

# **WALTHAM FOREST MIGRANT ACTION SAFEGUARDING POLICY AND REPORTING PROCEDURE**

## **POLICY STATEMENT**

### **1. Purpose and Scope**

Waltham Forest Migrant Action (WFMA) provides support for local migrants, asylum seekers and refugees in Waltham Forest, and to advocate and campaign for the rights of migrants in the UK. Migrants can face a heightened risk of harm and abuse due to their precarious circumstances and limited access to support systems. This policy sets out our commitment to safeguarding all individuals who come into contact with WFMA, with particular attention to vulnerable adults who form our primary user group. Children remain the responsibility of their parents or carers whilst they are at the drop-in centre, however centre staff and volunteers have a duty to safeguard any children who may be present.

The policy applies to all WFMA staff, volunteers, trustees, centre visitors, and partner organisations. The policy will be implemented when a safeguarding concern arises in connection with WFMA activity. Concerns unconnected to WFMA are outside the scope of this policy.

We give equal priority to keeping everyone who accesses our services or works with us safe from harm regardless of age, sex, ethnicity, disability, sexuality, or belief. This policy is founded on and complies with the Care Act 2014, Mental Capacity Act 2005, Equality Act 2010 and Safeguarding Vulnerable Groups Act 2006.

### **2. Monitoring and Review**

The policy will be:

- Reviewed annually by the Board of Trustees
- Updated in response to significant incidents or changes in legislation
- Informed by staff and volunteer feedback and best practice
- Made available to all parties on the WFMA website

### **3. Definitions**

Vulnerable adult	<p>A person aged 18 or above with care and support needs who is experiencing, or is at risk of, abuse, neglect or exploitation and, as a result of their care and support needs, is unable to protect themselves from this (Care Act 2014).</p> <p>Specific vulnerabilities relevant to our visitors may include:</p> <ul style="list-style-type: none"><li>- Immigration status issues</li><li>- Language barriers</li><li>- Limited access to public funds</li><li>- Social isolation</li><li>- Mental health challenges</li><li>- Experience of trauma</li></ul>
Child	A person under the age of 18, in England
Safeguarding	Protecting people's right to live safely, free from abuse, neglect or exploitation

Safeguarding concern	A worry about the safety or wellbeing of an individual; suspecting someone may be experiencing or at risk of abuse, neglect or exploitation
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#### 4. Types of abuse

WFMA recognises its responsibility to respond to all types of abuse and harm including physical, emotional, financial and sexual abuse, neglect, child sexual exploitation, female genital mutilation, bullying, harassment and cyberbullying, radicalisation, trafficking, grooming and harmful sexual behaviour. The different categories and signs of abuse and neglect are detailed in the NSPCC factsheet [here](#) and the Care Act guidance [here](#) (chapter 14). All staff, trustees and volunteers should be familiar with these.

#### 5. Prevention and Risk Management

In recognition of our duty to protect those that come into contact with the organisation from coming to harm, WFMA commits to:

- 5.1. Set out clear **roles and responsibilities** for safeguarding including appointing a nominated safeguarding lead staff member, and a lead trustee for safeguarding.
- 5.2. Implement and communicate our **code of conduct** for staff, trustees and volunteers.
- 5.3. Implement clear **reporting procedures** for escalating concerns or suspected cases of abuse or harassment, which reflect best practice.
- 5.4. Ensure staff, trustees and volunteers understand the basic principles of safeguarding and their responsibilities through **induction and training** appropriate to their role.
- 5.5.** Ensure that safeguarding procedures are **clearly communicated to centre visitors**
- 5.6. Practice **safe recruitment principles** in checking the suitability of all job applicants, staff, volunteers and trustees, obtaining DBS checks at the highest level a role is eligible for, and ensuring partner organisations and sub-contractors have appropriate safeguarding policies and procedures in place where their work with WFMA involves vulnerable adults.
- 5.7. Use our procedures to **manage any allegations** against staff or volunteers appropriately.
- 5.8. Having a **whistleblowing policy** that includes how to escalate safeguarding concerns.
- 5.9. Maintaining standards by the National Centre for Cyber Security for **information security management** and complying with GDPR to ensure the safe handling of personal data.

#### 6. Roles and responsibilities

**The Designated Safeguarding Lead is Jazmyn Sadri, General Manager**

Contact: [jazmyn@wfma.org.uk](mailto:jazmyn@wfma.org.uk)

**The Safeguarding Trustee Lead is Calee Valentine, Trustee**

Contact: [calee13a@icloud.com](mailto:calee13a@icloud.com)

Safeguarding role descriptions and responsibilities are set out as follows:

- 6.1. **Trustees** are accountable for all safeguarding within WFMA and will maintain oversight of all safeguarding practices. Trustees will:
  - Review the safeguarding policy and procedure on an annual basis

- Review the incident log on a quarterly basis. The Chair of the board is responsible for making the final decision on whether to report any safeguarding incidents to the relevant regulators.
- Ratify changes to policy
- Participate in mandatory safeguarding training specific to trustees and refresher training on an annual basis
- Sign the WFMA Safeguarding Policy statement

6.2. **The Designated Safeguarding Lead (DSL)** is accountable to Trustees for safeguarding within WFMA and will ensure a clear framework for accountability is in operation.

- All safeguarding concerns within WFMA will be reported to the DSL (unless they are concerning the DSL in which case the Safeguarding Trustee Lead will be responsible).
- The DSL will maintain an incident log of all safeguarding concerns, log any referrals made, and record any feedback about the reporting process.
- The DSL will report to trustees on safeguarding concerns and coordinate Safeguarding reporting for the charity commission.
- The DSL will ensure that all staff and volunteers are trained in the principles of safeguarding and aware of WFMA's policy and procedures.
- The DSL will advise on updates to our policy and practice in accordance with current legislation and best practice guidelines.
- The DSL will ensure WFMA's safeguarding policy is available to all parties on the organisation's website.

6.3. **Trustee Safeguarding Lead:** the role of the Trustee Safeguarding Lead is to review the policy and hold the DSL(s) to account for policy adherence. They will be made aware of all safeguarding concerns that relate to staff and volunteers. Any allegation or safeguarding concern / incident related to the DSL(s) should be referred to the Trustee Safeguarding Lead.

6.4. **Staff members and volunteers** are responsible for knowing their safeguarding duties, following the procedures outlined in this policy and adhering to the code of conduct. Everyone should be able to identify signs of abuse and know how to escalate concerns and this will be included in inductions.

- All new staff members and volunteers will be given a copy of the safeguarding policy and will provide signed confirmation of the safeguarding policy as part of the induction checklist.
- All new staff members and volunteers will be given training in the general principles of safeguarding, and the application of WFMA's safeguarding policy and procedures.

6.5. **Staff members who require an enhanced DBS check** must notify the DSL if they are the subject of an investigation by the police or other safeguarding agency into an allegation of abuse of a child or adult at risk and disclose any relevant police cautions or convictions for criminal offences.

## 7. Appropriate conduct and behaviour for staff, trustees and volunteers

- Centre staff and volunteers will use appropriate language at the centre.

- Centre staff and volunteers are not to spend any time alone with children and will ensure at least two people are present other than the child, ideally the child's parent or carer.
- WFMA's qualified Immigration Advisors and Welfare Advisor may take appointments with visitors off the premises or outside of the centre's opening times for the purpose of providing immigration or welfare advice on cases initiated at the drop-in centre. Meetings should take place in a public place for the safety of the client and the Advisor. Advisors should avoid being alone with clients, unless privacy is requested by the client.
- If any staff or volunteers wish to continue contact with any of the visitors off the premises or outside of the centre's opening times (whether in-person or remotely), they should consult with the Designated Safeguarding Lead, take appropriate precautions and be aware that such contact takes place at their own risk.
- Centre staff and volunteers will avoid making any physical contact with visitors. When contact is initiated by a visitor, it is acceptable to reciprocate, provided the response is professional, appropriate, and aligned with our safeguarding policy.
- If a child requires physical assistance, for example, where a child has limited mobility, staff and volunteers should ask the child's parent to assist the child.
- Be aware that someone might misinterpret our actions no matter how well intentioned.

## 8. Safeguarding Children and Adults at Risk

Some aspects of managing safeguarding in relation to children differ to those in relation to adults at risk, and there are also differences in legislation. The key differences are as follows:

### 8.1. Safeguarding children

- 8.1.1. Safety is the primary concern. Whilst a child's views are important, they are not considered to be responsible for protecting themselves.
- 8.1.2. Abuse should be reported to the local children's social care team.

### 8.2. Safeguarding adults

- 8.2.1. Adults have a right to self-determination. The law mostly intervenes only when an adult is assessed to lack capacity in making choices about their protection, or where the concerns may extend to children (such as when they are living in the same household). If consent is refused or cannot be sought, you can and should still share information with the relevant professionals if the information indicates a risk of serious harm to others or themselves. If there is any uncertainty as to how to proceed, consult with the Designated Safeguarding Lead.
- 8.2.2. Financial abuse and organisational abuse are more likely to be relevant with respect to adults than children.
- 8.2.3. Abuse should be reported to the local adult social care team.

## 9. Raising a safeguarding concern

If you believe that an individual could be in immediate danger, you should call the police on 999 as well as following the procedure detailed below.

Anyone regardless of their role has a duty to raise a safeguarding concern when abuse or harm is suspected, or when a person makes a disclosure. There are a number of ways that

a safeguarding concern becomes apparent. In some cases, the child or adult at risk will make a direct disclosure. In other cases, the individual at risk may not feel able to make a disclosure directly. For example, they do not have the opportunity (e.g. their abuser is physically present), or because they are scared of repercussions from their abuser or fear that they will not be believed.

The different categories and signs of abuse and neglect are detailed in the NSPCC factsheet [here](#) and the Care Act guidance [here](#) (chapter 14). Abuse is difficult to assess; situations are rarely as tidy or straightforward as these categories suggest. Many situations may involve a combination of abusive elements. The following section details the procedure staff and volunteers should follow in the event a child or adult makes a safeguarding-related disclosure or when abuse is suspected.

**The minimum requirement for all staff, trustees and volunteers is to know how to:**

- Recognise, record and report abuse
- Take action to protect further harm by working with police and social services
- Access help and advice for the individual at risk

**If you are made aware of a safeguarding concern**, notify the Designated Safeguarding Lead at the earliest opportunity. Provide them with a clear and concise account of the concern, ideally via email. If the concern is regarding the DSL, you should contact the Lead Safeguarding Trustee.

When raising a concern via email use the subject line Safeguarding Concern and provide as much information as possible, remaining objective and factual:

- Date, time and location of the incident or meeting
- The person's name, age, address, contact details (if known); if the concern is regarding a child, include the details of their parent, carer or guardian (if known)
- Description of signs of abuse (e.g.: marks on the body, behaviour), disclosures, or suspicions of harm, abuse, or neglect involving a vulnerable individual
- Description of what you observed or been told by the affected individual(s) using their exact words where applicable; ensure the record is factual, accurate and dated

The Safeguarding Lead will assess the concern and advise on the next steps. This may include reporting the matter to external agencies such as social services or the police. The Safeguarding Lead will not only help you with the reporting process but can also provide emotional support during what might be a difficult time. They are available to answer your questions and address any anxieties you may have about raising a concern.

**Maintain Confidentiality:** Do not discuss the concern with anyone who does not need to know, as this could jeopardise the investigation or the safety of those involved.

**Cooperate with Further Action:** Be prepared to provide additional information or support if required during any follow-up actions or investigations initiated by the safeguarding lead. Keep any notes you have made in a secure place until the investigation has been concluded.

**Confidentiality Limits:** While the Safeguarding Lead will manage the concern with transparency, the progress or outcome of any investigation may not always be shared with the person who raised the concern due to confidentiality and data protection requirements.

If you have reason to believe the Designated Safeguarding Lead has not responded appropriately to a report, you may refer the matter to the Trustee Safeguarding Lead.

## 10. Allegations against WFMA staff members, trustees and volunteers

If a safeguarding allegation is made against a staff member, trustee or volunteer, the organisation will act promptly and in accordance with its safeguarding policy and procedure. The steps taken are not an assumption of guilt but are implemented to protect all parties involved and ensure a fair and thorough investigation. The staff member or volunteer in question will have their duties temporarily suspended or reassigned without prejudice while the matter is investigated. This measure is taken in the best interests of both the individual and those the organisation supports, maintaining a safe environment and upholding the integrity of the process. The investigation will be conducted impartially, respecting the rights and confidentiality of all involved, and the individual will be supported throughout. Once the investigation is concluded, appropriate actions will be taken based on the findings.

## 11. Further information and policies

The following guidance and resources have been consulted in developing this policy:

[NCVO | Policies and Procedures](#)

[Gov.uk | Safeguarding and protecting people for charities and trustees](#)

[Zurich | What should you include in your charity's safeguarding policies and procedures?](#)

[Ann Craft Trust | Writing and Implementing a Safeguarding Adults Policy and Procedure](#)

## 12. Policy control

VERSION NO.	2		
APPROVED BY THE BOARD OF TRUSTEES	07-03-2025	DESIGNATED SAFEGUARDING LEAD	Jazmyn Sadri
NEXT REVIEW DATE	07-03-2026	TRUSTEE SAFEGUARDING LEAD	Calee Valentine

**Chair of Trustees:** Norman Minter

Signature:  Date: 12/03/2025

**Safeguarding Trustee Lead:** Caroline Valentine

Signature:  Date: 13/03/2025

# Appendix 1: Disclosures Do's and Don'ts

## You should:

- Respond in a way that shows that the person making the disclosure is being listened to and supported by staying calm, giving your full attention, not rushing the disclosure and reflecting back what's been said
- Be sympathetic ("I am sorry that this has happened to you")
- Be aware of the possibility of medical evidence
- Tell the person that he/she did right to tell you
- Treat the information seriously
- If it is safe to do so, inform the child or adult if you have a duty to share their disclosure ("I hear that you have asked me not to, but I have a duty to disclose this information with...").  
*There may be circumstances where it is inappropriate to inform them that you need to disclose information they have shared, if doing so would put anyone at risk. If you are in any doubt about whether or not to inform them, seek advice from the DSL*
- Write down what was said by the person affected, including 1) date and time 2) the person's name and details 3) what they said or did that gave cause for concern (if they made a verbal disclosure, record their exact words) 4) any information given about the alleged abuser
- Share your information with the DSL via email as soon as possible
- Maintain a duty of confidentiality and only share information in accordance with this policy

## You should not:

- Commit to maintaining confidentiality to someone who makes a disclosure
- Make promises you cannot keep (e.g. "this will never happen again")
- Attempt to investigate the allegation yourself
- Press the person for more details. It may however be helpful to ask clarifying questions, as interpreting behaviours and verbal comments can be subjective and gaining a fuller understanding could be helpful
- Ask leading questions (e.g., "did your mother or father do this to you?")
- Contact the alleged abuser
- Be judgemental (e.g. "why didn't you...?")
- Break the confidentiality agreed with the alleged victim (e.g. to other members of staff – "something terrible happened to...")
- Wait for someone to directly disclose abuse before you take action