

**Bradford City of Sanctuary Safeguarding Policies**

**Contents:**

* **Safeguarding Children Policy and Record**
* **Safeguarding Adults Policy and Record**
* **Online Safeguarding Policy**

**Rationale**

Bradford City of Sanctuary (BCoS) seeks to promote the inclusion and welfare of asylum seekers and refugees; to encourage and support statutory and non-statutory organisations and businesses to support and work with asylum seekers and refugees; to publicise and celebrate the contribution asylum seekers and refugees make to society and community.

BCoS believes that it is unacceptable for any child or adult to face hostility, discrimination or abuse of any kind and will endeavour to ensure that adults and children within its sphere of influence and practice are safeguarded to the best of our ability.

Within its Board of Trustees, BCoS has a safeguarding officer (SO) whose role is to ensure that BCoS undertakes its responsibilities regarding safeguarding seriously and effectively. The current officer is **Kay Holden** who can be contacted on **07905 844617**

This policy is in three parts: safeguarding of children, safeguarding of vulnerable adults, online safeguarding.

This policy is unable to cover every eventuality but anyone with concerns about a safeguarding issue is expected to alert a relevant body and/or our safeguarding officer. Proformas are available for use in such instances.

The policy has been guided by the following which also provide further information as required:

Care Act 2014 (amended 2020/2021) <https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

Children Act 1989/2004 (updated 2019) <https://www.legislation.gov.uk/ukpga/1989/41/contents>

Children and Social Work Act 2017 <https://www.legislation.gov.uk/ukpga/2017/16/contents>

The Data Protection Act 2018<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

Human Rights Act 1998 <https://www.legislation.gov.uk/ukpga/1998/42/contents>

Mental Capacity Act 2005 <https://www.legislation.gov.uk/ukpga/2005/9/contents>

Mental Health Resource Pack City of Sanctuary 2017 <https://health.cityofsanctuary.org/wp-content/uploads/sites/47/2017/12/CoS-Mental-Health-Resource-Pack-digital.pdf>

Protection of Freedoms Act 2012 (part 5) <https://www.legislation.gov.uk/ukpga/2012/9/part/5/enacted>

Sexual Offences Act 2003 <https://www.legislation.gov.uk/ukpga/2003/42/contents>

Rehabilitation of Offenders Act 1974 <https://www.gov.uk/government/publications/new-guidance-on-the-rehabilitation-of-offenders-act-1974>

Safeguarding Vulnerable Groups Act 2006 <https://www.legislation.gov.uk/ukpga/2006/47/contents>

UN Convention on the Rights of the Child 1989 <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

Working Together to Safeguard Children 2018 <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf>

Keeping Children Safe in Education 2023<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf>

Safer Bradford policy and procedure (Adults) <https://www.saferbradford.co.uk/adults/>

Safer Bradford policy and procedure (Children) <https://www.saferbradford.co.uk/children/>



**Part 1: Safeguarding Children (Child Protection)**

**Principles**

* BCoS does not ordinarily provide direct services to children but is committed to safeguarding all children and young people who come into contact with its work.
* All employees, trustees and volunteers working on behalf of BCoS accept personal and individual responsibility for the welfare of children they come into contact with
* All employees, trustees and volunteers will raise any concerns they might have by following BCoS guidelines and reporting those concerns to a responsible person or body, including the BCoS Safeguarding Officer (SO)
* All employees, trustees and volunteers should familiarise themselves with the BCoS safeguarding policy and develop an awareness of the signs of stress relating to safeguarding issues
* All prospective employees, trustees and volunteers working with BCoS’ Schools of Sanctuary project will be vetted as effectively as possible for any background characteristics which may negatively impact on child safeguarding/protection
* A culture of mutual respect between children and those connected with BCoS will be encouraged and adults will be expected to model good practice
* No representative of BCoS should work in isolation with a lone child
* For the purpose of this policy, ‘child’ refers to anyone less than 18 years of age.
* BCoS recognises that people seeking sanctuary can face additional safeguarding challenges that hinder the recognition of abuse and neglect in children from this group. Children from minority ethnic groups and those whose first language is not English, including the children of asylum seekers and refugees, face specific barriers, especially around communication, which may impact disclosure.

**Guidelines**

*1 Issues causing harm to children:*

* 1. Neglect: the persistent failure to meet a child’s basic physical, psychological or social needs. Short-term neglect may be due to poor adult supervision leading to harm
  2. Sexual Abuse: the sexual exploitation of a child takes place where they are under the legal age of consent and/or they do not comprehend what they are being required to do. Adults may misuse their power over children for their own sexual needs. Matters may become worse where children are trafficked or groomed by adults
  3. Physical abuse: actual or likely physical injury to a child, e.g. hitting, burning, shaking etc which also links with neglect where lack of supervision is involved
  4. Emotional abuse: persistent emotional ill-treatment or rejection which includes a child being frightened, made to feel worthless, subject to constant/regular criticism, bullying or undue pressure to perform to high expectations.

1. *Signs of physical abuse: this list is not exhaustive and can sometimes be misinterpreted*.

* Unexplained injuries/burns
* Improbable excuses for injuries
* Refusal to discuss injuries
* Untreated injuries
* Withdrawal from physical contact
* Arms and legs covered (other than for cultural reasons) e.g.in hot weather
* Fear of receiving medical help
* Low self-esteem/neurotic behaviour
* Compulsive behaviour e.g. stealing
* Lack of social relationships

1. *Signs of emotional abuse: again, not an exhaustive list*

* Lack of trust in adults/fear of an individual
* Over-familiarity or provocative behaviour
* Withdrawal and introversion/problems with peer relationships
* Running away/sudden behaviour changes
* Low self-esteem
* Stealing/substance misuse/over-sexed behaviour
* Sleeplessness/nightmares/fear of the dark
* Depression/eating disorders
* Recurring urinary tract problems/pregnancy

1. *Specific Issues:*

* Child sexual exploitation- where children receive something (money/gifts/drugs etc or simply affection) in return for engaging in sexual activities. There is nearly always a control element involved and children may be groomed or bullied (including cyberbullying) over a substantial time period
* Female genital mutilation may cause significant harm both physically and emotionally to children
* Radicalisation refers to the process by which a young person may come to support terrorism. Multi-agency interventions seek to intervene to prevent this

These issues are complex and may not be revealed. Where BCoS staff, trustees or volunteers come across incidences, they should refer to the police and to the BCoS SO.

1. *How concerns may arise*

* Self-observation e.g. The conduct of an individual, a child ‘disclosing’ abuse, evidence of physical hurt, inadequate support arrangements, from a third party

1. *Should a child reveal they are being abused:*

* Reassure the child
* Do not make promises you cannot keep, e.g.do not tell them that you will keep the information to yourself
* Stay calm and ensure that the child is safe
* Tell the child that you are going to inform someone
* Do not approach the alleged abuser; where possible keep the child away from the alleged abuser
* If you are working with a partner agency, report it to their lead person or some other reliable person
* Contact the BCoS SO and agree one person to contact police and/or Social Care if required. If the SO is not available, take the relevant action
* Complete the BCoS proforma and inform the SO - or Chair, should any complaint involve the SO

1. *Role of the SO*

* Know which safeguarding/child protection agency to contact in the event of a concern
* Liaise with the appropriate person where the complaint involves a partner organisation
* Provide information about safeguarding/child protection to BCoS staff, trustees and volunteers
* Appraise the Board of Trustees about any concerns and the actions stemming from them
* Ensure that, where appropriate, staff, trustees and volunteers have a Disclosure and Barring Service (DBS) check
* Initiate any internal investigation into concerns raised about BCoS staff, trustees or volunteers; ensure that there is no further contact between alleged victim and abuser
* Ensure that appropriate records are kept following BCoS’ policy
* Advise the Board of Trustees about any training needs
* Ensure that this policy is regularly reviewed and updated

1. *Useful Contacts*

* Bradford Social Care <https://www.saferbradford.co.uk/children/>
* Local Authority Designated Officer (LADO) 01274 435600 [LADO@bradford.gov.uk](mailto:LADO@bradford.gov.uk)
* Bradford Children’s Services Contact Centre 01274 433999. Out of office hours number 01274 431010
* NSPCC Child Protection Helpline- free 24-hour service offering counselling, and advice. 0808 800 5000 [LocalOffer@bradford.gov.uk](mailto:LocalOffer@bradford.gov.uk)
* NSPCC Whistleblowing Advice Line- for professionals concerned about their organisation regarding safeguarding. 0800 028 0285 [help@nspcc.org.uk](mailto:help@nspcc.org.uk)



**Sent to:**

**Date**:

**Bradford City of Sanctuary (BCoS): Child Safeguarding Record**

On completion, this record should be sent/given to the BCoS Safeguarding Officer who is **Kay Holden** who can be contacted on **07905 844617**

The record is confidential and should be kept according to the BCoS Confidentiality policy.

|  |  |
| --- | --- |
| **Your name** |  |
| **Date and time of incident / report** | *(If for example neglect or emotional abuse is identified)* |
| **Location of incident / report** |  |
| **Person identifying the problem**  **(add contact details)** |  |
| **Child’s name** |  |
| **Child’s details (DoB/age/home address/tel no)** |  |
| **Person with parental responsibility (and contact details)** |  |
| **Details of incident/allegation** |  |
| **Action taken e.g. reported to another agency** |  |



**Part 2: Safeguarding Vulnerable Adults**

**Principles**

* All adults have the right to be safe from harm and should be able to live free from fear of abuse, neglect and exploitation (Protection)
* For the purpose of this document, ‘adult’ means a person aged 18 years or over
* BCoS has a Safeguarding Officer (SO) who is **Kay Holden** who can be contacted on **07905 844617** and whose role can be found in Part 1 of this policy (Safeguarding Children - para. 7).
* All employees, trustees and volunteers working on behalf of BCoS have a duty to promote the welfare and safety of vulnerable adults and to familiarise themselves with this policy (Prevention)
* Being a vulnerable adult may be a temporary condition, e.g. as a result of an accident, or may be more long-term and complex
* Being an asylum-seeker or refugee does not necessarily mean that an adult is automatically vulnerable, but BCoS recognises that adults who are from minority ethnic groups, who may not speak English or who may be asylum-seekers or refugees may be at an increased risk of abuse and exploitation.

Whilst legislation does not provide any definition of vulnerability, para 66 of <https://www.legislation.gov.uk/ukpga/2012/9/part/5/enacted> makes it clear that vulnerability is determined (only) by the need for care and support due to clearly defined factors, primarily relating to age and disability.

* BCoS will work in partnership with service providers and carers to safeguard anyone who we believe to be definable as vulnerable adults (Partnership)
* BCoS will, wherever possible, involve vulnerable adults in decisions about making a safeguarding referral (Empowerment)

**Guidelines**

1 *The Nature of Abuse*

Abuse is a violation of an individual’s human and civil rights by any other person or persons. It may consist of a single act or repeated acts. It may be an act of neglect or an omission to act. It may happen when a vulnerable person is persuaded or coerced into a financial or sexual transaction to which s/he has not consented or is unable to consent. People can be abused in several ways:

* *Physical* including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions
* *Sexual* including rape and sexual assault or sexual acts to which the vulnerable adult could not consent or was pressurised into consenting
* *Psychological* including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, control, withdrawal of supportive networks
* *Financial or material* including theft, fraud, exploitation, pressure regarding wills, property or financial transactions or the misuse and/or misappropriation of personal finances/goods etc.
* *Neglect and acts of omission* including ignoring medical or physical needs failure to provide appropriate health, education or social care services, withdrawal of medicines, food, heating etc.
* *Discriminatory* including racist, sexist discrimination or that based on disability, age, sexuality etc
* *Institutional* including rigid and insensitive routines, lack of privacy or comfort.
* *Modern slavery* includes human trafficking, forced labour and domestic servitude. It may take the form of organisational abuse or domestic abuse. Any of the above forms of abuse might present themselves under this abuse.
* *Self-neglect* includes lack of care for personal hygiene, hoarding, not taking medication, poor nutrition etc.

*2 Signs and Symptoms of Abuse*

* *Physical-* history of unexplained falls or minor injuries; bruising in protected areas; finger marks; burns; bruising in the shape of an object; injuries in various stages of healing; history of GP or agency hopping; differing accounts; weight loss; ulcers or bed sores; drowsiness
* *Sexual-* disclosure or partial disclosure; medical problems such as genital infections or pregnancy; disturbed behaviour e.g. depression, withdrawal, sleeplessness or nightmares, self-harm, inappropriate sexual behaviour; circumstantial- e.g. 2 people found in a quiet location, one in a distressed state
* *Psychological/emotional-* isolation; unkempt or unwashed; over-meticulous; inappropriately dressed; withdrawn or agitated; change in appetite; insomnia or excessive sleep; tearfulness; low self-esteem; confusion
* *Neglect-* poor physical condition; poor clothing; inadequate diet; untreated injuries/medical problems; poor personal hygiene
* *Financial/Material-* unexplained or sudden inability to pay bills; unexplained or sudden withdrawal/closure of accounts; disparity between assets and satisfactory living conditions; excessive interest in their accounts by others

Institutional, Modern Slavery and Self-neglect may feature any of the signs or symptoms of the other forms of abuse.

*3 Disclosure*

* Where a disclosure is made or observations lead to the possibility that there has been abuse, make sure that both yourself and the victim are safe. If there are immediate concerns, ring 999. If the alleged abuser is present, do not confront them.
* Where possible, discuss the nature of the abuse with the victim. Reassure them. Do not investigate. Explain that you need to refer the situation in order to get help. Unless there is a clear lack of capacity, obtain the victim’s agreement for referral. Where interpreters are in use, ensure that they have understood that the information gathered is confidential
* Make sure that you take notes of all the key points and check details for accuracy. If there is evidence of criminal activity, preserve the evidence.
* As soon as possible, contact the SO who will make any onward referral should that be necessary. Complete the BCoS proforma as soon as possible and within 24 hours.

*4 Role of the SO*

* Once a referral is made, progress that referral to an appropriate agency (police, adult social services, local mental health team)
* Consider capacity and consent. Consent for referral must be obtained unless the vulnerable adult lacks the mental capacity to make a decision, where others might be at risk, or where a crime has been committed.
* The SO should collate all relevant material/evidence etc including liaising with others involved e.g. witnesses
* Where a member of staff, trustee or volunteer is suspected of perpetrating abuse, then the SO should liaise with the Chair of BCoS to consider whether that person needs to be suspended from BCoS activity pending a full investigation. The SO would normally lead such an investigation.
* Identify and inform trustees of any new training requirements regarding vulnerable adults
* Ensure that records are secured and kept in line with BCoS policy.
* Ensure that this policy is regularly reviewed and updated

Graphical user interface

Description automatically generated with medium confidence

**Sent to:**

**Date**:

**Bradford City of Sanctuary (BCoS): Vulnerable Adult (VA) Safeguarding Record**

On completion, this record should be sent/given to the BCoS Safeguarding Officer who is **Kay Holden** who can be contacted on **07905 844617**

The record is confidential and should be kept according to the BCoS Confidentiality policy.

|  |  |
| --- | --- |
| **Your name** |  |
| **Date and time of incident** |  |
| **Location of incident** |  |
| **Person identifying the problem**  **(add contact details)** |  |
| **VA name** |  |
| **VA details (DoB/age/home address/tel no)** |  |
| **Next of kin/contact details** |  |
| **Support agencies involved** |  |
| **Details of incident/allegation** |  |
| **Action taken eg reported to another agency** |  |



**Bradford City of Sanctuary (BCoS) Online Safeguarding Policy**

**Rationale**

BCoS is committed to ensuring that its work meets the highest standards of safety and security for adults and children associated with its work. This policy relates to the online work of BCoS and includes virtual meeting platforms. It outlines the measures BCoS commits itself to in order to fulfil this commitment.

**Principles**

* BCoS believes that everyone connected to it has the responsibility to promote the welfare and safety of vulnerable adults and children.
* BCoS recognises that adults and children who are asylum seekers or refugees are often particularly vulnerable and may need extra support

**Guidelines**

1. *Non-interactive livestreaming*

* This refers to streaming of video or webinars where participant video/audio is not enabled
* Content must be appropriate for and sensitive to the participants’ age group and backgrounds
* The activity must be able to restrict the audience to just the intended participants
* Participants’ personal information should not be visible to others accessing the content

1. *Interacting livestreaming*

* This refers to livestreaming videos, webinars, meetings
* The event should be held via an official BCoS business account e.g., Zoom
* The waiting room should be enabled to allow staff to accept only registered participants
* Sufficient staff/leads should be present to manage the meeting
* Interactions should be monitored via chat facility and moderation requests responded to as a matter of priority
* Challenging behaviour/inappropriate comments should lead to the immediate removal of the participant
* If events are to be recorded, this should be made clear to participants before the event. Participants should be able to change their name and turn video off if they request it
* Photos/recordings of the event should not be made by participants
* BCoS will make it clear to participants who they should contact if concerned about content etc.

1. *Events run by contractors*

* All contractors will be made aware of BCoS safeguarding policies and expected to follow such policies
* Unaccompanied children should not attend any event
* Contractors are expected to follow the guidelines above for non-interactive or interactive livestreaming

1. *Events co-ordinators*

* Should ensure that adequate registration information is obtained before any event- name, contact details etc
* Should produce information which explains that BCoS aims to create safe spaces; preserve peoples’ rights to privacy and anonymity; respect others’ participation - e.g., not speaking over someone; use mechanisms for engagement - e.g., raising a ‘virtual’ hand; maintain confidentiality where required

1. *Instant Messaging*

* This refers to group communication via instant messaging applications such as WhatsApp.
* Group communication of this sort should only be used when reasonably necessary, particularly for ease of access.
* Participants should self-join via a link sent by the organiser. The organiser should explain that, by joining, the participant must observe BCoS policy on safeguarding and that any personal information such as phone numbers must only be shared by the group.
* The organiser will moderate the group’s activities

|  |  |  |
| --- | --- | --- |
| Policy Lead | Kay Holden |  |
| Date of adoption | 26.5 21 |  |
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