



Safeguarding Adults at Risk

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Please avoid referring to printed versions of this policy.

Printed versions may quickly go out of date – the latest version will be on the Policy Hub or contact the Governance Team. For support and advice regarding the policy, please contact the Policy Owner.

Contents Page

| | | |
|-------------|--|-----------|
| 1.0 | Introduction and Scope | 3 |
| 2.0 | Our Core Purpose, Vision and Priorities | 3 |
| 3.0 | Regulation, Legislation and Strategic Alignment | 5 |
| 4.0 | Definitions | 5 |
| 5.0 | Modern Slavery | 7 |
| 6.0 | Policy Statement and Reporting | 7 |
| 7.0 | Records | 7 |
| 8.0 | Roles and Responsibilities | 8 |
| 9.0 | Policy Delivery | 8 |
| 10.0 | Policy Outcomes | 9 |
| 11.0 | Escalation | 10 |
| 12.0 | Confidentiality | 10 |
| 13.0 | Monitoring and Review | 10 |
| | Version Control | 11 |
| | Appendices | 12 |

1.0 Introduction and Scope

1.1 This document covers our policy on Safeguarding Adults at Risk. The policy should be read in conjunction with the Safeguarding Adults at Risk Toolkit. The policy and toolkit provide clear directions on how we will provide a safe environment for adults at risk whilst carrying out our work and how we intend to provide support and assistance to those who we consider could be at risk of abuse or neglect.

1.2 The purpose of the policy is, therefore, to ensure that safeguarding concerns and referrals are handled sensitively, professionally and in ways that support the needs of the adult at risk.

1.3 The scope of this policy covers:

| | |
|---------------------|---|
| Gentoo Group | X |
| Gentoo Homes | |
| Gentoo Developments | |
| Gentoo Genie | |

1.4 It applies to:

| | |
|---|---|
| General Needs rented properties | X |
| Supported Housing | X |
| Sheltered Housing | X |
| Leasehold/Shared ownership | X |
| Rent to Buy properties | X |
| Market rented properties (domestic) | X |
| Temporary Accommodation | X |
| Stock owned but not managed by the Group | X |
| Communal Areas, including those relating to Leasehold/Shared Ownership properties | X |
| Commercial Property (offices, depots etc) | X |
| Stock managed by Gentoo on behalf of a third party | X |
| Garages and outbuildings | |
| Remote plant (district heating, electrical pumps etc) | |
| Curtilage | |

2.0 Our core purpose and vision and priorities

Our core purpose is to provide safe and decent homes for our customers of today and tomorrow.

Our vision is to provide great homes, strong communities, and inspired people for Sunderland.

The safety of our customers and colleagues will always be our number one priority.

We have identified six further priorities which will guide the delivery of our services.

We live our values in everything we do from the boardroom to the front room, to deliver our priorities for our customers.

- We know our customers.
- We provide great homes.
- We help communities to thrive.
- We are a great place to work.
- We spend our money wisely.
- We are well governed.

Our values are what we stand for and what we want to be known for. They are what makes us, us.

- We care about people.
- We take accountability.
- We shape the future.
- We bring leadership.
- We deliver.

2.1 This Policy operates within our Vision and Values and links to the Safeguarding Adults at Risk Policy and Toolkit, Hoarding Toolkit, Data Protection Policy, Domestic Abuse Policy and Community Safety Policy and Toolkit.

2.2 Consumer Standards

We are guided by the Consumer Standards, which describe ways to improve things for people living in Social Housing.

- The Safety and Quality Standard (<https://www.gov.uk/government/publications/safety-and-quality-standard>)
- The Transparency, Influence and Accountability Standard (<https://www.gov.uk/government/collections/transparency-influence-and-accountability-including-tenant-satisfaction-measures>)
- The Neighbourhood and Community Standard (<https://www.gov.uk/government/publications/neighbourhood-and-community-standard>)
- The Tenancy Standard (<https://www.gov.uk/government/publications/tenancy-standard>)

3.0 Regulation and Legislation and Strategic Alignment

- 3.1 Our Regulator sets out the Neighbourhood and Community Standard which we must meet. Failure to properly discharge these responsibilities could lead to a serious detriment or other judgement from the Regulator if we breach the Standards in place at the time

4.0 Definitions

4.1 Adults at risk:

Under the **Care Act (2014)**, an adult at risk is defined as someone who:

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

4.2 Gentoo recognises that harm can take place in many forms. The commonly recognised forms of adult abuse are listed below:

- **Domestic** – Including an incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is, or has been an intimate partner or family member regardless of gender or sexual orientation. This includes psychological/emotional, physical, sexual, financial abuse; so called ‘honor’ based violence, forced marriage or Female Genital Mutilation (FGM). Gentoo has a separate Domestic Abuse Policy and Toolkit.
- **Physical** – Punching, hitting, slapping, pinching, pushing and shaking
- **Psychological / Emotional** – Humiliation, intimidation, indifference
- **Sexual** – Non – contact i.e. voyeurism, involvement in viewing or making pornography, indecent exposure, harassment, serious teasing and innuendo. Contact i.e. touching breasts, genital, anus, mouth, masturbation of either or both persons, penetration or attempted penetration of the vagina, anus or mouth with penis fingers, or other objects
- **Financial or Material** – Misuse or exploitation of the adults at risks money, property, inheritance, possessions, theft
- **Neglect or Acts of Omission** – Administering too much or too little medication, failure to access appropriate health care, social care or educational services. Withholding or failing to provide the necessities of life such as adequate nutrition, heating or clothing. Failure to intervene

in situations that are assessed as being dangerous to the person concerned or to others, particularly where the person lacks capacity

- **Self-neglect** – Includes a person neglecting to care for their personal hygiene, health or surroundings; or an inability to provide essential food, clothing, shelter or medical care necessary to maintain their physical and mental health, emotional wellbeing and general safety. It includes behaviour such as hoarding
- **Modern Day Slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
- **Discriminatory-** Motivated abuse by oppressive and discriminatory attitude towards the person's disability, race, gender, age, religion, cultural background, sexual orientation
- **Organisational or Institutional-** Inflexible routines being imposed e.g. bedtime, bathing/washing, meals, using toilet etc

There are additional types of harm that are not included in The Care Act, but they are also relevant to safeguarding adults and are listed below:

- **Cyber Bullying** - Cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities. The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.
- **Mate Crime** - A "mate crime" is when "vulnerable people are befriended by members of the community who go on to exploit and take advantage of them" (Safety Network Project, ARC). It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private. In recent years there have been a number of Serious Adult Reviews relating to people with a learning disability who were seriously harmed, or even murdered, by people who purported to be their friend.
- **Radicalisation** - The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.

5.0 Modern Slavery

5.1 Gentoo take a zero-tolerance approach to human trafficking and slavery. Modern slavery encompasses human trafficking, forced labour and domestic servitude which are all a form of abuse and must be dealt with as our highest priority. Gentoo carry out customer checks at various points within the tenancy which aim to ensure that the legal tenant and their household are living in the property and that it is not being used for illegal purposes, which includes human trafficking and slavery.

6.0 Policy Statement and Reporting

6.1 Gentoo regards the safety and protection of adults at risk as paramount within all of its activities whether this involves direct or indirect contact. Our aims with this policy are:

- Associated Toolkits will ensure that tenants are treated as individuals with fairness and respect
- Staff and customers will be clear in their understanding of how Safeguarding is defined.
- We will review good practice, regulator recommendations, revised legislation, awareness of support and early intervention options and follow guidelines from Sunderland Safeguarding Adults Board to ensure that our safeguarding service is effectively managed.
- Encourage and use reports of abuse and neglect to enable us to have a better understanding of issues affecting our neighbourhoods.
- We will cooperate with local partnership arrangements both operationally and strategically to gain a better understanding of safeguarding issues and amend our approach accordingly.

7.0 Records

7.1 All safeguarding referrals and information relating to attendance at meetings is recorded on our case management system. All correspondence with agencies regarding safeguarding should be forwarded to the Safeguarding Team who will ensure that a copy is stored in the appropriate location.

8.0 Roles and Responsibilities

- 8.1 As a Housing Association, we have a statutory responsibility to comply with all relevant regulation and legislation in relation to safeguarding Adults at Risk.

| Roles | Responsibility |
|---|---|
| Director of Customer Service | Is accountable for the effective implementation of this policy and ensuring colleagues involved in its delivery understand their roles and responsibilities |
| Head of Neighbourhoods / Head of Safety and Support/Operations Manager, Safeguarding | Will assist with implementing this policy and ensuring all staff involved in it are trained in our procedures and adequately skilled to implement those. |
| Housing and Safety and Support Colleagues | Should have awareness of the policy, act accordingly and help in recognising and reporting any safeguarding issues they come across. They should attend Safeguarding meetings where relevant and see cases through to their conclusion. |

9.0 Policy Delivery

- 9.1 Gentoo does not operate in isolation. Safeguarding adults at risk is the responsibility of all adults and especially those working with adults. **Safeguarding is everyone's business.**
- 9.2 Gentoo staff are encouraged to recognise and report anything that does not seem right. However, they also may have to act immediately to prevent any further harm from occurring such as contacting the Police if there is an immediate risk of harm.
- 9.3 Gentoo's aim is to help protect the adults at risk for whom we have responsibility as part of our group functions and work consistently and appropriately with safeguarding agencies/authorities.
- 9.4 The work undertaken by Gentoo is increasingly diverse and of a cross-boundary nature. The policy therefore acts in accordance with national legislation, guidance and good practice implemented locally by the Sunderland Safeguarding Adult Board (SSAB).
- 9.5 Whilst SSAB has a role in co-ordinating and ensuring the effectiveness of local individuals and organisations work to safeguard and promote the welfare of adults, it is not accountable for their operational work. This means that Gentoo Group retains accountability for safeguarding and promoting the welfare of adults at risk through our services.

- 9.6 We will ensure we are making safeguarding personal and will follow this sector led initiative to ensure that safeguarding concerns and referrals are handled sensitively, professionally and in a way that supports the need of adults at risk.
- 9.7 We will involve adults at risk in any safeguarding decisions. However, where someone is judged as not having capacity to make an informed decision about their own wellbeing, these will be made on their behalf in accordance with the requirements of the Mental Capacity Act 2005, and in liaison with the necessary statutory services and agencies, involving carers and family members as appropriate.
- 9.8 Gentoo is committed to respond in accordance with the SSAB procedures in all cases where there is a concern about Significant Harm.

10.0 Policy Outcomes

- 10.1 This policy and accompanying toolkit covers the range of interactions the group has with adults at risk and recognises the six key principles of safeguarding, **Empowerment, Prevention, Proportionality, Protection, Partnership, Accountability**.
- **Empowerment** - Victims should be supported in making their own decisions and choices, including those related to risk and their own perceived vulnerability. If decisions are made without taking account of the victims' views this may infringe their human rights and jeopardise other qualities of life.
 - **Protection** - support and representation for those in greatest need.
 - **Prevention** - it is better to take action before harm occurs.
 - **Proportionality** - safeguarding must be built on proportionality and a consideration of people's human rights.
 - **Partnership** - local solutions through services working with their communities.
 - **Accountability** – safeguarding is everyone's business and everyone in contact with an adult at risk should be responsible for noting any risks. Practice and arrangements should be accountable and transparent.
- 10.2 As part of our ongoing commitment and our presence within the Sunderland Safeguarding Adults Board, we actively seek to ensure these principles are realised.

- 10.3 Our Safeguarding Adults at Risk Policy and Toolkit will ensure that customers are treated as individuals with fairness and respect. An Equality Assessment has been completed on this policy.

11.0 Escalation

- 11.1 Where the Board or any Board member has concerns about significant issues in any area of compliance with the safeguarding children policy and toolkit, they must escalate these concerns to the Executive Director of Housing and the Chair of the Board.
- 11.2 Where a member of staff has concerns about significant issues in any area of compliance with safeguarding children, they must escalate these concerns through their line management structure, ultimately to the Group Executive Team.
- 11.3 Where a member of staff continues to have concerns about significant issues in any area of compliance with safeguarding children, they should refer to the Group Whistleblowing Policy for further guidance.

12.0 Confidentiality

- 12.1 We will treat all information received in a private and confidential manner as far as possible but if we believe an adult is at risk there may be situations where we cannot do this.
- 12.2 We will only disclose information to perpetrators, legal representatives, or other third parties once we have the consent of the adult to do so.
- 12.3 We may, however, have a legal obligation to pass information on, for example to the Police or Adult Services or other statutory agencies.
- 12.4 This policy fully complies with the Group's Data Protection Policy.

13.0 Monitoring and Review

- 13.1 This policy will be reviewed every 3 years or in line with business need or changes in legislation.
- 13.2 This policy may be subject to an audit in line with the internal audit plan.
- 13.3 The toolkit will be regularly reviewed and updated where appropriate, drawing on external expertise where required.

13.4 This Policy is Grade 2 and changes require the approval of the Executive Director of Housing and the Executive Director of Corporate Services.

Version Control

| Version | Reason | Issuer | Date |
|---------|---|------------------|-------------|
| 2.0 | Approved. | Julie Lister | 2017 |
| 2.0 | Amended format. | Sarah Treadwell | 22/03/2018 |
| 2.1 | Changed names to job titles and added accountable ED. | Sarah Treadwell | 07/10/2019 |
| 2.2 | Draft for review. | Julie Lister | 16/12/2020 |
| 2.3 | Changes made after discussions with Carol Long, Susie Thompson, Julie Walker and Julie Lister. | Julie Lister | 21/12/2020 |
| 3.0 | Approved. | Julie Lister | 11/01/2021 |
| 4.0 | Job titles amended. Policy reviewed to bring in line with review of Safeguarding Adults (audit recommendation). Inc Julie Walker's amends. Sent to Tenants Voice Team for comments, no suggestions to change or add anything. | Julie Lister | 19/10/2021 |
| 4.1 | Updated core purpose and vision and priorities | Catherine Loftus | 31/08/2023 |
| 5.0 | Policy reviewed (no suggestions from safeguarding audit for any changes). Approved by the Executive Team | Julie Lister | 14/01//2025 |
| | | Chloe Appleby | 14/02/2025 |

Appendix 1

Regulation and Legislation

In fulfilling its obligations under this Policy, the organisation will comply with all legislation and regulations as appropriate. This section aims to highlight the different areas of law, which may be of particular significance to safeguarding adults at risk.

This is a general overview and should not be used as a substitute for seeking legal advice in specific cases. If there is any doubt about the law relevant to a particular case, legal advice should be sought from the Legal Team

- The Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- The Equality Act 2006 & 2010
- Mental Capacity Act 2005
- Domestic Abuse Act 2021
- Anti-Social Behaviour Act 2003
- Sexual Offences Act 2003
- The Care Standards Act 2000
- Hate Crime: The Crime and Disorder Act 1998
- Data Protection Act 2018
- The Public Interest and Disclosure Act 1998
- The Human Rights Act 1998
- Protection from Harassment Act 1997
- Housing Act 1988 & 1996
- National Health Service and Community Care Act 1990
- Disabled Persons (Services, Consultation & Representation) Act 1986
- The Mental Health Act 1983
- Modern Slavery Act 2015
- Protection of Freedoms Act 2012
- Counter-terrorism and Security Act 2015
- FGM Act 2003
- Anti-social Behaviour, Crime and Policing Act 2014
- Health and Social Care Act 2012
- Sex Offenders Act 1997

In addition to the above, further guidance can be found from:

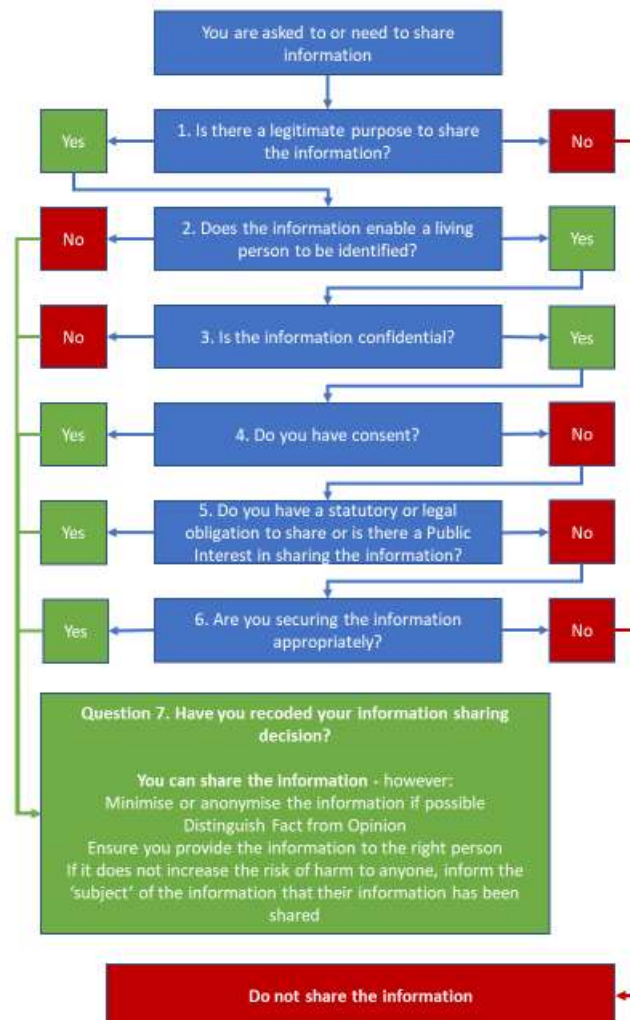
- Independent Safeguarding Authority
- Association of Directors of Adult Social Services

Gentoo has a suite of complementary policies and procedures which staff may refer to in cases where there are cross cutting concerns, these include (but are not limited to):

- Safeguarding Children Policy and Toolkit
- Community Safety Policy and Toolkit
- Domestic Abuse Policy and Toolkit
- Hate Incidents Toolkit
- Vulnerability Toolkit
- Hoarding Toolkit
- Whistle Blowing Policy
- Forced marriage toolkit.

Appendix 2

Information Sharing – Community Safety Team - All requests to share information related to safeguarding must be referred to the Community Safety Team.



You are asked to or wish to share information.

Question 1 - Is there a clear and legitimate purpose for sharing information?

- Ensure there is a good enough reason to share the information?
- What is the outcome you are trying to achieve?
- Could the aims be achieved without sharing the information at all?
- Could the aims be achieved by anonymising the information, or minimising (reducing the amount of) the information shared?

Golden Rule - Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.

Other things to consider:

- Do not assume that you need to share the whole case file.
- Different agencies may have different processes for sharing information.

You will need to be guided by Gentoo's Data Protection Policy and Procedure, the Group's Code of Conduct and the code of conduct specifically relating to working with young people set out in this policy.

Question 2 - Does the information enable a living person to be identified?

If the information is about an identifiable living individual or could enable a living person to be identified when considered with other information, then it is classed as personal information under the Data Protection Act and subject to Data Protection law. This is likely to be the case in the course of your work. You should be open about what information you might need to share and why. However, it may not be appropriate to inform a person that information is being shared or seek consent to this sharing. This is the case if informing them is likely to hamper the prevention or investigation of a serious crime or put a child at risk of significant harm or an adult at risk of serious harm. Golden Rule - Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is safe or inappropriate to do so.

Other things to consider:

- If the person was informed about how and with whom their personal information might be shared at the outset, it will usually not be necessary to inform them again as long as the use as described in the original notification is the same.

Question 3 - Is the information confidential?

- Not all information is confidential
- Confidential information is information of a private or sensitive nature that is:
 - not already lawfully in the public domain or readily available from another public source; and
 - had been provided in circumstances where the person giving the information could reasonably expect that it would not be shared

with others.

Golden Rule - Seek advice from the **Community Safety Team** if you are in any doubt, without disclosing the identity of the person where possible.

If the information is not confidential, you must now consider question 6.

If the information is confidential, you must now consider question 4.

Question 4 - Do you have consent to share?

- You should seek consent where possible and respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement on the facts of the case, that lack of consent can be ignored due to the 'public interest' i.e. it is important that others are aware of the information as withholding it would potentially put others in danger.
- You do not always need consent to share personal information. There will be some circumstances where you should not seek consent, for example, where doing so would:
 - place a child at increased risk of significant harm; or
 - place an adult at increased risk of serious harm; or
 - prejudice the prevention, detection or prosecution of a serious crime; orlead to unjustified delay in making enquiries about allegations of significant harm or serious harm.

Golden Rule - Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.

Other things to consider:

Generally, there should be 'no surprises'. Obtaining explicit consent is best practice. It can be expressed either verbally or in writing, although written consent is preferable since that reduces scope for subsequent dispute. You will need to consider whose consent should be sought. Does the person have the capacity to understand and make their own decisions on this occasion? If not, is someone else authorised to act on their behalf? Consent must be informed, i.e.

when people agree to information sharing, they must understand how much of their information needs to be shared, who will see it, why it is necessary to share the information and any implications of sharing or not sharing.

Consent can be withdrawn at any time – if someone consents to sharing information and changes their mind, you should aim to respect their wishes. That said, there are still circumstances whereby you may still need to share information without someone's consent as discussed in Question 4, however in this case, they have previously provided it and withdrawn it. You would need to acknowledge their request to remove consent and then revisit Question 4 and 5 to see if you should continue to allow it to be shared.

Question 5 – Do you have a statutory or legal obligation to share the information, or do you think there is sufficient public interest to share the information (i.e., it's in the Public's interest to share it)?

- Even where you do not have consent to share confidential information, you may lawfully share if this can be justified in the public interest. Where consent cannot be obtained or is refused, or where seeking it is unsafe or inappropriate (as explained at Question 4), the question of whether there is sufficient public interest must be judged by the practitioner on the facts of each case. A public interest request to share information can arise in a wide range of circumstances.
- Where you have a concern about a person, you should not regard refusal of consent to automatically mean that you cannot share confidential information.
- In making the decision you must weigh up what might happen if the information is shared against what might happen if it is not, and make a decision based on professional judgement.

Golden Rule - Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

Other things to consider:

A competent adult has the right to make decisions which may put themselves at risk, but which present no risk of significant harm to children or serious harm to other adults. In this case it may not be justifiable to share information without consent.

If you decide not to share information you must consider Question 7.

If you decide to share information you must consider Question 6.

Question 6 - Are you sharing information appropriately and securely?

Only share what is necessary to achieve the purpose, distinguishing clearly between fact and opinion.

Ensure you have not simply 'hidden' information in a spreadsheet, where someone can 'unhide' it.

Share only with the person or people who really need to know the information. Make sure the information is accurate and up to date.

- Understand the limits of any consent given and especially if the information has been provided by a third party.
- Check who will see the information and share the information in a secure way. For example, confirm the identity of the person you are talking to; ensure a conversation or phone call cannot be overheard; use secure email; ensure that the intended person will be on hand to receive a fax.
- Establish with the recipient whether they intend to pass it on to other people and ensure that they understand the limits of any consent that has been given.
- Inform the person to whom the information relates that you are sharing the information, if it is safe to do so, and if you have not already told them that their information may be shared.

Golden Rule - Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.

Question 7 - Have you properly recorded your information sharing decision?

- Record your information sharing decision and your reasons, including what information you have shared and with whom, following the Group's arrangements for recording information and in line with any local information sharing procedures in place.
- If, at any stage, you decide not to share information you should record this decision and the reasons for it.

Golden Rule - Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

If there are concerns that a child may be at risk of significant harm or an adult may be at risk of serious harm, then follow the relevant procedures without delay.

Seek advice from a member of the Community Safety Team or your local Neighbourhood Operations Manager if you are not sure what to do at any stage and ensure that the outcome of the discussion is recorded.

Appendix 3

What is Prevent* and what should I do if I have a concern?

Prevent safeguards vulnerable adults or children at risk of being radicalised to stop them becoming terrorists or supporting terrorism. It safeguards people in the same way as safeguarding individuals from being drawn into sexual exploitation, gangs, county lines etc. Prevent works in the non-criminal space so those referred will not be criminalised. Prevent is a multi-agency response to offer support to individuals referred and deals with all forms of extremism such as Right Wing and Islamist extremist. The referral process is:

NOTICE

If you identify that a vulnerable person may be at risk of being radicalised or drawn into terrorism...

(NOTE: if there is an IMMEDIATE RISK of a terror incident taking place you MUST call 999 or the Anti-Terrorist Hotline 0800 789321)

CHECK

Ask relevant questions that will help you describe your concerns and any vulnerabilities the person may have e.g. by speaking with your line manager and/or your agency's Safeguarding/Prevent lead (see below for examples of types of information you should attempt to check out)

SHARE

If your concern is valid then you MUST share the concern by following Gentoo's SAFEGUARDING procedures for making a safeguarding referral/reporting a concern.

Make sure you state that you are making a referral under 'PREVENT' (risk of radicalisation).

Staff in the Adult/Child Safeguarding front door will then make their named Prevent single point of contact (SPOC) aware that there has been a safeguarding referral made under Prevent.

The Adult or Child Prevent SPOC will then contact the referrer to ask them to complete the national Prevent referral form. They will assist the referrer to complete this if required. This form gathers more detail about the concern and how it is relevant to Prevent (i.e. risk of radicalisation) as well as anything in the individual's life that might be affecting their wellbeing or that might make them more vulnerable.

The Adult of Child Prevent SPOC will then send the national Prevent referral form to the Police Prevent Team who will check that it is within the scope of 'Prevent' (i.e. that it is in the non-criminal space, before a crime happens).

The Police Prevent Team will then send a copy of the National Prevent referral form to relevant partner agencies with a request that they carry out an information sweep. The Police Prevent Team will carry out a Police Gateway Assessment (PGA) to decide if a case is appropriate for Channel. If it is, they will complete a vulnerability assessment framework (VAF) to determine if the threshold is met for a Channel Panel.



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| <p>If CHANNEL PANEL threshold is met then a multi-agency Channel Panel is convened to address the risk of radicalisation. The Adult/Child Prevent SPOC chairs this panel.</p> | <p>If CHANNEL PANEL is not met, then the case is signposted to relevant partner agencies for other safeguarding support or early help.</p> |
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*Prevent is one of the 4 strands of the Government's Counter Terrorism Strategy (CONTEST). It operates in the non-criminal space to safeguard anyone who is at risk of being radicalised or drawn into terrorism. The following agencies have a duty to report Prevent concerns: local authorities, schools and registered childcare providers, higher and further education, the health sector, police, prisons, and probation.

Prevent referral Process: Last Updated March 2020

For the **check and share stage**, attempt to check and collate information that can include, but is not limited to:

YOUR CONCERNS – Describe in as much detail as possible the specific concern(s) relevant to Prevent.

For example:

- How / why did the Individual come to your organisation's notice in this instance?
- Does it involve a specific event? What happened? Is it a combination of factors? Describe them.
- Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? If so, Where? When? How?
- Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?
- Is there something about the Individual's mobile phone, internet or social

media use that is worrying to you? What exactly? How do you have access to this information?

- Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?
- Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider any extremist ideology, group or cause, as well as support for “school-shooters” or public-massacres, or murders of public figures.
- Please describe any other concerns you may have that are not mentioned here.

COMPLEX NEEDS - Is there anything in the Individual’s life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense? For example:

- Victim of crime, abuse or bullying.
- Work, financial or housing problems.
- Citizenship, asylum or immigration issues.
- Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings.
- On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency.
- Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.
- Educational issues, developmental or behavioural difficulties, mental ill health (see Safeguarding Considerations below).
- Please describe any other need or potential vulnerability you think may be present.

SAFEGUARDING CONSIDERATIONS for example:

- Does the Individual have any stated or diagnosed disabilities, disorders or mental health issues? If so, has this been diagnosed.
- Have you discussed this Individual with your organisations Safeguarding / Prevent lead? What was the result of the discussion?
- If your concerns are sufficient that you want to make a safeguarding referral, have you informed the Individual that you are making this referral? If so, what was the response?
- Have you taken any direct action with the Individual since receiving this information? What was the action & the result?
- Have you discussed your concerns around the Individual with any other agencies?

OTHER INFORMATION you think may be relevant. For example: social media details, military service number, other agencies or professionals working with the Individual, etc...

Prevent referral Process: Last Updated March 2020