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**GATWICK DETAINEES WELFARE GROUP**

*Registered Charity No. 1124328*

*A Company Limited by Guarantee registered in England and Wales No. 4911257*

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| **Policy title** | Adult Safeguarding Policy & Procedures |
| **Approved by** **Date** | Pious KekuMay 2023 |
| **Date ratified by Board** | May 2023 |
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13. **Policy statement**

Gatwick Detainees Welfare Group (GDWG) seeks at all times to promote the welfare, safety, and protection of adults at risk of abuse or neglect. The nature of our work may bring us into contact with adults at risk who are or who have been detained at Tinsley House and Brook House Immigration Removal Centres (IRCs) at Gatwick Airport; adults at risk who are volunteers with the group; adults at risk who attend meetings of the Group which are open to the public.

All people held in immigration detention are in some sense vulnerable because they have been detained without criminal charge and without ready access to legal advice; they have little privacy or personal security; and the environment is usually culturally alien to them. Many do not speak or read English, and so are unable to understand the process they are undergoing. They may have suffered physical violence, torture, or sexual violence. They may have learning or physical disabilities or mental ill health. The stresses and anxieties caused by the experience of detention, their memories of the past or fears for the future, can tip them over into an even greater state of vulnerability.

Should there be any concerns about the safety of an adult being held under immigration powers or who appears to be at risk of abuse or neglect, GDWG commits to taking all reasonable steps to assist that person and alert the appropriate authorities, as outlined in these guidelines. This commitment also applies to adults at risk who encounter the group as volunteers or members of the public.

We also commit to ensuring that all staff0F[[1]](#footnote-1) and volunteers who come into contact with adults at risk of abuse during the course of their duties with GDWG have read this document, are committed to the principles which it outlines, and understand the responsibilities that it entails and will act promptly on them. All staff, trustees and volunteers will be required to sign GDWG’s Code of Conduct confirming they have read and understood this policy in its entirety before they start their duties.

The safeguarding lead will act as the Designated Safeguarding Person in the organisation, ensuring adherence to the policy and procedures, which will be in line with the Sussex Safeguarding Adults Policy & Procedures. An updated pdf version of this document is available on the homepage of the Sussex Safeguarding [website](https://sussexsafeguardingadults.procedures.org.uk/). The safeguarding lead will draw the attention of staff, volunteers, and trustees to this as appropriate. One of the trustees will have a lead on safeguarding, ensuring policies and procedures are compliant with the law and best practice.

1. **Guiding principles and definitions**

The Care Act 2014 and accompanying statutory guidance was a major step forward in safeguarding adults who are experiencing, or are at risk of, abuse or neglect, and who are unable to protect themselves. Safeguarding means protecting an adult’s right to live in safety, free from abuse and neglect. It is about working together to support people to make decisions about the risks they face in their own lives and protecting those who lack the mental capacity to make those decisions.

The Care Act safeguarding duties apply to an adult who:

 has needs for care and support

 is experiencing, or at risk of, abuse or neglect,

 as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

While this clearly applies to certain groups of adults, e.g., those living in care homes, the Sussex Safeguarding Adults Policy & Procedures point out that the above is not an exhaustive list. In its definition of who should receive a safeguarding response, the Policy clarifies that legislation could also include people who are victims of sexual exploitation, trafficking, and modern slavery, to give a few examples.

GDWG will always seek to promote the adult’s wellbeing as part of safeguarding arrangements. People have many aspects to their lives and being safe may be only part of what is important to them. We seek to work with each adult at risk to establish what being safe means to them and how that can best be achieved. All staff and volunteers working or having dealings with adults who are at risk of abuse or neglect have a duty to treat them with respect and care, to be sensitive to their particular needs and to protect them. They are required to make themselves fully aware of this policy and the guidelines within it. All allegations of abuse or neglect of an adult must be treated seriously. All action taken under these guidelines must be carried out expeditiously and sensitively, taking account of such issues as race, culture and ethnicity, age, gender, religion, disability, and sexuality.

According to the Sussex Safeguarding Adults Policy & Procedures, the following six principles underpin all adult safeguarding work:

* Empowerment - presumption of person led decisions and informed consent.
* Prevention - it is better to take action before harm occurs.
* Proportionality - the least intrusive response appropriate to the risk presented.
* Protection - support and representation for those in greatest need.
* Partnership - local solutions through services working with their communities.
* Accountability - accountability and transparency in delivering safeguarding.

GDWG seeks to reflect these principles in its work. We endeavour to ensure those who are detained have a voice in telling us what we do well and what we can do better in terms of keeping them safe.

In terms of the Counter-Terrorism and Security Act 2015 and the Prevent Duty, GDWG is not defined as a specified authority. However, a visitor may become aware that the person they visit in detention has been or is in the process of being radicalised and may be a potential risk to others in detention/IRC staff/the wider community. There is a legal duty on us all to report any concerns of potential terrorist actions.

1. **Categories of abuse**

Categories of abuse include:

* Physical
* Sexual
* Financial
* Emotional or psychological (including radicalisation)
* Neglect and self-neglect
* Domestic violence
* Discriminatory or “hate crime”
* Modern slavery and/or trafficking
* Institutional

These are not mutually exclusive and many situations will combine a combination of different types of abuse.

In the context of detention, the abuser may be:

* A person visiting the detention centre (friend, family, or volunteer)
* A person supporting the person detained but not necessarily visiting
* One of the staff at the detention centre
* One of the staff responsible for transporting a person being detained
* Another person in detention

For those who have been released from detention, or who are GDWG volunteers or staff, or who are members of the public attending GDWG events, the abuser may be:

* a family member, friend, or neighbour
* a volunteer befriender
* a professional health, social, care or other worker
* a fellow volunteer or staff member
* the person they are befriending
* another adult at risk
* a stranger
1. **Procedures in the case of suspected abuse**

**Responding**

If the adult concerned is in immediate danger or in need of urgent medical attention, action must be taken to ensure their immediate safety and well-being. This may include calling the appropriate emergency service.

The following checklist provides guidance for staff and volunteers relating to responding:

* remain calm and try not to show shock or disbelief
* listen carefully
* reassure the person that they are being listened to and supported
* explain that you will need to share the information and who you will do this with

**Do not:**

* press the person for further details
* promise to keep secrets
* make promises you can’t keep
* be judgemental
* ask leading questions

**Raising a safeguarding concern**

Anybody can raise a safeguarding concern for themselves or for another person. A ‘safeguarding concern’ is when any person has a reasonable cause to believe that:

 an adult has needs for care and support and,

 may be experiencing, or is at risk of abuse or neglect and,

 is unable to protect themselves from that abuse or neglect because of their care and support needs.

If on the basis of the presenting information available, it appears that these conditions are met then a safeguarding concern should always be raised with the West Sussex Adult Social Care. In an emergency, the emergency services should be contacted. Other agencies may need to be advised: in the case of a safeguarding concern about someone in detention, this will be the detention centre management company (currently Serco). If the GDWG safeguarding lead has concerns that the IRCs safeguarding team has not taken the allegation sufficiently seriously they should contact the Independent Monitoring Board (IMB), HMIP, and/or the Independent Chief Inspector of Borders and Immigration (ICIBI).

Where possible and safe to do so, the person raising a safeguarding concern would have had a conversation with the adult concerned regarding their consent, views and wishes. The exception to this could be if there is the possibility it would have increased the risk for the adult.

**Remember!**

 You may not be the only person who has noticed or experienced the abuse or neglect

 There could be lots of people who have ‘low-level’ concerns about the same thing but if you do not pass the information on it cannot be addressed

 Even if it has not affected you, or someone you know directly, it could be affecting someone else who may not be able, or in a position, to say something about it.

 Abuse and neglect do not just appear from nowhere. Sharing information before something becomes abuse or neglect is really important – do not think you are making a fuss about nothing!

**Reporting procedures**

The designated GDWG Adult Safeguarding Person is Karris Hamilton. Under normal circumstances staff/volunteers are required to pass on promptly any concerns about possible abuse or neglect of an adult to Karris Hamilton (safeguarding lead). However, should an urgent issue arise during a visit that requires immediate action, the staff member/volunteer should approach the Gatwick IRC’s duty safeguarding team directly (see contact list at end). The staff member/volunteer should then endeavour to inform the safeguarding lead as soon as possible.

If these designated people are not available the staff member/volunteer is required to contact the Chair of Trustees, or in extreme cases whilst in the detention centre, the staff member/volunteer can ask the nearest staff member to contact the Duty Operations Manager of the Day at Tinsley House or Brook House (“Oscar 1”).

In circumstances away from the IRC where staff/volunteers believe there to be an urgent, serious, and imminent threat to an adult’s safety they must call 999 and report the matter to the police.The GDWG Director and safeguarding lead should then be informed straight away.

It is then the responsibility of the GDWG Director and safeguarding lead to contact West Sussex Adult Social Care department to discuss the concerns (see contact list at end) and agree what action is to be taken. This is a centralised number and the caller will need to ask to speak to someone stating clearly that it is regarding an adult safeguarding concern.

Remember **do not**:

* attempt to contact the alleged ‘abuser’ or alleged ‘victim’
* talk to other staff, volunteers or service users about the information shared with you

**Concerns about adults in the community known to someone in detention:**

During the course of a visit to an adult in detention, a person in detention may tell their GDWG visitor of a concern they have about an adult in their network living in the community, e.g., they fear a friend has been trafficked and can’t escape, or is experiencing very serious domestic abuse. The staff member/volunteer will need to explain that this is not something they can keep confidential and that the GDWG safeguarding lead will need to be informed so they can take any appropriate action needed.

**Supporting formerly detained people in the community**

GDWG’s primary purpose is to assist people in detention whilst they are being held at Tinsley House and Brook House. All volunteers are made aware of this fact upon joining the group. However, GDWG recognises that, on occasion, a volunteer may form a close friendship with the person they have been visiting and choose to stay in touch with them in their private capacity if they are released. All new volunteers are given guidelines which state that the relationship henceforth becomes a private arrangement and falls outside of the remit of GDWG. We advise any volunteer whilst acting from this position who is concerned about an adult at risk of abuse or neglect should seek the advice of the adult social care services or police of the area in which the person formerly detained lives and follow the course of action suggested.

**5. Digital Safeguarding**

Digital safeguarding means: ‘the protection from harm in the online environment through the implementation of effective technical solutions, advice and support and procedures for managing incidents’. GDWG is committed to the safeguarding and protection of all detained people, volunteers, staff and users of our digital platforms and we apply the same safeguarding principles to our work whether offline or online. 'Digital platforms' includes social media websites and apps such as Facebook, Twitter and YouTube, but also software and apps such as Microsoft Teams, WhatsApp, Google Drive, and emails.

This means protection from:

* Online bullying
* Online abuse (the use of technology to control another individual. For example, by demanding passwords, making threats via email or social media, identity theft, malicious comments to discredit, and the threat to share images.)1
* Sexual exploitation and grooming online
* Discrimination and abuse on the grounds of any protected characteristics
* Sharing of illegal and inappropriate imagery
* Cyberstalking
* Impersonation and hacking
* Disinformation and misinformation
* The oversharing of personal information

We expect staff and volunteers to follow our code of conduct online just as they would offline. Staff and volunteers must also abide by our Social Media and Media and Communications Policy, which is included in the Staff Handbook and the Volunteer Handbook.

GDWG seeks to ensure our work supports online safety and that we use best practice digital safeguarding for technical solutions, processes, and procedures. GDWG seeks to:

* Help our volunteers to be effective online.
* Take best practice action when a digital safeguarding incident occurs.
* Support and train volunteers and staff in digital safeguarding.
* Maintain links with key organisations to raise awareness and refer and report incidents.
* Risk assess all projects, initiatives, programmes and activities to make sure digital safeguards are in place.
* Support volunteers and staff via our safeguarding policy

To put these principles into practice, our volunteers, members, and staff must:

* Ensure the correct permissions are in place before taking and using photographs.
* Make sure GDWG has parent or carer permissions before contacting any child under 14 years of age, even if they've contacted us first.
* Make every effort to ensure that our community understand why and how they must use social media responsibly and safely.
* Recognise that digital safeguarding is an important part of all our work, and that we are committed to always delivering best practice.

**Online Safeguarding Procedure**

Anyone who becomes aware of an online safeguarding incident must follow the usual procedure by first recording the facts and then passing them onto the safeguarding lead (Anna Pincus) as soon as possible. It is important that you do not delete any evidence, such as images or messages. If possible, ensure the relevant device is placed in a secure place so that the individual cannot be further abused and no evidence can be destroyed.

The safeguarding lead is Anna Pincus, who can be reached via anna@gdwg.org.uk or 01293 657070. Out of office hours, Anna can be reached via 07804903157

Once the information has been passed on, the safeguarding lead will decide if the person is at immediate risk of harm. If they are, they will take appropriate action.

However, if you deem the person to be at risk of immediate significant harm, and you cannot reach the safeguarding lead, then you must encourage them to call the emergency services (999) or offer to do so on their behalf.

Once the information has been passed onto GDWG, the safeguarding lead will decide whether the issue needs to be investigated further. If so, all evidence will be collected to ensure transparency and accountability.

In the case of evidence involving an illegal image (such as pornography that involves illegal acts), GDWG will seek advice from the police. If the image or abuse involves children, GDWG will seek advice from the CEOP (Child Exploitation and Online Protection Command).

**GDWG’s Digital Platforms**

GDWG uses the following online platforms and we have assessed and addressed each platform for associated safeguarding risks:

**WordPress**

Risks

* Images being posted that disclose an individual’s identity without their consent
* Abusive comments being posted

Actions taken to mitigate risks

* Individuals are asked for their permission before photographs are posted
* All comments must be approved by our team’s moderators before they go live on the site

**Twitter and Instagram**

Risks

* Oversharing: members of our community sharing personal information, other people’s personal information, or photos of other members of our community/themselves
* Location sharing: members of our community tagging photos with the geo-location or checking into venues they frequent. This can put you at risk of someone building up an accurate picture of your daily routine or home location.
* Abusive comments: members of our community viewing abusive comments that are posted in response to tweets by other members of the community. Or they may see abusive comments due to people in our community responding to abusive tweets or comments (even if their intention is to criticise or discredit them.)

Actions taken to mitigate risks

* Oversharing: members of our community are advised to avoid sharing personal information, either about themselves or others. We will not post photographs of members of our community without seeking their permission first, and we will immediately remove photographs if requested to do so.
* Location sharing:  members of our community are advised to turn off geo-location tagging on their photographs and to avoid checking into venues.
* Abusive comments: any abusive comments on GDWG or Refugee Tales social media will immediately be reported and the users will be blocked. We will not engage with such comments and neither should members of our community.

**Microsoft Teams**

Risks

* Anonymous users joining Teams meetings to post or share abusive content
* Oversharing: individuals might inadvertently share personal information whilst sharing their screen in a meeting. Their privacy might also be compromised if their home is visible in the background of video calls.

Actions taken to mitigate risks

* Anonymous users: anonymous users are prevented from joining Teams meetings through the settings. If anyone does post abusive content they will immediately be removed from the meeting.

Oversharing: individuals are advised to close personal documents or webpages when sharing their screen. They are also advised to blur their background if concerned about privacy.

**Zoom**

Risks

* Uninvited individuals joining a meeting to share abusive content and/or disrupt the call
* People being recorded without their permission
* Oversharing: individuals might inadvertently share personal information whilst sharing their screen in a meeting. Their privacy might also be compromised if their home is visible in the background of video calls.
* There is a risk that someone might disclose something that is triggering for themselves or others.

Actions taken to mitigate risks

* Settings are used to prevent participants sharing their screen unless the host has granted permission.
* A Waiting Room will be used to ensure that those who wish to join the meeting can be verified first.
* Remote control will be disabled (preventing other participants from taking remote control of the system belonging to the person sharing their screen.)
* ‘Join before host’ will be disabled so that no one can join the call before the host.
* ‘Allow removed participants to re-join’ will be disabled. Anyone posting abusive content will immediately be removed from a meeting.
* ‘Mute participants upon entry’ will be enabled
* Meetings will not be recorded without first requesting the permission of all participants
* Oversharing: individuals are advised to close personal documents or webpages when sharing their screen. They are also advised to blur their background if concerned about privacy.
* We invite participants to use a pseudonym if showing their real identity poses any risks or concerns for them.
* Participants will not be asked to turn on their cameras if they do not wish to.
* We will include a trigger warning for planned contributions.
* To mitigate the risk of someone being distressed by an online discussion, our Mental Health First Aid responders will check in with people at risk following the Zoom call and the Samaritans’ details.

**WhatsApp for the Self-Advocacy Group**

Risks

* Phone numbers are shared with other members

Actions taken to mitigate risks

* When a new member joins the group, the existing group members are made aware and given the opportunity to leave the group if they wish
* New group members are told the purpose of the group and also forewarned that it means their numbers will be public to a small group of people.
* Three members of the staff are part of the group and moderate posts for appropriate content.
* We model a positive, celebratory, encouraging tone for the group WhatsApp.

**6. Safe Storytelling**

GDWG prioritises stories of the detention experience where the subjects of stories have had a GDWG visitor or support from the GDWG staff team with the building of trust over time that the visitor or supporter relationship creates.

A risk assessment is completed prior to working with someone on sharing their tale and safety risks are discussed with contributors, and documented on the consent form.

We will respect the voice of each contributor and, where possible, support them to tell their story in their own words. If they share their story in collaboration with another writer, we will prioritise the contributor’s editorial requests over the writer’s.

We will respect the privacy of the contributor, removing identifiable features in the narrative if they wish to remain anonymous or if we have reason to believe that they could be at risk if identified.

The sharing of a story will depend on GDWG having established that the subject of the tale wishes to share, has a support network in place and has the resilience to ensure the process is positive for the subject of the story.

GDWG makes psychotherapy support available to the subject of the tale and MHFA trained volunteers are available on request or offered according to need.

The subject of the tale is supported by the Director ahead of a meeting to share a story and the sharing takes place with a chaperone present at all times who is a member of GDWG staff or an experienced visitor.

After a sharing with a writer, the subject of the tale receives daily, weekly, then monthly support from the GDWG team.

 If an individual shares their tale in the first person the checks on intention, resilience and support apply and the person is supported in the preparation of the telling including with prompts, rehearsal and by being given time to take in the performance space. Support from a psychotherapist or trained MHFA volunteers applies as does support after the sharing. Wherever possible, such first-person sharing will take place in the supportive framework of a GDWG walk where the community becomes a strength and support.

**7. Record keeping**

It is essential that the GDWG member records what they have seen or heard that has led them to believe that an adult’s welfare or safety is at risk. This should be done as soon as is practical after it has come to their attention. The GDWG safeguarding lead also needs to keep clear and concise records, made in a timely manner, as to the action taken and why.

Records should include the following details where possible and/or relevant:

* name and position of GDWG member (e.g., job title, volunteer)
* name of the adult at risk
* name of person alleging abuse (if not the same as above)
* date, time and setting in which allegation was made or event witnessed
* names of other people present
* record of what happened using individual’s own words
* whether there is any evidence such as bruising or change in behaviour
* who has been told about it, when and what action they took, if any
* the precise action, if any, that the staff member or volunteer has taken
* date and sign the record, ensuring it is legible

A standardised recording format is available for staff and volunteers’ use. An electronic copy of the record will be securely stored in the password protected Management folder in SharePoint on Office 365. The volunteer/staff member reporting abuse or flagging up a concern will also receive a copy of any record kept and must retain this record in a manner consistent with GDWG’s data protection responsibilities.

When an incident/concern is reported it is paramount that the exact words that the adult has used (if known) are noted, distinguishing between verbatim quotation and summary. It is imperative that this information is recorded as soon as possible after the conversation.

Once the information is passed to West Sussex Adults’ Social Care, they will make a decision on whether the Police need to be informed and if there is a need for a joint investigation. In this case, the investigation team should keep GDWG updated with the progress of the investigation on a need-to-know basis. Otherwise, an investigation or enquiry may be carried out by Adults’ Social Care or, if an allegation has been made about a member of staff or a volunteer, it may be carried out by GDWG at the request of Adults’ Social Care.

In the event that a volunteer is called to attend a Police station to make a statement, the GDWG safeguarding lead will also attend to provide support (or another GDWG member acting on his/her behalf).

**Confidentiality**

Personal information may need to be disclosed in the best interests of the adult at risk. The following safeguards therefore need to be observed:

* information will only be shared on a need-to-know basis when it is in the best interests of the adult at risk
* informed consent should be obtained wherever possible
* it is inappropriate for staff, volunteers, or agencies to give assurances of absolute confidentiality in cases where there are concerns about abuse
* adults at risk should be advised why, and with whom, information will be shared.

**8. Recruitment and selection of staff, volunteers & trustees**

GDWG is committed to “Safer Recruitment” practice as outlined in the “Staff Selection & Recruitment Policy”. This includes the following measures to reduce the risk of abuse by staff members, volunteers, and trustees:

* All potential volunteers and staff will be required to provide references, attend an interview, and agree to a Disclosure and Barring Service (DBS) check at the appropriate level. This will vary – either basic or enhanced – depending on their role.
* In the case of references for paid staff, past employers will be contacted directly. Original birth certificates, driving licenses or passports will be used to verify dates of birth for DBS checks, as there is risk of fraud and consequent evasion from detection if copies are accepted. All checks will need to be satisfactory before appointment. Staff will work for a probationary period before being confirmed in post.
* If staff, volunteers, and trustees do not subscribe to the DBS updating service, a new check will be made once every 5 years following their appointment.
* By signing the Code of Conduct, staff and volunteers undertake to inform GDWG of any subsequent criminal charges, convictions or cautions, or any other safeguarding matters concerning them.

**9. Training**

There will be two safeguarding training sessions annually and all staff, trustees, and volunteers will attend at least one session per year.

**10. Allegations against a member of staff, trustee, or volunteer**

Gatwick Detainees Welfare Group assures all staff/volunteers that it will fully support and protect anyone, who in good faith reports his or her concern about a colleague’s poor practice or that a colleague is, or may be, abusing an adult. Such concerns should be reported to the GDWG safeguarding lead, or in their absence, the Chair of Trustees. If the person making the report considers their concerns are not being taken seriously, they should refer to the GDWG “Whistleblowing Policy” or they may wish to use the Charity Commission’s whistleblowing helpline. They may also wish to consult the GDWG “Bullying and Harassment Policy”.

Where there is a complaint against a member of staff there may be three types of investigation:

* A criminal investigation carried out by the police
* A safeguarding investigation or enquiry carried out by West Sussex Adults’ Social Care, or at their request, by GDWG
* A disciplinary or misconduct investigation carried out by GDWG.

The results of the police and adult safeguarding investigation may well influence the disciplinary investigation, but not necessarily.

**Concerns about poor practice – action to be taken:**

* If, following consideration by the GDWG safeguarding lead, the allegation is clearly about poor practice; this will be dealt with as a training or misconduct issue as appropriate.
* If the allegation is about poor practice by the GDWG Director or safeguarding lead, or if the matter has been handled inadequately and concerns remain, it should be reported to the Chair who will decide how to deal with the allegation and whether or not the organisation should initiate disciplinary proceedings.

**Concerns about suspected abuse – action to be taken**

* Any suspicion that a person has been abused by either a member of staff or a volunteer should be reported to the GDWG safeguarding lead who will take such steps as considered necessary to ensure the safety of the person in question and any other people who may be at risk.
* The GDWG safeguarding lead will refer the allegation to the Adults’ Social Care department who may involve the police, or if the matter is urgent and serious, s/he may go directly to the police.

If the GDWG safeguarding lead is the subject of the concern/allegation, the report must be made to the Chair of Trustees who will refer the allegation to Adults’ Social Care.

**Any concerns or allegations about a member of staff, volunteer or trustee should be brought to the attention of GDWG’s insurer immediately by the GDWG safeguarding lead. It may also be a condition of some grant making trusts that they are informed promptly of any allegations made against staff or volunteers. Reporting requirements to the Charity Commission about serious incidents (defined as “adverse events, whether actual or alleged”) relating to harm to beneficiaries or others, property, finance or reputation will be followed as required.**1F**[[2]](#footnote-2) Trustees will review the handling of any serious safeguarding incident at the Board Meeting following the incident, or earlier if appropriate. After any very public or serious incident, they will plan what information to give people in the organisation/the media as appropriate.**

**We wish to be a learning organisation and are committed to acknowledge and learn from our failures or poor practice.**

**Internal Enquiries and Suspension**

* The GDWG safeguarding lead will contact the West Sussex Adult Social Care to inform them of the allegation, and will seek their advice as to whether any individual accused of abuse should be suspended pending any police and Adults’ Social Care inquiries or an internal investigation if requested by Adults’ Social Care.
* Should allegations be made against a staff member, they should be made aware of their rights under employment legislation and of the GDWG internal disciplinary procedure. Any investigation will be carried out in a timely manner.
* Following the outcome of any investigation, the organisationwill assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to justify any action by the police. In such cases, the organisationmust reach a decision with the assistance and advice of West Sussex Adult Social Care. This will be based upon the available information and the balance of probability. The welfare of the adult at risk should remain of paramount importance throughout.

Employers and managers of volunteers working with people in regulated activity have a legal duty to make referrals to the Disclosure and Barring Service in circumstances where they have permanently dismissed a person from the organisation (or would have if the person had not left, resigned, retired or been made redundant) because the person has:

 been cautioned, arrested, or convicted for a relevant offence, or,

 engaged in misconduct in relation to children or adults at risk – i.e., that an action or inaction (neglect) has harmed a child or adult or put them at risk of harm, or,

 satisfied the ‘Harm Test’ in relation to children or adults at risk – i.e., that there has been no relevant misconduct but a risk of harm to a child or adult still exists.

**11. . Contacts and telephone numbers**

**Please contact the GDWG office in the first instance unless it is an emergency. We will follow up on all concerns as appropriate, speaking to Brook House or Tinsley House management as needed.**

**GDWG Office number: 01293 657070**

**Out of hours or if above not answered, please contact the: GDWG safeguarding lead, Karris Hamilton on 07990 113174, or out of hours call 07985 749627. Alternatively, the GDWG Director, Anna Pincus, can be called on: 07804 903157**

**If Karris and Anna are unavailable, please contact Laura Moffatt (Chair of Trustees) – 07974 318137**

**Brook House and Tinsley House:**

Duty Safeguarding Team Gatwick IRCs (concerns can be raised anonymously) -

Tel: 01293 556 521

safercommunitygatwick@serco.com

**West Sussex Adults’ Care Point**: 01243 642 121

Email: adults.carepoint@westsussex.gov.uk

Online https://www.westsussex.gov.uk/social-care-and-health/social-caresupport/adults/safeguarding-adults-raise-your-concerns/

**GDWG insurers - Ecclesiastical Insurance:** 0345 777 3322

Email: information@ecclesiastical.com

**Charity Commission:**

https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

**Independent Monitoring Board (IMB)**: www.imb.org.uk

Email: IMB@justice.gov.uk

**Independent Chief Inspector of Borders and Immigration (ICIBI):** +443000 720128.

Email: chiefinspector@icibi.gov.uk

**12. . Related policies and resources**

* Bullying and harassment policy
* Guidelines for visiting people in detention who pose a safety risk
* Guidelines for visiting suicidal people
* Safer recruitment policy
* Health & Safety policy
* Walk With Us policy
* Whistleblowing policy
* Visitors’ Code of Conduct
* Leaflet about visiting for people in detention

Charity Commission:

* <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>
* <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756636/10_safeguarding_actions_for_charity_trustees_infographic.pdf>

WSCC:

* WSCC leaflet “Safeguarding Adults: What to do if you think someone is being abused, neglected or exploited”
* WSCC leaflet “Safeguarding children: What do you do if you’re worried a child is being abused?”
* Pan Sussex Adult Safeguarding Procedures: <https://sussexsafeguardingadults.procedures.org.uk>/
* Pan Sussex Child Safeguarding Procedures: <https://sussexchildprotection.procedures.org.uk/>
1. “Staff” refers to GDWG staff throughout the document, unless otherwise specified. [↑](#footnote-ref-1)
2. See https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity [↑](#footnote-ref-2)