



*Dignity and hope for
asylum seekers and refugees*



DP SAFEGUARDING POLICY

DP (The Destitution Project) believes each person has value and dignity, and this implies a duty to protect them from abuse. This policy outlines the duty and responsibility of all staff, volunteers and trustees in line with government legislation, guidance and safe practice.

The key objectives of this policy are for all trustees, employees and volunteers of DP to:

- have a general overview of safeguarding and what safeguarding looks like within DP.
- be clear that safeguarding is everybody's responsibility, and therefore pertinent to all roles.
- ensure the necessary actions are taken, without delay, where there is deemed to be risk.
- ensure all incidents of concern are recorded promptly, as per good record keeping practice, stored securely and shared appropriately. (See appendix 8 Confidential Incident/Concern Form)
- ensure all concerns are reported to the DP designated Safeguarding Officer, and confidentiality maintained unless it is felt that the person making the disclosure is a risk to themselves or others in which case the appropriate referrals will be made.

WHO AT DP MAY BE CONSIDERED VULNERABLE?

Because of their lived experiences all of our **service users** will have suffered from some degree of trauma in their journey to this country, such as physical and emotional harm, threat, exploitation or persecution. This vulnerability may further be increased by difficulties encountered when they reach this country, such as language, discrimination and statutory process.

Many of our families bring with them **children**, who are vulnerable as minors (under 18).

DP recognises that, due to disability, reduced capacity or by their own particular situation, anyone may experience periods of vulnerability in their lives and that applies equally to our **staff, volunteers and helpers** for whom we have a duty of care.

WHAT IS ABUSE?

Abuse is a violation of an individual's human and civil rights by any other person or persons. It may also be a criminal offence. Abuse hurts people in many ways: it can cause fear, suffering, injury or even death. Abuse can take many forms. It can be obvious but sometimes it is subtle.

Examples of abuse:

- Physical: restraint, over medication, hitting or threatening to hurt someone.
- Financial: Pressure to change a will, share PIN number, taking or borrowing possessions without the owner's consent, over charging, pressure selling.
- Psychological: name calling, threats, humiliation (in person and on line via social media).
- Sexual: touching, marriage or sexual acts without a person's consent, professionals involved in intimate relationships with their clients.
- Domestic abuse: controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member.
- Organisation abuse (previously known as institutional abuse): including neglect or poor care within an institution or specific care setting.
- Neglect: ignoring or isolating a person, refusing access to food, medical attention etc
- Self- neglect: this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviours such as hoarding.
- Modern slavery: encompasses slavery, human trafficking, it could involve forcing adults into labour and/or domestic servitude.
- Discrimination: on account of race, gender, religious belief, age, sexual orientation, political belief

SAFEGUARDING RESPONSIBILITIES

Trustees

- Trustees will appoint a Safeguarding Officer and a Deputy Officer and ensure they are adequately trained.
- The role will usually be undertaken on a voluntary basis although expenses should be met.

Designated Safeguarding Officer

The role of the Designated Safeguarding Officer is to

- advise and support DP Trustees, employees and volunteers in meeting the safeguarding requirements of their role.
- ensure that any concerns raised about potential abuse to a service user by a member of staff or a volunteer is managed according to DP Procedures.
- ensure records are kept of all incidents/concerns according to good practice guidelines.
- ensure that all required safeguarding training and DBS checks are undertaken and records kept.
- attend training and meetings relevant to the role.
- report to DP Trustees at least quarterly.
- ensure completion of an annual assessment of safeguarding practice to inform DP trustees of areas of good practice and where developments need to be made.
- ensure a risk assessment is completed for all areas of activity in DP and reviewed at least annually.
- support safer recruitments for all posts.
- Support **Induction Procedures (Team Members Handbook p13 and Induction Policy)**
- ensure that DP maintains a current, signed Safeguarding Policy, which includes contact numbers for local and national helplines and which is reviewed annually.
- ensure that all employees, volunteers and Trustees have access to the Safeguarding Policy (hard copy on Safeguarding notice board, also in Team Member's Handbook)

GOOD PRACTICE

We aim to ensure safeguarding is key to all areas of activity at DP therefore also commit to the following:

- All people are treated with respect and dignity and unacceptable behaviour, whether on the part of a service user, team member or visitor will be managed according to the **Principles for Managing Unacceptable Behaviour (Appendix Two) or Complaints Procedure (Appendix Three)**
- All our Service Users are considered vulnerable on account of their status. Some may have additional vulnerability or may present a risk to other service users/team members. **See Appendix 3: Managing Risk, Safeguarding Designations and Service Users.**

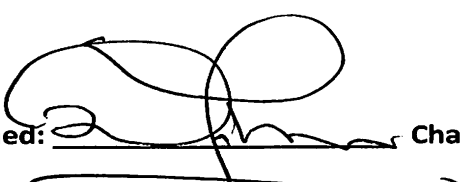
- Sometimes DP receives referrals from other organisations such as the Probation or Mental Health Services. In this case the Caseworker assesses the referral and, if they are eligible to attend DP, they must be accompanied by a Support Worker for 4 visits, after which time, if there have been no issues they may continue to attend alone.
- Sometimes DP receives requests for help from Asylum Seekers who are unaccompanied minors. Asylum Seekers who are officially classed as minors may attend Casework appointments without an adult. Appointments should be conducted with a Trustee/Operations Manager present (to reduce the risk of allegations being made against a staff member). In recognition of their vulnerability and the more diverse environment of the Drop in, they may only attend Drop in with an adult recognised as responsible for their care. **See**

Appendix Three

- Service Users may approach Team Members for help with an aspect of their situation and, historically, some Team Members have formed friendships with Service Users. **At all times Team Members should behave in line with the Volunteer - Service User relationship as outlined during the Induction process and on p6 of the DP Team Members Handbook (hard copy available in Food Room and DP Office, digital sent to all volunteers and available on request).** Those who act on behalf of DP must comply with the Lone Working Policy (hard copy on Safeguarding Notice Board and digitally on request)
- Sometimes families may need to bring children. Pre school children must stay with and be supervised by their parents at all times. School aged children can attend for the purpose of visit (attending appointment, collecting food parcel). Guidance displayed on the 'School Age Children' notice board at Drop in (including key DP language translations) and held at Reception. Also on p12 Team Member Handbook.
- A risk assessment of DP premises will be undertaken and reviewed annually by those staff responsible for health and safety and property management, supported by the DP designated Safeguarding Officer and shared with the Trustee board.
- Any DP organised transport of vulnerable adults and/or children accompanying adult DP service users will be checked to ensure the vehicle is suitably maintained, has all the required safety restraints, is adequately insured for the purpose and that the driver and escort have been safely recruited. A record will be kept in DP file for each driver/car/transportation.
- Where any activities are undertaken outside of DP premises, the DP designated Safeguarding Officer must be notified, and have shared with them the completed risk assessment, in advance. If the activity is unusual or considered to be high risk, the DP designated Safeguarding Officer will seek the advice of the DP Safeguarding Advisor.

- All complaints must be acted upon as per the DP Managing Complaints procedure (as detailed in Team Member's Handbook p11) and the DP designated Safeguarding Officer informed.

This is intended to be a dynamic policy. It will be reviewed at least annually by DP Trustees.

Signed:  Chair of Trustees

15th February 2026

DP (DESTITUTION PROJECT, BOLTON) – CHARITY 1194734

APPENDICES

APPENDIX ONE: PROCEDURES FOR RESPONDING TO SAFEGUARDING INCIDENTS

These procedures explain what to do when a safeguarding concern is disclosed. It may be where allegations are made about an employee, member, volunteer or about someone not connected with the Project.

Whether the concern is about current or past events, the response should be the same. Past events can still give rise to current safeguarding concerns.

Allegations that are not a safeguarding concern but are still inappropriate conduct should be reported to Safeguarding Officer /Team Member responsible at the time for further action.

First Response

The person noticing or being informed of concerns must inform the Safeguarding Officer, Manager or Trustee as soon as possible except if that Team Member is the

subject of allegation, in which case inform one of the other designated Team Members as soon as possible.

If approached by anyone wishing to talk about a concern, follow the basic guidelines below:

Listening

- Are the time and place appropriate for you to listen with care and security. Do not defer listening, but seek the other person's agreement to find a suitable place to listen.
- Stay calm and listen to the information very carefully, take seriously what you are being told. Do not pass judgement, minimise or express shock or disbelief. Reassure them that disclosing is the right thing to do.
- Use the person's own words; do not put words into their mouth or sanitise any language .
- You can take notes if they agree. Record date, time and persons present and sign. Reflect back to them what they said and what you have recorded to confirm you have understood.
- Do not make promises you cannot keep.
- Do not promise confidentiality. Explain that you may have to share information with others if there is a safeguarding risk. Explain what will be shared, how, when that will happen and with whom.
- Find out what the person hopes for.
- Provide the person with the means to contact you and be clear about how and when you will give feedback.

Note Below

exception to informing any of the above is if one of them is the subject of the concerns. The person who is the subject of the allegations will not be informed until after the allegations have been discussed and agreement reached with the statutory authorities. Further action will be decided in discussion and agreement with the statutory agencies.

EMERGENCY SITUATIONS FIRST 5 MINUTES

- **Is the person safe?**

- **Are there any risks to other adults at risk or children?**
- **Does the person have capacity to decide what they would like to happen?**
- **Does the person require medical attention?**
- **Do the police need to be informed?**
- **At this stage do not question the victim or the alleged perpetrator or witness**

Contact your group's designated officer to discuss the concern:

- **If the person is in immediate danger or you suspect a criminal offence has been committed phone the Police on either 999 or 101 for less urgent calls. The Manager, Safeguarding officer or a trustee should always be advised when a referral is made to the police.**

**Referral to Adult Social Care required. For all post codes phone:
01204337000
01204 337777 - Emergency out of office hours**

The person receiving the information will need to assess whether the subject of the concern is at risk of immediate harm and if so, take any immediate action necessary to safeguard them including contacting statutory authorities such as police, child or adult services.

FOLLOW UP ACTIONS (SAFEGUARDING OFFICER)

Recording

Whenever a safeguarding concern has been raised about an adult, anyone receiving a concern or responsible for dealing with the situation must keep clear and comprehensive records in order to ensure there is:

- a history of events
- continuity if there are changes of personnel
- accountability
- evidence in case of proceedings. It is important that all records are kept in a secure place and only shared in accordance with legislation, government guidance.

The incident / concern should be recorded on a standard form that everyone has access to. The following practice should be followed:

- **Include:**

- who was involved – names of key people
- what happened – facts not opinions
- where it happened
- when it happened
- Keep a log of all actions you have taken and details of referrals to statutory agencies.

Making a referral

When making a referral, have the following information ready wherever possible:

- the name, date of birth and address of the person at risk
- names and addresses of parents or carers (as appropriate)
- any other contact details (eg others who may be at risk of harm)
- any other professional known to be involved with the person at risk or family (where appropriate)
- the date, time and context of the disclosure
- nature of the alleged abuse/concern including details of the disclosure
- what impact the alleged abuse is having on the person including their wishes and feelings about the situation and possible outcomes
- any known or previous issues of concern
- your knowledge of personal circumstances
- any work undertaken with the person at risk or family by the project
- names of those who are aware of the referral (person at risk, family, alleged perpetrator etc)

- what the person disclosing the concerns has been told will happen next
- name and contact details of the Safeguarding Officer
- your name and contact details.
- whether consent for referral was given and your view on the adult's capacity

In most situations a referral to the Designated Officer adult safeguarding (local authority) in adult services should occur within one working day. It is preferable for the safeguarding officer to do this but if they are not available, anyone can do it. The project must follow the advice given by statutory agencies (Children's Services, Adult Social Care/police) in determining what can be said and when to the subject against whom allegations have been made. While this may be uncomfortable for those who know the person concerned, failure to follow this advice could result in:

- risk to the safety of children or adults
- anxiety for the subject of allegations before information is available to make them aware of the situation and next steps

Once a decision has been made to make a referral to the statutory agencies, the information listed above will need to be passed on.

If you don't have all the above information, pass on what you do have. This can be done via telephone, although some local authorities prefer online referrals. If you do refer by telephone, you will need to follow up in writing (this includes email correspondence).

The vulnerable adult's safety is the priority and there must not be a delay.

What can you expect from Adult Social Care/police?

- they will check previous records to determine what action to take
- they have a duty to ensure the person is safe from harm and aim to progress an enquiry as soon as possible, including seeing the person
- their name and contact details
- what action they intend to take and when
- advice to you on what to do next
- a timescale for action and an update to you on action taken (where confidentiality permits).

If you are passing on information via telephone, you will need to follow up in writing by noon the following day at the latest. 'In writing' includes email correspondence (note: some local authorities will only take referrals via online referral forms).

In each local authority there are published procedures for use by anyone in the area who may find themselves dealing with the possible abuse of a child or adult. Those procedures are usually available online and on open access. No one should be deterred from making a referral because they are unsure about the formal procedure.

**Referral to Adult Social Care required. For all post codes phone:
01204 337000**

01204 337777 - Emergency out of office hours

APPENDIX 2. LOCAL STATUTORY SAFEGUARDING SUPPORT

Concerned about an adult	Concerned about a child
To report abuse In an emergency call 999	
Email: Safeguardingadults@bolton.gov.uk 01204 337000 - during office hours 01204 337777 – out of office hours Online referral form: Bolton Council - Adult Safeguarding Referral	Telephone: 01204 331500 – during office hours 01204 337777 – out of office hours Online referral form: Schools and children: Child referral (verintcloudservices.com)
For further information please see: Safeguarding adults at risk – Bolton Council Bolton Safeguarding Adults Board – Bolton Council	For further information please see: Working with children and young people – Bolton Safeguarding Children Worried about a child? – Bolton Council Home – Bolton Safeguarding Children

APPENDIX 3. PRINCIPLES FOR MANAGING UNACCEPTABLE BEHAVIOUR

We expect all staff, volunteers and Trustees to:

- provide a fair, open, proportionate and accessible service
- listen and understand
- treat everyone who contacts us with respect, empathy and dignity

We expect everyone who contacts DP to:

- treat staff, volunteers and other service users with respect and courtesy
- engage with us in a way that does not jeopardise our ability to carry out our work effectively and efficiently for the benefit of everyone in receipt of our services

Examples of unacceptable behaviour

Aggressive, abusive or offensive language/behaviour that may cause staff, volunteers or other service users to feel intimidated, uncomfortable, degraded, threatened or abused

Unacceptable demands – such as requesting responses within unreasonable timescales, inappropriate escalation when not receiving their desired response, refusing to accept a decision where explanations have been given.

Unacceptable levels of contact – such as numerous calls or emails in one day or excessive contact over a short period of time, repeatedly sharing the same information, continually reframing the issue in such a way that it makes it difficult for us to do our job effectively

Refusal to co-operate – such as refusing to provide information and/or evidence, refusing to access other services more appropriate to their need

Managing unacceptable behaviour

We recognise that some people who contact us may feel aggrieved, upset or distressed and in a small number of cases, a person's behaviour while engaging with us may become unacceptable because it involves abuse of our staff, volunteers or service.

When this happens, we will take action according to our RESPONDING TO BEHAVIOURAL ISSUES guidance to protect our Team Members and maintain our ability to do our work and provide a service to others. A copy of this guidance is on the Safeguarding Notice board.

In the first instance we will try to work with the individual to resolve the situation and continue communication in a respectful and dignified way for all involved.

If this fails then we will consider action, which may include a verbal warning at the time to enable the individual to understand the impact of their behaviour and to take steps to amend it, restrict contact, bar them from the premises

Where appropriate, we will refer the incident to the police for criminal investigation.

APPENDIX 4: MANAGING RISK: SAFEGUARDING DESIGNATIONS AND SERVICE USERS

Barred:

- no admission

Secure Support: Restricted Entry

- admitted to casework with Trustee/Operations Manager present
- not admitted to Drop-in (food parcels etc brought upstairs)

Secure Support: Restricted Entry Minor

- admitted to casework with Trustee/Operations Manager present
- not admitted to Drop-in (food parcels etc brought upstairs)

Secure Support:

- admitted to casework with Trustee/Operations Manager present
- admitted to Drop-in - Hall lead notified
- escorted downstairs

Pastoral Support:

- admitted to casework trustee presence optional depending on circumstances
- admitted to Drop-in, Hall Lead notified
- not escorted

Guidance

These designations are given when it is felt that an individual may present a degree of risk to team members and/or other service users. They are given by the Safeguarding Officer/Operations Manager in consultation with the Caseworker based on casework knowledge and/or behaviours at the Drop-in/remote casework. We also take account of information shared by trusted 3rd parties e.g. health workers, probation. They are reviewed every 6 months.

Examples of risk; they are not exclusive.

Barred

previous very high risk behaviour at the Drop-in; failure to comply with previous warnings; under the influence of drugs/ alcohol; carrying a weapon.

Secure Support Restricted Entry

potentially high risk e.g. reported to use substances; reported to carry a weapon; prison release/wearing a tag/on probation (may attend Drop-in if with Support Worker, Probation Officer)

Secure Support Restricted Entry Minor

Risk is on account of vulnerability as a minor rather than behaviour unaccompanied minors (below 18 years). Minors can go downstairs if accompanied by an adult recognised as responsible for their care.

Secure Support

easily frustrated, sometimes non-compliant or verbally aggressive, moderate/low risk to others

Pastoral support

prone to stress and anxiety but no risk to others.

APPENDIX 5. COMPLAINTS PROCEDURE (FROM TEAM MEMBERS HANDBOOK)

We encourage all staff and volunteers to raise any complaint they might have with the Lead Volunteer in their work area (see contact on back page). This approach can very often bring about a resolution of an issue to the satisfaction of both parties.

If the complaint is not satisfactorily resolved in this way or if the complaint is more serious, you should bring it to the attention of the trustee on duty and the Operations Manager. They will ensure that you can speak about your issue confidentially. They will also ask you to submit your complaint in writing and include sufficient detail to enable the DP to investigate. The coordinator will then acknowledge receipt of the written complaint and indicate the next course of action.

DP will seek to resolve the complaint as a matter of urgency. If the complainant is not satisfied with the outcome of the action taken, they can indicate this in writing to the Chair of Trustees, who will meet with the relevant parties with the aim to resolve it satisfactorily. Once resolved, the Chair will write to the complainant, confirming the action that has been taken to resolve the complaint.

If the complaint is about one of the Trustees or the Operations Manager, then it should be made to the Chair of Trustees, who will proceed as indicated above.

APPENDIX 6. PRINCIPLES OF GOOD RECORD KEEPING

Records should be:

- Legible
- Clear, concise and thorough
- Non-discriminatory
- In the persons own words, where possible
- Kept up to date
- Clear about what is first hand or hearsay
- The rationale for any decision made, including the decision not to take action, must be

recorded

- If any information is shared without consent the reasons for not doing so must be clearly recorded
- Written as soon after the event as possible
- Signed, dated and timed

APPENDIX 7: SEVEN PRINCIPLES OF DATA PROTECTION (DETAILED IN: DP PRIVACY POLICY)

1. Lawfulness, fairness, and transparency – we will use personal data in a way that complies with the law
2. Purpose limitation – we will only use personal data for the reasons we collected it, and not for something extra or unrelated.
3. Data minimisation – we will limit the amount of personal data we collect and only ask for that which is required to enable us to work well with our service users.
4. Accuracy – the personal details in our records will be kept up to date and checked to ensure accuracy.
5. Storage limitation – we will only keep personal data for as long as it is needed. After this time it will be securely destroyed or deleted.
6. Integrity and confidentiality (security) – personal data will be kept securely.
7. Accountability – The Trustees accept their responsibility to ensure appropriate measures are in place, and that our records demonstrate how we achieve data protection compliance.

APPENDIX 8: CONFIDENTIAL INCIDENT/CONCERN REFERRAL FORM



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Confidential Incident / Concern Referral Form

Name and contact details of child / young person / vulnerable adult subject of concern / at risk:	
Name and contact details of parent / guardian / carer of above named;	
Name and contact details of worker / member / attendee causing concern:	
Name and contact details of parent / guardian / carer of above named; N/A	
Nature of concern: (The Allegation / Behaviour / Risk that is causing concern): (Names of principle parties are essential. If you have not done so make a factual written record of your observations and any conversations - sign and date it)	
Who have you spoken to about your concerns?	
Social Services	No
Police	no
Probation	No

Name / Position / Contact details of persons contacted:
Initial Report compiled by: Signature: Date and time:

Log of action taken / by whom	
Date	Action