

CITY GATE
COMMUNITY
PROJECTS

Registered Charity No. 1093245



Safeguarding Policy and Procedures

FareShare Sussex & Surrey is a project wholly run by the charity, City Gate Community Projects (charity No. 1093245)

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1. Introduction / Policy Statement

The aim of this policy and procedures document is to maintain a safe working and service delivery environment, which is free from abuse; where staff, trustees, service users, volunteers and visitors feel confident to report concerns, and understand that “Safeguarding is... Everyone’s Business”. The purpose of this policy is to set out City Gate Community Projects (the “Charity”), which incorporates FareShare Sussex & Surrey practice on safeguarding, whistleblowing and procedures throughout the organisation and its operations in order to:

- Take a responsible attitude towards the welfare of all those who either use or provide the service.
- Ensure that all members of staff receive sufficient training to put the policy into practice.
- Ensure the policy is monitored and reviewed on a timely basis in order to comply with all necessary legislation and best serve its purpose.

2. Confirmation of reading

All employees will be asked to sign and date the Staff Safeguarding Declaration Form and return to the Designated Safeguarding Lead before employment commences. This form is to confirm employees have read, understood and agree to work with the Safeguarding Policy and Procedures for the charity. See Appendix IV

Volunteers will be asked to sign and date a Volunteer Safeguarding Declaration Form and submit it to the Volunteer Manager.

3. Legislation

The Charity will comply with all relevant protection legislation and implement strategies and policies in line with this legislation, in order to protect vulnerable people from abuse and enable members of staff, services users, volunteers and visitors to feel confident to report concerns. This includes but is not limited to:

- The Mental Health Act 2007
- Mental Capacity Act (2005)
- Safeguarding Vulnerable Groups Act (2006)
- The Public Interest Disclosure Act 1989
- The Care Act 2014
- The Serious Crime Act 2015 & Domestic Abuse Act 2021
- The Data Protection Act 2018 & General Data Protection Regulation (GDPR), 2018

4. Key principles

The Care Act and the Care Act guidance set out the statutory requirement for local authority social services, health, police and other agencies to both develop and assess the effectiveness of their local safeguarding arrangements. This is founded on the six key principles below.

Six key principles

These six principles should inform the ways in which professionals and other staff work with adults. They apply to all sectors and settings including care and support services, further education college, charities, social work, healthcare, welfare benefits, housing, wider local authority functions and the criminal justice system.

These principles are also used by Safeguarding Adults Boards (SABs) and organisations to develop and improve local arrangements.

- **Empowerment** - People being supported and encouraged to make their own decisions and give informed consent.

“I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.”

- **Prevention** - It is better to take action before harm occurs.
“I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.”
- **Proportionality** - The least intrusive response appropriate to the risk presented. *“I am sure that the professionals will work in my interests, as I see them, and they will only get involved as much as needed.”*
- **Protection** - Support and representation for those in greatest need. *“I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”*
- **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
“I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”
- **Accountability** - Accountability and transparency in delivering safeguarding. *“I understand the role of everyone involved in my life and so do they.”*

5. Definitions

How do we define ‘vulnerable’?

Individuals with care and support needs and/ or at risk from harm, and unable to protect themselves from abuse/ harm/ neglect or the risk of them. Vulnerability is not necessarily a fixed status and can change for example if someone becomes ill or starts a new relationship.

What constitutes abuse and neglect?

This section considers the different types and patterns of abuse and neglect and the different circumstances in which they may take place. This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern.

The Charity does not limit its view of what constitutes abuse or neglect, as it can take many forms, and the circumstances of the individual case should always be considered.

Exploitation, in particular, is a common theme in the following list of the types of abuse and neglect.

Physical abuse including	<ul style="list-style-type: none"> ● Assault ● Hitting ● Slapping ● Pushing ● Misuse of medication ● Restraint ● Inappropriate physical actions
Domestic violence including	<ul style="list-style-type: none"> ● Psychological ● Physical ● Sexual ● Financial ● Emotional abuse ● So called ‘honour’ based violence
Sexual abuse including	<ul style="list-style-type: none"> ● Rape ● Indecent exposure ● Sexual harassment ● Inappropriate looking or touching

	<ul style="list-style-type: none"> ● Sexual teasing or innuendo ● Sexual photography ● Subjection to pornography or witnessing sexual acts ● Indecent exposure ● Sexual assault ● Sexual acts to which the adult has not consented or was pressured into consenting
Psychological abuse including	<ul style="list-style-type: none"> ● Emotional abuse ● Threats of harm or abandonment ● Deprivation of contact ● Humiliation ● Blaming ● Controlling ● Intimidation ● Coercion ● Harassment ● Verbal abuse ● Cyber bullying ● Isolation ● Unreasonable and unjustified withdrawal of services or supportive networks
Financial or material abuse including	<ul style="list-style-type: none"> ● Theft ● Fraud ● Internet scamming ● Coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions ● The misuse or misappropriation of property, possessions or benefits ● Change in living conditions ● Lack of heating, clothing or food ● Inability to pay bills/unexplained shortage of money ● Unexplained withdrawals from an account ● Unexplained loss/misplacement of financial documents ● The recent addition of authorised signers on a client or donor's signature card ● Sudden or unexpected changes in a will or other financial documents
Modern slavery Find more information about Modern Slavery at https://modernslavery.co.uk/	<ul style="list-style-type: none"> ● Slavery ● Human trafficking ● Forced labour and domestic servitude ● Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse including forms of:

Harassment, slurs or similar treatment because of:

- Race
- Gender and gender identity
- Age
- Disability
- Sexual orientation
- Religion.

Read 'Discrimination: your rights' for further information.

<https://www.gov.uk/discrimination-your-rights/types-of-discrimination>

Organisational abuse

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Neglect and acts of omission including:

- Ignoring medical, emotional or physical care needs
- Failure to provide access to appropriate health, care and support or educational services
- The withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. An assessment should be made on a case by case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour.

There may come a point when they are no longer able to do this, without external support.

Incidents of abuse

These may be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm, just as the CCG, as the regulator of service quality, does when it looks at the quality of care in health and care services. Repeated instances of poor care may be an indication of more serious problems and of what we now describe as organisational abuse. In order to see these patterns it is important that information is recorded and appropriately shared.

Patterns of abuse vary and include:

- Serial abuse, in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse
- Long-term abuse, in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse
- Opportunistic abuse, such as theft occurring because money or jewellery has been left lying around.

Domestic abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents 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.

An offence of coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence imposes a maximum 5 years imprisonment, a fine or both.

The offence closes a gap in the law around patterns of coercive and controlling behaviour during a relationship between intimate partners, former partners, or family members, sending a clear message that it is wrong to violate the trust of those closest to you, providing better protection to victims experiencing continuous abuse and allowing for earlier identification, intervention and prevention.

Section 68 of the [Domestic Abuse Act 2021](#) (the 2021 Act) amended the definition of "personally connected" in section 76 of the Serious Crime Act 2015. This removed the "living together" requirement, which means that the offence of controlling or coercive behaviour now applies to partners, ex-partners or family members, regardless of whether the victim and perpetrator live together.

Further information can be found here regarding this type of behaviour:

[Controlling or coercive behaviour: statutory guidance framework - GOV.UK](#)

Financial abuse

Financial abuse is the main form of abuse investigated by the Office of the Public Guardian both amongst adults and children at risk. Financial recorded abuse can occur in isolation, but as research has shown, where there are other forms of abuse, there is likely to be financial abuse occurring. Although this is not always the case, everyone should also be aware of this possibility.

Challenging safeguarding dilemmas / grey areas

There are a number of challenging safeguarding dilemmas.

Questions include:

- When should poor support from a family trigger a safeguarding enquiry?
- Is self-neglect a safeguarding issue?
- Does the person understand the implications of not doing anything?
- Is it likely that the person will come to serious harm?

There is more information and guidance here:

[Adult safeguarding practice questions - SCIE](#)

Additional safeguarding issues

This policy also recognises that there are implications for staff and volunteers of working with adults who may be at risk or vulnerable.

Volunteers with criminal records

This policy recognizes that there are certain risks to staff, volunteers and service users of working alongside adults with criminal records.

Not all volunteers, staff or service users will be aware of the backgrounds of the people they are working with, therefore it is the responsibility of the charity to ensure their safety.

The charity has produced a specific risk assessment to assess the level of risk presented by volunteers with criminal records so that we can be consistent with how we manage these volunteers and put the relevant procedures in place.

Consideration of factors may include is anyone else at risk? Has a crime been/ will be committed? Is it likely that the person will come to serious harm?

See Appendix I for the Volunteer Risk Assessment Form

For risks above 15 there will be a clear plan of action in place, recorded in the 'Volunteer Risk Assessment Form' and staff will continue to monitor the situation closely. For risks of this level and above, the whole staff team will be made aware of the risk and risk management procedures in place.

For risks of 20 and above, this indicates that it is not currently safe for the volunteer to be on site at that present time. This score would therefore initiate a formal process to determine the next course of action with appropriate safeguarding leads and professional support if required.

In the case of volunteers with a criminal record of a sexual nature, the following specific precautions are in place:

- The volunteer will not be allowed out on the van to come into contact with Community Food Members
- The volunteer will work in a team of three or more on site

We acknowledge that we will not necessarily be aware of the backgrounds of all of our volunteers. However, we are confident that our operational setup, supplemented by this policy and procedures document, enables us to provide a safe environment to all volunteers and staff.

For those volunteers undertaking a regulated activity (e.g driving with a passenger who has additional

support needs) we have a specific process in place to promote safeguarding (DBS and driving licence checks etc).

Lone working procedures

In order to ensure the safety and wellbeing of staff and volunteers, a lone working policy is within the employee handbook and volunteer handbook respectively.

Emergency procedure to ensure sufficient operational cover

A member of staff who is not feeling well should not come into the office to ensure sufficient operational cover. The necessary cover should be maintained whilst maintaining staff wellbeing.

6. Responsibilities

Trustees

All charities have a responsibility to ensure they do not cause harm to anyone who has contact with them. Charities working with children or adults at risk have extra responsibilities.

As trustees they must make sure their charity fulfils this responsibility. Even if some responsibilities are delegated to a safeguarding lead or group, trustees retain overall responsibility.

Harm and abuse have a devastating impact. A strong safeguarding culture means:

- you protect people
- you minimise the risks of any harm or abuse
- everyone has confidence their concerns will be dealt with appropriately
- everyone at the charity understands their role

Every trustee must make sure their charity undertakes these 5 key areas - information available on these links:

1. [Identify and manage risks](#)
2. [Have suitable policies and practices in place](#)
3. [Carry out necessary checks](#)
4. [Protect your volunteers and staff](#)
5. [Handle and report incidents appropriately](#)

Further information is available here:

<https://www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities/strategy-for-dealing-with-safeguarding-issues-in-charities>

Staff

All staff have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

Additional specific responsibilities:

Role	Responsibilities
Chief Executive Officer & Designated Safeguarding Lead	Ensure the policy is implemented
	Ensure staff have access to appropriate training/information

	Develop and maintain effective links with relevant agencies as required
Chief Executive, Head of Development and Head of Operations	Receive staff and volunteer concerns about safeguarding and respond to all seriously, swiftly and appropriately
Trustee Lead	The policy is in place and appropriate
	The policy is monitored and reviewed
	Safeguarding risks are regularly being reviewed
Volunteer Manager	Ensure that all volunteers are aware of what adult safeguarding is and the procedures for raising concerns regarding abuse. This can be through inductions, handbooks, posters etc.
	Receive volunteer and staff concerns about safeguarding and respond to all seriously, swiftly and appropriately
Warehouse Manager	This member of staff has a duty to communicate any safeguarding concerns immediately to the Safeguarding Lead for appropriate action to be followed up.
Safeguarding Leads: Clare Nice (DSL) Dan Slatter Nathan Catt Gemma Bradshaw (Guildford)	To be a point of contact for staff and volunteers across Brighton and Guildford sites to report a concern. Receive staff and volunteer concerns about safeguarding and respond to all seriously, swiftly and appropriately. To review safeguarding action plans and policy to ensure they are rolled out and communicated effectively across volunteer and staff teams.

7. Implementation stages

The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation. These include:

- Grievance and disciplinary procedures – to address breaches of procedures/ policies
- Health and Safety General Policy
- Equal Opportunities policy– ensuring safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory
- Whistleblowing Policy
- Data protection (how records are stored and access to those records)
- Confidentiality (or limited confidentiality policy) ensuring that service users are aware of your duty to disclose
- Staff induction
- Staff training and updates on safeguarding
- Volunteer induction
- Volunteer training

Safe recruitment

The Charity ensures safe recruitment through the following processes:

- Providing the following safeguarding statement in recruitment adverts or application details –‘recruitment is done in line with safe recruitment practices.’
- Job or role descriptions for all roles involving contact with adults who may be at risk of harm will contain reference to safeguarding responsibilities.

- There are person specifications for roles which contain a statement on core competency with regard to adult protection/ safeguarding
- Volunteers shortlisting is based on application forms and not the provision of CV's. This process is also used for some employed staff roles. For other employed staffing roles shortlisting is based on a preset scoring criteria drawn from the Job Description and Person Specification. This criteria is scored against the submitted CV and Covering Letter.
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification
- DBS checks will be conducted for specific roles for all staff working with adults at risk. Portable/ carry over DBS checks from another employer will not be deemed to be sufficient. It is a criminal offence for individuals barred by the Disclosure & Barring Service to work or apply to work with adults at risk in a wide range of posts.

Disclosure Barring Service (DBS) Gap Management

The organisation commits resources to providing DBS checks on staff and volunteers whose roles involve contact with adults who may be vulnerable or at risk. Given the nature of our work and the fact that all staff may be in contact with vulnerable volunteers all staff roles require a basic DBS check

All volunteer drivers are also required to be DBS checked.

In order to avoid DBS gaps, the charity will:

- Ensure that their established staff and roles are regularly reviewed through a 3 year rolling programme of re-checking DBS for all posts.
- Request that all staff and volunteers who have a DBS check enrol onto the DBS update service. This will allow the charity to access the Update Service to do status checks on an individual's DBS certificate.

Service delivery contracting and subcontracting

- There will be systematic checking of safeguarding arrangements of partner organisations.
- Safeguarding will be a fixed agenda item on any partnership reporting meetings.
- Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non-compliance procedures.

8. Communication, training and support for staff

The charity commits resources for induction, training of staff, effective communications and support mechanisms in relation to Safeguarding.

Induction will include:

- Discussion of the Safeguarding Policy (and confirmation of understanding)
- Discussion of other relevant policies
- Ensure familiarity with reporting processes and role and responsibilities

Training

All staff who, through their role, are responsible for adults who may be vulnerable or at risk (The Chief Executive, Head of Operations, Warehouse Manager/Coordinator and Volunteer Manager/ Coordinator, Employability Programme Manager/Coordinator) will have safeguarding training at an appropriate level. The learning gained by these staff members can then be disseminated to the Warehouse Assistants and Fundraising/Comms Manager.

Sources and types of training will include the:

- Understanding and application of the principles that underpin all safeguarding adults (including Mental Capacity Act)
- Recognition of factors that may increase the risk of abuse
- Understanding of the practices that create a safe environment
- Recognition of evidence and indicators of possible abuse
- Understanding and use of procedures to enable suspected harm or abuse to be reported
- Knowledge of signposting resources to other safeguarding support

The Brighton and Hove Learning Gateway

(<https://learning.brighton-hove.gov.uk/cpd/portal.asp>) and Brighton Housing Trust (BHT) (<https://bht-training.org.uk/>) both offer a wide range of relevant training.

The charity receives notifications of these opportunities and takes advantage of these as and when appropriate. The Safeguarding Lead or delegated person should refresh training on a three yearly cycle, to correspond with the cycle of DBS update checks and policy review.

The Safeguarding Lead will be trained to Level 3 Safeguarding and it is advisable that the Volunteer Coordinator/Manager and Operations Manager are also trained to Level 3.

Training Log

Dan Slatter, Chief Executive, Level 3 Safeguarding, April 2025

Emma Bogue, Volunteer Manager, Level 3 Safeguarding, May 2022

Nathan Catt, Head of Operations, Level 3 Safeguarding, July 2022

Gemma Bradshaw, Operations and Volunteer Coordinator, Level 3 Safeguarding January 2024

Communications and discussion of safeguarding issues (staff, trustees, steering group)

Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice:

- One to one meetings (formal or informal) and End of Year Reviews
- Refresher sessions with staff on safeguarding
- Team meetings
- Board meetings
- Steering Group meetings
- Participation in multi-agency safeguarding procedures and meetings for relevant staff (Volunteer Manager, Head of Operations or CEO)

Communicating safeguarding issues to volunteers

- Volunteers will be made aware of the safeguarding policy and procedures as part of their induction, 121's and progress meetings
- We will continually look for opportunities to embed the safeguarding procedures across the organisation
- The Brighton and Hove Safeguarding Adults Board has some useful leaflets that we can order and have available on site for volunteers to read / take:

<http://brightonandhovelscb.org.uk/wp-content/uploads/Safeguarding-Adults-Leaflet.pdf>

Support

We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. Typical support mechanisms would include:

- Staff who have initiated protection concerns will receive a timely response detailing course of action e.g. within one week
- Chief Executive to provide / arrange debrief support for staff so that they can reflect on the issues they have dealt with
- A separate senior manager should support the member of staff who initiated concerns, so there is no conflict of interest with the Safeguarding lead who is dealing with the allegation.
- Ensure appropriate support is provided to volunteers

- Liaise with Trustee Safeguarding Lead to seek further support for staff dealing with allegations e.g access to counselling where required
- Where an allegation is made against a staff member, the Safeguarding Lead should consider the effect on them and provide appropriate support.

9. Professional boundaries

All staff and volunteers have a responsibility to apply and maintain professional boundaries with each other. Staff and volunteers in a position of responsibility for others may unwittingly be put in a position where their relationship with more vulnerable volunteers is compromised, or to be drawn into conversations or situations where the boundaries are being stretched or crossed.

Staff should seek the guidance of their manager, and volunteers seek guidance from the Volunteer Manager if they are unsure about the nature of a relationship with a team member, or if they need advice on how they intend to deal with a situation.

Boundary issues should be discussed during team meetings on a regular basis, and on occasions specific team training or facilitated discussion may be appropriate.

10. Reporting

If you are concerned that you or someone you know may be being abused, neglected or exploited, please say something. Everyone is responsible for preventing abuse by raising any concerns they have – it really is 'Everyone's Business'.

Abuse and neglect could be prevented if concerns are identified and raised as early as possible. It is important that everyone knows what to look for, and who they can go to for advice and support.

Changes in someone's physical or emotional state, or injuries that cannot be explained, may be a sign of abuse.

All members of staff need to alert the Safeguarding Lead to any safeguarding concerns as soon as possible. Volunteers should alert either the Volunteer Coordinator or the Operations Manager.

The course of action will then be taken:

1. If the adult is in immediate danger or a crime has been committed, emergency services will be contacted (Police, ambulance, GP etc).

2. If the adult is not in immediate danger then there should be a conversation with the adult about their desired outcome. Adult Social Care should be contacted without delay if the adult agrees this would help. If the adult has capacity, is not at risk and does not want it reported, then this needs to be recorded and a note made why it was not referred.

3. Actions will be recorded in a Safeguarding Concern form (see Appendix II)

If the Safeguarding Lead is implicated, then the member of staff should contact the Trustee Safeguarding Lead or Adult Social Care.

Contacts

Brighton

Access Point - Adult Social Care (ASC) Services

To provide caring services for communities and vulnerable people in Brighton & Hove so they can have more independence and control over their lives. The service works in partnership with health organisations, the police, private and voluntary agencies, community groups and others.

Email address: accesspoint@brighton-hove.gov.uk
 Phone: 01273 295 555
 Out-of-hours: 01273 295 555 (answered by Carelink Plus)
 Minicom: 01273 296205

Address: Adult Social Care, 2nd Floor, Bartholomew House, Bartholomew Square, Brighton, BN1 1JP

Brighton and Hove Safeguarding Adults Board – useful contacts:

<http://brightonandhovelscb.org.uk/safeguarding-adults-board/useful-links-sab/useful-contacts>

Contact centre for Adult Social Care 01273 295555 accesspoint@brighton-hove.gov.uk

Guildford

Surrey Safeguarding Adults Board:

<https://www.surreysab.org.uk/>

Concerns for an adult

- **Telephone: 0300 470 9100**
- **Online: Adult Safeguarding Referral online form.** If you would like a Microsoft Word version of this form, please email us using the following address: ascmarsh@surreycc.gov.uk
- **Textphone (via Text Relay): 18001 0300 200 1005**
- **SMS: 07527 182 861** (for the deaf or hard of hearing)
- **VRS: Sign Language Video Relay Service**
- **Out of hours: Emergency Duty Team 01483 517898**

If you need to report somewhere other than to your line manager you can contact:

- Adult Social Care Access Point (as above)
- Trustee Safeguarding Lead (TBC)

Adult Protection Procedures

The charity recognises that it has a duty to act on reports, or suspicions of abuse or neglect. It also acknowledges that taking action in cases of adult abuse is never easy.

How to respond if you receive an allegation:

- Reassure the person concerned
- Listen to what they are saying
- Record what you have been told/witnessed as soon as possible in a secure HR/incident log
- Remain calm and do not show shock or disbelief
- Tell them that the information will be treated seriously
- Don't start to investigate or ask detailed or probing questions
- Don't promise to keep it a secret

If you witness abuse or abuse has just taken place the priorities will be:

- To call an ambulance if required
- To call the police if a crime has been committed
- To preserve evidence
- To keep yourself, staff and volunteers safe
- To inform the Designated safeguarding Lead
- To record what happened in name of place/file/log where safeguarding adults concerns will be recorded

All situations of abuse or alleged abuse will be discussed with the Designated Safeguarding Lead. If a member of the management committee, a trustee, staff member or volunteer feels unable to raise this concern with the Designated Safeguarding Lead then concerns can be raised directly with Adult Social Care Direct. The alleged victim will be told that this will happen. This stage is called the alert.

If it is appropriate and there is consent from the individual, or there is a good reason to override consent,

such as risk to others, a referral (alert) will be made to the Adult Social Care Direct team.

If the individual experiencing abuse does not have capacity to consent a referral will be made without that person's consent, in their best interests.

The Designated Named Person may take advice at the above stage from Adult Social Care Direct and/or the Safeguarding Adults Unit and/or other advice-giving organisations such as Police. If an adult who may be vulnerable discloses abuse to you in the course of your work it is important to react appropriately

Here is some guidance on how to react to a safeguarding issue:

Do:	Do NOT:
<ul style="list-style-type: none"> ● Remain calm and receptive ● Listen without interrupting ● Only ask questions of clarification if you are unclear what the adult who may be vulnerable adult is saying ● Make it clear you take them seriously ● Acknowledge their courage in telling you ● Tell them they are not responsible for the abuse ● Let them know you will do what you can to help them and, where possible, get their consent to inform the Designated Safeguarding Lead and local Social Services Department 	<ul style="list-style-type: none"> ● Allow your shock or distaste to show ● Probe for more information/ask other questions ● Make assumptions or speculate ● Make negative comments about the abuser ● Make promises you cannot keep ● Agree to keep the information secret

Safeguarding Adults - Code of Conduct

All staff and volunteers have a duty of care to adults they serve or work with who might be 'at risk' or vulnerable. Alongside the practical issues of making sure the project you are serving in provides safe activities, you also need to ensure your behaviour and actions are reflecting safe practice too.

Our code of conduct goes some way to outline practical examples of what we would expect to see in place as a minimum, and what to do if you have a concern about someone in your project who may be suffering from abuse, coercion or control.

Do:

- Treat all people with respect. Some adults 'at risk' may need different help at times, but all of it should be respectful, and value them as adults with choice and capability wherever possible.
- Be fair in all your dealings with everyone and do not show favouritism to any individual adult. If extra time or resources are needed for someone, talk to your Line Manager or Site Volunteer Lead to keep it accountable.
- Take care to avoid your actions and words being misinterpreted. You may not know the background of all the people you are serving. For example, be conscious of the appropriateness of any physical contact and verbal comments you may make. Be age and gender appropriate and sensitive to ethnic/cultural boundaries.
- Remember, as a member of staff or volunteer you have a position of power and trust. Some charity workers and volunteers have used their position to take advantage of others, so be transparent and accountable in all that you do.
- Ensure where possible there is more than one member of staff or volunteer present during activities, or that you are in the sight or hearing of other staff or volunteers. There is safety and accountability in numbers.
- Try to avoid lone working where possible. If this is unavoidable due to the nature of your role then follow the guidelines for lone working, such as only meeting in a public space where other people are around and follow the safety guidelines we need you to observe.

- If you are in any doubt as to the appropriateness of your actions, then ask your Line Manager or the Site Volunteer lead.
- Report all concerns, allegations or suspicions of abuse.

Don't:

- Offer your private contact details to individuals or arrange to meet up with them outside the project you are representing - unless meeting up is in a professional capacity and remains accountable with your Line Manager.
- Message individuals privately on social media or mobiles as a friend. Group messaging is more accountable or including your Team Leader in the message if it is an individual communication.
- Enter into any agreement to handle money on behalf of the volunteers, CFM beneficiaries, staff or volunteers or offer to help them financially. If there is a financial need or crisis report this to your Line Manager or the Site Volunteer lead who may be able to help find appropriate support organisations or mechanisms.
- Enter into an intimate relationship with anyone you have a position of trust over. Intimacy can be emotional as well as physical.
- Allow boundaries to blur or be broken when serving adults who may be vulnerable.
- Let suspicions, disclosure or allegations of abuse go unrecorded or reported.

Organisations who can offer help and support:

Mental Health Line

Support and information over the phone

Call: 0300 5000 101

Open Monday to Friday 5pm to 9am, and 24 hours at weekends and bank holidays.

[Samaritans](#)

Confidential and non-judgemental emotional support whenever you need someone to talk to

Call: 116 123 or email jo@samaritans.org, or write a letter to Freepost SAMARITANS LETTERS.

Open 24 hours, seven days a week.

[Saneline](#)

Out-of-hours phone helpline offering practical information, crisis care and emotional support to anybody affected by mental health problems.

Call: 0300 304 7000

Open 4pm to 10pm.

[Mind in Brighton & Hove](#)

Promotes good mental health in Brighton & Hove and across Sussex.

Call: 01273 66 69 50

Email: info@mindcharity.co.uk

[Surrey and Borders Partnership Mental Health Helpline](#)

Mental Health Crisis Helpline 0800915 4644

Other websites:

[Safe in the City](#)

Part of the Safe in the City Partnership made up of the council's casework and projects teams and Brighton & Hove's neighbourhood policing teams. We work together with our partner agencies to tackle hate incidents and anti-social behaviour and reduce crime.

[Care Quality Commission](#)

The independent regulator of health and social care in England whose role it is to make sure hospitals, care homes, dental and general practices and other care services in England provide people with safe, effective and high-quality care.

Call: 03000 61 61 61

Email: enquiries@cqc.org.uk.

[Home - Speak Out Brighton & Hove](#)

Learning disabilities advocate - volunteer advocates work with individuals with learning disabilities in Brighton & Hove

Call: 01273 421921

Email: info@bhspeakout.org.uk

Open Monday to Friday from 9am to 5pm.

[Hourglass](#)

Supporting harm, abuse and exploitation of elderly people

UK helpline: 080 8808 8141 Text 078 6005 2906

Email: enquiries@wearehourglass.org

[Carers UK](#)

Advice line: 0808 808 7777

Email advice@carersuk.org

open Monday to Friday, **9am – 6pm (including Bank Holidays)**

[Domestic violence 24-hour free national helpline](#)

Call: 0808 2000 247.

[Sussex and Surrey Police](#)

Non Emergency Call: 101

[Think Drink Drugs](#)

For facts about drugs and alcohol, support services and latest information for Brighton & Hove and East Sussex. [Drink a Little. Risk a Lot. – THINK!](#)

[Catalyst Support - Catalyst Support](#)

Drug and Alcohol Misuse support in Surrey

[Mind Matters Surrey](#)

NHS Talking Therapies across Surrey

11. Allegations management

the charity recognises its duty to report concerns or allegations against its staff and volunteers within the organisation or by a professional from another organisation.

The process for raising and dealing with allegations is as follows:

- 1) Any member of staff from the charity is required to report any concerns in the first instance to the Safeguarding Lead.
- 2) A written record of the concern will be completed by the Safeguarding Lead. Contact Local Authority for advice
- 3) Follow the advice provided

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. A full Whistleblowing policy is contained within the employee handbook and volunteers can see how to manage concerns/allegations through the volunteer handbook.

The charity recognises its legal duty to report any concerns about unsafe practice by any of its staff to the Disclosure and Barring Service.

[DBS referrals guide: referral and decision-making process - GOV.UK](#)

12. Monitoring

The organisation will monitor the following Safeguarding aspects:

- Safe recruitment practices
- DBS checks undertaken
- References applied for new staff
- Records made and kept of supervision sessions
- Training – register/ record of staff training on child/ vulnerable adult protection
- Monitoring whether concerns are being reported and actioned
- Checking that policies are up to date and relevant
- Reviewing the current reporting procedure in place
- Presence and action of designated senior manager responsible for safeguarding is in post

13. Managing information

All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and adults who may be vulnerable. The public interest in safeguarding children and adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Designated Senior Lead..

All staff must be aware that they cannot promise service users or their families/ carers that they will keep secrets.

Data Protection

The charity will comply with the Data Protection Act 2018 and General Data Protection Regulation (GDPR), 2018 in line with this policy to protect vulnerable people from abuse and enable members of staff, services users, volunteers and visitors to feel confident to report concerns.

14. Conflict resolutions and complaints

Anyone who wishes to raise any concerns should firstly raise the matter with the relevant member of staff who will inform the Development Manager, who will attempt to resolve the issue.

If the complaint cannot be resolved at this level, the FareShare Sussex & Surrey Concerns and Complaints Policy (2022) outlines how a complaint will be handled by the Senior Leadership Team and Board of Trustees.

15. Communicating and reviewing the policy

The charity will make staff, volunteers and service users aware of the Safeguarding Policy through the following means:

- Staff inductions & training
- Volunteer inductions & forum
- Posters in office notifying Safeguarding Policy / one page summary document
- Copy of Policy printed off and in a folder on the volunteer location

This policy will be reviewed by the CGCP Board every two years and when there are changes in legislation and/or in response to incidents.

16. Appendices

- I. Volunteer risk assessment form
- II. Safeguarding incident form/Safeguarding Concern Form- Check name matches with document heading
- III. Staff safeguarding declaration

APPENDIX I

Volunteer risk assessment form

Please record below any risk of harm considering the criminal record disclosure or in the event of an incident. Answers to these questions should consider:

- Are the offence(s) or incident(s) relevant to the post?
- Does the nature of the role present any opportunities for the post-holder to reoffend or for the incident to be repeated in their role at the charity?
- Is the applicant taking part in any specific remedial/action programme?
- Does their role involve regular one-to-one/unsupervised contact with vulnerable people?

Name of volunteer	
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Incident/disclosure details		
Incident – With Injury <input type="checkbox"/>	Incident – Without Injury <input type="checkbox"/>	Abuse/threat/behavioural <input type="checkbox"/>
Hazard/near miss <input type="checkbox"/>	Voluntary disclosure <input type="checkbox"/>	Other <input type="checkbox"/>
Please give further details:		

Date Disclosure, Concern or Incident arose		
Type of location where did the alleged incident occur?		
FareShare Sussex & Surrey – on site <input type="checkbox"/>	FareShare Sussex & Surrey – whilst on van <input type="checkbox"/>	
FareShare Sussex & Surrey – whilst at project <input type="checkbox"/>	Other - Any other setting that does not fit into the above categories <input type="checkbox"/>	
If other please give details		

Nature of hazard? <i>e.g. reputational risk, risk of sexual harm, risk of theft</i>
Who might be harmed/at risk? <i>e.g. Staff, volunteers, service users at projects</i>
Details/What has already happened/ will be done to minimise risk?
Likelihood of hazard/risk occurring? Please select from: 1 = Remote 2 = Unlikely 3 = Possible 4 = Likely 5= Almost certain
Impact of hazard/risk? Please select from: 1 = Insignificant 2 = Minor 3 = Moderate 4 = Major 5 = Extreme
Using the below risk matrix, what is the remaining level of risk based on likelihood and impact?

Extreme 5	10	15	20	25	30
Major 4	8	12	16	20	24
Moderate 3	6	9	12	15	18
Minor 2	4	6	8	10	12
Insignificant 1	2	3	4	5	6
	1 Remote	2 Unlikely	3 Possible	4 Likely	5 Almost certain

Score	
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Score of 3 or less	Very low	No action required
Score of 4 - 6	Low	Suggests a controlled or insignificant risk. However the hazard must be kept under review

Score of 8 – 12	Medium	Action required to eliminate or control the risk but not immediately
Score of 15 – 18	High	Urgent action to eliminate or adequately control the risk is required
Score of 20 or above	Very high	The risk is imminent and indicates the activity should cease until the risk has been eliminated or adequately controlled

What further action is required (if any)?
Who is responsible for taking this action and by when?

Section 2. To be completed by all parties carrying out the risk assessment

✓ The information above has been considered and we are not satisfied that it is safe to allow the named applicant to commence volunteering.

Detail action to be taken below:

Signed: Relevant member of FareShare staff team and job title	
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Signed: Volunteer	
Print name:	Date:

APPENDIX II

CITY GATE COMMUNITY PROJECTS



Safeguarding Concern Form

Definition of a Safeguarding Concern

A Safeguarding Concern is a report made in order to raise concerns that an adult at risk may have been, is, or might be, abused. An alert may arise as a result of a disclosure, an incident, or other signs or indicators.

Purpose of a Safeguarding Concern

The purpose of submitting this form is to bring the concern to the attention of the FareShare Sussex & Surrey Safeguarding Lead and if necessary, other members of staff.

The Safeguarding duties apply to an adult who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and
- Is experiencing, or at risk of, abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse and neglect

Roles and responsibilities

A concern can be raised by anyone including the person at risk, other volunteers, members of FareShare staff and other members of the public.

Remember to:

Keep the report factual as far as possible. However, if it contains your opinion or assessment, it should be clearly stated as such and be supported by factual evidence. Information from another person should be clearly attributed to them and they should be informed that the information they provide is to be used in this manner.

Do:

Do NOT:

<ul style="list-style-type: none">• Remain calm and receptive• Listen without interrupting• Only ask questions of clarification if you are unclear what the vulnerable adult is saying• Make it clear you take them seriously• Make sure the written report is legible and is of a quality that can be photocopied• Acknowledge their courage in telling you• Tell them they are not responsible for the abuse• Keep the report confidential, storing them in a safe and secure place until needed.	<ul style="list-style-type: none">• Allow your shock or distaste to show• Probe for more information/ask other questions• Make assumptions or speculate• Make negative comments about the abuser• Make promises you cannot keep• Agree to keep the information secret
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<ul style="list-style-type: none"> Let them know you will do what you can to help them and, where possible, get their consent to inform your designated person and local Social Services Department 	
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Name of person that concern relates to		
If completed on behalf of a witness to an incident/concern please indicate	Name of witness:	

1. Consent/wishes of the adult	
Do you have the consent of the adult to complete this form and to share the content?	Yes/No
Have you spoken to the adult about this safeguarding concern?	Yes/No
<i>If the adult is unable to give consent due to mental capacity or because it is not safe to consult with them at this stage, or for any other reason (e.g. witness statement), please give details:</i>	
Was the individual or individual's representative asked what their desired outcomes were?	
<ul style="list-style-type: none"> Yes they were asked and outcomes were expressed 	
<ul style="list-style-type: none"> Yes they were asked but no outcomes were expressed 	
<ul style="list-style-type: none"> No not asked 	
Please consider all statements below and those which best indicate the persons own wishes and what outcomes they want?	
<ul style="list-style-type: none"> I want the abuse to stop and feel safe 	
<ul style="list-style-type: none"> I want help to protect myself in the future 	
<ul style="list-style-type: none"> I want to feel more confident 	
<ul style="list-style-type: none"> I want to be involved in what happens next 	
<ul style="list-style-type: none"> I want the people involved in my case to carry out the actions they will say they will do 	
<ul style="list-style-type: none"> I want the police to prosecute 	
<ul style="list-style-type: none"> I want to access any help that may be available to me 	
<ul style="list-style-type: none"> Other, please specify: 	

2. Mental Capacity	
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Do you have any concerns about the adult's mental capacity to make particular decisions in respect of the safeguarding concerns of abuse/neglect being currently reported?	Yes / No
If you have ticked 'Yes' please give details	

3. Nature of Concerns: <i>detail current or likely risk(s) to the adult</i>			
Type of abuse suspected, select all that are applicable.			
Financial <input type="checkbox"/>	Physical <input type="checkbox"/>	Emotional/Psychological <input type="checkbox"/>	
Sexual <input type="checkbox"/>	Discriminatory <input type="checkbox"/>	Organisational <input type="checkbox"/>	
Modern Slavery <input type="checkbox"/>	Self-Neglect <input type="checkbox"/>	Neglect and acts of omission (by a third party) <input type="checkbox"/>	
Domestic Abuse (this includes Forced Marriage, Sexual Exploitation, Female Genital Mutilation and Honour Based Violence)			<input type="checkbox"/>
Does the concern involve sexual exploitation?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
The sexual exploitation of adults with care and support needs involves exploitative situations, contexts and relationships where adults with care and support needs receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money as a result of performing sexual activities and/or others performing sexual activities on them.			

4. Details of Concerns and Risk to Adult:

Date Concern or Incident arose	Date Reported, <i>If there was a delay in reporting concerns please provide reason for delay</i>		
Type of location where did the alleged incident occur?			
FareShare Sussex & Surrey – on site <input type="checkbox"/>	FareShare Sussex & Surrey– whilst on van <input type="checkbox"/>		
FareShare Sussex & Surrey – whilst at project <input type="checkbox"/>	In a Community Service Day care, leisure centres, GP surgeries etc. <input type="checkbox"/>		
Own Home - Where the adult usually lives (whether private, tenancy or with family / friends) <input type="checkbox"/>	In the community excluding community service <input type="checkbox"/>		
Other - Any other setting that does not fit into the above categories <input type="checkbox"/>			
Address of location of suspected Concern/Incident			
Has the incident/concern been reported to the Police?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>If 'Yes' please provide the crime/log number:</i>			
Please provide details of any immediate actions taken to safeguard the adult, or any other action taken:			
In your view, does consideration need to be given to an immediate safeguarding plan?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
<i>Please give details:</i>			
Does the adult feel safe at the moment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
<i>If no, what action does the adult want to take?</i>			

Signed: Relevant member of FareShare staff team		
Print name and job title		Date:
Signed: Person who concern relates		
Print name		Date:

Signed: Witness (if applicable/different from above)		
Print name		Date:

Appendix III

CITY GATE
COMMUNITY
PROJECTS



Staff Safeguarding Declaration

I confirm that I have been made aware of, and understand the contents of, the Safeguarding Policy and Procedures for City Gate Community Projects including FareShare Sussex & Surrey. Furthermore I confirm I know who our Safeguarding Team are and where a copy of the policy can be found in the office if I need to access it.

Please complete below:

Employee's Role:

Employee's Name:

Employee's Signature:

Date: