



Working to create a society which is inclusive and compassionate towards migrants

Policy Document: Safeguarding Vulnerable People

Samphire places safe guarding at the heart of its practice and seeks to protect all individuals with whom it interacts. Samphire works to ease destitution of ex-detainees, to challenge attitudes towards migrants in the UK and to support integration and cohesion in Dover. We provide emotional and practical support to people who have been released from immigration detention nationwide and advocate to improve the situations of people affected by immigration detention. We provide support to local migrants groups and work with communities to raise awareness about the facts of migration and encourage positive integration.

Safeguarding is everyone's responsibility and all staff and volunteers who, during the course of their involvement with Samphire have direct or indirect contact with children or vulnerable adults, or access to information about them, have a responsibility to safeguard and promote their welfare.

This policy applies to anyone employed directly or indirectly by Samphire and includes Trustees, staff, volunteers, work placements, trainers and consultants. While this policy focuses on the workplace, responsibilities to safeguard and promote the welfare of children and vulnerable adults extend to an individual's personal and domestic life.

Samphire will conduct an annual audit of safeguarding concerns, action taken and staff training and support. Safeguarding policy and procedures will be reviewed every three years or in the light of significant changes to best practice or legislation.

For Samphire, safeguarding means ...

1. ensuring that Samphire practices **safe recruitment** in checking the suitability of staff, freelancers and volunteers to work with vulnerable adults and/or have contact with children.
2. ensuring **safe environments**, checking the suitability of premises at events held by Samphire, ensuring services are provided in safe environments and that sufficient safeguards are in place.
3. raising awareness of **child and adult protection** situations, and our procedures for identifying and reporting concerns or suspected cases.
4. raising awareness of how and when to **signpost vulnerable adults** to appropriate services.
5. building a **culture** that values and respects all children and adults and modelling appropriate conduct in line with our values
6. setting out clear **roles and responsibilities** for safeguarding



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We set out below the steps Samphire is taking and requires all Samphire personnel to take in order to safeguard children and vulnerable adults.

1. Safe Recruitment

Recruitment

Samphire will ensure that thorough checks are made prior to appointment of staff, volunteers and freelance consultants, in order to prevent a person using their position to harm a child or vulnerable adult.

For all **paid positions** at Samphire the following vetting checks are carried out prior to confirming the appointment:

- a Self Disclosure form to disclose previous spent/unspent convictions and disciplinary or capability procedures.
- Identity documents including photographic identity
- Proof of right to work in the UK
- References including a professional reference
- Qualification certificates if required for the role
- Disclosure and Barring Service (DBS) Check if eligible. All appointments to posts involving regulated activity with children and/or vulnerable adults will be subject to an Enhanced Disclosure from the DBS, and agreement to re-check every 3 years.

Newly developed roles (paid or voluntary positions) will be assessed to ascertain whether regulated activity is being undertaken using the flowcharts at pages 18 and 19 of the NCVO guidance document 'Safeguarding for volunteer involving organisations'.

<http://knowhownonprofit.org/people/volunteers/keeping/ncvosafeguardingforvolunteerinvolvingorgs.pdf>

It is anticipated that **volunteers** will not pose the same level of risk as staff, as any direct contact with children and vulnerable adults will be supervised. Samphire will only engage volunteers over the age of 16 years. Vetting checks for volunteers will include:

- a self-disclosure form to disclose previous spent/unspent convictions
- References
- DBS check if eligible. Any volunteers and freelance consultants involving regulated activity with children and/or vulnerable adults will be subject to an Enhanced Disclosure from the DBS, and an agreement to re-check every 3 years.

A criminal record may not prevent employment or volunteering at Samphire, dependant on the requirements of the role. If convictions are revealed on the declaration form or DBS check, or it is not possible to obtain a criminal record check from abroad, prior to confirming or withdrawing an



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appointment, Samphire will undertake a thorough risk assessment prior to deciding an appropriate course of action in terms of continuing or terminating the employment.

Induction and training

Samphire will ensure a thorough induction for new staff or volunteers into the organisation. As part of the induction process, the line manager will ensure new staff and volunteers read and understand key policies, including Safeguarding Vulnerable People, Data Protection and Confidentiality policies. Staff and volunteers will sign to confirm that they understand their personal responsibilities within these policy areas, and that any training needs are identified and addressed.

Samphire will ensure that all staff receive regular on going management, support and feedback on performance, to ensure that performance meets appropriate standards. Training and development opportunities will be provided in line with needs identified through regular supervision and appraisal. Volunteers will be provided with regular support meetings and training opportunities.

2. Safe environments

Safe environments

Samphire will ensure that all environments where services and activities are delivered will not cause harm to vulnerable adults or children. As well as ensuring that suitable staff deliver activities, all service delivery environments will be risk assessed to minimise the potential for harm.

Safe environments will also be supported by Samphire's Code of Conduct for Adults working with Young People and Children which sets out the behavioural expectations of anyone representing Samphire when engaging with under 18s.

Media and publicity

Samphire often receives interest from media outlets. Any communication with media outlets relating to any service users - whether deemed vulnerable or not - will be dealt with in reference to our Confidentiality policy. Samphire will ensure that informed consent is given before media introductions are made. Likewise, Samphire will seek informed consent from service users before using their photographic images on publicity materials. Photographic images of children will not be used for the purposes of publicity unless parental or guardian consent has been actively sought.

3. Child and adult protection

Contact with children

There are a number of situations in which volunteers and staff will come into contact with children while working with Samphire:



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- Samphire's work with youth/young people
- parents bringing their children with them to appointments or to Samphire engagement events at community centres
- parents bringing children to events at which Samphire is in attendance for networking or training
- children in a classroom setting during school talks
- school groups in attendance at events

It is Samphire's policy that staff or volunteers should never be alone with a child face to face in any of the above situations. Additionally, any contact with children and/or their parents should be via Samphire's email.

Contact with vulnerable adults

Samphire has contact with service users either face-to-face, online, over the telephone and in writing. These situations include:

- Delivery of training
- Use of the Ex-Detainee helpline
- Focus group or engagement sessions
- Research interviews
- Case study interviews
- Online – forums, online advice, website enquiry form and other social media

Alert to the signs of abuse

Our role in protecting children and vulnerable adults is to pick up cues that the child or adult may need protecting and pass this information to those who can assess the situation and act when required. Staff are required to be aware of the different types of abuse and should be alert to the signs of abuse and circumstances in which it can occur:

Domestic violence

The cross Government definition of domestic violence and abuse is: "Any incident of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological, physical, sexual, financial, emotional.

Physical abuse

Examples include: Slapping, pushing, kicking, rough handling, twisting of limbs/ extremities, misuse of medication, or inappropriate sanctions or restraint.

Sexual abuse

Examples include: Rape and sexual assault or sexual acts to which the vulnerable person has not

consented, could not consent or was pressured into consenting. Non-contact abuse such as voyeurism, involvement in pornography.

Psychological / Emotional abuse

Examples include: verbal assault or intimidation, emotional abuse, deprivation of contact, verbal abuse, threats of harm or abandonment, humiliation or blaming, overriding of consent, choices or wishes, feeling worthless, frightened or unloved.

NB: Psychological/emotional abuse will usually occur in conjunction with other forms of abuse.

Modern 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.

Financial abuse

Examples include: theft, fraud, exploitation, and pressure in connections with wills, property, possessions or benefits.

Neglect and acts of omission

Examples include: ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Discriminatory abuse

This abuse is usually motivated by discriminatory and oppressive attitudes towards race, gender, culture, background, religion, physical and/ or sensory impairment, sexual orientation and age.

Institutional abuse, neglect and poor practice

This may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to persuasive ill treatment or gross misconduct.

Self neglect

Has been recognised within the Care Act 2014 as part of the safeguarding framework.

Confidentiality - Children

Recognising that “the welfare of the child is paramount” Children Act 1989, considerations of confidentiality which might apply to other situations should not be allowed to override the right of children to be protected from harm. **Notwithstanding Samphire’s Confidentiality Policy, staff are required to act in any situation in which a child is at risk.**

Awareness of duty to report concerns.

When working with children it is **our duty** to raise any concerns. All concerns and allegations of abuse will be taken seriously and responded to appropriately (this may require a referral to social services and/or in an emergency, the Police). Staff have a duty to report concerns in line with

Samphire's procedures. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action. Volunteers should raise any concerns they have with a member of staff immediately to be escalated appropriately.

Confidentiality –Vulnerable Adults

While all staff should be open to the possible abuse of vulnerable adults in all situations, we envisage that there will be very few instances where staff will need to report adult protection concerns. The situations where this is most likely to happen and where staff will be expected to act are when:

- We have reason to believe that the adult is at high (imminent) risk of suicide
- There is a significant risk that the adult will be seriously harmed by, or will harm, another person.

Where possible and safe to do so, the person contacting the local authority about a safeguarding concern would have had a conversation with the adult regarding their consent, views and wishes.

In every situation it will be assumed that a person can make their own decisions and action will only be taken in the absence of consent from the service user where:

- they or others are in physical danger
- after seeking advice from an appropriate agency you have been advised to report the concern as it is believed that the vulnerable adult is unable/incapable of making an informed decision for himself or herself.

Staff should never give absolute guarantees of confidentiality to anyone wishing to tell them about something serious.

Samphire's complaints procedure is an important way in which concerns can be raised and should be easily accessible to service users.

Process for reporting safeguarding concerns

It is important that adults at risk are protected from abuse. All complaints, allegations or suspicions must be taken seriously. This procedure must be followed whenever an allegation is made that an adult at risk has been abused or when there is a suspicion that such abuse has occurred.

- Promises of confidentiality should not be given as this may conflict with the need to ensure the safety and welfare of the adult at risk. If abuse is suspected or disclosed, staff involved should always let the adult know that this will have to be passed on. In the case of a volunteer or member of staff this should be to the manager as soon as possible who will determine the action to be taken.
- If the complainant is the adult at risk, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. The use of

leading questions can cause problems for the subsequent investigation and any court proceedings.

- Any suspicion, allegation or incident of abuse must be reported to the Safeguarding Officer – Julie Lawrence
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- A full record shall be made as soon as possible of the nature of the allegation and any other relevant information using the 'Reporting a Safeguarding Concern' form (– try to remember as many details as possible about the words or behaviours which have led to concern. This information should include details of the vulnerable person, details of the concern, motivating factors, evidence in support of the concern, contact details of the person raising the concern and action taken)
- The designated Safeguarding Officer will discuss the issue with the person who reported it, and then report the matter to the Director. If the concern directly involves a representative of Samphire, or is a matter of reputational risk, this would be escalated to the Chair of Trustees.
- Subject to the advice received, the Designated Safeguarding Officer and the reporting member of staff/volunteer/member of the public will, together, write up an outline of the issue, using the form, which will be completed within 24 hours of the initial telephone call being made and submitted.
- Concerns will always be treated seriously. Your safeguarding officer will assess your concern and escalate it appropriately. All safeguarding concerns will be stored in the Safeguarding File in a locked cabinet at the Samphire office. Where there is an allegation against a member of staff, the Director should be informed and a disciplinary investigation will be carried out. (Should the allegation concern either of these staff members, the Chair of Trustees should be informed in the alternative.) There may also be criminal (police) investigations.
- All information received and discussed will be treated in confidence and only shared in a professional context with individuals who need to be involved in resolving the situation.

Responding appropriately to a vulnerable adult making an allegation of abuse

Listen carefully to what is said

- Stay calm.
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
- Tell the at risk adult that the matter will only be disclosed to those who need to know about it.
- If the individual can understand the significance and consequences of making a referral to social services she/he should be asked his or her view.
- Regardless of the at risk adult's view it remains the responsibility of the professional to take whatever action is required to ensure the safety of that person.
- Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.
- Reassure the individual that they have done the right thing in telling you.
- Tell them what you will do next, and with whom the information will be shared.

- Record in writing what was said, using the at risk adult's own words as soon as possible – note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated. Also record what the professional said.

It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. That is a task for the professional adult protection agencies, following a referral from Samphire.

1. Signposting vulnerable adults to support

A number of staff will come into contact with service users by phone or face-to-face and some staff and volunteers may interact with service users in person, via online forums, social media and other written communication.

Some service users may be particularly vulnerable, experiencing distress or have mental health issues. For the majority of these adults their situation will not be of a nature that requires a member of staff to report a concern. However Samphire believes it is important to recognise the vulnerability of these adults. Samphire does not have appropriate expertise to deal directly with these issues although our intervention may be helpful, nor do we provide expert counselling support, so it is vital that staff understand how to identify signs and signpost effectively.

Samphire will support frontline staff to recognise the signs of distress, to handle this and their own reactions, and to signpost clients to services that can provide support.

Samphire will provide up to date signposting information for use by staff and volunteers which details organisations that can be contacted to support vulnerable adults in a range of situations, such as domestic violence, mental health, drug and alcohol addiction and child safety.

2. Culture

Staff

Staff are encouraged to value diversity and respect the contribution of each individual in line with Samphire's Equality and Diversity policy. Employees are encouraged to raise concerns about employment practices and concerns will be taken seriously. Unlawful discrimination, bullying or harassment will not be tolerated.

If anyone alleges that someone has been abused by anybody representing Samphire, in the course of their duties, they should use Samphire's complaints procedure to have their complaint investigated. The incident should be reported immediately to the Director who must inform the Chair of the Board.

Any such complaint about staff will be investigated thoroughly using Samphire's disciplinary procedure. The Chair or Director will decide:



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- The stage of the procedure that the investigation will be started on
- That prior to any outcome of the disciplinary procedure the process of investigation is thorough, reported appropriately and appropriate confidentiality is respected
- Support arrangements if required during the period of the investigation and thereafter

Any staff accused of alleged abuse will be suspended until Samphire’s complaints or Disciplinary Procedure has been completed.

Samphire also has a clear policy for staff on I.T. usage forbidding inappropriate use of materials which includes sexually explicit material, obscene remarks and abusive or discriminatory messages.

Online forums and social media

Samphire will ensure that our online forums and Facebook and Twitter page are safe and supportive places.

Whilst we encourage lively debate, we do not tolerate behaviour which makes other users feel uneasy or unable to contribute. As such, we reserve the right to remove posts which are aggressive in tone, abusive towards other users or disruptive to how the forum or page operates. Racist, sexist, homophobic or bullying posts will be removed without delay. This is common practice and corresponds with social media terms and conditions.

3. Roles and responsibilities

It is important to remember that we are all responsible for safeguarding!

Specific safeguarding responsibilities are set out as follows:

- Trustees have overall responsibility for Samphire and therefore all safeguarding within the organisation, and will receive annual reports on safeguarding.
- The Director is accountable to Trustees for safeguarding within the organisation and will ensure that a clear framework for is in operation.
- Safeguarding contacts will provide advice and support to staff and volunteers unsure about how to proceed with a particular case, and take line management responsibility for the safe delivery, quality and effectiveness of their services.
- Front-line staff and volunteers are responsible for reporting safeguarding concerns.

Samphire’s Designated Safeguarding officer is Julie Lawrence

In absence of the Safeguarding Officer, contact Joy Poppe

Date policy reviewed: April 2021

Signed by Trustee

Signed by Chair.....

Date of next review: April 2023

Definitions

[1] Safeguarding

The term 'safeguarding' refers to inward facing procedures such as awareness raising, reporting concerns, responding appropriately to issues of abuse and exploitation and preventing harm through sound recruitment and safe programming. (*Charity Commission's Strategy for dealing with safeguarding Children and Vulnerable Adults Issues in Charities*, April 2012)

[2] Adult at Risk (this term has replaced 'vulnerable adult')

For the purpose of this policy an adult at risk is defined as

"any person who is aged over 18 years and at risk of abuse or neglect because of their needs for care and support (Care Act 2014, England).

Adults may be deemed to be 'at risk of abuse', and therefore covered by these procedures if they have any of the following (list is not exhaustive) :

- Adults with learning disabilities
- Adults with physical disabilities
- Adults with mental ill health
- Adults with sensory disabilities
- Adults with dementia
- Adults with brain injuries
- Adults with drug and alcohol problems
- Adults who are frail due to their age
- Adults who may suffer domestic abuse, honour-based violence, forced marriage, female genital mutilation, sexual abuse, modern slavery, trafficking.

Service users outside these definitions may also be at risk due to low self-esteem, social exclusion, offending history, homelessness, domestic abuse, ethnicity, immigration status etc.

[3] Vulnerable child



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For the purposes of this policy, a vulnerable child is an individual under the age of 18. The only exception to this is 16-17 year olds in employment or volunteering who are not deemed to be vulnerable.

[4] Trustee responsibility

Trustees of charities which work with children and vulnerable adults have a duty of care to their charity which will include taking the necessary steps to safeguard and take responsibility for those children and vulnerable adults. They must always act in their best interests and ensure they take all reasonable steps to prevent any harm to them. Trustees also have duties to manage risk and to protect the reputation and assets of the charity. [*Charity Commission's Strategy for dealing with safeguarding Children and Vulnerable Adults Issues in Charities, April 2012*]