

Record of Policy Changes and Reviews

Policy: Safeguarding

Review date	By who	Changes made	Agreed with
19.01.24	Carol Webster	Superficial changes: update address and email address	n/a
August 2024	Carol Webster	Include timings for responding to safeguarding issues	Matthew Guest
1.1.25	Carol Webster	List of other relevant policies added Change of main address, name of insurer	

Gravesham Sanctuary CIO

Safeguarding Policy

Version 5.0. 1st January 2025am

This Policy has been adapted from the model Safeguarding policy issued by Thirtyoneeight.

Other relevant policies and documents

Health and Safety

Whistleblowing

Disciplinary Procedures

Grievance Procedures

Recruitment

Referrals

Data Protection and Information Security

Confidentiality

Complaints

Equality, Diversity, Inclusion

Volunteer Handbook

Operational Handbook for 56 Windmill Street

1 Organisation Details

1.1 Contact and Registration Details

Name of Organisation: Gravesham Sanctuary CIO

Address: 56 Windmill Street, Gravesend DA12 1BB

Tel No: 07496 832 228

General Email address: office@graveshamsanctuary.uk

General Manager Name: Matthew Guest

General Manager Contact Telephone / Email: 07300 338 073 matthew.guest@graveshamsanctuary.uk

Safeguarding Officer Name: Carol Webster

Safeguarding Officer Contact Telephone / Email: 07300 338 073
carol.webster@graveshamsanctuary.uk

Charity Number: No.1181817 in England & Wales

Insurance Company: Markel

1.2 What we do:

Gravesham Sanctuary CIO only employs and works with adults. People under the age of 18 are not permitted to attend the day centre or our accommodation when in operation. Therefore, all our safeguarding policies are directed at adults, and in particular the safeguarding of vulnerable adults.

Gravesham Sanctuary provides a day centre and emergency supported accommodation all year round for the homeless community living in the Borough. People who have recently re-entered accommodation may also attend the day centre for support and community. We do this by:

Taking care of their needs through direct help in providing:

- Hot food and drinks
- Help in completing paperwork and getting ID
- Small items of clothing
- Emergency supported accommodation in our 6 bedroom house

Signposting them to agencies and local organisations who can help with:

- Accommodation
- Employment
- Physical and mental health
- Repatriation to their home country

1.3 Our commitment

As trustees we recognise the need to provide a welcoming, safe and caring environment for the adults we help, where all are treated with dignity and respect. We acknowledge that adults can be the victims of various forms of abuse, and neglect. We uphold the right of all adults to live in safety, free from neglect and abuse “without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status” (UN Universal Declaration of Human Rights). We believe that people are safest in a culture of openness and transparency and that healthy challenge of working practice leads to more effective and safer ways of working with ‘adults at risk’.

We have therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to building constructive links with statutory and voluntary agencies involved in safeguarding.

The policy and practice guidelines are based on the **Safe and Secure** safeguarding standards published by thirtyone:eight. They should be read alongside training notes for staff and volunteers that outline how to respond in a discussion where a guest makes a disclosure, as well as our Recruitment Policy.

The trustees undertake to:

- endorse and follow all national and local safeguarding legislation and procedures, in addition to the international conventions outlined above.
- provide on-going safeguarding training for all its volunteers and employees, and will regularly review operational guidelines
- ensure that the premises meet the requirements of the Equality Act 2010 and all other relevant legislation, and that it is welcoming and inclusive.
- support the Safeguarding Officers in their work and in any action they may need to take in order to protect adults at risk.

2 Prevention

2.1 *Understanding abuse and neglect*

Defining abuse against an adult is a difficult and complex issue. A person may abuse by inflicting harm or failing to prevent harm. Adults in need of protection may be abused within a family, an organisation or a community setting. Very often the abuser is known or in a trusted relationship with the adult.

Detailed definitions, and signs and indicators of abuse, as well as action to take in the event of a disclosure of abuse, are included here in our policy.

2.2 *Safer recruitment*

The trustees will ensure all volunteers and employees will be appointed, trained, supported, and supervised in accordance with government guidance on safe recruitment. This includes ensuring that:

- There is a written job description / person specification for the post
- Those applying have completed an application form and where necessary a self-declaration form
- Those short listed have been interviewed
- Safeguarding has been discussed at interview
- Written references have been obtained, and followed up where appropriate
- A disclosure and barring check (DBS) has been completed at the appropriate level where necessary (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information)
- Qualifications where relevant have been verified
- A suitable training programme is provided for the successful applicant
- For paid staff, the applicant has completed a probationary period
- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns.

2.3 Safeguarding training

The trustees are committed to on-going safeguarding training and development opportunities for all workers and volunteers, developing a culture of awareness of safeguarding issues to help protect everyone. All our workers, volunteers and trustees will receive induction training and undertake recognised safeguarding training on a regular basis. The trustees will also ensure that adults with care and support needs are provided with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern.

2.4 Management of Workers – Codes of Conduct

As trustees we are committed to supporting all volunteers and employees and ensuring they receive support and supervision. All workers have been issued with a code of conduct.

3 Practice Guidelines

As a charity that comes across adults at risk, we wish to operate and promote good working practice. This will enable workers and volunteers to run activities safely, develop good relationships and minimise the risk of false or unfounded accusation.

Our practice is underpinned by the 6 principles outlined in the 2014 Care Act. **Empowerment:** we will ask what the person at risk would like to happen so that they have choice and control over decisions that are taken. **Prevention:** Section 2. **Protection:** Sections 4 and 5. **Proportionality:** Our response will be the least intrusive, appropriate to the risk presented. **Partnership:** Section 3:2. **Accountability:** as well as a general code of conduct for workers and volunteers, we have specific good practice guidelines for each role, which are detailed in the training materials and Staff Handbook.

3.1 Who are Adults at Risk?

Any adult may experience abuse or harm. However, certain people are considered to be at greater risk so are given more protection by law. 'Adults at risk' or 'adults with care and support needs' are people who need more help than others with staying safe and with daily living. An 'adult at risk' is anyone aged 18 or over who:

- has needs for care and or support, whether or not they are being met
- as a result of care and support needs is unable to protect themselves from abuse or neglect
- is currently experiencing or is at risk of abuse or neglect.

Adults at risk may:

- have a mental or physical illness
- have a learning disability
- have addiction problems
- be frail
- have suffered bereavement or trauma

While not everyone sleeping rough is an 'adult at risk' as defined by the Care Act 2014, rough sleeping may exacerbate other conditions and impact negatively upon individuals' ability to care for and protect themselves. Many of our guests experience a range of risk factors which increase the risk of abuse, such as mental health problems, misuse of alcohol or drugs and poor physical health.

3.2 Working in Partnership

We believe good communication is essential in promoting safeguarding, both with those we wish to protect, with everyone involved in working with adults and with all those with whom we work in partnership. This safeguarding policy is just one means of promoting safeguarding. We have clear, agreed safeguarding and confidentiality guidelines with those with whom we work in partnership.

The Safeguarding Officer will liaise with the Guest Manager and Support Worker to ensure that, where a guest could generally be at risk of harm or neglect, the concern is raised in the appropriate forum (such as Rough Sleeper Initiative or the Gravesham Vulnerability Panel) with the relevant partner agencies. The Guest Manager and Support Worker will share possible safeguarding concerns, working with other agencies, to facilitate assessments where needed and receiving information about care and support that will be provided. We undertake to follow the agreed local protocols for multi-agency working.

4 Responding to allegations of abuse

All involved in the work of Sanctuary have a responsibility to report concerns regarding abuse or neglect, whether it is based on something they have witnessed, a suspicion, an allegation or a disclosure. Under no circumstances should a volunteer or worker carry out their own investigation into an allegation or suspicion of abuse. Follow procedures as below:

4.1 Documenting a concern

The employee or volunteer should make a report of the concern in the following way, using the Record of Concern form, if possible:

- The person in receipt of allegations or suspicions of abuse should report concerns as soon as possible to:

Name: (hereafter the "Safeguarding Officer") Carol Webster

Email: carol.webster@graveshamsanctuary.uk

- The above is nominated by the Trustees to act on their behalf in dealing with the allegation or suspicion of neglect or abuse, including referring the matter on to the statutory authorities.
- In the absence of the Safeguarding Officer or, if the suspicions in any way involve the Safeguarding Officer, the report should be made to:

Name: (hereafter the "Deputy") Lorna Nolan

Tel: 07496 832228

Email: lorna.nolan@graveshamsanctuary.uk

- If the suspicions implicate both the Safeguarding Officer and the Deputy, then the report should be made in the first instance to:

thirtyone:eight PO Box 133, Swanley, Kent, BR8 7UQ.

Tel: 0303 003 1111.

Alternatively contact Social Services or the police.

- The Safeguarding Officer should contact the appropriate agency or they may first ring the thirtyone:eight helpline for advice. They should then contact social services in the area the adult lives.

Adult Social Services

Tel: : 03000 41 61 61 or email social.services@kent.gov.uk

Out of hours Tel: 03000 41 91 91

Website Address: <https://www.kent.gov.uk/social-care-and-health/report-abuse>

Police Protection Team Tel: 101

A form can also be completed online at [Report abuse - Kent County Council](#)

- The Safeguarding Co-ordinator may need to inform others, depending on the circumstances and/or nature of the concern.
- The Safeguarding Officer will usually discuss the course of action with the General Manager and, where concerns are around guests at the day centre, with the Deputy Safeguarding Officer or, for residents in our accommodation, with the Support Worker.
- They may need to inform the Chair of trustees, who may need to liaise with the insurance company or the charity commission to report a serious incident.
- Suspicions must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.
- Whilst allegations or suspicions of abuse will normally be reported to the Safeguarding Officer, the absence of the Safeguarding Officer or Deputy should not delay referral to Social Services, the Police or taking advice from thirtyone:eight.
- The trustees will support the Safeguarding Officer/Deputy in their role and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis.
- It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from thirtyone:eight, although the trustees hope that volunteers/staff members of Gravesham Sanctuary will use this procedure. If, however, the individual with the concern feels that the Safeguarding Officer/Deputy has not responded appropriately, or where they have a disagreement with the Safeguarding Officers as to the appropriateness of a referral they are free to contact an outside agency direct. We hope by making this statement that the trustees demonstrate their commitment to effective safeguarding and the protection of all those who are vulnerable.
- The role of the Safeguarding Officer/ deputy is to collate and clarify the precise details of the allegation or suspicion and pass this information on to statutory agencies who have a legal duty to investigate.
- The person acting on the reported concern must record the actions taken and the final outcome.

4.2 Detailed procedures where there is a concern that an adult is in need of protection:

This includes suspicions or allegations of abuse or harm including physical, sexual, organisational, financial, discriminatory, neglect, self-neglect, forced marriage, modern slavery, domestic abuse.

- If there is immediate danger or a guest has sustained a serious injury, the member of staff on duty should contact the Emergency Services, also informing them of any suspicions. They should

then complete a Record of Concern and inform the General Manager and Safeguarding Officer. For guests at our accommodation, they should also inform the Support Worker.

- At the day centre, responding to concerns will usually be the responsibility of the Guest Welfare Manager (Deputy Safeguarding Officer) who will often become aware of neglect, self-neglect and abusive situations. They will liaise closely with partner services, adult social services and where appropriate put forward the person for support at the Gravesham Vulnerability Panel. They will complete a Record of Concern form and make the Safeguarding Officer aware.
- At our accommodation, the Support Worker will sometimes become aware of situations where a resident could be at risk. Where allegations involve a potentially criminal act, they will inform the police and support the resident through police interviews. They will partner with other agencies involved in the resident's support and will sometimes make referrals to social services, particularly in cases of self-neglect or vulnerability to exploitation outside the accommodation. A Record of Concern form should be completed and the General Manager and Safeguarding Officer made aware. For all other cases, the Support Worker will liaise with the Safeguarding Officer.
- If staff or volunteers working at our accommodation become aware of possible abuse or allegations, they should complete a Record of Concern and make the Safeguarding Officer aware. They may also need to inform the General Manager and Support worker but the main responsibility for safeguarding lies with the Safeguarding Officer, who will consult with other staff as appropriate.

Where concerns are raised by guests, volunteers or staff, the Safeguarding Officer/Deputy will

- Where appropriate, talk with the adult concerned about what has happened and the action they would like
- Contact the Adult Social Care Team who have responsibility under the Care Act 2014 to investigate allegations of abuse. Alternatively thirtyone:eight can be contacted for advice.

If there is a concern regarding spiritual abuse, the Safeguarding Officer will:

- Identify support services for the victim i.e. counselling or other pastoral support
- Contact thirtyone:eight and in discussion with them will consider appropriate action with regards to the scale of the concern.

Time scales

- Volunteers must report any concerns or disclosures before leaving their shift; ideally they will complete a written record within 20 minutes of hearing any disclosure. Immediate risks must be reported straight away to the member of staff on duty.
- Where someone is at immediate risk, staff will ring emergency services if necessary and will contact the safeguarding officer as soon as possible.
- All staff, including the Guest Manager and Support Worker, must report safeguarding concerns to the Safeguarding Officer within 24 hours.
- Other concerns must be reported to the Safeguarding Officer, Guest Manager or Support Worker, depending on which is most appropriate for dealing with it, within 24 hours.
- The safeguarding officer or deputy will respond to the concern within 48 hours or as quickly as possible where it is urgent (see further timescales below)

If reporting to Social Services, the Support Worker, Guest Manager or Safeguarding Officer should work within the following timescales for reporting allegations or suspicions of abuse:

- Immediate if the vulnerable person is at risk of serious harm, or a serious criminal act has taken place and evidence will need to be kept safe
- Within 24 hours if it relates to a specific incident which may be still going on, or may happen again
- Within 7 days if it is a more general concern, which does not indicate immediate harm

Allegations of abuse against a person who works with adults with care and support needs

The Safeguarding Officer will:

- Liaise with Adult Social Services in regard to the suspension of the worker
- Make a referral to the DBS following the advice of Adult Social Services

The Care Act places the duty upon Adult Social Services to investigate situations of harm to adults with care and support needs. This may result in a range of options including action against the person or organisation causing the harm, increasing the support for the carers or no further action if the 'victim' chooses for no further action and they have the capacity to communicate their decision. However, this is a decision for Adult Services to decide not the charity.

Suspicion of slavery and human trafficking

We recognise that some homeless people are victims of slavery or trafficking and that they can also be at increased risk of exploitation, Slavery, and trafficking. The Safeguarding Officer or Deputy will:

- If they believe a person is being trafficked and is in immediate danger, call 999 straight away
- Contact the Modern-Day Slavery and Human Trafficking Coordinator at Kent Police: 07801 461 713 or 01474 366290 or
- The Salvation Army 0800 808 3733
- The modern slavery helpline can be contacted: <https://www.modernslaveryhelpline.org/> to report online or Tel: 0800 0121 700 or
- Report online at [Modern slavery | Kent Police](#)

Allegations of abuse against a child

- Although Gravesham Sanctuary works only with adults, the Trustees recognise employees and volunteers can receive information where abuse or neglect of a child or young person is suspected or alleged. The person in receipt of the suspicion or allegation should follow the same procedure as that outlined for adults. In this case the concern will be reported to Kent Social Services on 03000 41 11 11 or 03000 41 91 91 (out of hours), social.services@kent.gov.uk or the appropriate number for the child's local area.
- If the allegation concerns someone who works with children or young people, whether in a paid or voluntary capacity, the Safeguarding Coordinator will contact the Local Authority Designated Officer (LADO) Contact number for Kent: 03000 41 08 88 Email: kentchildrenslado@kent.gov.uk If this is urgent, use the contact details above.

5 Pastoral Care

5.1 Supporting those affected by abuse

We will seek to protect survivors of abuse from the possibility of further harm and abuse whilst they are guests with us and will seek to offer compassion and understanding of the issues which past events may

have caused. The trustees are committed to supporting those affected and they will be signposted to agencies who can help.

5.2 Protection from others who may pose a risk

All guests are risk assessed when a referral is made to our accommodation. The risk assessment will take into account the guest's need for shelter and safety, the suitability of the accommodation to meet their needs, and the safety and wellbeing of everyone else (staff, volunteers and guests) in the building.

Anyone who is under investigation or is known to be a risk to adults with care and support needs will not be allowed into the day centre or our accommodation. More information is found in our Referrals Policy.

Help for women at risk of harm or abuse can be sought from Victim Support at Integrated Domestic Abuse Support Services on 0808 168 9276.

Our Violence Policy and Drugs and Alcohol Policy also help maintain a safe environment, guarding against abuse and exploitation. Suspicion or allegations of dealing in illegal drugs at the day centre or our accommodation must be dealt with in accordance with the Drugs and Alcohol Policy. As it potentially poses a risk to vulnerable adults, it must also be reported to the Safeguarding Officer, who will collate and keep records of observations, monitoring and outcomes, working closely with the General Manager.

6 Safeguarding Officer

Gravesham Sanctuary has a designated person who is responsible for implementing the safeguarding policy and responding to concerns. We also have a Deputy Safeguarding Officer who:

- Can cover in the absence of the Safeguarding Officer
- Can share the load
- As an alternative should ever an accusation be made against the Officer or someone close to them making it inappropriate for them to deal with the issue

The role of the Safeguarding Officer includes:

- The preparation and implementation of a safeguarding policy and its review annually
- Ensuring safeguarding policies and procedures are followed
- Acting as an advocate on behalf of adults in need of protection.
- Arranging and making sure volunteers and staff attend relevant training
- Keeping accurate records relating to safeguarding concerns and ensure their safe storage.
- Regularly informing the trustees on good practice issues
- Working in partnership with statutory and other agencies
- Be aware of the signs and impacts of modern slavery and how it can be detected and prevented
- Be proactive in raising awareness and safeguarding concerns
- Liaising with the Support Worker, General Manager and Guest Manager over safeguarding concerns that have been raised and agreeing appropriate courses of action.

7 Adoption of the policy

Signed by: 

Position: Trustee and Safeguarding Officer

Date: 01.01.25

Appendix 1: Forms of abuse

Physical abuse including assault, hitting, slapping, pushing, misuse of medication, restraint, requiring someone to work in an unsafe environment, theft of prescription medicines

Domestic violence including threatening behaviour, physical, psychological, sexual, financial, emotional, coercion

Sexual abuse including: rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, introduction to indecent material, subjection to pornography, being pressured to consenting to sexual acts for any purpose including in exchange for money or drugs.

Psychological abuse including: use of threats or fear, misuse of power in a relationship, bullying, harassment, controlling, lack of privacy or choice, deprivation of social contact or deliberate isolation, making someone feel worthless, verbal abuse, humiliation, blaming, coercion, including theft of prescribed medication or coercing into taking illegal drugs.

Financial or material abuse including theft, fraud, internet scamming, coercion in relation to financial affairs, misuse or misappropriation of property, possessions or benefits, misuse of a position of authority to persuade a person to make gifts

Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude, traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

Spiritual abuse: inappropriate use of religious belief or practice to persuade, indoctrinate or control; intrusive healing or deliverance ministries

Discriminatory abuse including forms of harassment, unfair or unkind treatment because of race, gender, gender identity, age, disability, sexual orientation, religion

Neglect and acts of omission including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating

Institutional abuse: failure to give the best form of care

Self-neglect: covers a wide range of behaviour - neglecting to care for one's personal hygiene, health or surroundings. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

Possible signs of abuse among Adults at Risk in a Day Centre or accommodation setting could include, but are not limited to:

- Physical signs: bruises, cigarette burns, cuts or grazes especially on the arms, unexplained illnesses, vomiting, sleeplessness, incontinence, drunkenness (if unusual for the individual), odour or soiled clothes beyond what might be expected from a guest's circumstances and/or time on the streets.
- Behavioural signs: unexplained change of demeanour, fearfulness, keeping close to staff, reluctance to be in certain spaces or with certain people, inappropriately sexual behaviour or dress or conversation, eating alone or not at all.
- Emotional signs: tearfulness, paranoia, adopting the role of "child" to a staff member's "parenting", attention seeking, difficulty containing anger or frustration.

Our guests will experience a range of conditions including mental health conditions, learning disabilities and addiction, and the effects of cold and exhaustion, and at any one time a range of factors may be involved.

