# Safeguarding Children and Vulnerable Adults Policy

**Document Control**

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| Designated Safeguarding Lead (DSL) | Name: Maria Falzetti  Contact  email: enquiries@togethernow.org.uk  t: 07929 337837 |
| Policy owner | Helen Slee, Chair of Trustees |
| Audience | This policy applies to all staff, including senior managers and the board of trustees, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of Together Now. |
| Formally endorsed by | Board of Trustees |
| Endorsement date | March 2025 |
| Next Review | March 2026 |

**Version History**

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| Date Issued | Version | Status | Reason for change |
| May 2019 | 001 | Approved |  |
| May 2021 | 002 | Approved | Updated definitions and inclusion of additional procedures for managing safeguarding disclosures. |
| January 2023 | 003 | Approved | Updated format to improve accessibility and recognise increased contribution of those with lived experience within the organisation. |
| April 2024 | 004 | Tbc | Inclusion of guidance notes on; Managing Allegations and Travel assistance for unaccompanied children. |

**Purpose**

The purpose of this policy is to:

* Support Together Now to meet its ethical and legal responsibilities to protect and safeguard all its clients and those who work with and for us.
* Provide protection for the children and young people who receive our services, including the children of adult members or users.
* Provide protection for vulnerable adults who receive our services.
* provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child, young person or vulnerable adult may be experiencing, or be at risk of, harm.

This policy sets out:

* Our safeguarding standards
* What we expect of people working with Together Now
* How we look to continuously learn and improve our safeguarding practice

**Introduction**

We recognise that everyone has a key role to play in safeguarding and promoting the welfare of children, young people and vulnerable adults.

Safeguarding is defined by the Children Act 1989 and the Safeguarding Vulnerable Groups Act 2006.

The government defines the term ‘safeguarding children and young people’[[1]](#footnote-1) as:

*‘protecting children from maltreatment, preventing impairment of children’s health or development ensuring that children are growing up in circumstances consistent with the provision of safe and effective care taking action to enable all children to have the best outcomes’*

And the policy objective on safeguarding vulnerable adults[[2]](#footnote-2) is to

*‘prevent and reduce the risk of significant harm to adults from abuse or other types of exploitation, whilst supporting individuals in maintaining control over their lives and in making informed choices without coercion’*

**Policy statement**

We are committed to working with others to ensure that people who receive our services do so in an environment that is free from prejudice and safe from abuse.

All our staff and volunteers have a responsibility to support the safeguarding of children, young people and vulnerable adults where there is a risk of abuse or neglect. As an organisation we have a responsibility to safeguard those who work with and for us.

For the purposes of the policy, abuse can include but is not limited to physical, financial, material, sexual, psychological, discriminatory, emotional abuse and neglect.

Abuse can take place in any setting, public or private, and can be perpetuated by anyone. We recognise that the circumstances many of our clients and their families find themselves in pose multiple and often complex risks. We acknowledge the need to manage these risks appropriately within the context whilst not allowing an aversion to risk to impact on our ability to support.

We are also committed to reviewing our policy and practice guidance annually.

**Vulnerability to abuse and exploitation**

We recognise that:

* Due to the nature of our core charitable mission, our service users can be more at risk of or vulnerable to abuse than others
* The nature of our work may create a power imbalance between our charity staff and volunteers and beneficiaries
* These imbalances may change with the decisions that are made relating to the services, support and funding that can be made available to our beneficiaries
* A client’s vulnerability can change during the course of our relationship with them, and it therefore requires that safeguarding is considered throughout the relationship to recognise concerns and take reasonable steps to safeguard all of our beneficiaries’ welfare.
* That a client’s safeguarding context may be significantly different before they arrive in the UK.
* That at times those who work with and for us may be in positions of vulnerability.
* There are many protective factors in place for clients and those who work with Together Now and we should consider our approach to safeguarding with these in mind.

**Safeguarding children**

We recognise that:

* The welfare of the child/young person is paramount
* All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
* Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

We will seek to safeguard children and young people by:

* Valuing them, listening to and respecting them
* Adopting child protection guidelines through procedures and a code of conduct for those who work with Together Now
* Recruiting staff and volunteers safely, ensuring all necessary checks are made
* Sharing information about child protection and good practice with children, parents and those who work with Together Now
* Sharing information about concerns with agencies who need to know, and involving parents and children appropriately
* Providing effective management for staff and volunteers through supervision, support and training.

Our responsibility:

* To ensure volunteers are aware of children and young people’s need for protection
* To notify the appropriate agencies if abuse is identified or suspected
* To support and where possible secure the safety of individuals and ensure that all referrals to services have full information in relation to identified risk and vulnerability
* To Disclosure and Barring Service (DBS) check volunteers that have access to or work with Vulnerable Adults

Responsibilities of our staff and volunteers:

* To be familiar with the safeguarding policy
* To take appropriate action in line with our policy
* To declare any existing or subsequent convictions
* To be familiar with and know how to access our practice guidance notes on protecting children

**Safeguarding adults**

Definition

Vulnerable adults are people who are over 18 years of age and are getting or may need help and services to live in the community. Vulnerable adults may be unable to take care of themselves and unable to protect themselves from harm or exploitation by other people.

Full legal definition

Definition of vulnerable adult from The Police Act 1997 (Enhanced Criminal Record Certificates) (Protection of Vulnerable Adults) Regulations 2002

**2**.—(1) In these Regulations “vulnerable adult” means a person aged 18 or over who is receiving services of a type listed in paragraph (2) below and in consequence of a condition of a type listed in paragraph (3) below has a disability of a type listed in paragraph (4) below.

(2) The services are—

1. accommodation and nursing or personal care in a care home;
2. personal care or nursing or support to live independently in his own home;
3. any services provided by an independent hospital, independent clinic, independent medical agency or National Health Service body;
4. social care services; or
5. any services provided in an establishment catering for a person with learning difficulties.

(3) The conditions are—

1. a learning or physical disability;
2. a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
3. a reduction in physical or mental capacity.

(4) The disabilities are—

1. a dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions;
2. severe impairment in the ability to communicate with others; or
3. impairment in a person’s ability to protect himself from assault, abuse or neglect.

(5) In this regulation “care home”, “independent clinic”, “independent hospital”, “independent medical agency” and “National Health Service body” have the same meanings as in the Care Standards Act 2000(1).

We note that under this definition our client group are not legally considered vulnerable adults but may find themselves in positions of vulnerability.

Rights and responsibilities

Our responsibility:

* To ensure volunteers are aware of vulnerable adult’s need for protection
* To notify the appropriate agencies if abuse is identified or suspected
* To support and where possible secure the safety of individuals and ensure that all referrals to services have full information in relation to identified risk and vulnerability
* To DBS check volunteers that have access to or work with Vulnerable Adults

Responsibilities of our staff and volunteers:

* To be familiar with the safeguarding policy
* To take appropriate action in line with our policy
* To declare any existing or subsequent convictions.
* To be familiar with and know how to access our practice guidance notes on protecting adults

Vulnerable adults have the right:

* To be made aware of this policy
* To have alleged incidents recognised and taken seriously
* To receive fair and respectful treatment throughout
* To be involved in any process as appropriate
* To receive information about the outcome

**Continuous learning and improving our safeguarding practice**

Everyone who works with Together Now who works with beneficiaries should be provided with:

* A copy of this policy and guidance notes
* Supervision and support to discuss safeguarding risks and concerns
* Opportunities to attend safeguarding training as required
* A copy of the Casework Policy along with training on how this informs decision making

Training will be provided for all those working with Together Now as below:

* Board members; every three years. (This can be delivered online)
* Those working with clients including staff and volunteers; annually.
* All other staff members; annually.

Training is to be delivered by an appropriately qualified independent organisation.

**Advocacy**

In some situations, our clients may not be able to represent themselves and their best interests effectively. This could be due to their being a child or vulnerable adult. In these cases an appropriate external advocate may be sought.

**Safeguarding Policy and Process Improvements**

The following should be undertaken to allow opportunities to improve the policies, procedures and processes relating to safeguarding beneficiaries of Together Now:

* Beneficiaries should be provided opportunities to provide feedback on what we are doing well and what risks there are to them that we should be aware of so that we can keep beneficiaries safe.
* Any safeguarding incidences are to be reviewed by a member of the Board who was not involved in the incident retrospectively. to review the response in line with the safeguarding policy to confirm if the actions taken were sufficient and handled appropriately. No personal identifiable data should be included as part of this process.
* Where poor practice or a breach of the policy is identified, appropriate action will be taken.
* Lessons on the handling of the incident are to be recorded to support with appropriate management of future incidents.

**Safeguarding Policy Updates**

* This policy should be reviewed at least annually and updated in line with policy changes and best practice.
* This policy should also be updated outside of the planned review schedule in the event of updated processes, learning or policies that impact the management of safeguarding incidents.

# Safeguarding Guidance Notes

**Purpose**

These procedures are designed to be used alongside our Safeguarding Policy and provide specific direction to those working with and for Together Now on how to ensure that as an organisation we are meeting our ethical and legal responsibilities.

**Our Designated Safeguarding Officer is: Maria Falzetti**

The responsibilities of the Designated Safeguarding Lead includes:

* Promote awareness of the policy and processes to all relevant parties
* Monitor implementation of the policy
* Report any safeguarding issues or concerns to the Trustee Board
* Report any issues or concerns regarding the implementation of the policies and processes to the Trustee Board
* Identify training and information needs, and act on these for all relevant parties
* Act a single point of support and information for all relevant parties on safeguarding issues
* To determine whether concerns or disclosures should be reported to an external party

**Our values**

Our organisational values underpin all our work including safeguarding. These are:

* We treat our clients as individuals.
* We are collaborative.
* We are needs-driven.

When applied to keeping clients safe these values translate to:

* Respecting the autonomy of our clients and involving them in decisions.
* Recognising our role in keeping people safe, including the limitations of our remit.
* Working effectively with other organisations to access skills and knowledge.
* Not letting an aversion to accepting risk affect the services we deliver.
* Acknowledging the imbalance of power between us and our clients.

We welcome feedback on the following guidance notes so we can continue to improve them.

**Risk**

Consideration of risk should include:

* The context for the client, for example the pre-travel level of risk may be unacceptable once they reach the UK.
* If our intervention heightens risk whether this is acceptable temporarily, for example the risk of the journey to the UK may pose longer term benefits.
* Whether the risk is immediate, urgent or ongoing.

# Concerns about a child’s welfare

**Summary**

It is our responsibility when working with families to manage any concerns about the welfare of a child. If you are not sure what you need to do, please speak to your manager.

We have a legal responsibility to report some types of concern about children to the local authority.

What do we do if a child is at immediate risk of harm?

If you are worried about the immediate safety of a child contact the Police on 999.

This might include;

* a child being at immediate risk of violence from a family member or someone else
* a child being left alone for a long period of time and unable to contact a parent

What would we be concerned about?

A concern could be a child;

* being abused, this could be by a parent, sibling or other person and abuse can be physical, sexual or emotional
* not having enough food or appropriate clothing
* being homeless and staying on the streets
* living in unsuitable accommodation, for example cold, damp or lacking privacy
* living in a household where a parent has a mental or physical illness that affects their day to day life or where they require care
* not having their education needs met, for example not being encouraged to go to school
* not having their emotional needs met, for example not being helped to access support
* becoming involved in gangs or being exploited
* being bullied
* being left alone if they are not old enough to manage in an emergency
* being at risk of female genital mutilation.

How would we spot concerns?

Working remotely with families it may be more difficult to identify concerns about children.

Warning signs may include;

* a parent or child directly reporting a problem, for example saying their child is being bullied
* hearing a parent is not coping with their mental illness or struggling to make important decisions or communicate
* a parent discussing that they are not going to register their child for school or are finding it to difficult to register or take them
* seeing pictures of poor accommodation, for example mould or a stove being used inside
* hearing a family is on the street

The NSPCC have a factsheet on spotting signs of abuse: <https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

What should we do if we are not sure about what is happening?

In some situations may be appropriate to ask more questions.

For example;

* if they have reported being on the street ask about what is being done to find housing and if they have anywhere safe to wait.
* if they have reported a child not attending school ask if they are still trying to find a place or if they need external support.

What if we are concerned about more serious abuse?

If abuse is disclosed;

* it may not be appropriate to ask questions, particularly via Whatsapp or phone
* it is really important that children feel listened to and that they are being taken seriously
* make notes to ensure you will remember all the details and use their exact words if the child has spoken about it
* confirm your understanding by repeating what has been said
* never speak to the alleged perpetrator about what has been said
* get consent to share the information with others to help them and explain why this is needed.

The NSPCC has guidance on responding to abuse being disclosed: <https://learning.nspcc.org.uk/child-abuse-and-neglect/recognising-and-responding-to-abuse>

When do I need to report concerns?

All concerns should be reported to your line manager even if you are not sure there is a problem.

If the child is suffering or at risk of suffering significant harm, you can share information with the relevant people.

Please follow the reporting flow chart for the process to follow.

**Process for reporting concerns**

Is the child in immediate danger?

Yes

No

Call the police on 999

Report to the Designated Safeguarding Lead

Decision to report to local authority

Decision not to report

Record concerns and reporting date in the case file

Are you in agreement that the concern does not need reporting?

Yes

No

Record conversation and reasons for not reporting in the case file.

Agree follow up and review of decision with the Designated Safeguarding Lead

Get advice from an external source. You can contact the NSPCC Helpline on 0808 800 5000 or by emailing [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Do you still feel that the concern needs reporting to the local authority?

Yes

No

Report to the child’s home local authority. You can use this tool to find the local authority and their website: <https://www.gov.uk/find-local-council>.

Record the conversation and the reasons for not reporting in the case file.

Agree follow up and review of decision with the Designated Safeguarding Lead

Record concerns and reporting date in the case file

What do I need to consider if I have concerns?

There are some considerations relevant to our client group in identifying and reporting concern, these include;

* not all reporting will be an indication of the parents not trying to protect a child
* there will be different cultural expectations about the role of children in a household and levels of independence

It's vital that children and young people are able to speak out and that whoever they tell takes them seriously and acts on what they've been told.

Children and young people may disclose abuse in a variety of ways, including:

* directly– making specific verbal statements about what’s happened to them
* indirectly – making ambiguous verbal statements which suggest something is wrong
* behaviourally – displaying behaviour that signals something is wrong (this may or may not be deliberate)
* non-verbally – writing letters, drawing pictures or trying to communicate in other ways.

Children and young people may not always be aware that they are disclosing abuse through their actions and behaviour.

Sometimes children and young people make partial disclosures of abuse. This means they give some details about what they’ve experienced, but not the whole picture. They may withhold some information because they:

* are afraid they will get in trouble with or upset their family
* want to deflect blame in case of family difficulties as a result of the disclosure
* feel ashamed and/or guilty
* need to protect themselves from having to relive traumatic events.

Even if a child doesn’t tell someone verbally about what’s happened to them, there may be other indicators that something is wrong. People who work with children need to be able to recognise the signs and know how to respond appropriately.

We also need to recognise that children may have experienced abuse or trauma before travelling to the UK that may impact on their experiences here.

This could include;

* Accepting inappropriate behaviour or violence as ‘normal’
* Wanting to protect others in the family including adults
* Feeling that their living situation is better than before and therefore acceptable.

**Instructions**

Have you?

1. Asked the family about any risks they are currently facing when you collect the application information?
2. Asked the family about any medical conditions or disabilities including mental health problems?
3. Included any older children or teenagers in the case WhatsApp group where possible and engaged with them directly?
4. Checked in with the family on arrival to ask about the journey and establish ongoing contact?
5. Checked in with the family in the weeks following arrival to identify any risks around finance and housing?

Recording

The families’ casework notes in the file should include;

* Risks to family members pre or post arrival
* Concerns noted and actions taken to explore these or seek help from other agencies
* Concerns raised by family members including dates and as much detail as possible
* Internal conversations regarding concerns and actions taken
* Any reports made to the police or local authority including dates and details.

Confidentiality

We have a responsibility to maintain our client’s confidentiality.

Actions to ensure this should include;

* Only sharing personal information and sensitive details with the appropriate professionals as required
* If appropriate speaking to family members to let them know you need to share their information or asking for their permission.

**Contact details**

NSPCC Helpline - 0808 800 5000 or by emailing [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Find a local authority - <https://www.gov.uk/find-local-council> - use the client’s home post code to find the correct website and then search for children’s safeguarding referrals.

# Concerns about an adult’s welfare

Summary

It is our responsibility to respond if we have concerns about the safety of an adult. This guidance sets out what you need to do if you have concerns.

Concerns about an adult’s welfare might include:

* Risk of harm from another person
* Mental health issues
* Unmet medical needs
* Domestic abuse or control
* Isolation or poor emotional wellbeing

Instructions

1. Assess the situation.

Consider:

* What are you concerned about specifically?
* Are they at immediate risk of harm?
* Is the client aware of the risk and have you discussed it with them?
* Do you have all the information you need to take next steps?
* Is the client already being supported with this?

1. Next steps.

If a client is at immediate risk of harm you need to call 999.

Other actions may include:

* Asking the client what they want to happen.
* Asking for clarification or further detail.
* Getting consent to refer to another organisation.
* Asking the client for permission to share the information with another agency to assess a response.
* Reporting the risk to another the local authority or another organisation.
* Looking for sources of support.
* Looking at what support is already in place.
* Discussing protective factors with the client.
* Agreeing with the client to reassess at a later date.
* Working out a plan of action. You can discuss this with our Safeguarding Lead if needed.

1. Follow up.

These actions will depend on the situation.

They might include:

* Reporting the concern to the local authority.
* Making a referral to another organisation.
* Agreeing a date to check back in with the client.
* Accepting that there is nothing that can be done to manage the immediate risk. This is most likely to be in the case where a family is at risk whilst waiting for a flight to the UK.
* Checking back in with the client to explain or review actions taken.

Recording

Clear records should be kept in the client notes to document concerns and actions taken.

This should include:

* Specifics of the concern.
* Referrals to other agencies.
* Actions taken, including where there has been no outcome.
* Decisions not to take further action.

Confidentiality

Keeping people safe may override the need for confidentiality. This may include making reporting with the local authority or police where there is a risk of serious concern.

Steps to keep client’s information confidential may include:

* Not disclosing details of concerns to other family members.
* Asking permission from clients before sharing their information.
* Not sharing personal details before an agency has confirmed they can help.
* Only sharing information relevant to a referral.
* Not sharing details of other family members unnecessarily.

Further information

# Disclosure Management

Summary

A ‘disclosure’ is when an child or adult tells you about abuse they have experienced.

It is our responsibility as an organisation to manage disclosures of abuse appropriately.

Instructions

All those making a complaint or allegation or expressing concern, whether they are staff, volunteers, service users, carers or members of the general public should be reassured that:

* They will be taken seriously
* Their comments will usually be treated confidentially, but their concerns may be shared with the appropriate authorities if they or others are at significant risk

Prioritising the safety and wellbeing of the child, young person or vulnerable adult should be the primary consideration.

Disclosures

The incident should be handled sensitively and professionally, including:

* Providing reassurance that what has been reported is being taken seriously
* Providing reassurance that it was the right thing to do to provide the information
* Do not interrupt the disclosure
* Allow the individual to speak freely
* Ask open questions if you need to clarify understanding
* Do not ask leading questions
* Be aware that the use of a translator may influence the information shared and received
* Ask the person what help they need so that they can be involved in the decisions that happen next
* Ask permission to share information with the DSL and others as appropriate.
* Confirm what will happen next and that you will keep them informed
* Write up the incident as soon as possible following the disclosure

All concerns about alleged or suspected harm should be reported to the Designating Safeguarding Lead immediately.

Appropriate actions should be:

* Agreed with the DSL
* Actioned
* Documented
* Shared with the person who disclosed the incident or a suitable proxy to ensure they are involved in the process

Recording

Clear records should be kept in the client notes to document concerns and actions taken.

This should include:

* Specifics of the concern.
* Referrals to other agencies.
* Actions taken, including where there has been no outcome.
* Decisions not to take further action.

Confidentiality

Keeping people safe may override the need for confidentiality. This may include making reporting with the local authority or police where there is a risk of serious concern.

Steps to keep client’s information confidential may include:

* Not disclosing details of concerns to other family members.
* Asking permission from clients before sharing their information.
* Not sharing personal details before an agency has confirmed they can help.
* Only sharing information relevant to a referral.
* Not sharing details of other family members unnecessarily.

Further information

NSPCC Advice on managing disclosures: <https://learning.nspcc.org.uk/child-abuse-and-neglect/recognising-and-responding-to-abuse>

Summary

An allegation may be made by a child or adult, service user, colleagues or external partners. Allegations could relate to the actions of our staff or volunteers, anyone representing Together Now.

Instructions

All those making a complaint or allegation or expressing concern, whether they are staff, volunteers, service users, carers or members of the general public should be reassured that:

* They will be taken seriously
* Their comments will usually be treated confidentially, but their concerns may be shared with the appropriate authorities if they or others are at significant risk

Prioritising the safety and wellbeing of the child, young person or vulnerable adult should be the primary consideration.

Disclosures

The incident should be handled sensitively and professionally, including:

* Providing reassurance that what has been reported is being taken seriously
* Providing reassurance that it was the right thing to do to provide the information
* Do not interrupt the disclosure
* Allow the individual to speak freely
* Ask open questions if you need to clarify understanding
* Do not ask leading questions
* Be aware that the use of a translator may influence the information shared and received
* Ask the person what help they need so that they can be involved in the decisions that happen next
* Ask permission to share information with the DSL and others as appropriate.
* Confirm what will happen next and that you will keep them informed
* Write up the incident as soon as possible following the disclosure

All concerns about alleged or suspected harm should be reported to the Designating Safeguarding Lead immediately.

Appropriate actions should be:

* Agreed with the DSL
* Actioned
* Documented
* Shared with the person who disclosed the incident or a suitable proxy to ensure they are involved in the process

Recording

Clear records should be kept in the client notes to document concerns and actions taken.

This should include:

* Specifics of the concern.
* Referrals to other agencies.
* Actions taken, including where there has been no outcome.
* Decisions not to take further action.

Confidentiality

Keeping people safe may override the need for confidentiality. This may include making reporting with the local authority or police where there is a risk of serious concern.

Steps to keep client’s information confidential may include:

* Not disclosing details of concerns to other family members.
* Asking permission from clients before sharing their information.
* Not sharing personal details before an agency has confirmed they can help.
* Only sharing information relevant to a referral.
* Not sharing details of other family members unnecessarily.

Further information

NSPCC Advice on managing disclosures: <https://learning.nspcc.org.uk/child-abuse-and-neglect/recognising-and-responding-to-abuse>

# Managing allegations

Summary

An allegation is a claim or belief that someone working on behalf of Together Now may have behaved in a way that has harmed someone, committed a criminal offence or put someone at risk of future harm.

A complaint not related to the above points, for example about conduct or professionalism not resulting in harm, may be dealt with through our complaints policy.

Allegations may include whistleblowing, where someone working on behalf of Together Now raises a concern about a colleague.

Instructions

If you are made aware of an allegation:

Immediately

* Report the concern to your line manager or other manager if needed.
* If necessary, take steps to safeguard anyone who is at risk of immediate harm. This may include reporting to the local authority designated officer or the police.

If someone reports an allegation to you:

Same working day

* Make a record of what has been witnessed, reported and discussed. Be specific and include facts, dates and times where possible.
* Request to meet with the Director or a trustee as appropriate. If there is no response try another trustee to avoid delays.
* If necessary, take steps to safeguard anyone who is at risk of immediate harm. This may include reporting to the local authority designated officer (for the authority in which the employee works or volunteers, which may be their home authority) or the police.
* Where there is any evidence of a crime make a report to the police. Note, where a police investigation is being carried out or potentially carried out this should not be communicated to the subject of the allegation.

Within 7 days of the allegation being made

* Where you are satisfied that no police or local authority investigation is required an internal investigation may be carried out.
* An investigation planning meeting should take place to consider actions to be taken. This meeting should include:
  + Consideration of the safety and wellbeing of any clients or colleagues who are the subject of the allegation.
  + Support for anyone affected by the allegation.
  + Support for the person making the allegation.
  + Support for the person who is subject to the allegation as appropriate.
  + A risk assessment considering any ongoing harm and potential for other clients who may have been affected.
  + Consideration of the need to suspend (without prejudice) in line with employment or volunteering policies.
  + A plan for communicating the allegation and subsequent actions to the subject of the allegation.
  + Next steps in investigating the concern.
* Care should be taken when carrying out this investigation to ensure that the risk of harm to clients and colleagues is minimised, this may include being sensitive about ‘official’ questioning or re-traumatisation.

Within 2 weeks

* Carry out a brief fact-finding process to establish key information and facts connected to the concern or allegation. There is no need to inform the subject of the allegation of this activity. Note, where this process identifies information that requires a police report this should be done immediately.
* Record the fact-finding process in full in a short report with a clear recommendation; this might include:
  + Nothing of concern identified. Close the inquiry.
  + No significant risk but some practice concerns to be addressed by training and development.
  + Proceed to an investigation. Note, this should include removing access to clients and systems for the subject of the allegation, suspension or restriction of duties.
  + Evidence of criminal offence. Report to the police immediately.
* Convene a second planning meeting to confirm the recommendation. This may include additional trustees as required. Agree at this meeting how and when to communicate concerns and next steps to the subject of the allegation.

Within 6 weeks

* Convene a planning meeting to agree the steps to be taken in carrying out a full investigation of the allegation.
* Carry out an investigation as thoroughly as possible. This may include:
  + Speaking to witnesses.
  + Reviewing written communication or records.
* Record the outcome of the investigation. This might include:
  + Substantiated allegation. Sufficient evidence found to prove the allegation or concern on the balance of probability.
  + Malicious allegation. Sufficient evidence to disprove the allegation and evidence found of a deliberate act to mislead.
  + False allegation. Sufficient evidence to disprove the allegation but no evidence of deliberate intention.
  + Unsubstantiated allegation. There is insufficient evidence to either prove or disprove the allegation.
  + Unfounded allegation. There is no evidence to support the allegation being made. This may be as a result of someone being mistaken about what they saw or not having all the information about the circumstances.
* All outcomes should have appropriate actions to be taken included in the report. This may include no further action, training and development needs to be met (for the subject of the allegation or the person making the allegation) or suspension or termination of work with Together Now.

Where there are concerns about the ability of Together Now to investigate allegations and remain impartial it may be required to seek an independent route to raising concerns.

Recording

Clear records should be kept in the client notes to document concerns and actions taken.

This should include:

* Specifics of the concern.
* Referrals to other agencies.
* Actions taken, including where there has been no outcome.
* Outcomes of fact-finding process and full investigations.
* Decisions not to take further action.

Confidentiality

Keeping people safe may override the need for confidentiality. This may include reporting to the local authority or police where there is a risk of serious concern.

Independent route to raise concerns:

* Local authority LADO (if related to employee conduct) or social care (if concern about a child or vulnerable adult’s safety). Select the most relevant local authority to report to.
* NSPCC to report child abuse: [help@NSPCC.org.uk](mailto:help@NSPCC.org.uk)

# Recruitment Processes

Summary

Safe recruitment processes are key to our safeguarding clients and those who work with us.

Recruitment Processes include:

* Appointing trustees
* Signing up volunteers
* Recruiting staff members

Instructions

Trustee recruitment should occur in line with The Charity Commission best practice guidance, and new Trustees are subject to relevant checks and to complete trustee eligibility declarations.

When signing up volunteers and staff members the person appointing should:

* Ensure that there is a clear role description that outlines expectations and responsibilities.
* Be clear on the criteria to the role and the process for identifying and rejecting candidates who do not meet these.
* Identify any gaps in employment history and confirm the reason for these. This includes recognising that many people with lived experience will have gaps that are not able to be evidenced and that this may be acceptable.
* Secure two references from those who have worked with the candidate previously. For those with little or no UK based work experience this could include references from employers abroad or supervisors for formal and informal volunteering.
* Verify references verbally with previous employers.
* Carry out DBS checks for any staff member of volunteer working directly with children.
* Check that employees have the ‘Right to Work’ if they are entering paid employment.

Recording

Clear records should be kept of all information obtained through the recruitment process. This should include:

* Application forms or covering letters.
* Interview notes.
* References.

Further information

Guidance on DBS checks: <https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment#skip-to-content>

Guidance on Right to Work:<https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

# Preventing and responding to bullying

Summary

It is everyone’s responsibility to stop bullying occurring within Together Now, to deal with it quickly and appropriately when it does happen and support those involved.

Bullying includes a range of abusive behaviour that is repeated and intended to harm someone physically or emotionally.

Bullying can come from colleagues, partner organisations and clients.

Instructions

Steps to prevent bullying include:

* Listening to colleagues and valuing their opinions and contributions.
* Respecting differences.
* Acting in an inclusive way.
* Dealing with problems in a positive and outcomes focussed way.
* Being proactive about welcoming new people to our organisation.

If you feel you are being bullied; you should:

* Tell someone you trust; we do not want anyone to feel isolated in this experience.

If someone tells you, they feel they are being bullied you should:

* Treat the information confidentiality and only disclose the information without their permission if there is a risk of serious harm.
* Ask them what steps they would like to take and how you can support them through the process.

Recording

Clear records should be kept to document concerns and actions taken.

This should include:

* Specifics of the concern.
* Referrals to other agencies.
* Actions taken, including where there has been no outcome.
* Decisions not to take further action.

Confidentiality

* Keeping people safe may override the need for confidentiality. This may include reporting to the local authority or police where there is a risk of serious concern.

Further information

Advice from ACAS on bullying at work: <https://www.acas.org.uk/bullying-at-work>

# Protecting those working with and for Together Now

Summary

It is our responsibility to protect those who work with and for us. This includes both physical safety and emotional wellbeing. Everyone who works with Together Now should take care to consider their own safety and that of their colleagues.

Instructions

Steps to be taken when working with clients in person:

* Do not meet clients if you have any concern about risk to your own safety.
* Inform Casework Lead if you are meeting clients.
* Only meet clients in public places (eg airport, drop ins etc) unless pre-agreed with Casework Lead
* Do not meet with children under 18 unless they are accompanied by a parent, guardian or other representative.
* Set clear boundaries and expectations on what we can and cannot do to help, ideally prior to meeting.
* Contact the Casework Lead if you have felt uncomfortable or there is any incident when meeting a client.

Steps to be taken when working with clients remotely:

* Be clear about when you are and are not available and what the client can do when you are not available. Note, this may include them waiting, for example over the weekend where it does not impact on their case.
* Set clear expectations on what we can do to help and where we will need to refer to other organisations.
* Manage your boundaries as you see appropriate and discuss approaches with the Casework Lead if needed.

Steps to be taken when working with partners:

* Only meet with staff from partner organisations in public places unless pre-agreed with Casework Lead.
* Contact the Casework Lead if you have felt uncomfortable or there is any incident when meeting a partner.

Recording

Any concerns or incidents should be reported to the Casework Lead and recorded in the client’s file.

Confidentiality

Keeping people safe may override the need for confidentiality. This may include reporting to the local authority or police where there is a risk of serious concern.

# Travel assistance for unaccompanied children

Summary

It is our responsibility to protect vulnerable children and their families. This includes considering the wellbeing of the child and both parents. Children who are travelling without either parent, an adult sibling or a family member will require specific consideration and arrangements.

Some of this guidance may also apply to children travelling with an adult with which they have no formal guardianship arrangements including extended family members.

Particular care should be taken where a child is being separated from a stable home with a parent although there may be instances where this is appropriate, for example if that parent is being persecuted or is unable to provide for the child due to their circumstances.

Instructions

Steps to be taken when booking travel for children:

Permissions

* Where possible, age and understanding permitting, we should have confirmation that the children wish to travel and understand the arrangements.
* Permission for the children to travel should be obtained from the non-sponsoring parent where this poses no additional risk to the family. Guidance may be sought from the referring organisation where they are involved and have an ongoing relationship with the family. This should be done over the phone with an interpreter unless this is absolutely not possible. The phone call should include:
  + Confirmation of the person being spoken to (ie name and dob)
  + Do the children want to come to the UK?
  + Are the children at any risk where they are now?
  + Are they are waiting on any visa application themselves?
  + Are they expecting to get a visa to come to the UK?
  + Do they understand that this is not a temporary visit or a holiday?
  + Do they have any concerns they want to discuss?
* In reviewing permission from the non-sponsoring parent, the following should be considered:
  + Is the consent informed and the consequences understood?
  + Has there been any level of coercion (including societal pressure) in obtaining the consent?
  + If the consent is written or via a legal document can this be validated?
* Ability of the sponsoring parent to care for the children after a long period of separation should be understood and appropriate referrals made.
* Where it is not possible to obtain satisfactory consent the implications of not providing support should also be reviewed including the impact of the family booking themselves and having reduced or no access to external support.

Booking travel

* Ensure you have consulted the Casework Lead for advice on country specific requirements around exit procedures and where required seek assurances from other agencies around the requirements.
* Unaccompanied minor assistance to be put in place for all under 18 unless not permitted by the airline. In these cases additional measures may need to be put in place, for example written information or sharing of films of airport transfers.
* Where the airline does not permit the booking of assistance (usually 16-17 year olds) there should be careful consideration given to route and direct flights sought.
* Airlines will have specific requirements around paperwork to be completed but this is likely to include details of the person dropping off at the airport including address and relationship to the child. These forms often need to be submitted and payment made which can take time depending on the airline. Two weeks should be allowed for this.

Managing expectations

* There are many additional requirements for unaccompanied children, this can result in last minute requests from immigration or the airline. Having the client speak to others who have travelled the same route can help identify these issues early.
* It is also more likely for unaccompanied children to be refused boarding due to a lack of staffing for the airline. These risks should be communicated to the client so everyone is prepared.
* Families will be expecting the same service as offered by the IOM. It is important to explain what will happen and that the children will only be met at check in.
* Consideration should be given to the arrangements for ongoing maintenance of contact where a parent is being separated for their child and contact details for Together Now provided for future concerns to be raised.

Arrangements for children arriving to Local Authority care.

When accepting cases, it is important to be clear if the children will need to become Looked After on arrival.

This is likely to be in the main where siblings of a Looked After child or care leaver are arriving to join a child or young adult.

Steps to be taken for arrival into care:

* Identification of the Local Authority who will assume responsibility for the children. This is likely to be the authority with duty for the sponsor.
* Identification of named contact for the authority who knows the sponsor and can support with arrangements. This may be a social worker or PA.
* Request the immigration or legal advisor send a letter confirming the duty of the authority to accommodate the arriving siblings. A template letter is provided at Appendix A.
* Where possible send a confirmation of flight booking to the authority three weeks before the arrival date. This should confirm the date, time and location of arrival and reassert the local authority’s duty to accommodate. Ensure that someone within the authority has confirmed in writing that this has been received.
* Ensure that a plan is in place with the sponsor in case the local authority does not accommodate the children on arrival. This may include guidance on what to do in the hour immediately following arrival including identification of a potential safe place to go from the airport.
* Ensure that the caseworker or colleague with knowledge of the case and access to the case information is available around the time of arrival in case of issues arising. This should include having the relevant duty social care phone number to hand.

Recording

Case records should include:

* Views of both parents on the travel to the UK including:
  + Understanding that the move is permanent and what the long term plan is for the children.
  + Understanding that there is no guarantee of the parent outside the UK being able to travel to the UK or stay for any length of time.
* Views of any referring agencies
* Any concerns around the ability of the sponsoring parent to care for the child on arrival and any arrangements made.

Confidentiality

* Keeping people safe may override the need for confidentiality. This may include reporting to the local authority or police where there is a risk of serious concern.

**Appendix A: Template letter to Local Authority confirming duty for arriving children**

Dear Madam/Sir,

**R H; DOB xx; current address:xxx; and his brother/sister/siblings: aa/bb/cc (DOB:..)**

We represent xx and his/her brother/sister/siblings: aa/bb/acc in connection with an application for a visa for aa/bb/cc to reunite with xx in the UK.

Xx is currently in semi-independent accommodation at the address set out for which falls and he is in the care of LB Sutton having arrived in the UK as an unaccompanied child asylum seeker.

We enclose the following documents for your information and consideration:

1. Form of authority signed by xx;
2. A copy of the residence permit for xx;
3. A copy of the refugee card for aa/bb/cc issued by the ZZ authorities;
4. A copy of the visa issued to aa/bb/cc by the UK on [DATE] and
5. A screenshot of the booking confirmation that aa/bb/cc is/are due to arrive in the UK on [DATE].

As you can see from enclosure (4) a family reunion visa has been issued to aa/bb/cc to join xx in the UK. Therefore, on arrival, aa/bb/cc will be a child/ren in need within the definition set out in s7 (10) of the Children Act 1989. Aa/bb/cc will also be a child/ren in need of accommodation in LB Sutton triggering a mandatory s20 Children Act duty to provide him/her/them with accommodation.

We would be grateful for confirmation that LB Sutton will accommodate aa/bb/cc on his arrival in the UK.

Aa/bb/cc is/are currently in Khartoum, Sudan and is/are booked on an Ethiopian Airlines flight to arrive in the UK at yy on [date].

Accommodation for aa/bb/cc needs to be arranged in advance of his/their arrival so that LB Sutton can make the appropriate plans including arrangements to collect aa/bb/cc from the airport. Please also confirm that all steps will be taken to ensure that aa/bb/cc is/are in a foster placement nearby so that the sibling are able to have contact on a frequent basis.

Please do not hesitate to contact the writer if you require further information.

We look forward to hearing from you.

# Taking, storing and recording photographs and images of clients

Summary

It is our responsibility to ensure that where we do take photographs of clients we do so with respect and the appropriate permissions.

What is appropriate permission?

Permission should be specific to the film, image or set of images. The client should be aware of the intended use of the material, for example if it will be used on websites or social media channels. Permission should be in writing. This can include emails, text or Whatsapp messages.

Permission should not be obtained from clients who are asking for additional support or have any expectation that giving permission to use images will impact in any way on our support to them.

Instructions

Steps to be taken when taking photos or films of clients:

* Do not take pictures of anyone who is distressed or vulnerable.
* Ask permission before taking pictures.
* Share pictures with the client(s) before using them.
* Ask for specific permission for use.

Steps to be taken when using photos or films shared by clients:

* Do not share photos of anyone appearing to be distressed or vulnerable.
* Ask for specific permission for using the images.

Recording

Images should be stored in the client’s case file and clearly marked ‘Permission to share’ in the file name.

Confidentiality

Clients who give permission for images to be shared have not necessarily agreed to have their name or other personal information used online. Unless specifically required and agreed with the client change all names of clients in published materials.

Further reading

Article on challenging stereotypical images of refugees: <https://deeply.thenewhumanitarian.org/refugees/community/2018/03/15/how-to-challenge-stereotypical-refugee-images-a-photographers-guide>

Resources on communicating messages of refugees: <https://imix.org.uk/resources/>

1. [Working together to safeguard children](about:blank), https://www.gov.uk/government/publications/working-together-to-safeguard-children--2 [↑](#footnote-ref-1)
2. <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/197402/Statement_of_Gov_Policy.pdf> [↑](#footnote-ref-2)