



# Brothers Autism Social Enterprise CIC (BASE)

## **Governance, Safeguarding & Operating Policies Suite**

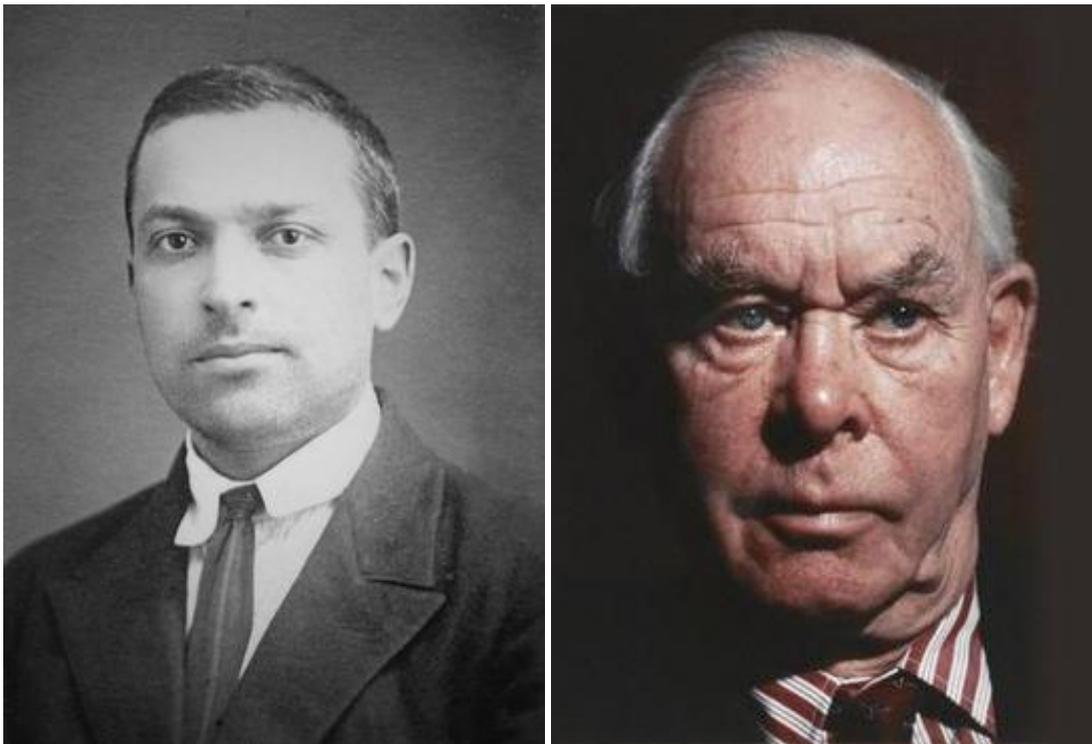
*Dated*

January 2026

## Empirical Foundation of our Best Practice Guidance, Policies, and Procedures

At Brothers Autism Social Enterprise CIC (BASE), our policies (A–N) are grounded in two core developmental psychology frameworks: Lev Vygotsky’s Zone of Proximal Development (ZPD) and John Bowlby’s Secure Attachment theory. We believe growth happens when people are supported at the right level - *not over-supported, not left behind* - through clear scaffolding, structure, and consistency. Equally, we recognise that learning and participation require a safe and predictable environment, where distress is responded to with calm, dignity, and safeguarding. These principles shape everything we do: boundaries, adjustments, engagement, and decision-making - ensuring BASE remains both supportive *and* accountable.

### Developmental Psychologists



Lev Vygotsky [*left*] and John Bowlby [*right*]

# CONTENTS

## **Section 1: Governance ... page 4**

A) Governance and Operating Principles

## **Section 2: Safeguarding Framework ... page 8**

B) Safeguarding Umbrella Framework

C) Safeguarding Adults at Risk Policy

D) Safeguarding Children and Young People Policy

## **Section 3: Employment Safeguarding & Workplace Procedures ... page 17**

E) Employment Safeguarding and Neutral Suspension Procedure

F) Grievance, Complaints and Escalation Procedure

## **Section 4 : Participation, Engagement & Support in Services ... page 22**

G) Participation and Engagement Policy

H) Distress, Wellbeing and De-escalation Protocol

I) Boundaries, Conduct and Mutual Respect Policy

## **Section 5: Equality, Inclusion & Adjustments ... page 29**

J) Reasonable Adjustments Policy

## **Section 6: Culture, Values & Behaviour Standards ... page 33**

K) Values Embedded into Behavioural Standards

## **Section 7: Risk, Records & Compliance ... page 36**

L) Risk Assessment Framework

M) Records, Evidence and Communications Protocols

N) Social Media, Photography, and Consent Policy

# **Section 1: Governance and Operating Principles**

A) Governance and Operating Principles

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## A) Governance and Operating Principles

### 1. Purpose

This document sets out the governance framework and operating principles of Brothers Autism Social Enterprise CIC (“BASE”).

It defines how decisions are made, responsibilities are allocated, and accountability is maintained in a manner that is proportionate, transparent, and aligned with the organisation’s values.

BASE is committed to good governance as a foundation for safeguarding, ethical practice, and sustainable service delivery.

### 2. Purpose of Brothers Autism

Brothers Autism Social Enterprise CIC exists to support autistic and neurodivergent adults through inclusive programmes, creative practice, and community-based opportunities that promote belonging, autonomy, and wellbeing.

BASE operates on a **profit-with-purpose** model, reinvesting resources to advance its social mission while maintaining financial and operational responsibility.

### 3. Scope of Activity

BASE delivers:

- autistic adult services and programmes
- creative, educational, and community-based initiatives
- training and capacity-building activities aligned with its mission

BASE does not:

- provide clinical, therapeutic, or medical services
- act as a substitute for statutory services
- offer crisis intervention beyond agreed safeguarding protocols

Where individuals require support beyond BASE's remit, appropriate signposting is provided.

#### **4. Micro-Organisation Context**

BASE is a small, founder-led social enterprise and does not operate a dedicated Human Resources department or in-house legal function.

Governance arrangements are therefore:

- proportionate to organisational size and resources
- aligned with statutory obligations and best practice
- designed to be practical, clear, and workable

Where specialist advice is required, BASE seeks external guidance from appropriate professional or statutory bodies.

#### **5. Governance Structure & Decision-Making Authority**

Overall responsibility for governance, strategy, and compliance rests with the Founder and Director, supported by the Board where applicable.

The Director is responsible for:

- operational decision-making
- safeguarding oversight
- employment decisions
- financial stewardship
- policy development and review

Decisions are made with due regard to:

- legal and regulatory obligations
- organisational risk
- proportionality and fairness
- the wellbeing of staff, service users, and the organisation itself

#### **6. Separation of Roles & Functions**

BASE recognises the importance of maintaining clear boundaries between different organisational roles.

Accordingly:

- the role of employer is distinct from that of service provider
- employment matters are managed through employment policies and procedures
- service user participation is governed by programme-specific policies

Engagement in BASE services does not confer employment rights, and employment does not guarantee ongoing participation in services where safeguarding or boundary considerations apply.

This separation is essential to:

- prevent conflicts of interest
- maintain safeguarding standards
- ensure fairness and clarity for all parties

## **7. Regulatory & Governance Context**

BASE operates in accordance with applicable legislation, including the Companies Act 2006, and remains mindful of evolving regulatory expectations.

While BASE is not subject to the UK Corporate Governance Code, its principles inform the organisation's approach to:

- accountability
- internal controls
- ethical leadership
- transparency

Governance arrangements are reviewed regularly to ensure continued effectiveness and compliance.

## **8. Review & Continuous Improvement**

This policy is reviewed annually, or sooner where required due to:

- organisational change
- regulatory developments
- learning arising from practice or incidents

BASE views governance as a living framework, supporting learning, reflection, and continuous improvement.

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:** 

## **Section 2: Safeguarding Framework**

B) Safeguarding Umbrella Framework

C) Safeguarding Adults at Risk Policy

D) Safeguarding Children and Young People Policy

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## B) Safeguarding Umbrella Framework

### 1. Purpose

Brothers Autism Social Enterprise CIC (“BASE”) is committed to safeguarding all individuals who engage with the organisation, including service users, staff, volunteers, and associates.

This framework sets out BASE’s overarching safeguarding principles, responsibilities, and processes. It applies across all activities and is supported by role-specific safeguarding policies.

Safeguarding is understood as both:

- protecting individuals from harm, and
- creating conditions in which people can participate safely, autonomously, and with dignity.

### 2. Legislative & Regulatory Context

This framework is informed by, and operates in accordance with, relevant UK and Northern Ireland legislation and guidance, including:

- Safeguarding Vulnerable Groups (NI) Order 2007
- Adult Safeguarding: Prevention and Protection in Partnership (DHSSPS NI, 2015)
- Children (NI) Order 1995
- Mental Capacity Act (NI) 2016
- Disability Discrimination Act 1995
- Human Rights Act 1998
- Data Protection Act 2018 / UK GDPR

BASE recognises its duties under these frameworks while ensuring safeguarding responses remain proportionate to organisational size and scope.

### 3. Safeguarding Principles

BASE adopts the following safeguarding principles:

- Prevention – acting early to reduce risk
- Proportionality – least intrusive response appropriate to risk
- Protection – support for those at risk
- Partnership – working with relevant agencies where required
- Accountability – clear responsibility and record-keeping

For adults, safeguarding is rooted in consent, autonomy, and capacity, unless overriding risk necessitates escalation.

#### **4. Scope**

This framework applies to:

- autistic and neurodivergent adults engaging with BASE services
- children and young people where applicable
- employees, volunteers, contractors, and associates

Supporting policies provide specific guidance for:

- Adults at Risk (18+)
- Children & Young People (<18)

#### **5. Roles & Responsibilities**

Overall safeguarding responsibility rests with the Founder/Director, who acts as Designated Safeguarding Lead (DSL).

Responsibilities include:

- receiving and assessing safeguarding concerns
- determining proportionate responses
- liaising with external agencies where necessary
- ensuring safeguarding decisions are documented

All staff and associates have a duty to:

- remain alert to safeguarding concerns
- report concerns promptly
- follow agreed procedures

#### **6. Safeguarding Responses**

Safeguarding actions may include:

- informal support and monitoring
- temporary adjustments or boundaries
- temporary suspension from activities or roles
- referral to statutory agencies where required

Safeguarding actions are not disciplinary by default.

## **7. Review & Learning**

Safeguarding practice and this framework are reviewed:

- annually, and
- following incidents or learning events

BASE is committed to reflective safeguarding practice and continuous improvement.

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:** 

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## C) Safeguarding Adults at Risk Policy (18+)

### 1. Purpose

This policy sets out how BASE safeguards adults aged 18 and over, including autistic and neurodivergent individuals and those who may experience periods of distress, vulnerability, or reduced capacity.

BASE recognises adults as autonomous individuals and seeks to balance safety with independence, avoiding unnecessary control or restriction.

### 2. Definition: Adult at Risk

In line with NI guidance, an adult at risk is a person aged 18 or over who:

- may be unable to protect themselves from harm, abuse, or exploitation due to disability, illness, distress, or circumstance.

Being autistic or neurodivergent does not automatically mean a person lacks capacity or requires safeguarding intervention.

### 3. Legal Context

This policy is informed by:

- Adult Safeguarding: Prevention and Protection in Partnership (NI, 2015)
- Mental Capacity Act (NI) 2016
- Human Rights Act 1998
- Disability Discrimination Act 1995

Safeguarding responses must respect:

- autonomy,
- consent,
- least restrictive intervention.

### 4. Consent & Capacity

BASE operates on the presumption of capacity.

Safeguarding actions involving adults will normally:

- be discussed with the individual,
- require consent,
- be co-produced where possible.

Safeguarding without consent will only occur where:

- there is serious risk of harm to the individual or others, or
- statutory thresholds are met.

## **5. Recognising Safeguarding Concerns**

Concerns may include:

- significant distress or deterioration
- risk-taking behaviours
- breakdown of boundaries
- allegations of harm or exploitation
- inability to engage safely with activities

Concerns may arise gradually or suddenly.

## **6. Safeguarding Responses**

Responses may include:

- supportive conversation and check-ins
- temporary adjustments to participation
- increased structure or boundaries
- referral to advocacy or support services
- temporary suspension from services as a neutral safeguarding measure

Suspension:

- is not punitive
- is intended to reduce risk and allow reflection
- is reviewed regularly

## **7. Advocacy & Third-Party Involvement**

Adults may choose to involve an advocate or supporter.

However:

- advocacy supports communication; it does not replace autonomy
- BASE retains responsibility for safeguarding decisions
- third parties do not direct organisational actions

## **8. Escalation & External Referral**

BASE will refer concerns to statutory agencies where:

- there is immediate risk
- abuse is suspected
- legal thresholds are met

Referrals are made in line with NI safeguarding pathways.

## **9. Recording & Confidentiality**

Safeguarding concerns and actions are:

- documented accurately
- stored securely
- shared only on a need-to-know basis

Information sharing complies with data protection legislation.

## **10. Review**

This policy is reviewed annually or following significant safeguarding events.

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:**



# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## D) Safeguarding Children and Young People Policy (Under 18)

### 1. Purpose

Brothers Autism Social Enterprise CIC (“BASE”) is committed to safeguarding and promoting the welfare of all children and young people who engage with the organisation.

This policy outlines BASE’s responsibilities, procedures, and expectations to ensure children and young people are protected from harm and supported in a safe environment.

### 2. Legislative Context (Northern Ireland)

This policy is informed by:

- Children (Northern Ireland) Order 1995
- Safeguarding Vulnerable Groups (NI) Order 2007
- Co-operating to Safeguard Children and Young People in NI (2017)
- Human Rights Act 1998
- Data Protection Act 2018 / UK GDPR

### 3. Scope

This policy applies to:

- all children and young people under the age of 18
- all staff, volunteers, contractors, and associates

Safeguarding duties apply regardless of disability or capacity.

### 4. Safeguarding Principles

BASE operates on the principles that:

- the welfare of the child is paramount
- safeguarding is everyone’s responsibility
- concerns must be acted on promptly
- actions must be proportionate and recorded

## 5. Roles & Responsibilities

The Founder/Director acts as Designated Safeguarding Lead (DSL).

All staff and associates must:

- remain vigilant to safeguarding concerns
- report concerns immediately to the DSL
- follow safeguarding procedures

## 6. Recognising Safeguarding Concerns

Concerns may include:

- physical, emotional, or sexual abuse
- neglect
- bullying or exploitation
- exposure to harmful behaviour

## 7. Reporting & Response

All safeguarding concerns must be reported immediately to the DSL.

The DSL will:

- assess the concern
- determine appropriate action
- refer to statutory agencies where required

Parental involvement will be managed appropriately and in line with statutory guidance.

## 8. Recording & Confidentiality

All concerns are:

- recorded accurately
- stored securely
- shared only on a need-to-know basis

## 9. Review

This policy is reviewed annually or following safeguarding incidents.

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)



**Signature:**

## **Section 3: Employment Safeguarding & Workplace Procedures**

E) Employment Safeguarding and Neutral Suspension Procedure

F) Grievance, Complaints and Escalation Procedure

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## E) EMPLOYMENT SAFEGUARDING & NEUTRAL SUSPENSION PROCEDURE

### 1. Purpose

This procedure sets out how BASE safeguards employees, service users, and the organisation where concerns arise in the workplace.

It recognises that safeguarding may sometimes require temporary separation while matters are clarified.

### 2. Safeguarding in Employment Context

Safeguarding in employment may arise where:

- distress impacts safe working
- boundaries become unclear
- allegations or concerns emerge
- wellbeing deteriorates

Safeguarding responses are not disciplinary by default.

### 3. Neutral Suspension

Suspension may be used as a neutral safeguarding measure where necessary.

Suspension:

- is not a presumption of wrongdoing
- is implemented on full pay
- is time-limited and reviewed
- allows space for clarification and support

### 4. When Suspension May Be Considered

Suspension may be considered where:

- immediate risk exists

- continued working may escalate distress
- safeguarding boundaries need to be re-established
- clarity is required before next steps

## 5. Process

Where suspension is implemented:

1. The reason is explained clearly and factually
2. Suspension is confirmed in writing
3. Support and signposting are offered
4. Contact arrangements are clarified

## 6. Advocacy & Support

Employees may access advocacy or support.

However:

- advocacy supports communication
- employment responsibility remains with the employee
- BASE retains decision-making authority

## 7. Review & Outcomes

Suspension is reviewed regularly and may result in:

- return to role
- adjusted duties
- formal procedures where appropriate
- or conclusion of employment by agreement

## 8. Recording

All decisions and actions are documented and retained confidentially.

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:** 

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## **F) GRIEVANCE, COMPLAINTS and ESCALATION PROCEDURE (Employment and Services)**

### **1. Purpose**

To ensure concerns are handled fairly, consistently, and without intimidation, while protecting everyone's dignity and rights.

### **2. Routes**

Concerns fall into:

- Informal resolution (preferred where appropriate)
- Formal complaint/grievance (written submission)

### **3. Timescales**

- acknowledgement within 3 working days
- response target within 10 working days
- extensions allowed with explanation

### **4. Advocacy**

Advocates may:

- support communication
- assist with accessibility

Advocates may not:

- replace the person's responsibility
- direct organisational decisions
- demand exclusion of direct contact unless safeguarding thresholds apply

## 5. Escalation Pathway

Stage 1: Informal discussion (where possible)

Stage 2: Formal written complaint

Stage 3: Review / decision by Director / Board

Stage 4: External bodies (LRA / Equality Commission / statutory agencies)

## 6. Safeguarding Override

If safeguarding risk exists, BASE may:

- pause internal processes
- implement neutral safeguarding measures
- escalate externally

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:** 

## **Section 4 : Participation, Engagement & Support in Services**

G) Participation and Engagement Policy

H) Distress, Wellbeing and De-escalation Protocol

I) Boundaries, Conduct and Mutual Respect Policy

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## **G) PARTICIPATION & ENGAGEMENT POLICY**

### ***(Autistic Adult Services & Programmes)***

#### **1. Purpose**

This policy sets out expectations for participation in BASE services and programmes, ensuring a safe, respectful, and inclusive environment for all.

#### **2. Who This Applies To**

This policy applies to:

- autistic and neurodivergent adults engaging with BASE services
- participants, facilitators, and associates

#### **3. Principles of Participation**

BASE is built on:

- mutual respect
- shared responsibility
- autonomy and consent
- clear boundaries

Participation is voluntary and conditional on safe engagement.

#### **4. Expectations of Participants**

Participants are expected to:

- engage respectfully with others
- communicate concerns appropriately
- follow agreed boundaries and guidance
- take responsibility for their conduct

#### **5. Boundaries & Behaviour**

BASE does not tolerate:

- disrespectful or harmful behaviour
- misrepresentation of others
- actions that undermine safety or trust

Boundaries are in place to protect everyone.

## **6. Temporary Suspension from Services**

Where safeguarding or wellbeing concerns arise, BASE may implement a temporary suspension from services.

Suspension:

- is not punitive
- is a safeguarding measure
- allows time for reflection and support
- is reviewed proportionately

## **7. Advocacy & Support**

Participants may choose to involve an advocate.

Advocacy:

- supports communication
- does not replace personal responsibility
- does not override safeguarding decisions

## **8. Complaints & Feedback**

Participants are encouraged to raise concerns through BASE's complaints process.

## **9. Review**

This policy is reviewed annually.

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:** 

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## H) DISTRESS, WELLBEING and DE-ESCALATION PROTOCOL

### 1. Purpose

BASE recognises that autistic and neurodivergent individuals may experience distress, overload, or anxiety during work or participation.

This protocol provides a structured, compassionate response to distress while maintaining safety and boundaries.

### 2. Early Indicators of Distress

Indicators may include:

- withdrawal or shutdown
- reduced communication
- increased agitation
- frustration or emotional escalation
- confusion or overwhelm

### 3. Initial Response

Where distress is identified, BASE will:

- slow pace
- clarify expectations
- offer reassurance
- offer breaks
- check understanding

### 4. De-Escalation Measures

If distress continues:

- activities may pause
- expectations may be temporarily adjusted
- a cooling-off period may be offered

- external support may be signposted

## **5. Temporary Suspension as Safeguarding**

Where necessary, BASE may implement temporary suspension from duties or services as a safeguarding measure.

Suspension:

- is not punitive
- is time-limited
- is reviewed
- supports wellbeing and safety

## **6. Advocacy & Support**

Advocacy may be involved where helpful.

However:

- safeguarding decisions remain with BASE
- advocacy does not override safety considerations

## **7. Recording**

All distress incidents and responses are recorded proportionately.

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:** 

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## I) BOUNDARIES, CONDUCT, and MUTUAL RESPECT POLICY

### 1. Purpose

This policy sets clear expectations for respectful behaviour, communication, and boundaries within BASE.

### 2. Scope

Applies to:

- employees
- participants
- volunteers
- associates

### 3. Core Principles

BASE is built on:

- respect
- trust
- shared responsibility
- psychological safety

### 4. Expected Conduct

All individuals are expected to:

- communicate respectfully
- raise concerns appropriately
- engage in good faith
- respect roles and boundaries
- avoid misrepresentation of others

### 5. Informal Communication Channels

Informal channels (e.g. WhatsApp) are for coordination and support, not:

- conflict escalation
- allegations
- grievance handling

Formal matters must follow formal processes.

## **6. Behaviour That Undermines Trust**

Includes:

- speaking negatively about colleagues or the organisation
- bypassing agreed processes
- escalating matters unnecessarily
- involving third parties inappropriately

## **7. Response to Boundary Breaches**

Where boundaries are crossed, BASE may:

- clarify expectations
- implement cooling-off measures
- apply safeguarding steps
- escalate to formal procedures where necessary

## **8. Review**

This policy is reviewed annually.

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:** 

## **Section 5: Equality, Inclusion & Diversity AND Reasonable Adjustments**

J) Equality, Inclusion, & Diversity AND Reasonable Adjustments Policy

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## J) EQUALITY INCLUSION & DIVERSITY and REASONABLE ADJUSTMENTS POLICY (Employment and Services)

### 1. Purpose

**Equality Inclusion and Diversity:** Brothers Autism Social Enterprise CIC (BASE) is committed to promoting equality of opportunity, valuing diversity, and creating inclusive environments in both employment and service delivery.

As a Community Interest Company operating within Northern Ireland, BASE recognises its responsibilities under equality legislation and is committed to ensuring that no individual is treated less favourably on the basis of protected characteristics.

Equality at BASE is not simply a legal obligation - it is embedded within our values of Belonging, Actualisation, Safeguarding, and Education.

**Reasonable Adjustments:** Brothers Autism Social Enterprise CIC (“BASE”) is committed to providing reasonable adjustments to support disabled employees and participants to engage safely, effectively, and independently.

This policy clarifies what reasonable adjustments are, how they are considered, and the limits of what BASE can reasonably provide as a micro-organisation.

### 2. Legal Context (Northern Ireland)

This policy is informed by:

- Disability Discrimination Act 1995 (as amended)
- Sex Discrimination (NI) Order 1976
- Race Relations (NI) Order 1997
- Fair Employment & Treatment (NI) Order 1998
- Employment Equality Regulations (sexual orientation, religion, age)
- Human Rights Act 1998

BASE remains mindful of guidance issued by the Equality Commission for Northern Ireland.

### **3. Scope**

This policy applies to:

- Employees
- Volunteers
- Participants in services
- Contractors and associates
- Board members

It covers:

- Recruitment and employment practices
- Service access and participation
- Training delivery
- Organisational conduct and communications

### **4. Protected Characteristics**

BASE does not discriminate on the grounds of:

- Disability
- Age
- Sex
- Race or ethnic origin
- Religious belief
- Political opinion
- Sexual orientation
- Gender reassignment
- Marital or civil partnership status
- Pregnancy or maternity status

### **5. Commitment in Practice**

BASE commits to:

- Providing fair access to services
- Delivering inclusive and sensory-considerate environments
- Implementing reasonable adjustments where required
- Challenging discriminatory behaviour
- Promoting dignity, respect and psychological safety
- Ensuring recruitment decisions are based on merit and suitability

### **6. Responsibilities**

The Founder/Director holds overall responsibility for implementation of this policy.

All employees, participants and associates are expected to:

- Act respectfully
- Promote inclusion
- Raise concerns appropriately
- Avoid discriminatory language or behaviour

Breaches may be addressed through relevant policies (e.g., Conduct, Safeguarding, Grievance).

## **7. What Are Reasonable Adjustments?**

Reasonable adjustments may include:

- changes to communication methods
- flexibility in pacing or task delivery
- additional explanation or clarification
- structured check-ins
- temporary adjustments during periods of distress

Adjustments are individualised, proportionate, and reviewed regularly.

## **8. What Reasonable Adjustments Are Not**

Reasonable adjustments do not:

- remove responsibility for conduct
- remove accountability for role requirements
- require BASE to operate beyond its capacity
- allow ongoing disrespectful or unsafe behaviour
- transfer decision-making authority to advocates or third parties

## **9. Requesting Adjustments**

Requests may be made verbally or in writing.

BASE will:

- discuss the request
- consider feasibility
- agree adjustments where reasonable
- record decisions

## **10. Review & Limits**

Adjustments are reviewed periodically and may be amended or withdrawn if:

- no longer effective
- no longer reasonable
- creating unintended risk

## **11. Advocacy**

Advocates may support communication but do not replace personal responsibility or override organisational decisions.

## **12. Monitoring & Review**

This policy is reviewed annually or earlier if required due to legislative change or organisational development.

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:**

A handwritten signature in black ink that reads "David McLaughlin". The signature is written in a cursive style with a large initial 'D' and 'M'.

## **Section 6: Culture, Values & Behaviour Standards**

K) Values Embedded into Behavioural Standards

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## K) VALUES EMBEDDED INTO BEHAVIOUR STANDARDS

### 1. Purpose

BASE values are not branding statements — they are behavioural standards. This document translates values into clear expectations for staff and participants.

### 2. BASE Values (Behavioural Translation)

#### ***Belonging***

We create inclusion by acting with respect and curiosity.

Standard: Speak to others with dignity; do not isolate, ridicule, or exclude.

#### ***Actualisation***

We support growth through responsibility and learning.

Standard: Take ownership of mistakes, accept feedback, and work towards independence.

#### ***Safeguarding***

We protect safety, wellbeing, and boundaries.

Standard: Raise concerns early, follow agreed processes, respect boundaries.

#### ***Education***

We promote understanding, development, and communication.

Standard: Ask for clarification, communicate needs, support learning respectfully.

### 3. Behaviour Examples (Practical)

Values-based behaviour includes:

- raising concerns directly and appropriately
- assuming good intent and seeking clarification
- using formal routes for formal matters
- respecting role boundaries (staff vs service users vs advocates)

Values breaches include:

- misrepresentation of others
- escalation through informal channels
- disrespectful communication
- undermining trust and safety

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:**

A handwritten signature in black ink that reads "David McLaughlin". The signature is written in a cursive, flowing style.

## **Section 7: Risk, Records & Compliance**

L) Risk Assessment Framework

M) Records, Evidence and Communications Protocols

N) Social Media, Photography, and Consent Policy

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## RISK ASSESSMENT FRAMEWORK

### 1. Purpose

Brothers Autism Social Enterprise CIC (“BASE”) uses risk assessment to protect service users, staff, volunteers, and the organisation. This framework ensures risk is identified early, managed proportionately, and reviewed routinely.

### 2. Scope

Applies to:

- autistic adult services/programmes
- employment activities
- remote working and digital delivery
- community events and travel
- safeguarding and wellbeing situations

### 3. Risk Principles

Risk management at BASE is:

- proportionate to a micro-organisation
- preventative, not reactive
- designed to support participation, not restrict it unnecessarily

### 4. Risk Categories

BASE assesses risk across the following categories:

1. Safeguarding risk (adult/child)
2. Wellbeing/distress risk

3. Operational risk (delivery failure, staffing capacity)
4. Employment risk (conduct, disputes, boundaries)
5. Legal/compliance risk (equality, GDPR)
6. Reputational risk
7. Digital risk (data, recordings, online platforms)
8. Physical H&S risk (venue, trips, equipment)

## 5. Risk Scoring Matrix

Likelihood (1–5) × Impact (1–5) = Risk Rating (1–25)

Risk response thresholds:

- 1–6 Low: monitor
- 7–12 Medium: mitigation plan required
- 13–19 High: immediate action + review date
- 20–25 Critical: stop activity / escalate safeguarding

## 6. Risk Ownership

Each risk must have:

- named owner (Director or delegated lead)
- mitigation steps
- review date

## 7. Review Cycle

- quarterly review (core risks)
- event-based review (incidents / learning)
- annual full review

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:**



# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## RECORDS, EVIDENCE and COMMUNICATIONS PROTOCOL

### 1. Purpose

BASE records information to:

- safeguard individuals
- ensure fairness and transparency
- evidence reasonable actions
- meet legal obligations (GDPR)

### 2. What Must Be Recorded

- safeguarding concerns and actions
- complaints/grievances and outcomes
- reasonable adjustment discussions and decisions
- suspension decisions and review notes
- incidents of distress or boundary issues

### 3. Communication Channels

Informal (WhatsApp)

Permitted for:

- routine coordination
- reminders
- brief supportive check-ins

Not permitted for:

- allegations
- disputes
- grievance escalation
- disciplinary discussion

Formal (Email/Letters)

Used for:

- complaints/grievances
- safeguarding outcomes
- adjustments
- suspension / return-to-work
- equipment and organisational property

#### **4. Recordings**

Meetings may be recorded only where:

- all parties are informed
- the purpose is safeguarding / accuracy
- storage is secure
- retention is limited

#### **5. Data Storage**

Records are stored:

- securely
- access-controlled
- retained only as long as necessary

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:** 

# BROTHERS AUTISM SOCIAL ENTERPRISE CIC



## SOCIAL MEDIA, PHOTOGRAPHY & CONSENT POLICY

### 1. Purpose

BASE promotes inclusion and autistic achievement responsibly. This policy protects participants from harm arising from public exposure, misinterpretation, or future regret.

### 2. Consent Principles

Consent must be:

- informed
- freely given
- specific
- revocable at any time

### 3. Media Categories

Consent is recorded separately for:

- internal use (private records)
- website
- social media
- press/media coverage

### 4. Withdrawal of Consent

Participants may withdraw consent at any time. BASE will:

- stop future use immediately
- remove content - where reasonably possible

### 5. Special Considerations

BASE takes extra care where:

- individuals are distressed
- capacity is unclear

- coercion is possible
- there is reputational risk

**Approved by:** David McLaughlin

**Date approved:** January 2026

**Review date:** January 2027

**Owner:** David McLaughlin (Founder | Director)

**Signature:** 