



Beyond the Streets

Adult Safeguarding Policy

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Issued By:	Natasha Manuel
Approved:	Services Director – Josephine Knowles Original Safeguarding Trustee (Champion) – Simon Hester

Document History

Version	Date	Author	Description
0.1	Sep 2019	Miriam Hargreaves	Review of policy
1.0	Sep 2019	Caroline Hattersley (SG Trustee)	Sign off policy
1.1	Nov 2019	Jeremy Sisley	Update SG Coordinator to Natasha
1.2	March 2021	Natasha Manuel	Review Policy
1.3	May 2021	Elaine Davidson/Natasha Manuel	Full Policy Reviewed by ED as part of External Safeguarding audit. Signed off by NM

1.3	Jan 2022	Natasha Manuel	Amendment to Safeguarding Trustee
1.3	April 22	Keira Johnston	Addition of Appendix 13- Thresholds for escalation of safeguarding risks

This adult safeguarding policy was updated: May 2021

Review date: Procedural review due September 2022

Beyond the Streets has a responsibility to protect and safeguard the welfare of adults they come into contact with. We take our Safeguarding responsibility seriously and commit to the implementing and reviewing guidelines and procedures to ensure that this is done with understanding and clarity.

The person with lead responsibility for safeguarding within the organisation is:

- **Natasha Manuel – Safeguarding Deputy (Services Manager)**
- **Josephine Knowles – Safeguarding Lead (Services Director)**
- **Simon Hester- Safeguarding Champion (Trustee)**

All staff and volunteers are made aware of this policy and the process for reporting concerns by issuing the policy at induction.

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Beyond the Streets

SAFEGUARDING ADULTS POLICY

1: INTRODUCTION

Beyond the Streets is a small charity, established in 1999, working with women who are being sexually exploited both on a face-to-face and telephone appointment basis. We provide holistic, trauma-informed support to women who face multiple disadvantage such as poverty, substance misuse, sexual and relational abuse, insecure housing and mental health issues. We provide street outreach on a weekly basis to women selling sex.

We consider the welfare of any child, young person or adult at risk of harm, who engages with Beyond the Streets, to be of paramount importance and we are committed to ensuring that they are valued, listened to, and respected within the work that we do.

1.1 Our Vision: *We want to see a world where people are free from sexual exploitation, and where those in prostitution have the option to pursue genuine alternatives, free from constraints such as poverty, drug dependency, and abuses of vulnerability.*

Beyond the Streets believes that all adults at risk of harm, no matter their sex, disability, racial or ethnic background, religious beliefs or sexual orientation, have the right to be in a safe, caring environment.

Everyone working with Beyond the Streets, including its trustees, employees and volunteers, are responsible for ensuring that adults at risk of harm are safe.

1.2 Principles

Beyond the Streets* will adopt and uphold the Southampton, Hampshire, Isle of Wight & Portsmouth 'Safeguarding Adults Multi-Agency Policy, Guidance and Toolkit May 2016' and reflect that advice and guidance throughout this policy whose key principles are outlined below:

- **Principle 1 Empowerment** - presumption of person-led decisions and informed consent.
- **Principle 2 Prevention** - it is better to take action before harm occurs.
- **Principle 3 Proportionality** - proportionate and least intrusive response appropriate to the risk presented.
- **Principle 4 Protection** - support and representation for those in greatest need.
- **Principle 5 Partnership** - local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Principle 6 Accountability** – accountability and transparency in delivering safeguarding

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***Door of Hope will adopt and uphold the London Borough of Tower Hamlets ‘Safeguarding Adults Procedure March 2016.’**

1.3 Aims of our policy

- Adopting person led safeguarding, respecting and promoting the rights, wishes and feelings of adults at risk of harm.
- Listening to and working alongside adults at risk of harm actively to provide support and representation for them as needed.
- Creating a safe and healthy environment within our organisation and the services it provides, avoiding situations where abuse may occur.
- On-going training, supervision and support for staff and volunteers to adopt local multi-agency good practice.
- Raising the awareness of the duty of care responsibilities relating to adults at risk of harm throughout the staff and volunteer team, assessing risk and responding to concerns proportionately.
- Actively encouraging good practice amongst all staff, and volunteers and promoting wider awareness wherever possible i.e. partnership organisations and user groups.
- Staff and volunteers who work with adults at risk of harm, will be subject to Safer Recruitment processes and the appropriate level of Criminal Records check through the Disclosure & Barring Service.
- Responding to any allegations appropriately and implementing the appropriate disciplinary and appeals procedures.
- Requiring staff and volunteers to adopt and abide by the Adult Safeguarding Policy and procedures.
- Managing allegations against staff or volunteers appropriately, referring any member of staff or volunteer to the appropriate agencies, including the Disclosure & Barring Service if required and referring as necessary any breaches of safeguarding to the Charity Commission.

Abuse of adults at risk of harm and safeguarding

‘Safeguarding adults’ means protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse and neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feeling and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

Prevention is critical to the vision of the Care Act 2014. The care and support system must work actively together to promote wellbeing and independence rather than waiting to respond once a person has

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reached a crisis point. Safeguarding involves achieving a balance between protecting people and preserving their right to make decisions for themselves.

1.3i Prevention of harm to staff.

Safeguarding the well-being of staff is also paramount to our organization. We ensure that all staff undertake the same core induction training to highlight the need to retain professional boundaries and personal safety with women with whom they work and to maintain a healthy work/home balance.

During Covid-19 restrictions we ensure that staff who are working on the front-line, have access to an office space so as to minimize the transfer of work content and vicarious trauma into the home in an attempt to maintain healthy boundaries. This applies to staff making calls to women and being seen face-to-face. Attach Covid 19 home working policy.

The Lone working policy also provides a level of prevention of harm through outlining the processes and procedures that have been considered and risk assessed, in relation to the day-to-day work with women and other agencies (appendix 7).

The Staff Code of Conduct also provides measures and ways in which staff should professionally conduct their behaviour to minimise risk to themselves and others (see appendix 8).

All Staff are required to read and understand these policies within their initial induction to the organisation. These policies are accessible within the Salesforce database also, and staff are reminded to refresh their awareness as notified through their personal Breathe HR account, as and when policies are regularly reviewed and required to confirm that they have read the document.

1.4 The Care Act 2014 definition of an adult needing care and support

Under the Care Act 2014 the Government expects local authorities and others to help people with care and support needs, who may be at risk of abuse or neglect as a result of those needs, keep safe. But this must not mean preventing them making their own choices and having control over their lives. Everyone in the community should understand the importance of safeguarding and help keep people safe.

The terminology of what was a vulnerable adult under 'No Secrets' has changed. A term and definition now in use reflects the recognition of the individual as an 'Adult at Risk of Harm' (or **Adult at Risk**) and as "Any adult aged 18 or over, who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or as it at risk of, abuse or neglect; and as result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse and neglect." (Care and Support Statutory Guidance, published under the Care Act 2014, Department of Health)

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This **may** include a person who:

- Is elderly or frail
- Has a mental health difficulty
- Has a physical disability
- Has a learning disability
- Has a severe physical illness

This may include a situation where a person receives care or is currently unable to protect themselves, for instance, someone who:

- Is misusing substances
- Is homeless
- Is in an abusive relationship (this can include women who are being pimped by a partner)
- is vulnerable due to context or experience e.g. bereavement, poverty

1.5 Introducing the 4 R's (see Appendix 1 for flow chart)



The 4 R's shown above can act as a guide for dealing with possible disclosures/ indicators of abuse. A helpful reference point can be found in Appendix 1.

- **Recognise** – Making sure we are aware of signs of abuse and aware of situations, signs and symptoms that may indicate abuse.
- **Respond** – Ensuring we understand what is required of us when an individual discloses abuse in the moment, and the importance of responding well.
- **Refer** – Ensuring that the information has been passed on to the right people/ organisation in a timely manner.
- **Record** – Information disclosed must be recorded and stored correctly (See Data Protection Policy).

2: RECOGNISE

2.1 Recognising Adult Abuse

Incidents of abuse may be one-off or multiple and affect one person or more. Patterns of abuse may vary and include:

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- serial abusing 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; or
- opportunistic abuse such as theft occurring because money or jewellery has been left lying around

(Care and Support Statutory Guidance issued under the Care Act 2014, Department of Health)

Abuse is the violation of an individual’s human and civil rights by any other person or persons. It is the use of power and/or abuse of vulnerability of a person. Abuse can consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented and cannot consent.

2.2 Where and how abuse might occur

Abuse of adults at risk of harm may be perpetrated by a wide range of people, including spouses/partners, relatives and family members, professional staff, paid care workers, volunteers, other service users, neighbours, friends and associates, people who deliberately exploit vulnerable people, strangers or the elderly. Mate crime happens when someone is faking a friendship in order to take advantage of someone.

There is often particular concern when abuse is perpetrated by someone in a position of power or authority who uses his or her position to the detriment of the health, safety, welfare and general well-being of a person at risk of harm. Abuse can occur in any setting. Abuse and crimes against adults may occur in different contexts. Actual or suspected abuse of persons at risk in any of the contexts below will trigger a safeguarding response in accordance with this policy.

2.3 The main forms of abuse

Abuse can occur in any relationship and may result in significant harm to or exploitation of, the person subjected to it. It can take a number of forms:

- **Physical abuse** e.g. hitting, pushing, shaking, inappropriate restraint, neglect or abandonment
- **Sexual abuse** e.g. involvement in any sexual activity against his/her will, exposure to pornography, voyeurism and exhibitionism.
- **Sexual Exploitation** is a type of abuse in which young people/ adults are sexually exploited for survival, money, power or status.

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- **Emotional/psychological abuse** e.g. intimidation or humiliation, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- **Financial abuse** e.g. theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Discriminatory abuse** e.g. racial, sexual or religious harassment, abuse based on a person's disability, and other forms of harassment, slurs or similar treatment.
- **Personal exploitation** - involves denying an individual his/her rights, to forcing him/her to perform tasks that are against his/her will
- **Violation of rights** e.g. preventing an individual speaking his/her thoughts and opinions.
- **Institutional abuse** e.g. when the routines, systems and norms of an institution compel individuals to sacrifice their own preferred style and cultural diversity to the needs of the institution
- **Neglect and acts of omission** e.g. ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. *Under the Mental Capacity Act 2005, wilful neglect and ill treatment become a criminal offence.*

2.4 Other forms of abuse to consider:

2.4.1 Hate crime

Hate crime is defined as any crime that is perceived by the victim, or any other person, to be racist, homophobic, trans-phobic or due to a person's religion, belief, gender identity or disability. It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence.

2.4.2 Mate crime

Mate crime happens when someone is faking a friendship in order to take advantage of a vulnerable person. Mate crime is committed by someone known to the person. They might have known them for a long time or met recently. A 'mate' may be a 'friend', family member, supporter, paid staff or another person with a disability.

2.4.3 Self Neglect the Care Act 2014 Statutory Guidance Chapter 14 recognises self-neglect as a type of abuse. It describes self-neglect as a wide range of behaviours; neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

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Where self-neglect persists the risks to the individual may increase and could have a significant impact on the person's wellbeing.

2.4.4 Carers at risk of harm: Carers experiencing abuse by the person they offer care to can expect the same response as any person at risk of abuse. Carers also have a legal right to an assessment of their needs. A carer's assessment should be seen as part of the overall assessment process. Sometimes both the carer and the supported person may be at risk of harm.

2.4.5 Abuse of trust: a relationship of trust is one in which one person is in a position of power or influence over the other person because of their work or the nature of their activity. There is a particular concern when abuse is caused by the actions or omissions of someone who is in a position of power or authority and who uses their position to the detriment of the health and well-being of a person at risk, who in many cases could be dependent on their care. There is always a power imbalance in a relationship of trust.

2.4.6 Abuse between adults at risk, and organisations supporting these individuals have a responsibility to protect them from abuse as well as preventing them from causing harm to other adults. It is important the needs of the adult causing the harm are taken into consideration in the safeguarding responses for both parties.

2.4.7 Domestic Violence

Domestic violence includes any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults or young people, who are or have been intimate partners, family members or extended family members, regardless of gender and sexuality.

(HM Government, *Working Together to Safeguard Children, London, Stationery Office, 2015*)

Family members are defined as mother, father, son, daughter, brother, sister and grandparents, whether directly related, in-laws or stepfamily; see Association of Chief Police Officers 2004.

2.4.8 Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: "an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim." Hampshire Adult Safeguarding Glossary <http://www.hampshiresab.org.uk/professionals-area/jargon-buster/>. The Serious Crime Act 2015 creates a new offence of controlling or coercive behaviour in intimate or familial relationships (section 76). This closes a gap in the law around patterns of controlling or coercive behaviour in an ongoing relationship between intimate partners or family members. The offence carries a maximum sentence of 5 years' imprisonment, a fine or both.

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2.4.9 Honour based violence

“Honour based violence is a crime or incident, which has or may have been committed to protect or defend the honour of the family and or community.”

It is a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. (Crown Prosecution Service/Association of Chief Police Officers)

<http://www.cps.gov.uk/legal/h to k/forced marriage and honour based violence cases guidance on flagging and identifying cases/>

2.4.10 Forced marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

[The Anti-social Behaviour, Crime and Policing Act 2014](#) makes it a criminal offence to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
- Breaching a Forced Marriage Protection Order is also a criminal offence.

Forcing someone to marry can result in a sentence of up to 7 years in prison.

2.4.11 Female genital mutilation (FGM)

FGM involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy. FGM constitutes a form of child abuse and violence against women and girls and has severe short-term and long-term term physical and psychological consequences. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

2.4.12 Sexual Exploitation

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The Southampton, Hampshire, Isle of Wight & Portsmouth 'Safeguarding Adults Multi-Agency Policy, Guidance and Toolkit May 2016' states: :

There are key aspects of sexual exploitation that are common whether the exploitation is of children or of adults at risk of abuse. Sexual exploitation involves someone taking advantage of the child or adult sexually, for their own benefit through threats, bribes, violence, and humiliation. The perpetrator uses their power to get the child or adult to do sexual things for the perpetrator's own or other people's benefit or enjoyment. The definition of child sexual exploitation provided by the Department of Health is: "Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology."

In relation to adults who are at risk of sexual exploitation there is a spectrum of seriousness of exploitation. Less serious instances might include a one-off exploitative situation between a couple while at the other end of the spectrum there may be instances of organised crimes where adults are trafficked and sexually exploited on a large scale.

2.4.13 Trafficking and Modern Slavery

The Modern Slavery Act 2015 defines the trafficking of people as

arranging or facilitating the travel of another person (child or adult) with a view to them being exploited. This includes recruiting, transporting or transferring, harbouring or receiving, or transferring or exchanging control over a person

and modern slavery as

holding another person in slavery or servitude for the purposes of:

- forced or compulsory labour
- sexual exploitation
- removal of organs

securing these services by force, threats or deception and securing services from children and vulnerable persons.

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2.4.14 Exploitation by radicalisers who promote violence involves the exploitation of susceptible people who are drawn into violent extremism by radicalisers. Violent extremists often use a persuasive rationale and charismatic individuals to attract people to their cause. The aim is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. The Prevent Strategy, launched in 2007, seeks to stop people becoming terrorists or supporting terrorism. It is the preventative strand of the government's counter-terrorism strategy, CONTEST.

2.4.15 Spiritual Abuse Across the four UK nations, there are varying government definitions of the major recognised forms of abuse. However, currently there is no single agreed definition.

In 2013 spiritual abuse was defined as:- . . . *coercion and control of one individual by another in a spiritual context. The target experiences spiritual abuse as a deeply emotional personal attack. This abuse may include:- manipulation and exploitation, enforced accountability, censorship of decision making, requirements for secrecy and silence, pressure to conform, misuse of scripture or the pulpit to control behaviour, requirement of obedience to the abuser, the suggestion that the abuser has a 'divine' position, isolation from others, especially those external to the abusive context. (Oakley, 2013 in Oakley & Kinmond, 2013 p21) courtesy of CCPAS leaflet 'Help. . . I want to understand Spiritual Abuse'* [http://files.ccpas.co.uk/documents/Help-SpiritualAbuse \(2015\).pdf](http://files.ccpas.co.uk/documents/Help-SpiritualAbuse (2015).pdf)

This is not an exhaustive list of examples, but a guide to forms of abuse. You can find more detailed descriptions of these forms of abuse in the Appendix 5 of this policy.

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3: RESPOND

R E S P O N D

3.1 Responding to a disclosure.

It is important that the adult is given the opportunity to talk and every effort should be made to ensure this takes place in private. The person at risk may not understand that they are being abused and so may not realise the significance of what they are telling you. Some disclosures happen many years after the abuse. There may be good reasons for this, for example the person they were afraid of has left the setting. Therefore, any delay in an individual reporting an incident should not cast doubt on its truthfulness. Often a disclosure can be the 'tip of the iceberg' so it is important to believe the person.

3.2 Principles of responding to a disclosure.

- assure the person that you are taking them seriously.
- listen carefully to what they are telling you, stay calm, try to get a better picture of what happened, but avoid asking too many questions.
- do not give promises of complete confidentiality.
- explain that you have a duty to tell your Manager or other designated person (if you are an employee/volunteer), and that their concerns may be shared with others who could have a part to play in supporting and protecting them.
- reassure them that they will be involved in decisions about what will happen.
- explain that you will try to take steps to protect them from further abuse or neglect.
- if they have specific communication needs, provide support and information in a way that is most appropriate for them.
- record the words of the person at risk and accept the statements as fact; record the full details, including the time, date and location that disclosure was made. All written notes must be made as soon as practicable and kept securely.
- do not confront the person alleged to have caused the harm as this could place you at risk, or provide an opportunity to destroy evidence, or intimidate the person alleged to have been harmed or witnesses.
- do not be judgemental or jump to conclusions.
- staff and volunteers should follow the Beyond the Streets organisational procedures for raising the alert (See Appendix 2 for specific response procedures for disclosure of abuse).

When someone discloses to you, remember you are not investigating.

Do:

- Stay calm and try not to show shock.
- Listen very carefully.
- Be sympathetic.

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- Be aware of the possibility that medical evidence might be needed.

Tell the person that:

- You believe them
- They did a good/right thing in telling you.
- You are treating the information seriously.
- It was not their fault.

4: REFER

4.1 Referring a concern or a disclosure.

These procedures inform all staff and volunteers of what actions they should take if they have concerns or encounter a case of alleged or suspected vulnerable adult abuse, i.e. response actions.

Important Rule

It is important that all staff and volunteers are aware that the first person that has concerns or encounters a case or suspected abuse is ***not responsible for deciding whether abuse has occurred.***

However, staff and volunteers do have a duty of care to the adult to report ***any suspicions or concerns*** you may have to a line manager/ Safeguarding Deputy.

The Safeguarding Deputy will ultimately decide whether to alert Adult Services in each case. Once a decision has been made to refer, either the Safeguarding Deputy will make the referral, or it will be agreed that this is made by the staff member responding directly to the alert.

***** If someone is deemed at immediate and significant risk, then the Emergency Services (999) should be contacted straight away*****

4.2 Witnessing abuse

In situations of immediate danger take urgent action by calling the relevant emergency services i.e. Police, ambulance, GP. You may wish to challenge the person who is abusing the individuals and try to persuade them to stop whilst ensuring your personal safety is not compromised. Remember to have regard for your own safety. Leave the situation if it is not safe for you.

Report the incident to your line manager straight away and/or Safeguarding Deputy.

4.3 Referring or reporting to other agencies - Alerting Authorities.

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An alert is a concern that a 'person at risk' is suffering, or at risk of, or may be being, abused, neglected or exploited by a third party, or where a person at risk may be being harmed by others usually in a position of trust, power or authority.

Alerts *may* be made to Adult Services by anyone and should be made when:

- the person is a person at risk and there is a concern that they are being or are at risk of being abused, neglected, or exploited.
- the person is a person at risk and there is a concern that they have caused or are likely to cause harm to others.
- the adult has capacity to make decisions about their own safety and wants this to happen.
- the adult has been assessed as not having capacity to decide about their own safety, but a decision has been made in their best interests to make a referral.
- a crime has been or may have been committed against an adult who lacks the mental capacity to report a crime and a 'best interests' decision is made.
- the abuse or neglect has been caused by a member of staff or a volunteer.
- other people or children are at risk from the person causing the harm.
- the concern is about institutional or systemic abuse.
- the person causing the harm is also an adult at risk of harm.

If there is an overriding public interest or vital interest or if gaining consent would put the adult at further risk, an alert must be made.

4.4 Harm

In determining what justifies intervention and what sort of intervention is required the LSAB framework uses the concept of 'significant harm'. This refers to:

- Ill treatment (including sexual abuse and forms of ill treatment which are not physical)
- The impairment of, or an avoidable deterioration in, physical or mental health and/or
- The impairment of physical, intellectual, emotional, social, or behavioural development.

The importance of this definition is that in deciding what action to take, consideration must be given not only to the immediate impact on and risk to the person, but also to the risk of future, longer term harm, neglect or exploitation.

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The criteria used to identify whether an issue should be raised as a safeguarding alert are as follows:

Does the adult have needs of care and support*?

Is abuse or neglect by a third party alleged?

AND

Is adult unable to take care of him or herself?

OR

Is the adult unable to protect him or herself against significant harm or exploitation?

If the answer is YES, then you have a 'safeguarding alert'.

*A person aged 18 years or over; who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. The Care Act 2014

4.5 Supporting immediate needs.

In line with information sharing considerations, Beyond the Streets may need to take the following actions:

- Make an immediate evaluation of the risk to the person at risk and any others who may be at risk.
- Take reasonable and practical steps to safeguard the person at risk as appropriate.
- Consider referring to the Police if the abuse suspected is a crime.
- If the matter is to be referred to the Police, discuss risk management and any potential forensic considerations.
- Consider the support needs of the person alleged to have caused harm if they are also an adult at risk of harm.
- Arrange any necessary emergency medical treatment; note that offences of a sexual nature will require expert advice from the Police.
- If there is a need for an immediate Safeguarding Plan, we will refer to the relevant Adult Services or Emergency Duty Services if out of hours.

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- Consider appropriate action in line with Beyond the Streets' disciplinary procedures if a staff member is suspected to have caused harm.

4.6 Person led safeguarding.

Professionals are often wary of intervening in abusive situations if the adult does not want them to do so because of human rights and other issues. These dilemmas are very real for staff but can lead to an approach of non-intervention which conflicts with the professional "duty of care".

Person led adult safeguarding follows the principle of 'no decision about me without me' and means that the adult, their families and carers are working together with agencies to find the right solutions to keep people safe and support them in making informed choices.

This person led approach to safeguarding leads to services which are: person-centred and focused on the outcomes identified by the individual; planned, commissioned and delivered in a joined-up way between organisations; responsive and which can be changed when required.

4.7 Mental capacity

People must be assumed to have capacity to make their own decisions and be given all practicable help before they are considered not to be able to make their own decisions. Where an adult is found to lack capacity to make a decision then any action taken, or any decision made for, or on their behalf, must be made in their best interests.

Professionals and other staff have a responsibility to ensure they understand and always work in line with the Mental Capacity Act 2005. In all safeguarding activity due regard must be given to the Mental Capacity Act 2005. In all cases where a person has been assessed to lack capacity to make a decision, a best interest's decision must be made. Even when a person is assessed as lacking capacity, they must still be encouraged to participate in the safeguarding process. (copy in appendix 5).

4.8 Responding to allegations or concerns against another person, a member of staff or volunteer, parent, carer or service user

Unfortunately, those that live with, care for, work alongside or serve those that are at risk of harm, can be individuals who go on to abuse them. Should you ever have a concern about a person close to the adult who may be at risk be that a relative, or a member of your team for example you should:

- Take the allegation or concern seriously.
- Consider any allegation or concern to be potentially dangerous to the adult at risk of harm.
- Report to and inform (if appropriate) your Line Manager or the Safeguarding Co-Ordinator

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- Record in writing on a Safeguarding – Serious Incident Form (see Appendix 3) all the details that you are aware of as soon as possible.
- Safeguarding Co-ordinator/ Line Manager informs relevant persons, i.e. Adult Services, and/or the Police if appropriate.
- Report to and inform the Trustee Safeguarding Lead of any allegations involving a line manager/ senior team leader. Refer to the Confidential Reporting Policy for details on making a report. (appendix 11).

4.9 Internal investigation for staff or volunteers

When a complaint or allegation has been made against a member of staff or volunteer, he/she must be made aware of their rights under employment legislation and internal disciplinary procedures.

It is the responsibility of trustees, to conduct a thorough investigation in accordance with the Beyond the Streets Disciplinary Policy and Procedure. Every incident involving a staff member or volunteer will be reported to the board of trustees by the Trustee Safeguarding Lead or one of the Directors if it concerns that trustee.

A risk assessment must be undertaken immediately to assess the level of risk to all service users posed by the member of staff/volunteer. This must include whether it is safe for them to continue their role or any other role within Beyond the Streets whilst the investigation is being undertaken. The consideration of risk must be considered alongside the right of the employee. Decisions both to suspend and not to suspend an employee must be fully documented.

Action to be considered will include the following:

- Is this a supervisory/training issue?
- Is it a matter for discipline/capability issue?
- Does discussion need to take place with other agencies, e.g. the Police and Adult Services?
- Is there a need to refer to Disclosure & Barring Service?
- Does it need to be referred to the Charity Commission?

N.B. Every incident involving a staff member or volunteer must be reported to the board of trustees by the Trustee Safeguarding Lead (or a Director if it involves the Trustee Safeguarding Lead) before being referred to The Charity Commission.

Refer to the Disciplinary Procedure for details on the process of action taken – (appendix 11)

4.10 Reporting abuse for investigation

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Concerns of abuse towards an adult at risk of harm should be referred/reported to the area Adult Service team or the Emergency Social Services duty team if urgent and outside of normal office hours. To prevent a delay in raising concerns, alerts to the local authority should usually be made by contacting:

SOUTHAMPTON:

- Southampton 023 8083 3003
- Hampshire 0845 603 5630

BEYOND SUPPORT:

- Contact Adult Social Care for the relevant local area

<https://www.gov.uk/find-local-council>

DOOR OF HOPE

TOWER HAMLETS:

- Tower Hamlets Safeguarding Adults Hotline: 020 7364 6085
- To report abuse to the police please contact the Tower Hamlets Multi Agency Safeguarding Hub on 020 3276 3501 or email towerhamletsMASH@met.police.uk.

Where a crime may have been committed the Police must always be contacted, and if in any doubt, they should still be notified so that they can make that judgement.

Staff and volunteers are required to liaise with Adult Services throughout the investigation and provide any necessary information or assistance. This may include attending meetings and case conferences.

Managers/Designated Leads must keep Adult Services informed of outcomes of any internal investigations and disciplinary proceedings being undertaken alongside Adult Services own investigation.

All agencies will work together and decide on the best possible course of action for both the perpetrator and the victim.

Criminal Activity (Terrorism and Serious crime)-Refer to Policy above for further info

1. Ensure details taken (Do not need to inform individual of referral)
2. Contact BTS Director/ Safeguarding Co-ordinator

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3. After call:

A) Serious crime committed- led to serious injury (or worse) to another person or intention to do so- Call 999

B) Disclosing info about terrorism- Call Terrorist hotline 0800 789321

C) Disclosing info/threat that could lead to harm to Beyond the Streets staff/volunteer -Call 101

5: RECORD

R E C O R D

5.1 Recording Information

As soon after the disclosure/incident as possible, record in writing on a 'Safeguarding – Serious Incident Form' (Appendix 3) all the details that you are aware of and what was said using the person's own words.

To record you should include:

- The date and time.
- The person's name and address and date of birth if known.
- The nature of the allegation.
- *A description of any visible injuries.*
- *Your observations – e.g. a description of the adult at risk's behaviour and physical and emotional state.*
- Exactly what the adult said and what you said. Record their account of what happened as closely as possible.
- Any action you took as a result of your concerns e.g. who you spoke to and resulting actions. Include names, addresses and telephone numbers.
- Sign and date what you have recorded.
- Store the information in accordance with relevant procedures, e.g. GDPR

5.2 Preserving evidence

The first concern must be to ensure the safety and well-being of the adult at risk. However, in situations where there has been or may have been a crime and the Police have been called it is important that forensic and other evidence is collected and preserved.

Try not to disturb the scene, clothing or victim if at all possible. Secure the scene, for example, lock the door, preserve all containers, documents, clothing, locations, etc. Evidence may be present even if it cannot actually be seen. If in doubt, contact the Police and ask for advice.

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For Beyond Support when someone reports a recently occurred incident, speak with them about preservation of evidence.

The Police will always be responsible for the gathering and preservation of evidence to pursue criminal allegations against people causing harm. However, other organisations and individuals can play a vital role in the preservation of evidence to ensure that vital information or forensics is not lost.

5.3 Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only, i.e. Safeguarding Lead, Adult Social Care or other relevant agency and the police. It is extremely important that allegations or concerns are not discussed, as a breach of confidentiality could be damaging to the adult at risk, their family and any protection investigations that may follow.

Through informing the parent or carers of the adult at risk of harm, you may have concerns about needs to be dealt with in a sensitive way. This should be done in consultation with Adult Social Care.

Any individual under supervision has the right to be notified about the cause for concern. This should be done in joint consultation with Adult Services and the Police. It is important that the timing of this does not prejudice the investigation.

Recorded information should be stored in a secure place with limited access in line with GDPR laws (e.g. the information stored is accurate, regularly updated, relevant and secure). For Door of Hope, all forms are to be stored under 'Safeguarding DoH' and for Beyond Support all forms are to be stored under 'Safeguarding BS.' These folders are set with access limited only to those with permission to read or edit them.

Refer to the Data Protection Policy (appendix 12)

If enquiries arise from the public (including parents) or any branch of the media, it is vital that all staff and volunteers are briefed so that they do not make any comments regarding the situation. Staff and volunteers should be informed who the relevant, designated spokesperson will be (Mark Wakeling – Co-Director), and all enquiries directed through them. Staff and volunteers should reply 'no comment' to all questions/enquiries

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APPENDIX 1: FOUR R's Summary

RECOGNISE

- Be informed about signs of abuse and current SG policy
- Be aware of external factors (body language, physical signs of abuse)
- *Are children involved?*

RESPOND

- Listen well
- Never promise confidentiality
- Give reassurance
- *Don't ask leading or closed questions*

REFER

- Immediately refer to line manager/ safeguarding deputy, who in turn may refer to Social Services or advisory organisation.
- Report to Police if immediate danger is reported/ suspected

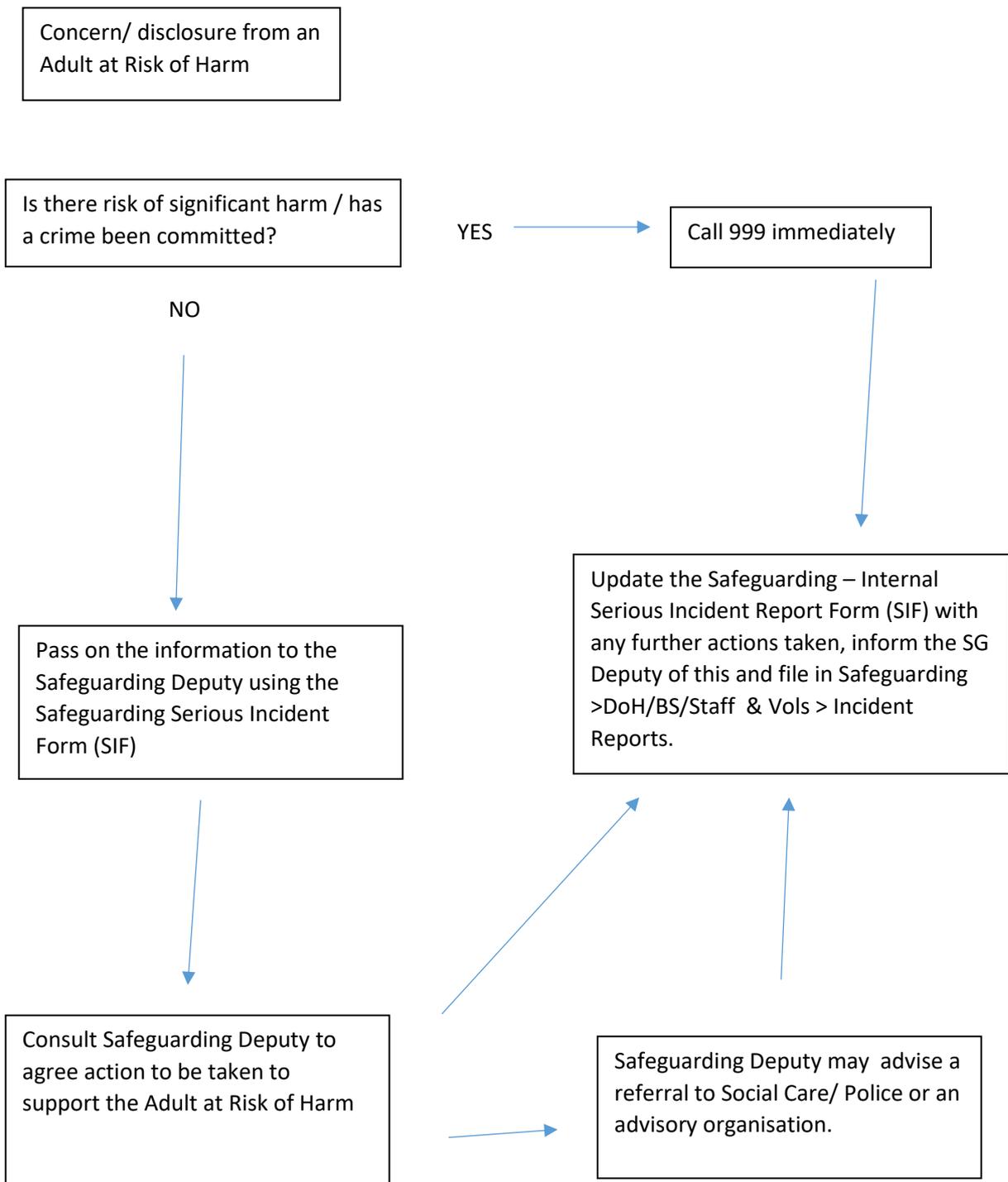
RECORD

- As soon as possible, make a note of exactly what happened.
- Include:
 - Date
 - Times
 - Others involved
 - Direct quotes where possible
- Ensure information is stored securely

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APPENDIX 2 Referring a concern/ disclosure of abuse:



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APPENDIX 3

Serious Incident Form

This form is to be used by the staff team to notify managers that a serious incident has occurred and to ensure that the appropriate action is taken

1. This is to inform you of the following serious incident. (Please tick box as appropriate)

• An occurrence where a service user or a member of staff has been put at risk for example threatening behaviour, or is a risk to others	
• The emergency services are called to the premises or by staff	
• Any incident or allegation of abuse, rape, domestic abuse, sexual exploitation	
• Threats/ thoughts of suicide, self-harm or a possible overdose	
• Any incident or suspected incidence of neglect to young person or child	
• Other please state:	

2. Name of people present when you were made aware of the incident.

Name	O18 (Y/N)	Worker/Service User/Other

3. Nature of Incident

Date:

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<p>In event of an allegation or incident of abuse, have Social Services (Safe-Guarding) / Police been informed or a referral been made? (Please attach a copy of the referral if applicable)</p> <p>If NO brief outline of reason for decision</p> <p>Was a Third Party Report made (Police/Specialist Midwife/NUM)?</p> <p>Was consent gained?</p>
<p>Outstanding Actions (Detail any outstanding actions, when they will be completed and by whom)</p>

Your Name and Job Title:	Signature:
BS/DOH:	Date completed:

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Email the completed form to Safe-guarding co-ordinator on date of completion:	Date completed:
Save a copy in the relevant team incident folder	Date completed:
Update case notes to reflect incident and completion of SIF	Date completed

Notes

Making Decisions on Reporting.

- All BTS staff and volunteers are expected to consult and follow the guidance of the BTS Safeguarding Policy
- We know that the majority of the women we work with are in high risk situations. Experience shows us that we don't always get the outcomes we are looking for by reporting. However, we have a responsibility to report incidences and escalate concerns.
- Make decisions with others on your team. Talking around the context together will help and the ultimate decision on reporting is the responsibility of the Safeguarding Co-ordinator (Natasha Manuel). In her absence, please contact Josephine Wakeling in the first instance and Simon Hester in the second instance.

Distinguish whether this is a concern or disclosure of an incident

- 1) CONCERN – after a disclosure or if you have witnessed harmful behaviour that is not clearly actionable as a crime report/incident
e.g. involving harassment or threatening behaviour towards a client or member or staff/volunteer

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Or

Where a woman discloses self-harm or suicidal ideation. Having ascertained the level of severity and imminent danger (see policy)

Log your concern in, Case notes, Reporting Forms. Please file all incident reporting forms in either: Safeguarding BS, DoH or Staff & Vols

- Speak where possible to a member/s of your team about it
- Email the Safeguarding Lead to alert them, discuss further to inform a reporting decision where necessary and to receive support if needed
- Take to next casework meeting for discussion

A **concern** is probably more likely to be ongoing, where we are alerted. We will need to keep monitoring the situation and this will need recording. If there is then evidence that a situation is escalating and that someone is in increasing danger, the decision will need to be made when to report on a situation by situation basis.

2) DISCLOSURE OF AN INCIDENT where an alleged crime has been committed e.g. rape, one off assault, physical or sexual abuse, theft, kidnapping, coercive control, domestic abuse. The decision will be between the following options:

- a) The woman reports to the Police herself with us offering support;
- b) If she doesn't want to, we speak with the woman and gain her consent to make a Third-Party Report (TPR) explaining that this will keep her identity confidential so that no charge can be made but that it will be on file under the name of the perpetrator;

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- c) If she does not give her consent to a TPR, we explain that we need to do it on her behalf to help towards the Police building up a picture of a perpetrator and to help protect others.

We will need to be explicit with her about the level of detail we need to give.

This needs to be balanced against the risk of a woman disengaging and facing greater risk.

- d) Consider context and don't make the decision by yourself.

At **Door of Hope** this may take the form of information sharing that already happens as part of our working relationship with THPP. Please check when sharing info that a formal report is being made as a follow up to that conversation.

For **Door of Hope and Beyond Support** –

- In all reporting, explain that you will be writing down what is said to make sure it is an accurate record, that it will only be shown with the relevant people and that it will be kept locked away. At the end, either show the record to a woman to read or read it to her. Gain a signature or verbal consent to share with specified relevant people (Police/Social Care/Medical/NUM/another 3rd party).

For all **Beyond the Streets staff and volunteers**

If the event of an incident or concern involving staff members or volunteers, either internal (2 or more members of the team, e.g. bullying or harassment) or external (between a member of the team and another person they have contact with) please follow the same procedures as above, including reporting to either Natasha Manuel, Josephine Knowles or, in the last instance to Simon Hester, the trustee responsible for overseeing safeguarding at BTS)

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NUM

We can offer a woman access to making an Ugly Mugs report and support her through the process if she decides to do this. It is important to make sure she is aware that other women who know her could be signed up to the NUM alerts so that her circumstances could be recognisable.

TH Monitoring For Door of Hope Only:

Sexual Orientation	
Disability	
Religion	
Gender reassignment	
Relationship Status	
Pregnant Y/N Any relevant details:	
Maternity (Given birth in last 26 wks)	

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APPENDIX 4. DECLARATION

Beyond the Streets is fully committed to safeguarding the well-being of adults by protecting them from neglect, physical, sexual and emotional harm.

Working as an employee or volunteer of Beyond the Streets it is important that you have taken time to thoroughly read the Safeguarding Adult Protection Policy and procedures.

By being made aware of the policy it is our intention to ensure that all are proactive in providing a safe and secure environment for adults and other people who use our service.

.....

Declaration:

I have read and understand the Safeguarding Adult Policy and Procedures and I accept the principles therein.

Signed: _____

Date: ___/___/20__

Name: _____

(Please print)

Position: _____

This will be kept in your personnel file.

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APPENDIX 5: Forms of Abuse – further information and links

In the process of raising awareness relating to safeguarding children and adults, we are conscious of growing information regarding Domestic Violence, Human Trafficking, Forced Marriage, Honour-based Violence (HBV) and Female Genital Mutilation (FGM). These are all forms of Gender-based violence (GBV), as they disproportionately affect women globally. Gender-based Violence is defined by the UN (1992) as:

Gender-based Violence, which is violence that is directed against a woman because she is a woman or that affects women disproportionately. It includes acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion and other deprivations of liberty, whether occurring in public or in private life.

Domestic Violence or Intimate Partner Violence

Domestic violence (also referred to as domestic abuse, intimate partner violence, wife battering or beating, among other terms) is intentional violent or controlling behaviour by a person who is currently, or was previously, in an intimate relationship with a victim/survivor.

It is important to recognise that domestic violence is a widespread problem that cannot be ignored. It is unacceptable and we will promote the understanding that everyone has the right to live free from violence and abuse in any form and the responsibility for the violence lies with the perpetrator. Safety of the individual is the highest priority in any decisions being made regarding domestic violence incidents and ongoing abuse.

Definition – (Home Office, 2013)

For the purpose of this policy domestic violence is defined as any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse:

- Psychological (including spiritual abuse)
- physical
- sexual
- financial
- emotional

Domestic violence occurs regardless of race, creed, religion, culture, socio-economic group, or level of education and can be found in some same sex relationships and men may also be victims of domestic violence. It should be noted, however, that all research, past and current, points to the preponderance of female victims and male perpetrators.

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It is estimated that 1 in 4 women are affected by domestic violence at some point in their lifetime, (Council of Europe, 2002) although those most at risk are girls and women in the 16-25 age bracket.

Research indicates that many women involved in prostitution have experienced some form of violence, either from their intimate partner, a client, or a “pimp”. As practitioners we need to understand the implications of this and ensure that our working practices are up to date and that our professional relationships with women are based on trust and respect.

Coercive Control (Controlling behaviour) is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Methods of coercion and control include humiliation, intimidation, fear and intentional physical, emotional or sexual injury. Domestic violence exists along a continuum from a single incident to on-going pattern of coercive control, also referred to as ‘intimate terrorism’.

In December 2015 under the Serious Crime Act, the government announced a new domestic violence law criminalising patterns of coercive, controlling and psychological abuse. The announcement is designed to clarify and strengthen the law on abuse, to drive a culture change ensuring that no form of abuse can be perpetrated without criminal sanction.

The new offence closes a gap in the law around patterns of controlling or coercive behaviour in an ongoing relationship between intimate partners or family members. The offence carries a maximum sentence of 5 years’ imprisonment, a fine or both.

This offence is constituted by behaviour on the part of the perpetrator which takes place “repeatedly or continuously”. The victim and alleged perpetrator must be “personally connected” at the time the behaviour takes place. The behaviour must have had a “serious effect” on the victim, meaning that it has caused the victim to fear violence will be used against them on “at least two occasions”, or it has had a “substantial adverse effect on the victims’ day to day activities”. The alleged perpetrator must have known that their behaviour would have a serious effect on the victim, or the behaviour must have been such that he or she “ought to have known” it would have that effect.

Should an adult or child, disclose information regarding domestic abuse the Team Leader must be informed.

Forced marriage

Arranged marriages have worked well in parts of Society for many years, where families of potential spouses take a leading role in arranging the marriage, but the choice to accept the arrangement, or not, remains with the prospective spouses.

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Forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
- Breaching a Forced Marriage Protection Order is also a criminal offence.

Forcing someone to marry can result in a sentence of up to 7 years in prison.

The Government's Forced Marriage Unit deals with 5,000 enquiries and 300 cases of forced marriage each year (30% of these concern under-18s and 15% are men). The UK Government and the Welsh Assembly Government regard forced marriage as an abuse of human rights and a form of domestic abuse and, where it affects children and young people, child abuse. It can happen to both men and women, although most cases involve young women and girls aged between 13 and 30 years. There is no 'typical' victim of forced marriage.

If a potential victim of forced marriage seeks help:

- They should be seen immediately in a secure and private place.
- Insist on seeing them on their own, even if they attend with others.
- Contact the Forced Marriage Unit as soon as possible and give the potential victim the Unit's details.
- If there is any suspicion that a child may have been harmed or be at risk of harm, refer the matter to the Children's Social Care Department of your Local Authority.
- If there is a suspicion that a crime has been, or may be, committed against a child, or if the potential victim has children under 18 years old, refer the matter to the local Police Child Protection Unit.
- Handle all confidential information in a sensitive manner and store/retain it securely as required.
- Where the potential victim is due to travel imminently, they should be given the details of the British Embassy or High Commission in the country to which they are travelling. As much

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information as possible should be obtained from them e.g. their passport details, dates of travel and destination.

- If an adult seeks help, they should be encouraged to contact the Police who, with other agencies, can minimize the significant risk of harm to them, working with the potential victim in a sensitive manner.

If a potential victim of forced marriage seeks help, do not:

- Treat their allegations merely as a domestic issue, or an acceptable cultural issue, letting them return to the family home.
- Dismiss out-of-hand their need for immediate protection.
- Approach their family, friends, or people with influence within their community, without their express consent as this will alert them to enquiries being made and could increase the risk to the potential victim.
- Contact their family, either by telephone or letter, in advance of any enquiries.
- Try to be a mediator.

Mediation, reconciliation and family counselling in response to forced marriage, can be extremely dangerous. There have been cases of victims being murdered while mediation was being undertaken. Do not attempt any of these activities, since they may place the potential victim in further danger.

<https://www.gov.uk/guidance/forced-marriage>

Honour-based violence (HBV)

Definition: Murder in the name of so-called 'honour' are murders where (predominantly) women are killed for actual, or perceived, immoral behaviour, which is deemed to have breached the honour-code of a family, or community, causing shame. They are sometimes called 'honour killings'. There is, however, no honour in murder.

The honour-code refers to the rules set by male relatives, for women, according to their view of what is 'acceptable behaviour'. Breaking the rules is seen as destroying the good name of the family and is deserving of punishment (carried out at the discretion of male relatives). Honour is an unwritten code of conduct where loyalty is considered to be of paramount importance and the family name is upheld within the community, with no loss of 'face or status'.

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Honour-based Violence is found in many cultures and communities¹ -where cultures are particularly male dominated, HBV may exist.

Home Office figures suggest there are around 12 'honour' killings each year, but the total is likely to be far higher. Evidence shows that where murders occur, wives are usually murdered by their husbands, and daughters by their fathers. HBV is often a child protection issue. Males can also be victims of HBV, sometimes as a consequence of their involvement in what is deemed to be an 'inappropriate relationship' or if they are believed to be in support of the victim.

Relatives, including females, may conspire, aid, abet or participate in the killing. Younger relatives may be selected to undertake the killing, to avoid senior family members being arrested. Sometimes contract killers are employed. The perception, or rumour, of immoral behaviour may be enough to incite HBV.

Evidence shows that these types of murders are often planned. They are sometimes made to look like a suicide, or an accident. A decision to kill may be preceded by a family council. There tends to be a degree of premeditation, family conspiracy and a belief that the victim deserves to die.

When dealing with potential victims it is important to recognise the seriousness/immediacy of the risk.

Incidents that may precede a murder include:

- forced marriage
- domestic violence
- an attempt to separate or divorce
- starting a new relationship
- pregnancy
- threats to kill, or denied access to, children
- pressure to go abroad
- house arrest and excessive restrictions
- denied access to the telephone, internet, a passport or friends

Where a victim has fled, be aware that members of the family may make false allegations of crime against them in an attempt to enlist your support to track them down. This may be in the guise of missing person reports or an alleged theft. They may also employ bounty hunters/contract killers to trace and return the victim. There is specific refuge provision available for victims of HBV and the Forced Marriage Unit are available to advise and help.

Female Genital Mutilation (FGM)

¹ For example, Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European communities, among others.

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Female Genital Mutilation comprises all procedures involving the partial or total removal of the external female genitalia, or any other injury to the female genital organs for non-medical reasons.

FGM is sometimes known as 'female genital cutting' or female circumcision. Communities tend to use local names for referring to this practice, including 'sunna'.

FGM is considered a grave violation of the rights of girls and women.

The age at which girls undergo FGM varies enormously according to the ethnic group they belong to. The procedure may be carried out when the girl is new born or during childhood, adolescence or at marriage, or during the first labour/childbirth.

The World Health Organisation estimates that 3 million girls undergo some form of the procedure every year. It is practiced in 28 countries in Africa and some in the Middle East and Asia. FGM is also found in the UK amongst members of migrant communities. **It is estimated that up to 24,000 girls in the UK, under the age of 15 are at risk of FGM.** UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. Non-African communities that practise FGM include Yemeni, Kurdish, Indonesian and Pakistani.

Signs that a girl may be at risk of FGM:

Suspicious that a child is being prepared for FGM abroad may arise in a number of ways. These include knowing that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school. The child may also talk about a 'special procedure/ceremony' that is going to take place.

Indicators that FGM may have already occurred include prolonged absence from school, with noticeable change in behaviour on return, and long periods away from classes or other normal activities, possibly with bladder or menstrual problems. Some teachers have said that children affected by FGM can find it difficult to sit still, look uncomfortable or may complain of pain between their legs. Any concerns must be reported to the Team Leader. We recommend contacting FORWARD who provide support, counselling, and a safe space for girls and women to talk about their experiences. They also work with families to educate and prevent FGM happening to other girls in the family. There are also specialist health services available to women who have undergone FGM.

Depending on the degree of mutilation, FGM can have a number of short-term health implications including severe pain and shock, infection, urine retention and injury to adjacent tissues. Sometimes immediate fatal haemorrhaging can occur.

Long-term implications include extensive damage to the external reproductive system and uterus, vaginal and pelvic infections, cysts and neuromas, increased risk of complications in pregnancy and childbirth, psychological damage, sexual dysfunction and difficulties in menstruation.

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The Female Genital Mutilation Act was introduced in 2003 and came into effect in March 2004 and has a penalty of up to 14 years in prison and/or a fine. It is illegal to:

- practice FGM in the UK
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in the country of destination
- aid, abet, counsel or procure the carrying out of FGM abroad.

Sexual Exploitation

The official definition of Sexual Exploitation developed by the National Working Group for Sexually Exploited Children and Young People (NWG). Whilst there is currently no official definition of the sexual exploitation of adults, this definition of sexual exploitation of children and young people under 18 is applicable as there are key aspects of sexual exploitation that are common whether the exploitation is of children or of adults at risk of abuse. A large proportion of the women supported by BTS were sexually exploited as children or experienced the trauma of sustained sexual abuse which can be understood as a contributing factor to the exploitation they experience as adults.

“Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.”

A really helpful resource is the government publication ‘Safeguarding Children and Young People from Sexual Exploitation’, Supplementary guidance to Working Together to Safeguard Children 2015².

“The nature of sexual exploitation

3.3 Any child or young person may be at risk of sexual exploitation, regardless of their family background or other circumstances. This includes boys and young men as well as girls and young women. However, some groups are particularly vulnerable. These include children and young people who have a history of running away or of going missing from home, those with special needs, those in and leaving residential and foster care, migrant children,

² <https://www.gov.uk/government/publications/safeguarding-children-and-young-people-from-sexual-exploitation-supplementary-guidance>

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unaccompanied asylum seeking children, children who have disengaged from education and children who are abusing drugs and alcohol, and those involved in gangs.

3.4 Sexual exploitation can take many forms from the seemingly 'consensual' relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. What marks out exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops. This chapter sets out some of the more common indicators found in cases of sexual exploitation.

3.5 Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from their peers to have sex, sexual bullying (including cyber bullying), and grooming for sexual activity. Technology can also play a part in sexual abuse, for example, through its use to record abuse and share it with other like-minded individuals or as a medium to access children and young people in order to groom them. A common factor in all cases is the lack of free economic or moral choice.

3.6 Many children and young people are groomed into sexually exploitative relationships, but other forms of entry exist. Some young people are engaged in informal economies that incorporate the exchange of sex for rewards such as drugs, alcohol, money or gifts. Others exchange sex for accommodation or money as a result of homelessness and experiences of poverty."

Some young people have been bullied and threatened into sexual activities by peers or gangs which is then used against them as a form of extortion and to keep them compliant.

'Safeguarding Children and Young People from Sexual Exploitation', Supplementary guidance to Working Together to Safeguard Children.

Human Trafficking and Modern Slavery

The Council of Europe Convention on Action against Trafficking in Human Beings defines human trafficking as: 'the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.' Human trafficking is essentially the recruitment, movement or receipt of a person by deception or coercion into a situation of exploitation, this may include:

- prostitution (or other forms of sexual exploitation)
- forced labour
- slavery
- servitude, or

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- the removal of organs³.

The recruitment phase can involve deception, coercion, violence or being sold by a third party. It can also involve the child/adult going willingly with an adult because they believe that they are going to a better life. If the child is moved from one place to another, and used for the benefit of another person, then they are likely to be classed as a victim of trafficking. The movement of a child/adult can occur across international borders or within one country; the latter is often described as 'internal trafficking'. This means that children/adults who are moved around the UK for the purposes of exploitation can be considered a victim of trafficking. It is not considered possible for a child to consent to its own exploitation, so any child transported for exploitative reasons is considered to be a victim of trafficking.

In the UK children and adults are trafficked for sexual exploitation, domestic servitude, forced labour (including restaurant and catering work), manual labour, drug trafficking, begging, petty theft, benefit fraud, cannabis cultivation and selling counterfeit goods such as DVD's. There is also evidence that children are brought to the UK for forced marriage and illegal adoption.

The majority of children/adults trafficked to the UK are already vulnerable because of poverty, lack of education, few job opportunities, or the loss of family support. This makes them a target for traffickers who recruit them by offering opportunities of employment and education, which gives parents and children alike, false hope of a better future.

Identifying children who have been trafficked is difficult, but there are some indicators to be aware of. Most children who are trafficked and used as full-time workers are out of the education system. Those trafficked for benefit fraud have poor attendance at school and tend not to socialise with other children for fear of being asked questions. The majority of trafficked children have suffered from many, if not all, forms of abuse and where abuse indicators are combined with poor English and/or being looked after by 'aunty', trafficking may be the issue. We must act on all indicators of abuse, whether we suspect trafficking, or not.

Identifying adults who have been trafficked can also be difficult. It can be useful to check through these questions as possible key indicators of trafficking:

- Is the person in possession of their own passport, identification or travel documents?
- Are these documents in possession of someone else?
- Does the person act as if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
- Was the person recruited for one purpose and forced to engage in some other job? Have transport costs been paid for by facilitators, whom they must pay back through working or providing services?

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/275239/Human_trafficking.pdf [accessed online on 28.1.2015]

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- Does the person receive little or no payment for their work? Is someone else in control of their earnings?
- Does the victim have freedom of movement? Are they dropped off and collected from work?
- Is the person withdrawn or do they appear frightened?
- Has the person or their family been threatened with harm if they attempt to escape?
- Is the person under the impression they are bonded by debt, or in a situation of dependence?
- Has the person been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities?
- Can the person freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment? ⁴

Spiritual Abuse

Across the four UK nations, there are varying government definitions of the major recognised forms of abuse. However, currently there is no single agreed definition.

In 2013 spiritual abuse was defined as:- . . . *coercion and control of one individual by another in a spiritual context. The target experiences spiritual abuse as a deeply emotional personal attack. This abuse may include:-manipulation and exploitation, enforced accountability, censorship of decision making, requirements for secrecy and silence, pressure to conform, misuse of scripture or the pulpit to control behaviour, requirement of obedience to the abuser, the suggestion that the abuser has a 'divine' position, isolation from others, especially those external to the abusive context. (Oakley, 2013 in Oakley & Kinmond, 2013 p21) courtesy of CCPAS leaflet 'Help. . . I want to understand Spiritual Abuse'*
[http://files.ccpas.co.uk/documents/Help-SpiritualAbuse \(2015\).pdf](http://files.ccpas.co.uk/documents/Help-SpiritualAbuse (2015).pdf)

These definitions show that spiritual abuse, like any abuse, is about the misuse of power. Spiritual abuse may be thought to be associated with cults. However, it has been argued that spiritually abusive practices are present in some mainstream religious churches and groups.

The fact that people fail to acknowledge its existence makes it problematic for individuals who have experienced spiritual abuse first-hand, because they are unable to share their experiences with any degree of acceptance or understanding. For this reason, it can be extremely difficult to identify abusive practices.

⁴https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/181550/Human_Trafficking_practical_guidance.pdf

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The main understanding of spiritual abuse has come from adults who felt they had to be obedient to the church/ a leader in all areas of their life, without question, and who thought they would be ostracised if they questioned the practices of their church. For children and young people, extreme spiritual abuse, such as ritual abuse, has been reported. However, abuse can occur in children/young people when beliefs and practices are imposed upon them more strongly than they should – this can undermine their freedom to think and choose for themselves.

If it is felt that a particular worker is being slightly coercive, rather than lightly encouraging, procedures outlined earlier for responsibilities to fellow workers should be followed, or, if needed, the whistle-blowing policy. (See Staff Handbook or Volunteer Handbook and BTS Faith and Ethos Statement for details.)

Within some of our projects, it may be appropriate for staff/ volunteers to share personal faith stories, or offer prayer to women, with consent, and in a non-coercive manner. In other projects this behaviour would be deemed completely inappropriate and counter-productive to the support offered. Ensure you are confident of the expectations of your role in this area. Please enquire with your line manager if you are unsure.

Appendix 6 – Mental Capacity Act

https://www.legislation.gov.uk/ukpga/2005/9/pdfs/ukpga_20050009_en.pdf

Appendix 7: Care Act 2014

https://www.legislation.gov.uk/ukpga/2014/23/pdfs/ukpga_20140023_en.pdf

Appendix 8 - Lone Working Policy

The purpose of this policy is to set out specific requirements that apply to the health and safety of an employee who is working alone. We value the health and safety of all our staff and volunteers. However, there is a need to acknowledge the potential risks of service users being inappropriate with their anger or becoming aggressive toward other service users or staff. Due to the potentially chaotic nature of our service user group, there needs to be clear lone working practices adhered to, to minimise the risks to staff and volunteers. Beyond the Streets asks that you discuss anxieties about service users with your line manager or senior staff member in her absence at the earliest opportunity and consider suspending meetings/visits with them until you have been able to talk through your concerns.

Duties of the employer

1

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In accordance with the Health and Safety at Work Act 1974, the employer has a duty of care to the employee. When an employee is working alone the employer will:

- Carry out a risk assessment of the work before the employee starts work. If any risks are identified consideration will be given to adjustments that can be made to reduce or eliminate any risks. The employee should take part in carrying out the risk assessment and should be made aware of the contents of the risk assessment and of any specific action that needs to be taken because of the assessment.
- Ensure that risk assessments are reviewed regularly, and at least once per year.
- Arrange back-up or change the work if the risk assessment indicates that it is not safe for an employee to be working alone.
- Ensure that the employee is provided with safe and adequate equipment. The employer will ensure that the employee is fully trained in the use of all relevant equipment.
- Ensure that the employee is provided with any personal protective equipment that is required.
- Ensure that the premises are safe (and ensure that the employee is made aware of any potential hazards, as identified in the risk assessment).
- Ensure that the employee is aware of the procedures and processes to follow in carrying out the work.
- Ensure that the employee is aware of any legal restrictions relating to the work being undertaken (e.g. laws relating to the control of hazardous materials)

Duties of the employee

In accordance with the Health and Safety at Work Act 1974, the employee has a duty of care to take care of his or her own health and safety.

- When lone working at any time, the staff member needs to be aware of any potential risks or challenges regarding service user's behaviour.
- All staff who are lone working, whether it be meeting with a service user or taking a service user to an appointment, will need to have their mobile phones on them (charged and switched on), have a time frame on when they are leaving their appointment and update the team via the WhatsApp group if there is potential for being late, or something has changed with the service user.
- Upon arrival at destination, staff should check whether their phone can receive signal, and if not, move to an alternative location where possible.
- If you feel unsafe whilst lone working and you can make a phone call, then call the police.
- If you can make a phone call but are being overheard and it would not be safe to explicitly call the police, call a colleague and use the pre-determined code for requesting help: 'I'M NOT FEELING WELL'.

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- Colleague on the phone can ask yes or no questions ie. Do you need me to call the police? Are you at the location stated in your outlook calendar?

- If the answer is yes, call the police on 999, and give the name, contact details and last known whereabouts – i.e. address where the home visit was planned to take place; description of the member of staff including clothing worn that day and of any vehicle they are using that day.

- No visits should be agreed for staff to attend the client's home address alone. Home visits should only be conducted in pairs and where it is an assessed and low risk. If this is problematic arrange the visit to occur in a public place. All visits should be in communication with others on the team.
- Staff must communicate their whereabouts to the staff team by updating their outlook calendar with the full address of the appointment, who she is meeting and start/finish times. Before leaving for her appointment, the staff member should establish that her colleague(s) are available to keep track of her movements via the WhatsApp group in her absence (ie. not be in appointments themselves). The staff member should check in via the WhatsApp group to confirm that they have arrived at the designated location. WhatsApp messages should be acknowledged by a member of the team. If message is not acknowledged, staff member should assume that her message has not been read and should call the duty number instead.
- If the staff member changes location whilst with the service user, she should update the WhatsApp group with the full address of her new location and updated finish time.
- Similarly, if the appointment will overrun, staff should update the WhatsApp group with a new finish time.
- The staff member should check out at the end of the appointment, again via the WhatsApp group. If the time passes and the staff member who has gone out with a service user has not checked out via the WhatsApp group:
 - Call her on her work mobile phone to see if she has been delayed.
 - If you do not get an answer, immediately call her on her personal mobile phone.
 - If you do not get an answer, immediately try the service user's mobile phone (if they have one) and if she does not answer, wait and try the numbers again at 5-minute intervals for the next 20 minutes.
 - Your line manager should be informed that you are unable to establish contact after 20 minutes.
 - You could also contact the location of the appointment if appropriate (eg GP surgery/McDonalds).
 - If, after 30 minutes, still no contact has been established, contact the police. Inform your line manager of this.
- Make sure that the office has the registration and a description of your car if you are using one for outreach or follow up visits.

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- When calling the police in such circumstances give the name, contact details and last known whereabouts – i.e. address where the home visit was planned to take place; description of the member of staff including clothing worn that day and of any vehicle they are using that day.
- If the staff member then makes contact inform the police immediately if they had already been contacted re the missing member of staff.
- Be aware that any threat to yourself may not come from the service user but may come from a third party. If in any doubt make your excuses and leave the environment, then report to your Line Manager.
- Always keep yourself safe, in the case of service users and third parties getting into conflict. Take all other service users and children out of the area. If necessary, call the police.
- Never place yourself in between a service user fighting always assess the risks to you and other service users. If in doubt call the police.
- Volunteers should never be left alone with a service user without at least one other team member being present.

General Safety:

- Staff members attending meetings, training sessions etc. away from the office especially in areas of the city deemed to be risky or any member of staff working out of the office needs to be mindful of their personal safety at all times.
- Ensure that the mobile you use for work is on, fully charged and topped up with credit (if necessary).
- Try to park near the venue and ensure safety of car in usual way when leaving it – locked and nothing in sight.
- Staff and volunteers are not to have senses impaired by alcohol or be under the influence of alertness impairing medication.
- Only take what you need on external visits. Keep valuables on you to a minimum and keep them close to you at all times.
- A procedure should be agreed about contacting a Line Manager in the event of Accidents or Emergencies.
- No young person (defined as aged under 18 years) may work alone.

Travelling with service users in cars can pose some risks, if your Trustees/team has agreed this then please observe the following guidelines:

- Talk with your team before you do this and agree together the purpose and scope of the lift (i.e. is it a one off/late at night/is it a regular request/how far will you travel?)
- Always ensure child safety seats are used where needed.

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- Check insurance is valid for purpose of journey, often it is not unless pre arranged.
- Check MOT / service record/ fuel.
- Avoid driving if you have had sleep deprivation or are tired or consumed alcohol for at least 12 hours prior to journey.
- Ensure a safe ratio of staff to service users.
- Carry a personal alarm and ensure that the mobile you use for work is on, fully charged and topped up with credit.

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Appendix 9– Staff Code of Conduct

Beyond the Streets Code of Conduct Policy

At the heart of prostitution lies ‘an abuse of power and/or vulnerability’ (Huda, S 2005). For this reason, we aim to engage with women in a way that does not mirror their previous traumatic experiences. The following code of conduct is set out in order to provide a framework for staff and volunteers working with Beyond the Streets, taken from the organisation’s value statement.

1. Working together
2. Non-discriminatory practice
3. Valuing
4. Learning
5. Empowering
6. Confidentiality

1. Working together:

- To work with other agencies and organisations, where appropriate, in order to provide the best holistic response to the complexity of exiting prostitution.
- To respect all institutions with whom partnerships are entered into whilst maintaining responsibility for improving internal working practices.
- To work as part of a team and seek to give and receive support from colleagues and other agencies.

2. Non-discriminatory practice:

- To actively promote social justice for all and oppose all discriminatory practice.
- To ensure that every service user is treated with respect, value and dignity, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, gender, sexual orientation, background or criminal history.

3. Valuing: (see also the Faith statement)

- To provide the highest quality of care for service users of the project.
- To value the women we support as people and act in their best interest.
- To value the views, opinions and choices of service users and for staff and volunteers to work in a way that does not impose personal or faith-based agendas, but instead support a ‘woman focused’ approach.

4. Learning:

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- To consistently seek opportunities for professional development through formal and informal education and training.
- To commit to regularly reflect on personal boundaries and practice, to actively seek supervision, accountability and support.

5. Empowering:

- To be objective in the care, support and practice towards service users, to express unconditional positive regard and not be possessive.
- To seek to empower service users towards wholeness; mind, body and spirit are all important.
- To be non-judgemental, including avoiding the use of labelling (prostitute, addict, sex worker).

6. Confidentiality:

- To practice high standards in confidentiality, record keeping and storage (See Data Protection Policy), unless in specific instances e.g. in situations where a child is at risk (See Safeguarding – Child Protection Policy) or any other safeguarding concern.
- To keep confidentiality as a team, rather than as an individual

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Appendix 10 - Complaints Policy

Introduction

Beyond the Streets aims to deliver an excellent service by listening to and resolving complaints from service users quickly, fairly and effectively.

You should complain to Beyond the Streets if you feel you:

- Have received an inadequate service
- Have been treated unfairly
- Have been discriminated against
- Are unhappy with services provided jointly by Beyond the Streets and another service

Beyond the Streets will:

- Show clearly how a complaint can be made;
- Respond promptly and politely to all complaints;
- Respond to formal complaints by emailing or writing to you;
- Look into complaints thoroughly and do all we can to resolve the situation, and if applicable, prevent the situation recurring in the future;
- Explain, apologize or let you know what we have done where we need to;
- Take complaints seriously and use them to help us do things better;
- Record your complaint;
- Review our complaints policy regularly.

Complaints procedure

The complaints procedure is for the use of service users in relation to the direct support work of Beyond the Streets (Door of Hope and Beyond Support).

The procedure has 4 levels, shown below:

- Verbal Complaint
- Formal Complaint – Stage 1
- Formal Complaint – Stage 2
- Formal Complaint – Stage 3

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Summary:

Level	Service User Actions	Staff Actions
Informal Verbal Complaint	Service User voices a Complaint	<ul style="list-style-type: none"> • Listen • Apologise if appropriate, respond immediately and attempt to resolve the situation. • Make complaints policy available to service user and offer to provide a formal complaint form. • Record complaint in complaint log. • Inform Line Manager. • Discuss complaint within team to consider its basis and if future actions need to change. • Line Manager to add to agenda of next management meeting.
Formal Complaint – Stage 1	Service user fills in “Formal Complaint Form” and submits within 10 working days	<ul style="list-style-type: none"> • Inform Line Manager. • Line Manager to add to agenda of next management meeting. • Acknowledge complaint within 10 working days. • Record in complaints log. • Discuss as a team reason for complaint and reconsider if our actions or policies need to change as a result of the complaint. • Respond to complaint within 28 working days and include details of how to contest the response (stage 2) by writing to the Director • Consider change of frontline worker if appropriate while complaint proceedings are happening.
Formal Complaint – Stage 2 (Contesting the Response)	Service user writes to Director within 10 working days of receiving response to Stage 1.	<ul style="list-style-type: none"> • Director to acknowledge contestation within 10 working days of receiving it. • Director to respond to contestation within 28 working days of receiving it, including details of how to write to the Chair of Trustees (Stage 3) should their response be unsatisfactory. • Record contestation in complaints log.
Formal Complaint – Stage 3	Service user writes to the Chair of	<ul style="list-style-type: none"> • Chair of Trustees to acknowledge receipt of letter within 10 working days of receiving it,

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(Escalating the Response)	Trustees within 10 working days of receiving response to Stage 2.	<p>including details of any investigation that will be necessary and how long this is likely to take.</p> <ul style="list-style-type: none"> • If appropriate, Chair of Trustees to invite service user to a meeting to discuss the complaint within six weeks of receiving the letter. • Chair of Trustees to write formal response within 10 working days of concluding any investigation and any meeting with the service user.
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How to make a complaint

Verbal Complaint

If you want to make a complaint, the first step is to talk it over with a project employee as soon as possible. Many problems can be resolved informally this way. We will take your complaint seriously and discuss it as a team to try to improve our services in future.

Formal Complaint – Stage 1

If you are unsatisfied with the response you got from a verbal complaint, or you feel that the problem is too serious to be dealt with like this, you can make a formal written complaint using our Formal Complaint Form, which a member of staff can give you on request. You should submit the formal complaint within 28 working days of the incident you want to complain about, or within 28 working days of realising that you want to complain, if the problem is not confined to one incident. We will acknowledge that we received it in 10 working days, and formally respond in 28 working days.

*Beyond the Streets asks anyone making a complaint to recognise that some circumstances may be beyond the control of Beyond the Streets.

Formal Complaint – Stage 2

If you are unsatisfied with the response you got from making a formal complaint, you can write to our Director at: The Director, Beyond the Streets, PO Box 1676, Southampton, SO15 9DA, or you can give a

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letter to a member of staff to forward on to them. You must say in this letter why you are dissatisfied with the response to Stage 1. Again, you must do this within 28 days of receiving the response from Stage 1. The Director will acknowledge your letter within 10 working days and respond to it within 28 working days.

Formal Complaint – Stage 3

If you are still unsatisfied after the Director's response, you can write to our Chair of Trustees. Details of how to do this will be included in the Director's response in Stage 2. You must do this within 28 days of receiving the response from Stage 2. The Chair of Trustees will acknowledge your letter within 10 working days and they will explain to you if any investigation is impending and how long this is likely to take. They may also invite you to a meeting about your complaint within six weeks of receiving your letter, if they feel it is appropriate. You can bring a supporter with you to this meeting if you wish. The Chair of Trustees will write to you within 10 working days of concluding any investigation to let you know the outcome of Stage 3.

If you are still unhappy with the outcome after Stage 3, you may start legal proceedings.

Monitoring, Reporting and Confidentiality

Trustees of Beyond the Streets will receive regular and anonymous reports of any complaints made and action taken, and the Director(s) will be able to read relevant information at any stage.

Your complaint will only be heard by the people involved and anyone who needs to be consulted in order for the complaint to be resolved.

Staff guidelines for dealing with a complaint

Verbal Complaint

Most complaints can be resolved at the verbal stage. Verbal complaints should be dealt with immediately and recorded and fed back to Beyond the Streets.

Employees should respond to verbal complaints not by being defensive, but by listening and taking time to talk about the issue. If appropriate, changes to the individual situation and in some cases core procedure should be made after discussion with the team, and this should be communicated to the complainant.

Employees should also make the complainant aware of the complaints policy, and what to do if they wish to formalise the complaint.

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Complaints should be logged in the appropriate folder. The employee listening to the complaint should communicate the situation to their Line Manager at the earliest opportunity to ensure that an appropriate response has been made.

Formal Complaint – Stage 1

If a service user is unsatisfied with the response to an informal verbal complaint, they may proceed to making a formal complaint. Employees must not attempt to influence a service user's decision to do so but must make the complaints procedure readily available to the service user. The service user must submit a formal complaint form within 10 working days of the incident they want to complain about, or if it is an ongoing issue then within 10 working days of realising they want to make a complaint.

If the content of the complaint directly concerns an employee, the employee concerned should be kept informed of the complaint proceedings at all stages. If appropriate, and direct work with the service user is continuing, the team of the employee should consider whether a change in member of staff working with the service user would be appropriate during the complaint proceedings.

To make a formal complaint the service user should fill in the Formal Complaint Form, to detail the complaint that they have. If it is not going to be possible for the service user to receive the response via post, arrangements should be made at the point of submitting the Formal Complaint Form for how the response is to be delivered - for example, a care-of address, at a future meeting, or via email.

The service user can expect written acknowledgement of the complaint within 10 working days of making it, unless the acknowledgement cannot be posted and other arrangements cannot be made within this time. The service user can expect a written response to the complaint within 28 working days of making it. This response must be endorsed by the management team and the Director(s) of Beyond the Streets must be aware of the proceedings.

Formal Complaint – Stage 2

If the service user is dissatisfied with the response to their original formal complaint, they can write to the Director of Beyond the Streets within 28 days of receiving the response, detailing the reasons for their dissatisfaction.

The service user may then expect written acknowledgement of the contestation within 10 working days, unless the acknowledgement cannot be posted, and other arrangements cannot be made within this time. The service user can expect a written response from the Director to the contestation within 28 working days of making it. The Director must include in the response details of how to write to the Chair of Trustees (stage 3) should their response be unsatisfactory.

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If the content of the complaint is concerning the Director(s), the contestation may be dealt with by another member of the management team.

Formal Complaint – Stage 3

If the Director's response is unsatisfactory to the service user, they have the option to write to the Chair of Trustees of the charity. The service user must do this within 10 working days of receiving the Director's response. The service user must detail why they are unhappy with proceedings up to this point.

The Chair of Trustees will acknowledge the complaint within 10 working days. This acknowledgement will detail how much further investigation is necessary and how long this is likely to take. If appropriate, the service user may be invited to a meeting to discuss the complaint, within six weeks of a complaint to the Chair of Trustees being made. The service user will receive a written response to this complaint by the Chair of Trustees no longer than 10 working days after the conclusion of any necessary investigation or meeting between the service user and trustees.

If the complainant remains dissatisfied, they will be advised of their right to legal action against Beyond the Streets.

Principles of the Complaints Policy:

- If at any time during the investigation of a complaint matters arise that warrant investigation under disciplinary proceedings, or through a criminal investigation, the complaints procedure should be suspended until those investigations are concluded.
- The complaints procedure should be suspended also if a service user is actively seeking legal redress.
- Where a complaint is against a member of staff they should be made aware of the support services available to them.
- The Director(s) should be informed of the receipt of a Stage 1 formal complaint.
- A complete record of the entire process should be kept, and copied, along with transcripts of interviews and other relevant information.
- Beyond the Streets may, at any stage of the formal complaints procedure, review a complaint and give a decision, without a formal investigation, where the management deem the complaint to be deliberately repetitive or vexatious (e.g. unsubstantiated or repetitive complaints against an individual or where a complaint has previously been investigated and acted upon appropriately).
- When appealing against a previous decision, the service user will be asked to state why they are dissatisfied with how their complaint was handled.

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Formal Complaint Form

You should submit this form if you have made a verbal complaint to a member of staff at Beyond the Streets but feel dissatisfied with the response that you received.

You must submit this form within 28 days of the incident which has caused you to make a complaint. You can submit it by sending it to Beyond the Streets, PO Box 1676, Southampton, SO15 9DA, emailing it to office@beyondthestreets.org.uk, or giving it to a member of staff in person.

Your Details

Name		Date of Birth	
Address		Today's Date	
Phone Number			
If you do not have an address, how can we get a written response back to you?			

Details of the Complaint

Does your complaint involve a particular member of staff or volunteer?	Yes/No Name of staff member(s) of volunteer(s):
Does your complaint involve another client?	Yes/No Name of other client:

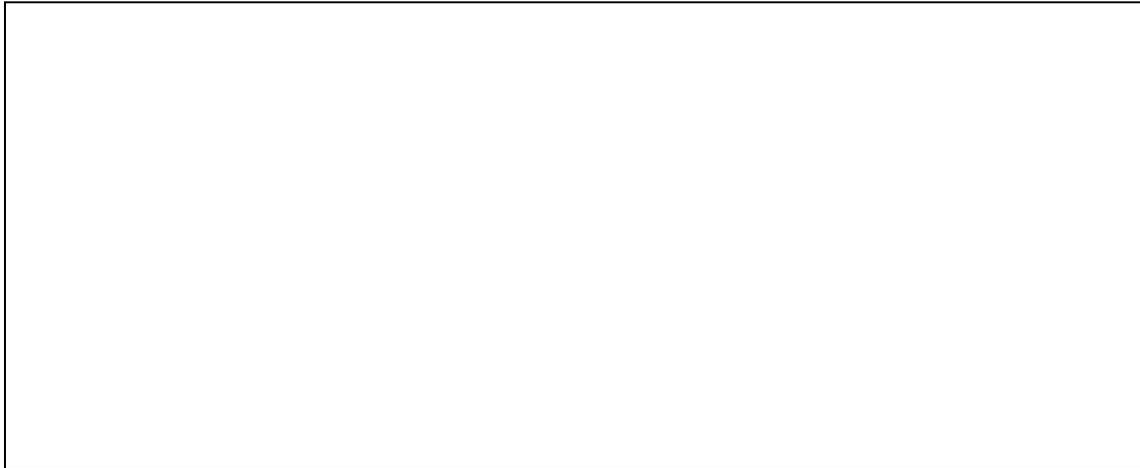
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Does your complaint involve any other organisations other than Beyond the Streets?	Yes/No Name of other organisation:
What date did the incident you are complaining about happen?	
Are there any witnesses to the incident you are complaining about? If so, write their names.	
Please describe your complaint. Please include details of the informal stage of your complaint, if applicable.	

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Please ask if you need any help filling in this form.

After making a formal complaint, you will receive acknowledgement that we have received it within 10 working days.

You will receive a written response to the complaint within 28 working days. This response will detail how to proceed further with the complaint if you are dissatisfied with the response.

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Appendix 11 – Confidential Reporting Policy

Definition

Confidential Reporting is when an individual knows, or suspects, that there is some wrongdoing occurring within the organisation and alerts the employer or the relevant authority accordingly.

The Public Interest Disclosure Act 1998 gives protection to individuals, casual workers, agency workers and contractors who make a qualifying disclosure when they reasonably believe it is in the public interest for them to do so.

This procedure is not intended to exclude, restrict or limit in any way any right you may have to make a protected disclosure under the Employment Rights Act 1996. In certain circumstances there is protection for ‘whistle-blowers’ where it is believed that a harmful or illegal activity is being undertaken. You are encouraged in the first instance to discuss any concerns or knowledge of such activities with your line manager or the chair of trustees.

Our policy

Beyond the Streets is committed to maintaining the highest standards of honesty, openness and accountability and recognises that you have an important role to play in achieving this goal.

Employees will usually be the first to know when someone inside or connected with an organisation is doing something illegal or improper, but often they feel apprehensive about voicing their concerns. This may be because they feel that speaking up would be disloyal to their colleagues or the organisation itself. It may also be because they do not think that their concerns will be taken seriously or because they are afraid that they will be bullied or dismissed. However, Beyond the Streets does not believe that it is in anyone’s interest for employees with knowledge of wrongdoing to remain silent.

Beyond the Streets takes all malpractice very seriously, whoever it is carried out by. This document sets out the procedure by which you can report your concerns to us.

What sort of activities should I report using this procedure?

It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice, however, broadly speaking, Beyond the Streets would expect you to report the following:

- criminal offences
- failure to comply with legal obligations
- actions which endanger the health or safety of staff, projects or the public
- other actions which would constitute gross misconduct (see examples in the Disciplinary Procedure)
- actions which are intended to conceal any of the above

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It will not always be clear that a particular action falls within one of these categories, and you will need to use your own judgement. However, if in doubt, Beyond the Streets would prefer you to report your concerns rather than keep them to yourself.

If you make a report in good faith then, even if it is not confirmed by an investigation, your concern will be valued and appreciated, and you will not be liable to disciplinary action. However, if it is established that you made a false report, maliciously or for personal gain, then you will face disciplinary action.

How do I make a report?

You can make a report orally (which will be recorded in writing) or in writing to the Director or the Chair of the Board of Trustees. Which individual is most appropriate will depend on the seriousness of the malpractice and who you think is involved in it. Please say if you wish to raise the matter in confidence.

Independent advice: If you are unsure whether to use this procedure or would like advice at any stage, you may contact the independent charity Public Concern at Work for free advice on 020 3117 2520.

Do I need proof of wrongdoing to make my report?

Beyond the Streets does not expect you to have absolute proof of any misconduct or malpractice that you report. However, you will need to be able to show the reasons for your concern.

Will Beyond the Streets protect my identity if I make a report?

Beyond the Streets will do everything possible to keep your identity confidential, if you wish. However, there may be circumstances (for example, if your report becomes the subject of a criminal investigation) where you may be needed as a witness.

Will my report be investigated?

Once you have made a report, the person that received it will acknowledge receipt within three working days, first verbally, then in writing.

There will be preliminary investigations made into the allegation to decide whether a full investigation is necessary. If such an investigation is deemed necessary then, depending on the nature of the misconduct, your concerns will be either be investigated internally (by management) or referred to the appropriate external person (i.e. police) for investigation.

What can I do if I am unhappy with the way Beyond the Streets has dealt with my report?

In the first instance we would prefer that you submit another report explaining why this is the case. Your concerns will be investigated again if there is cause to do so. However, it may be that you do not think that this is appropriate and wish to raise your concern with an external organisation. It is of course your prerogative to do so, provided you have sufficient evidence to support your concern. Beyond the Streets seriously advises that before you report your concerns externally you seek advice from Public Concern at Work. (<https://www.pcaw.org.uk/>)

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Appendix 11 – Disciplinary Policy

Introduction

The disciplinary procedure set out below is applicable to all staff. It is designed to ensure that all employees are dealt with fairly and consistently in disciplinary and other related matters affecting their work with Beyond the Streets. Every effort will be made to deal with the issue as quickly as possible.

Guiding principles

- No disciplinary action will be taken against an employee until the case has been fully investigated.
- At every stage in the procedure the employee will be advised of the nature of the complaint against him or her, and will be given the opportunity to state his/her case before any decision is made.
- At all stages the employee will have the right to be accompanied by a fellow worker during the disciplinary interview(s).
- No employee will be dismissed for a first breach of discipline, except in the case of gross misconduct when the penalty will be dismissal without notice or payment in lieu of notice.
- The employee will be given an explanation for any penalty imposed.
- The employee will have the right to appeal against any disciplinary penalty imposed.
- The procedure may be implemented at any stage if the employee's alleged misconduct warrants such action.
- All records relating to the proceedings will be kept confidential.

Misconduct/performance

Minor incidents of misconduct or irregularities in performance will be dealt with informally, but where the matter is more serious the following stages will normally be followed. Beyond the Streets reserves the right to initiate the procedure at any stage (including dismissal) or to jump stages, depending on the particular circumstances of the case.

There are 4 stages to the procedure.

Stage 1: Oral warning

If conduct or performance does not meet acceptable standards, the employee will normally be given a formal oral warning by their line manager. They will be advised of the reason for the warning, and of the consequences of repetition or failure to improve to acceptable standards. They will also advise that an appeal can be made. A note of the warning will be kept in the staff member's employment record, but

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subject to satisfactory conduct and performance can be removed after six months.

Stage 2: Written warning

If the offence is serious, or a further offence occurs, the line manager will issue a written warning. This will give details of the complaint, the change in behaviour or improvement in performance required, and a timescale for the required improvement. It will warn that further action under stage three will be taken if improvement is not satisfactory and inform the member of staff of their right to appeal. A copy of this letter will be placed in the employee's record for twelve months, and upon satisfactory improvement it can be removed.

Stage 3: Final written warning

If the required improvement is not made, and if the misconduct is not sufficiently serious to warrant only one written warning, a final written warning will be issued by the line manager. This will give details of the complaint, warn that dismissal will result from insufficient improvement, and advise of the right to appeal. A copy of this warning will be kept on the employee's file for two years' subject to satisfactory performance.

Stage 4: Dismissal

If conduct or performance is still unsatisfactory, and the employee fails to take sufficient action to rectify the problem, dismissal will normally result. Beyond the Streets may however consider other disciplinary action. Examples include (but are not limited to) demotion, transfer, suspension with or without pay.

Only the appropriate member of the Board of Trustees can take the decision to dismiss. The employee will be provided as soon as reasonably practicable with written confirmation of the dismissal, including reasons for dismissal, the date on which employment terminates, and the right to appeal.

Operation of the procedure

No disciplinary action will be taken against an employee until the matter has been investigated. This will include giving the employee an opportunity to explain their actions and put their case.

Each stage of the disciplinary process will be conducted in a meeting. The employee will receive notice at least 2 days in advance of these disciplinary meetings. This meeting notice will state the reason for the meeting.

At the meeting(s) the employee will be informed of the possible penalties which may be imposed. At each stage of the procedure the employee shall have an opportunity to explain the alleged misconduct or unsatisfactory performance.

The employee may be accompanied at the disciplinary meeting, if they wish, by a colleague of their choice or by a Trade Union Official.

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Appeals

An employee is entitled to appeal a disciplinary decision. Any employee who wishes to appeal against a disciplinary decision should inform the Chair of the Trustees in writing within 5 working days of the notification of the disciplinary decision. Beyond the Streets will confirm to the employee in writing the results of the appeal and outline the reasons for the decision reached.

Gross misconduct

Beyond the Streets will be entitled to dismiss an employee without notice (a summary dismissal) in the event of gross misconduct, or some other fundamental breach of Beyond's rules or of the contract of employment. Examples of conduct which may render an employee liable to summary dismissal include, but are not limited to:

- assault or attempted assault
- theft or attempted theft of either the employer's or other employees' property
- wilful damage to, or unauthorised removal from, the employer's premises of property belonging to the employer or to other employees
- falsification of records
- working under the influence of drink or drugs
- cases of insulting behaviour
- indecent or immoral behaviour
- wilfully endangering the lives of any persons on the employer's premises
- serious breaches to the health and safety policy
- refusal to carry out a reasonable instruction given by management
- introduction of unauthorised third-party computer software into the working environment
- communication to a third party of confidential information relating to the employer or any of its affiliates without authority to do so

The employee may be suspended while the alleged gross misconduct is being investigated. During this time, he or she will be paid their normal pay rate. Any decision to dismiss will be taken by the employer after full investigation. When this investigation has been completed the employee will be invited to attend a disciplinary meeting (at which s/he will be entitled to representation) to respond to the allegations.

In cases of misconduct (situations less serious than gross misconduct) it might also be appropriate to suspend the employee if this assists with the investigation.

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The procedure described above will apply to any case of suspected gross misconduct.

If this disciplinary procedure is required for volunteers, it may be necessary to only comply with stage 1, 2 and 4.

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Appendix 12 – Data Protection Policy

Policy Statement

Beyond the Streets collects and uses information about people with whom it communicates. This personal information must be dealt with properly and securely however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material – and there are safeguards to ensure this in the General Data Protection Regulation 2018.

Beyond the Streets regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions, and to maintain confidence between those with whom it deals. To this end Beyond the Streets fully endorses and adheres to the Principles of Data Protection, as set out in the General Data Protection Regulation 2018.

Purpose

The purpose of this policy is to ensure that the staff, volunteers and trustees of Beyond the Streets are clear about the purpose and principles of Data Protection and to ensure that it has guidelines and procedures in place which are consistently followed.

Failure to adhere to the Data Protection Act 2018 is unlawful and could result in legal action being taken against Beyond the Streets or its staff, volunteers or trustees.

Principles

The GDPR regulates the processing of information relating to living and identifiable individuals (data subjects). This includes the obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems and card indexes.

Data users must comply with the data protection principles of good practice which underpin the Act. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

To do this Beyond the Streets follows the eight Data Protection Principles outlined in the GDPR, which are summarised below:

- Personal data will be processed fairly and lawfully
- Personal data will be obtained only for one or more lawful purposes
- Personal data will be adequate, relevant and not excessive
- Personal data will be accurate and, where necessary, kept up to date
- Personal data will not be held any longer than necessary
- Personal data will be processed in accordance with the rights of data subjects

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- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data
- Data will not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

The principles apply to “personal data” which is information held on computer or in manual filing systems from which they are identifiable. Beyond the Streets’ employees, volunteers and trustees who process or use any personal information in the course of their duties will ensure that these principles are followed at all times.

Procedures

The following procedures have been developed in order to ensure that Beyond the Streets meets its responsibilities in terms of Data Protection. For the purposes of these procedures data collected, stored and used falls into 2 broad categories:

1. Internal data records;

Staff, volunteers and trustees

2. External data records;

Members, customers, clients.

Beyond the Streets as a body is a DATA CONTROLLER under the Act, although is not required to register with the ICO, as a not for profit organisation. The Directors are ultimately responsible for the policy’s implementation.

Internal data records

Purposes

- Beyond the Streets obtains personal data (names, addresses, phone numbers, email addresses), application forms, and references and in some cases other documents from staff, volunteers and trustees. This data is stored and processed for the following purposes:
- Recruitment
- Equal Opportunities monitoring
- Volunteering opportunities
- To distribute relevant organisational material e.g. meeting papers
- Payroll

Access

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The contact details of staff, volunteers and trustees will only be made available to other staff, volunteers and trustees. Any other information supplied on application will be kept in a secure filing cabinet and secure online systems, and is not accessed during the day to day running of the organisation.

Contact details of staff, volunteers and trustees will not be passed on to anyone outside the organisation without their explicit consent.

A copy of staff, volunteer, trustee emergency contact details will be kept in the Staff Handbook for Health and Safety purposes to be used in emergency situations e.g. fire/ bomb evacuations.

Staff, volunteers and trustees will be supplied with a copy of their personal data held by the organisation if a request is made.

All confidential post must be opened by the addressee only.

Accuracy

Beyond the Streets will take reasonable steps to keep personal data up to date and accurate. Personal data will be stored for 6 years after an employee, volunteer or trustee has worked for the organisation and brief details for longer. Unless the organisation is specifically asked by an individual to destroy their details it will normally keep them on file for future reference. The Directors have responsibility for destroying personnel files.

Storage

Personal data is kept in paper-based systems and on a password-protected computer system. Every effort is made to ensure that paper-based data are stored in organised and secure systems. Beyond the Streets operates a clear desk policy at all times.

Use of Photographs

Where practicable, we will seek consent from individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), the organisation will remove any photograph if a complaint is received. This policy also applies to photographs published on the organisations website or in the Newsletter. We will endeavour at all times to only use photographs that cannot directly identify a person or their location.

Disclosure and Barring Service

Beyond the Streets will act in accordance with the DBS's code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. (See Appendix A for details.

Safeguarding Adults Policy May 2021

Beyond the Streets believes this policy was up to date and complied with current legislation at the time of writing. Beyond the Streets takes no responsibility for the policies or practical implementation of another project. Each project should apply into their own context, at their own liability. Policies should be regularly reviewed in light of changing practices and/ or legal requirements.

External data records

Purposes

Beyond the Streets obtains personal data (such as names, addresses, and phone numbers) from members/clients. This data is obtained, stored and processed solely to assist staff and volunteers in the efficient running of services. Personal details supplied are only used to send material that is potentially useful. Most of this information is stored on the organisation's database.

Beyond the Streets obtains personal data and information from clients and members in order to provide services. This data is stored and processed only for the purposes outlined in the agreement and service specification signed by the client/ member.

Consent

Personal data may be collected over the phone and using other methods such as e-mail. During this initial contact, the data owner is given an explanation of how this information will be used.

Written consent is requested from donors and supporters. It is not requested from clients unless they are entering into a face-to-face casework arrangement (i.e. Door Of Hope). Phone-based clients (i.e. Beyond Support) are asked to give verbal consent and this is recorded in the client notes.

Personal data will not be passed on to anyone outside the organisation without explicit consent from the data owner unless there is a legal duty of disclosure under other legislation, in which case the Directors will discuss and agree disclosure.

Access

Only relevant staff, volunteers and trustees within the organisation will be given access to personal data. All staff, volunteers and trustees are made aware of the Data Protection Policy and their obligation not to disclose personal data to anyone who is not supposed to have it.

Information supplied is kept in a secure filing, paper and electronic system and is only accessible by those individuals involved in the delivery of the service.

Information will not be passed on to anyone outside the organisation without their explicit consent, excluding statutory bodies e.g. the Inland Revenue.

Individuals will be supplied with a copy of any of their personal data held by the organisation if a request is made.

All confidential post must be opened by the addressee only.

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Accuracy

Beyond the Streets will take reasonable steps to keep personal data up to date and accurate. Personal data will be stored for as long as the data owner/ client/ member uses our services and normally longer. Where an individual ceases to use our services and it is not deemed appropriate to keep their records, their records will be destroyed according to the Data Retention Schedule (See separate Data Retention Policy).

If a request is received from an organisation/ individual to destroy their records, we will remove their details from the database and request that all staff holding paper or electronic details for the organisation destroy them. This work will be carried out by a Director.

This procedure applies if Beyond the Streets is informed that an organisation ceases to exist.

Storage

Personal data may be kept in paper-based systems and on a password-protected computer system. Paper-based data are stored in organised and secure systems.

Beyond the Streets operates a clear desk policy at all times.

Use of Photographs

Where practicable, Beyond the Streets will seek consent of members/ individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), the organisation will remove any photograph if a complaint is received. This policy also applies to photographs published on the organisation's website or in the Newsletter.

Responsibilities of staff, volunteers and trustees

During the course of their duties with Beyond the Streets, staff, volunteers and trustees will be dealing with information such as names/addresses/phone numbers/e-mail addresses of members/clients/volunteers. They may be told or overhear sensitive information while working for Beyond the Streets. The Data Protection Act (1988) gives specific guidance on how this information should be dealt with. In short to comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. Staff, paid or unpaid must abide by this policy.

Staff, volunteers and trustees are asked to read and sign the Handbook, including this policy, to say that they have understood their responsibilities as part of their induction. The Data Protection Summary summarises the main responsibilities for staff/ volunteers on a day to day basis.

Confidentiality

Safeguarding Adults Policy May 2021

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There will be times that Beyond staff may be exposed to sensitive information about clients/ affiliates of Beyond the Streets. We take the issue of confidentiality very seriously. Please see our Confidentiality Policy for clear expectations of all staff/ volunteers. Individual projects will also have their own processes for handling sensitive information.

Beyond also have a clear process for dealing with safeguarding concerns affecting children and young people under 18, and vulnerable adults. See our Safeguarding Policy for details.

Compliance

Compliance with the Act is the responsibility of all staff, paid or unpaid. Beyond the Streets will regard any unlawful breach of any provision of the Act by any staff, paid or unpaid, as a serious matter which will result in disciplinary action. Any employee who breaches this policy statement will be dealt with under the disciplinary procedure which may result in dismissal for gross misconduct. Any such breach could also lead to criminal prosecution.

Any questions or concerns about the interpretation or operation of this policy statement should in the first instance be referred to the line manager.

Retention of Data

No documents will be stored for longer than is necessary. For guidelines on retention periods see the Data Retention Schedule.

All documents containing personal data will be disposed of securely in accordance with the Data Protection principles.

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Appendix 13: Thresholds for escalation of safeguarding risks

Internal escalation

	Organisational Safeguarding Lead	Management Team	Trustee Safeguarding Lead	Trustee Governance Sub-committee	Board of Trustees
All allegations against staff or volunteers	Always consult	Always consult	Consider consulting	Consider consulting	Consider consulting
Allegations which reach the threshold of external escalation to Social Care or Police	Always consult	Always consult	Always consult	Consider consulting	Consider consulting
Allegations which reach the threshold for external escalation to the Charity Commission	Always consult	Always consult	Always consult	Always consult	Always consult
Safeguarding concern about a service user	Always consult	Consider consulting	Consult by exception	Consult by exception	Consult by exception
Proposed change to a primary policy which changes safeguarding risk strategy	Always consult	Always consult	Always consult	Always consult	Consider consulting
Proposed change to an operational procedure with no change to overall safeguarding risk strategy under policy	Always consult	Always consult	Consider consulting	Consult by exception	Consult by exception
Safeguarding risk assessment identifies safeguarding risk to service users for a planned activity	Always consult	Always consult	Consider consulting	Consider consulting	Consult by exception
Safeguarding concern about practices within an affiliate or beneficiary organisation	Always consult	Always consult	Always consult	Consider consulting	Consider consulting

Key:

Always consult	Always consult
Consider consulting	Consider consulting
Consult by exception	Consult by exception

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Guidance for External Escalation

Charity Commission

[guidance](#)

You should report an incident if it results in, or risks, significant:

- *harm to people who come into contact with your charity through its work*
- *loss of your charity's money or assets*
- *damage to your charity's property*
- *harm to your charity's work or reputation*

Local Authority

[child guidance](#)

[adult guidance](#)

Any allegation against a member of staff or volunteer who works in a position of trust with children, young people, or adults with needs for care and support, if they are alleged to have:

- behaved in a way that has harmed a child, or may have harmed a child/young person/adult at risk
- possibly committed a criminal offence against or related to a child/young person/adult at risk
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children/young people/adults at risk
- behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people/adults at risk

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