the appropriate statutory agencies such as the local authority or trust social work team, the Police and commissioners, regulators, or professional registration bodies.

Reporting to the Police is necessary where a member of staff may have:

- Behaved in a way that has harmed an adult at risk or may have harmed an adult at risk.

- Possibly committed a criminal offence against or related to a child or an adult at risk.
- Behaved towards an adult at risk in a way that indicates they may pose a risk of harm to adults at risk.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with adults at risk.

There are two aspects to consider when an allegation is made:

- **Protecting the adult at risk from further harm** – Staff are responsible for ensuring that the adult at risk (and where relevant other adults accessing the service) is protected from further harm and that the appropriate internal and external teams are aware of the allegation.
- **Investigating the allegation of harm and supporting the member of staff, trustee or volunteer subject to the allegation** – In consultation with the external agencies, service and senior management, the National Autistic Society Safeguarding Team, and HR will assess the nature, content and context of the allegation, and agree an appropriate course of action. Where relevant, this assessment should include Police advice about when to inform the member of staff of the details of a criminal allegation.

The possible suspension of the staff member or volunteer, without prejudice, should be discussed with HR and the Safeguarding Team without delay if there are concerns that a staff member has harmed an adult at risk or is at risk of harming an adult at risk.

Staff members and volunteers (including agency staff) against whom an allegation is made are owed a duty of care and should be treated fairly, honestly and without discrimination. They should be provided with support throughout the process.

Low Level Concerns

As part of their whole approach to safeguarding, services should seek to ensure that they promote an open and transparent culture in which all concerns about all staff, trustees or volunteers are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults at risk are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. It should enable services to identify staff's concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and seek to ensure that staff working in or on behalf of the service are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the National Autistic Society.

A **low-level concern** is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the service may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Has not caused harm and is not likely to cause harm. (Examples of such behaviour could include, but is not limited to being over friendly with people we support; spending too much time with one particular person we support, having favourites.)

It is crucial such concerns are reported so appropriate guidance, supervision, training and action can be taken.

Staff are not expected to determine for themselves whether a concern is low level or not. Any concern must be reported to the relevant manager who will make this assessment in collaboration with HR and the National Autistic Society Safeguarding Team, and in full knowledge of any previous concerns.

Services should:

- Ensure their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empower staff to share any low-level concerns with the Team or Service Manager.
- Address unprofessional behaviour and support the individual to correct it at an early stage.
- Provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and help identify any weakness in the services' operations.

12. Whistleblowing

Staff should always act whenever harm is suspected. Where staff do not feel able to report harm using the reporting procedures detailed above, or where concerns have been reported but not appropriately acted upon, they are able to whistleblow.

Whistleblowers are given protection under the Public Interest Disclosure Act 1998.

All staff have access to SafeCall as an alternative independent whistleblowing method to raise a concern about the action or inaction of a member of staff or the organisation. SafeCall can be contacted confidentially via phone: 0800 915 1571 or email: nas@safecall.co.uk.

13. Outcomes and Learning

Where safeguarding concerns have been identified, we need to ensure we are reflecting on and learning from there. This reflection and learning may come as part of a formal investigation. Investigation or review of a concern may lead to changes being made at a person, service, or organisation level to prevent it happening again.

Where relevant, the Team or Service Manager should use the Risk Assessment process to prevent reoccurrences of similar incidents.

Where concerns have been reported to external agencies such as Local Authority Safeguarding Team, an outcome should be received. It is important the Service receives this information, in order to inform actions and learning. This information should be passed onto the National Autistic Society Safeguarding Team and added to the service's safeguarding records.

If a staff member or service is not satisfied with the response (or lack of response) from external agencies, this should be challenged and/or escalated in accordance with the appropriate local procedures. Advice and support should be sought from the National Autistic Society Safeguarding Team.

14. Supporting Staff and Supervision of Staff

It is encouraged for all staff working directly with adults at risk to have access to regular supervision during which adult safeguarding concerns can be discussed. In some of our services regular supervision is a mandatory requirement of the regulatory body.

Staff may find situations where an adult at risk has been harmed stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the relevant line manager and to seek further support such as counselling or regular supervision, debriefing, or reflective practice, as appropriate. Employees also have access to a confidential helpline via the Employee Assistance Programme (EAP).

To reduce the risk of allegations being made against staff, and seek to ensure that staff are competent, confident and safe to work with vulnerable adults, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

15. Recruitment and Selection of Staff and Volunteers

The National Autistic Society has written recruitment and selection policy statements and procedures for the recruitment and selection of both employed staff and volunteers.

The safer recruitment statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

The recruitment process is robust in seeking to establish the commitment of candidates to support the National Autistic Society in the safeguarding of adults at risk and to deter, identify, reject or identify people who might pose a risk of harm to adults or are otherwise unsuited to work with them.

All staff and volunteers in regulated activity within our teams and services have been checked as to their suitability, including verification of their identity, qualifications, previous employment history and relevant criminal records check and a right to work in the United Kingdom.

The protocol for receiving information prior to Agency staff working in services must be followed and this includes sight and consideration of an appropriate and in date criminal records check, references, training history (this must include adult safeguarding and other basic mandatory training).

16. Training

All staff and volunteers will receive safeguarding training that is relevant to their role. Training will be completed within the induction framework and be refreshed on an annual basis (not later than 13 months since the last training) via internal training sessions, the online e-learning modules or from the relevant local agencies or specialist organisations.

For staff working directly with vulnerable adults, the training will as a minimum cover:

- Adults at risk.
- Prevention and recognition of harm.
- Dealing with disclosures and concerns.
- Information sharing.
- Whistleblowing.
- Maintaining confidentiality.
- Mental Capacity (where relevant).
- Deprivation of Liberty Safeguards (where relevant).

All staff and volunteers must read, understand and become knowledgeable about the organisation's adult safeguarding policies and procedures during induction and must ensure they are familiar with any updates made.

17. Contacts and Whistleblowing

SafeCall (Independent Whistleblowing Service)	
All staff have access to SafeCall as an alternative independent whistleblowing method to raise a concern such as about the action or inaction of a member of staff or the organisation.	
Telephone	0800 915 1571
Email Address	nas@safecall.co.uk

National Autistic Society Safeguarding Team	
Safeguarding concerns and reports should be sent to the Safeguarding Team inbox at notifications.safeguarding@nas.org.uk and not to personal emails.	
Role	Name and Email Address
Safeguarding Lead	Danielle Wilson Danielle.wilson@nas.org.uk
Safeguarding Advisor for Adult Services	
Safeguarding Advisor for National Programmes	
Safeguarding Advisor for Children and Young People	

Chair of the Independent Safeguarding Board (ISB)	
Name	John Goldup
Email Address	John.goldup@nas.org.uk

Nominated Safeguarding Lead Trustee	
Name	Pamela Marsden
Email Address	Pamela.marsden@nas.org.uk

Local Safeguarding Contacts

Please list here any relevant local safeguarding contacts for your team or service.

Local Safeguarding Contacts	
Agency	Contact Details
Frontdoor	social.services@kent.gov.uk 03000 41 61 61 Out of Hours 03000 41 91 91
Kent & Medway Prevent Officer	Rachel Murray prevent@kent.gov.uk 03000 412431