



THE AUTISM HUB BY TCS

Policy Pack (TCS-01 to TCS-10)

Policy Owner: Chioma Nwajuaku

Date Created: February 2026 | Next Review: February 2027

Contact

Email: info@thrivingcare.co.uk

Phone: 07341 856 671

This document contains the organisation's core operational policies for The Autism Hub by TCS. It is intended for internal use by staff, volunteers, and authorised partners.



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TCS-01 | Safeguarding & Child and Adult Protection Policy

Policy Header / Document Control	
Policy Code	TCS-01
Policy Owner	Chioma Nwajuaku
Position	Registered Manager / Designated Safeguarding Lead (DSL)
Module	Legal & Regulatory Compliance
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Review Frequency	Annual or upon legislative change
Local Authority	London Borough of Havering
Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

The Autism Hub by TCS is committed to providing a safe, inclusive, and regulatory-compliant environment for every child, parent, and carer engaged in our programmes. This safeguarding policy defines how we prevent, identify, respond to, and report concerns related to the welfare of both children and adults at risk.

We recognise that:

- All children and adults have a right to live free from abuse, neglect, and exploitation.
- Safeguarding is everyone's responsibility.
- Protection is best achieved through early identification, consistent procedures, and multi-agency collaboration.
- Our environment must be neurodiversity-affirming and trauma-informed, ensuring the wellbeing of autistic children and their families.

2. Scope

This policy applies to:

- All TCS employees, volunteers, contractors, and partner facilitators
- Parents/carers participating in hub sessions
- All children aged 5–16 years attending our programmes
- Any adult (18+) using or connected to TCS services who may meet the definition of an “adult at risk”



3. Legislative Framework

This policy aligns with: Children's legislation

- Children Act 1989 & 2004
- Working Together to Safeguard Children (2018, updated 2023)
- Keeping Children Safe in Education (2023)
- Education Act 2002 (s175)

Adult and combined frameworks

- Care Act 2014
- Mental Capacity Act 2005 & Liberty Protection Safeguards (2019)
- Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1998
- Domestic Abuse Act 2021
- UK GDPR & Data Protection Act 2018
- Counter-Terrorism & Security Act 2015 (Prevent Duty)
- Equality Act 2010

4. Definitions

- Child: anyone under 18.
- Adult at Risk: a person aged 18+ who has care/support needs and is unable to protect themselves from abuse or neglect.
- Safeguarding: protecting the rights of children and adults to live safely and promoting their wellbeing.
- Abuse: physical, emotional, sexual, financial, or neglectful acts that cause harm or distress.

5. Policy Principles

Child Safeguarding

- Every child has equal rights to protection and education.
- All interactions with children recognise communication differences and sensory preferences.
- Participation is always child-led and pressure-free.

Adult Safeguarding

- Support adults to understand and manage risk, balancing autonomy and safety.
- Recognise carers or family members may themselves be vulnerable to stress or harm.

Universal Principles

- Empowerment • Prevention • Proportionality • Protection • Partnership • Accountability (Care Act 2014).

6. Roles and Responsibility Summary



Registered Manager / DSL (Chioma Nwajuaku)

- Lead safeguarding culture and compliance.
- Receive and log all safeguarding concerns.
- Report serious concerns to Havering Children's Services or Adult Social Care same-day.
- Ensure staff training, DBS checks, and safe recruitment practices.
- Maintain confidential records in line with GDPR.

Session Leads / Staff

- Attend mandatory training; report concerns immediately; support children's safety within zones.
- Assist DSL in risk assessment and incident documentation.

Parents / Carers

- Remain on-site and retain primary responsibility for their child's supervision.
- Report any safety concerns to staff immediately.
- Collaborate in behavioural plans and risk management.

7. Recognising Abuse and Neglect

Children

- Physical, sexual, emotional abuse; neglect; exploitation; bullying and cyber-abuse.

Adults at risk

- Physical, domestic, psychological, financial, discriminatory, self-neglect, organisational abuse.

Contextual risks

- Peer/community harm, online risks, county lines, radicalisation, sexual or criminal exploitation.

8. Reporting Procedure

1) Immediate safety: If a child or adult is in immediate danger, call 999. 2) Report: All concerns must be shared same day with Chioma Nwajuaku (DSL). 3) Record: Complete a Safeguarding Incident Form within 24 hours. 4) Referral: DSL contacts the appropriate Havering team:

- Children: 020 7649 3509 (MAST) or Out of Hours 01708 433999
- Adults: 01708 432 929 / adultsocialcare@haverling.gov.uk

5) Escalation: If not satisfied with response, refer to the Local Authority Designated Officer (LADO) or Police 101. 6) Confidentiality: Information shared on a need-to-know basis only.

9. Training and Safe Recruitment

- Enhanced DBS required for all staff and volunteers.
- Recruitment follows safer recruitment guidance.
- Mandatory training: Safeguarding Level 1–2 for all team members; DSL Level 3+.
- Induction covers Prevent Duty, FGM reporting, and autism-specific trauma awareness.



10. Confidentiality & Data Protection

- Information stored securely for six years after case closure.
- Parents may request copies of records under GDPR.
- Information shared lawfully to protect from harm (vital interests basis).

11. Quality Assurance and Monitoring

Regular audits review:

- Number and type of safeguarding reports
- Staff training completion rates
- Referrals made and outcomes
- Parent/carer feedback on safety and trust

12. Local Safeguarding Contacts (Havering)

- Havering Children's Services (MAST): 020 7649 3509 / childrensservices@havering.gov.uk / Out of Hours 01708 433999
- Havering Adult Social Care: 01708 432 929 / adultsocialcare@havering.gov.uk
- Local Authority Designated Officer (LADO): lado@havering.gov.uk / 01708 433 480
- Police Emergency: 999
- Police Non-Emergency: 101
- NSPCC Helpline: 0808 800 5000

13. Policy Review & Continuous Improvement

- Annual review by Registered Manager / DSL with governance oversight.
- Interim amendments following legislative changes or incident learning.
- Feedback sought from staff, families, and partners each cycle.

14. Approval and Sign-Off

Approved by: Chioma Nwajuaku Position: Registered Manager / Designated Safeguarding Lead

Signature: _____ Date: February 2026 Next Review: February 2027



TCS-02 | Health & Safety Policy

Policy Header / Document Control	
Policy Code	TCS-02
Policy Owner	Chioma Nwajuaku
Position	Registered Manager / Health & Safety Lead
Module	Legal & Regulatory Compliance
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Next Review Date	February 2027
Review Frequency	Annual or after significant incident / legislative change
Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

The Autism Hub by TCS is committed to providing a safe, accessible, and sensorially appropriate environment for all children, carers, staff, and visitors. Our policy ensures full compliance with UK health and safety legislation and best practice guidance for community settings supporting autistic children.

We will:

- Maintain safe physical spaces and equipment
- Support sensory, emotional, and physical safety equally
- Prevent accidents, injuries, and illness
- Promote wellbeing for every child and adult
- Respond swiftly to emergencies and review all incidents

2. Legislative Framework

- Health & Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- RIDDOR 2013
- COSHH 2002
- Fire Safety Regulations 2005
- Children Act 1989 & 2004
- Equality Act 2010
- Manual Handling Operations Regulations 1992



- Food Safety Act 1990 (where snacks are served)
- Safeguarding Vulnerable Groups Act 2006

3. Scope

Applies to all staff, volunteers, parents/carers, children, contractors and visiting facilitators, across all venues and activities organised by The Autism Hub by TCS.

4. Principles

1) Prevention first 2) Shared responsibility 3) Reasonable control 4) Equality of access 5) Transparency and learning

5. Risk Assessment & Management

- Written risk assessments for all activities and zones.
- Generic risk assessments reviewed each term and after any incident or venue change.
- Dynamic risk assessment during sessions.
- Urgent repairs recorded in Maintenance Log and addressed within 24 hours.

6. Venue Safety & Access

- Fire exits clear and signed.
- PAT testing annually.
- Hazardous materials stored securely (COSHH).
- Safety checks before each session.
- Reasonable adjustments for mobility, sensory and communication needs.

7. Infection Control

- Cleaning schedule before and after every session.
- Hand sanitiser available in all zones.
- Universal precautions for bodily fluid spillages.
- Illness protocol: refrain from attending for 48 hours post-symptom for contagious illness.

8. Accidents & First Aid

- Qualified first aider on-site at every session.
- First aid kits checked monthly.
- Accidents recorded within 24 hours; carers informed immediately.
- RIDDOR reporting handled by Registered Manager.

9. Fire Safety & Emergency Procedures

- Venue evacuation routes and assembly points displayed.



- Staff briefed at start of each programme block.
- Drills carried out each term; emergency contacts kept updated.

10. Manual Handling & Equipment Use

- Staff trained; heavy items moved by two adults minimum.
- Equipment checked before use.
- Special equipment used per risk assessment.

11. Food, Drinks & Allergies

- Pre-approved snacks and drinks only; no nuts policy.
- Allergy info available at session base.
- Parents/carers manage child's snacks and medications.

12. Security & Visitor Management

- Visitors sign in and wear ID.
- Children released only to designated parent/carer.
- Vigilance for unauthorised persons.

13. Incident Reporting & Investigation

- All incidents logged; weekly review for patterns.
- Debrief after serious incidents to identify preventive actions.

14. Training & Supervision

- Induction covers community-session safety standards.
- Annual refresher training.
- Senior staff complete Level 2 Health & Safety supervision training.
- Autism-specific modules include sensory awareness.

15. Quality Assurance & Monitoring

- Venue audits and incident/accident reviews each term.
- Annual compliance report; parent/carer feedback reviewed.

16. Emergency Contacts

- Emergency services: 999
- NHS 111: 111
- Havering Environmental Health: 01708 432 777
- Havering Health and Safety Team: 01708 433 700
- Registered Manager / H&S Lead: 07341 856 671



17. Policy Review

Reviewed annually or following any serious incident; updates shared with staff and carers.

18. Approval and Sign-Off

Approved by: Chioma Nwajuaku Position: Registered Manager / Health & Safety Lead Signature:
_____ Date: February 2026 Next Review: February 2027

TCS-03 | Behaviour & Positive Support Policy

Policy Header / Document Control	
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Position	Registered Manager / Behaviour & Safeguarding Lead
Module	Operational Practice & Regulatory Compliance
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Review Frequency	Annual or as required following legislative / procedure change
Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

The Autism Hub by TCS supports the emotional, social and behavioural wellbeing of all children, parents and carers. Behaviour support is child-led, person-centred, rooted in understanding, and delivered in partnership with families.

2. Legislative Framework

- Children Act 1989 & 2004
- Equality Act 2010
- Human Rights Act 1998
- SEND Code of Practice 2015
- Care Act 2014
- Mental Capacity Act 2005
- UNCRC Article 12 (voice and participation)
- DfE guidance on Positive Behaviour Support and Restrictive Practice Reduction (2019)

3. Scope

All children (ages 5–16), carers on-site, staff/volunteers, and external professionals working under The Autism Hub by TCS.

4. Policy Principles

- 1) Understanding before action (behaviour is communication)
- 2) Regulation first
- 3) Positive reinforcement
- 4) Consistency and predictability
- 5) Least restrictive practice
- 6) Collaboration with carers



5. Understanding Behaviour

Behaviours may signal sensory overload, communication frustration, pain, fatigue or anxiety. Approaches include low-arousal communication, reduced language, visual aids, offering choice, and regulation spaces.

6. Prohibited Practices

Zero tolerance for corporal punishment, humiliation, deprivation as punishment, or restraint except to prevent immediate harm.

7. Positive Behaviour Support Strategies

- Gather pre-session information on triggers and regulation strategies.
- Use visual/verbal cues at transitions.
- Encourage breaks without penalty.
- Model co-regulation and emotional literacy.
- Praise specific actions.

8. Managing Challenging Behaviour

1) Observe and pause 2) Regulate (quiet space/sensory tools) 3) Reduce demands 4) Debrief when calm 5) Record incident within 24 hours

If risk of harm: intervene proportionately; contact manager; call 999 if required.

9. Restrictive Physical Intervention

Permitted only with immediate risk, after other methods fail, and must be reasonable, proportionate, and recorded. Report same day and review learning.

10. Behaviour Support Plans

Written plans co-produced with carers and professionals; reviewed at least once per 12-week programme cycle.

11. Record Keeping and Confidentiality

Logs stored securely under GDPR; parents can request copies in writing; patterns analysed termly.

12. Training and Development

PBS, autism awareness, de-escalation/low arousal, trauma-informed practice, recording/incident management.

13. Partnership with Parents/Carers

Carers retain primary supervision; feedback at mid-point and end of programme cycles.



14. Reporting and Escalation

Escalate to Registered Manager; suspected harm follows TCS-01 safeguarding procedures.

15. Monitoring and Quality Assurance

Termly incident review, feedback, training completion; outcomes feed into annual compliance report.

16. Review Cycle

Reviewed each February or earlier if guidance changes, incidents require learning, or feedback suggests updates.

17. Approval and Sign-Off

Approved by: Chioma Nwajuaku Position: Registered Manager / Behaviour & Safeguarding Lead
Signature: _____ Date: February 2026 Next Review: February 2027



TCS-04 | Fire Safety & Lockdown Policy

Policy Header / Document Control	
Policy Code	TCS-04
Policy Owner	Chioma Nwajuaku
Position	Registered Manager / Health & Safety Lead
Module	Health, Safety & Emergency Preparedness
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Date Created	February 2026
Last Review Date	February 2026
Next Review Date	February 2027
Review Frequency	Annual or following major incident / venue change
Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

This policy outlines how we prevent, prepare for, and respond to fire emergencies or lockdown situations in our venues, supporting autistic participants with accessible procedures.

2. Legislative Framework

- Regulatory Reform (Fire Safety) Order 2005
- Fire Safety (England) Regulations 2022
- Health & Safety at Work etc. Act 1974
- Management of Health & Safety Regulations 1999
- Children Act 2004 (safeguarding and welfare)

3. Scope

Applies to all programmes delivered in community or partner venues: children, carers, staff, volunteers, contractors and visitors.

4. Principles

Safety before property; clear and calm communication; drills reduce anxiety; inclusion means adapting procedures for sensory/communication needs.

5. Fire Safety Management

- Annual venue fire risk assessments (and after layout changes).
- Extinguishers serviced annually; emergency lighting tested every 6 months.



- Exit routes checked before each session.

6. Evacuation Procedure

- Shout “Fire – Everyone Out!” and activate alarm if needed.
- Evacuate calmly via nearest safe exit; do not collect personal items.
- Children remain with their parent/carer.
- Session Lead takes register and attendance at assembly point.
- Lead staff calls 999.
- No re-entry until authorised by Fire Service.

Support for autistic participants:

- Visual cards, noise-reduction headphones, minimal language/visual guidance.

7. Lockdown Procedure

Initiated when remaining inside is safer (e.g., security incident, threat outside).

- Announce “Stay inside – lockdown!”
- Lock doors; close blinds/curtains; lights off; voices low.
- Move to interior safe area; remain until “All Clear.”
- Registered Manager liaises with police/emergency services as required.

8. Fire and Lockdown Drills

Once per term (minimum three times per year) and recorded; introductory drills for new participants in week 1 of each programme.

9. Inclusion & Accessibility

Visual supports/social stories; ear defenders; alternative routes for wheelchair users; phased familiarisation drills when needed.

10. Reporting & Recording

Drills recorded; incidents/faults logged; serious incidents reported to relevant authorities/venue management.

11. Training

Induction plus annual refresher; Session Leads complete Fire Marshall training (Level 2); autism-specific emergency support included.

12. Monitoring & Review

Annual review and continuous improvement; outcomes shared with staff/carers.

13. Emergency Contacts



- Emergency services: 999
- Havering Fire Safety Office: 01708 433 243
- Havering Council Health & Safety Team: 01708 433 700
- Registered Manager / H&S Lead: 07341 856 671

15. Approval and Sign-Off

Approved by: Chioma Nwajuaku Position: Registered Manager / Health & Safety Lead Signature:
_____ Date: February 2026 Next Review: February 2027



TCS-05 | Missing Child Policy

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Policy Owner	Chioma Nwajuaku
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Module	Child Protection & Operational Safety
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Review Frequency	Annual or following serious incident / change in guidance
Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

The Autism Hub by TCS is committed to ensuring that no child is left unsupervised or unaccounted for. Although carers remain on-site and retain primary supervision, this policy sets out immediate coordinated steps if a child becomes unaccounted for.

2. Legislative Framework

- Children Act 1989 & 2004
- Health & Safety at Work Act 1974
- Working Together to Safeguard Children (2018, updated 2023)
- Care Act 2014 (for relevant adults)
- Equality Act 2010
- Data Protection Act 2018 / UK GDPR

3. Scope

All children (5–16), carers, staff/volunteers, facilitators, and all venues/off-site activities.

4. Aims

Ensure swift search, notification and reporting; reduce risk; review and prevent recurrence.

5. Prevention Measures

Sign-in/out, boundary briefings, appropriate staffing coverage, visible ID where required, controlled entry/exit, monitoring wandering/flight risk and adjusting environment.



6. Definition of “Missing Child”

A child is missing when they cannot be located within agreed boundaries and efforts to locate within 5 minutes are unsuccessful.

7. Immediate Action Procedure

1) Alert staff: “Missing child – [Name/Description]” 2) Secure exits; staff stationed at doors/gates 3) Structured search of zones/adjacent areas (including toilets/quiet spaces) 4) If not found within 5 minutes, contact Registered Manager 5) Call Police 999 within 10 minutes (or earlier if immediate risk) 6) Suspend non-essential activities until found 7) Follow safeguarding procedures if concerns of neglect/abduction

8. Off-Site Missing Child

Activate protocol immediately; keep group safe; call 999 within minutes if unlocated; share description/location lawfully; inform DSL.

9. After the Child is Found

Reassure; complete incident report; debrief same day; update risk assessments; follow safeguarding channels if needed.

10. Confidentiality and Information Sharing

Need-to-know basis; secure storage; retain records 6 years; copies on written request.

11. Training & Awareness

Induction and annual review alongside safeguarding; carers briefed at programme start.

13. Emergency Contacts

- Police: 999 / 101
- Havering MAST: 020 7649 3509 / childrensservices@haverling.gov.uk
- Out of Hours: 01708 433 999
- Registered Manager/DSL: 07341 856 671

15. Approval and Sign-Off

Approved by: Chioma Nwajuaku Position: Registered Manager / Safeguarding Lead Signature:
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TCS-06 | Data Protection (GDPR) Policy

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Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

The Autism Hub by TCS processes personal information lawfully, fairly and transparently in compliance with UK GDPR and the Data Protection Act 2018. This policy sets expectations for collection, storage, use, sharing and breach management.

2. Legislative Framework

- Data Protection Act 2018 (UK GDPR)
- Human Rights Act 1998 (Article 8)
- Freedom of Information Act 2000 (where applicable)
- Children Act 1989 & 2004
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010

3. Scope

All staff/volunteers/contractors handling data; children and carers registered; information shared for legitimate purposes.

4. Types of Data Collected

- Personal data: name, DOB, contact, emergency details
- Special category data: health, diagnosis, medication, allergies, sensory/behavioural profiles
- Operational data: attendance, incident forms, training logs, staff records



- Digital data: emails, photographs, social media (where consent applies)

5. Lawful Bases for Processing

Consent, Contract, Legal obligation, Vital interests, Public task, Legitimate interests. Sensitive child health data processed with explicit consent or where vital interests apply.

6. Data Protection Principles

Lawfulness/fairness/transparency; purpose limitation; minimisation; accuracy; storage limitation; integrity/confidentiality; accountability.

7. Data Storage and Security

Locked cabinets for paper records; encrypted password-protected digital storage; need-to-know access; secure device practices; retain 6 years after last contact then delete securely.

8. Information Sharing

With consent for routine purposes; without consent where safeguarding/vital interests; use secure channels; record rationale and recipients.

9. Rights

Right to be informed, access, rectification, deletion where appropriate, restrict/object, complain to ICO. Acknowledge requests within 30 days.

10. Consent and Privacy Notices

Consent forms for photos, health details, marketing and sharing; privacy notice provided at registration; withdrawal allowed.

11. Data Breaches

Report immediately; contain; assess risk; notify ICO within 72 hours where required; inform affected individuals if high risk; record in breach register.

12. DPIAs

Required for new projects/systems involving sensitive or large-scale processing or new technology or new sharing arrangements.

13. Training and Accountability

Induction and annual refreshers; confidentiality agreement; supervision and audits.

14. Monitoring and Audit

Annual compliance checks and reporting.

16. Approval and Sign-Off



Approved by: Chioma Nwajuaku Position: Registered Manager / Data Protection Lead Signature:
_____ Date: February 2026 Next Review: February 2027

TCS-07 | Equality, Diversity & Inclusion Policy

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Review Frequency	Annual or upon change in legislation or guidance
Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

The Autism Hub by TCS values diversity and commits to fair treatment without discrimination. We embrace neurodiversity and create inclusive environments for children, families, staff and volunteers.

2. Legislative Framework

- Equality Act 2010 (protected characteristics)
- Human Rights Act 1998
- Children Act 2004
- Care Act 2014
- SEND Code of Practice 2015
- Public Sector Equality Duty (s149 Equality Act 2010)
- Autism Act 2009 and National Autism Strategy

3. Scope

All children, carers, staff, volunteers, contractors and activities, communications and recruitment processes.

4. Our Commitments

Inclusive accessible service; challenge discrimination; respect diverse communication/culture/faith/gender; staff training; reasonable adjustments; representation and voice; prompt response to complaints.



5. Protected Characteristics

Age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex, sexual orientation.

6. Inclusive Practice in Sessions

Visual supports and quiet spaces; respect pronouns; honour cultural preferences; challenge unconscious bias; carers invited to share insights.

7. Employment & Recruitment

Decisions based on skills; adjustments offered; concerns raised via complaints/whistleblowing routes.

8. Bullying, Harassment & Victimisation

Zero tolerance; investigate, record, and refer to safeguarding if required.

9. Reasonable Adjustments

Flexible scheduling, easy-read/visual materials, physical adaptations, breakout zones, trusted carer presence.

10. Training & Awareness

Annual training: equality, bias, anti-racism, cultural competence, neuro-affirming support.

11. Monitoring & Evaluation

Monitor participation, feedback, complaints, recruitment and retention; report annually.

12. Complaints Procedure

Raise with Session Lead/Registered Manager or email; acknowledge within 3 working days; respond within 10 working days; appeal route available.

14. Approval and Sign-Off

Approved by: Chioma Nwajuaku Position: Registered Manager / EDI Lead Signature:

_____ Date: February 2026 Next Review: February 2027



TCS-08 | Carer Responsibility Policy

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Review Frequency	Annual or following policy or service review
Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

The Autism Hub by TCS operates on a family-inclusive model where children attend with a parent/carer. Carers retain primary responsibility for supervision, safety, behaviour and wellbeing while participating in hub activities.

2. Legislative Context

Children Act 1989 & 2004; Care Act 2014; Health & Safety at Work Act 1974; Equality Act 2010; UK GDPR / Data Protection Act 2018; Working Together to Safeguard Children (2018, updated 2023).

3. Scope

All carers attending with children; all staff/volunteers; all venues and off-site activities.

4. Core Principles

Safety first; shared responsibility; partnership; respect; confidentiality.

5. Carer Duties and Expectations

- Remain on site for the full session.
- Direct supervision of child and safe participation.
- Follow zone and equipment safety guidance.
- Provide accurate medical/allergy/emergency information.
- Be responsive in distress/incidents.
- Collaborate on behaviour support; respect media/photography rules.



6. Hub Responsibilities to Carers

Safe venues; qualified staff/first aiders; induction briefing; access to policies; respectful communication; concerns logged and addressed.

7. Shared Behaviour Support

Work jointly; carers may be asked to assist; physical intervention by carers only to prevent immediate harm and must be reported to staff.

8. Health & Safety

Carers manage child's devices/medication; appropriate clothing; alert staff; manage snacks/food per allergy rules.

9. Absence and Late Arrival

Inform hub; staff not responsible outside session times; repeated non-attendance may affect placement.

10. Confidentiality and Information Sharing

Handled under TCS-06; carers must respect other families' privacy.

11. Complaints and Concerns

Raise with Session Lead/Manager or email; acknowledged within 3 working days and investigated within 10 days.

12. Breach of Responsibilities

Informal discussion; written reminder; final action (including suspension/review of placement) if persistent non-compliance.

15. Approval and Sign-Off

Approved by: Chioma Nwajuaku Position: Registered Manager / Safeguarding Lead Signature:

_____ Date: February 2026 Next Review: February 2027



TCS-09 | Complaints Policy

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Review Frequency	Annual or following changes to regulation or guidance
Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

Feedback and complaints are opportunities to improve practice. Complaints will be handled promptly, fairly, and without discrimination or retribution.

2. Legislative Framework

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (Regulation 16)
- Children Act 1989 & 2004
- Equality Act 2010
- Data Protection Act 2018 / UK GDPR
- Human Rights Act 1998
- Local Government and Social Care Ombudsman guidance on effective complaint handling (2020)

3. Scope

Applies to families, children (where appropriate), staff and volunteers. Excludes allegations of abuse covered by safeguarding procedures.

4. Aims

Clear process; timely resolution; protect rights; encourage early resolution and learning.

5. Principles

Accessibility, confidentiality, fairness, right to representation, learning and improvement.



6. Stages of the Complaints Process

Stage 1: Informal resolution (aim within 5 working days; recorded in concerns log). Stage 2: Formal complaint (email/submit in writing; acknowledge within 3 working days; respond within 10 working days). Stage 3: Appeal/review (independent review; outcome within 20 working days).

7. Serious or Safeguarding Complaints

Refer immediately to DSL and follow safeguarding procedures.

8. Anonymous Complaints

Recorded and investigated as far as possible.

9. Recording and Monitoring

Logged with actions/outcomes; retain 6 years; quarterly reviews; annual summary report.

10. Learning from Complaints

Root cause analysis; adjust practice; training; feedback to complainant.

11. Confidentiality and Data Protection

Secure storage and minimisation; share only as needed.

13. External Escalation Options

Havering Council Customer Relations: 01708 434 343 Ofsted (where relevant): 0300 123 4666 LGSCO: 0300 061 0614

15. Approval and Sign-Off

Approved by: Chioma Nwajuaku Position: Registered Manager / Complaints Lead Signature:
_____ Date: February 2026 Next Review: February 2027



TCS-10 | Photography & Media Consent Policy

Policy Header / Document Control	
Policy Code	TCS-10
Policy Owner	Chioma Nwajuaku
Position	Registered Manager / Data Protection Lead
Module	Safeguarding & Information Governance
Version	1.0
Status	Active
Date Created	February 2026
Last Review Date	February 2026
Next Review Date	February 2027
Review Frequency	Annual or as required by GDPR or policy change
Contact Email	info@thrivingcare.co.uk
Contact Phone	07341 856 671

1. Statement of Purpose

This policy ensures photography, video recordings, and media materials are captured only with explicit consent, used safely, and stored in compliance with UK GDPR and the Data Protection Act 2018.

2. Legislative Framework

- Data Protection Act 2018 / UK GDPR
- Human Rights Act 1998 (Article 8)
- Children Act 1989 & 2004
- Equality Act 2010
- Copyright, Designs and Patents Act 1988
- Safeguarding Vulnerable Groups Act 2006

3. Scope

Photography/filming by staff/volunteers/approved contractors; images used for learning, promotion, training, or internal documentation; all children/carers/staff/visitors.

4. Principles of Safe Photography

Consent before capture; right to withdraw; purpose-limited use; no identifiable info without permission; secure storage; no images in private spaces; no personal devices.

5. Consent Process



During registration, families complete a consent form and select: A) Internal use only B) External use/marketing C) No photography/media Consent can be changed at any time in writing.

6. Use of Images

Publicity: external consent only; moderated by Registered Manager; no tagging/naming. Training: internal consent only; shared securely and destroyed after use. Third parties/press: separate, time-limited consent per event.

7. Storage and Retention

Encrypted storage; restricted access; secure transfer only; retain max 6 years then delete securely.

8. Withdrawal of Consent

Email request; remove images from active files/platforms; confirm within 10 working days; keep audit record.

9. Unauthorised Photography

Prohibited; report immediately; investigate and apply disciplinary/safeguarding actions as required.

10. Online Safety

Only authorised staff post; no tagging/naming; geolocation/face recognition disabled.

11. Training

GDPR and image use, consent management, reporting unauthorised images, online safety.

14. Approval and Sign-Off

Approved by: Chioma Nwajuaku Position: Registered Manager / Data Protection Lead Signature:
_____ Date: February 2026 Next Review: February 2027