



Safeguarding Policy

Last Review Date: September 2026

Next Review Date: September 2027





Safeguarding Policy

Statement of Policy

The Harbour Project is committed to safeguarding and promoting the welfare of all children and adults who come into contact with our services, particularly our 'Visitors' (service-users) who are those seeking refuge and asylum in the UK. We recognise that refugees and asylum seekers, due to their experiences of trauma, displacement, and vulnerability, may be at a heightened risk of abuse, neglect, and exploitation. This policy outlines our commitment to creating a safe environment, preventing harm, and responding effectively to any safeguarding concerns.

The Harbour Project believes that everyone has the right to live in safety, free from abuse and neglect, regardless of their age, gender, race, ethnicity, religion, disability, sexual orientation, or immigration status. We are dedicated to:

- Protecting children (anyone under 18 years old) and adults at risk from all forms of abuse, neglect, and exploitation.
- Promoting the welfare of all individuals we support, ensuring their wellbeing is paramount.
- Creating a culture where safeguarding is everyone's responsibility and concerns can be raised and addressed with confidence.
- Working in partnership with individuals, families, and relevant agencies to ensure effective safeguarding practices.

Scope of the Policy

This policy applies to all trustees, staff, volunteers, contractors, and any other individuals working on behalf of The Harbour Project. It covers all activities and services provided by the charity, both online and offline.

Definitions

- **Safeguarding:** Safeguarding is a broad, proactive approach to protect children and adults at risk from harm and promote their welfare. It includes everything from creating safe environments to ensuring staff are properly vetted. It aims to prevent harm before it happens.
- **Adult & Child protection:** Adult & child protection is a reactive part of safeguarding that focuses specifically on individuals who have been identified as being at risk of or suffering from significant harm. It involves the procedures and actions taken to protect a specific individual from abuse or neglect, such as involving social services, law enforcement, or other agencies.
- **Child:** Anyone under the age of 18 years old. This includes separated migrant children and those whose age is disputed, who will be treated as children until their age is definitively determined.
- **Adult at Risk:** As defined by the Care Act 2014, an adult who:
 - Has needs for care and support (whether or not the local authority is meeting any of those needs).
 - Is experiencing, or is at risk of, abuse or neglect.
 - As a result of those care and support needs, is unable to protect themselves from the abuse or neglect or the risk of it
- We recognise that many refugees and asylum seekers may meet this definition due to their experiences and circumstances.
- **A Safeguarding Concern:** A concern may be:
 - a direct disclosure by an individual at risk.
 - a concern raised by a third party (a staff member, volunteer, visitor, carer or member of the public).



- **Abuse and Neglect:** Abuse is a violation of an individual's human and civil rights by any other person or persons. Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Abuse and neglect can take many forms, including but not limited to:
 - **Physical Abuse:** Causing physical harm to a person, or allowing physical harm to be caused. This can include hitting, slapping, pushing, shaking, burning, misusing medication, restraint, or force-feeding.
 - **Emotional/Psychological Abuse:** Behaviour that is likely to cause mental or emotional suffering. This can include threats, intimidation, humiliation, harassment, bullying, coercion, control, verbal abuse, or isolation.
 - **Sexual Abuse:** Involving a person in any sexual activity without their informed consent. This includes rape, sexual assault, sexual exploitation, indecent exposure, sexual harassment, or grooming. For children, this includes any sexual activity with an adult.
 - **Neglect and Acts of Omission:** The ongoing or repeated failure to meet a person's basic physical, emotional, or social needs. This can include ignoring medical or care needs, inadequate nutrition, hygiene, heating, or shelter, or failing to provide appropriate supervision or support.
 - **Financial Abuse:** The unauthorised or improper use of a person's money, property, or assets. This can include theft, fraud, coercion in relation to financial affairs, misuse of power of attorney, or preventing access to their own money.
 - **Domestic Abuse:** Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This includes psychological, physical, sexual, financial, emotional abuse; and 'honour'-based violence. Children can also be exposed to domestic abuse. They can be directly involved in incidents or they may be harmed by seeing or hearing abuse happening.
 - **Modern Slavery:** This encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave masters use coercion, deception, and violence to trap victims. Refugees and asylum seekers are particularly vulnerable to this form of exploitation.
 - **Discriminatory Abuse:** Abuse or neglect based on a person's protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation). This can include hate crime, slurs, harassment, or denial of access to services based on these characteristics.
 - **Organisational Abuse (or Institutional Abuse):** The mistreatment or neglect of an individual or individuals by a regime or individuals within an institution or setting (e.g., a care home or day centre), where the poor practice is systemic rather than an isolated incident. This can include rigid routines, lack of choice, or a culture of disrespect.
 - **Forced Marriage:** A marriage in which one or both parties do not (or, in the case of adults with impaired capacity, cannot) freely and fully consent to the marriage. It is a serious abuse of human rights and is illegal in the UK. Forced marriage often involves physical, psychological, financial, sexual, or emotional pressure.
 - **Child Sexual Exploitation (CSE):** This occurs when a child is coerced or manipulated into sexual activity, often by older individuals or groups, for their (the perpetrators') gain or the gain of others. It involves an imbalance of power, whether real or perceived, and frequently involves grooming, deception, or threats. CSE can occur online, offline, or both, and may involve a wide range of activities including sexual images, live streaming, or direct sexual contact.



- **Bullying & Cyberbullying:**
 - **Bullying:** Repetitive behaviour intended to hurt someone, emotionally or physically, and can be carried out by an individual or a group. It can take many forms, including verbal, physical, social, or psychological.
 - **Cyberbullying:** Bullying that takes place using electronic technology, such as mobile phones, computers, and tablets, and communication tools including social media sites, text messages, chat rooms, and websites.
- **Radicalisation:** The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Individuals, especially young people and those who are vulnerable or isolated, may be susceptible to radicalisation through various channels, including online propaganda and direct influence.
- **Female Genital Mutilation (FGM):** All procedures that involve altering or injuring the female external genitalia for non-medical reasons. It is recognised internationally as a violation of the human rights of girls and women. It is illegal in the UK to perform FGM, or to arrange for it to be performed, even if it takes place outside the UK.

Safeguarding Principles (drawing on the Six Principles of Safeguarding Adults)

Our safeguarding practice is underpinned by the following principles

- **Empowerment:** Supporting individuals to make their own decisions and give informed consent. We will ensure individuals understand their rights and how to raise concerns.
- **Prevention:** Taking proactive steps to prevent harm from occurring. This includes robust recruitment, training, and risk assessment.
- **Proportionality:** Ensuring that any intervention is the least intrusive response appropriate to the risk presented, respecting an individual's autonomy as far as possible.
- **Protection:** Providing support and representation for those in greatest need, ensuring their safety is prioritised.
- **Partnership:** Working collaboratively with individuals, families, local authorities, statutory agencies, and other charities to ensure a coordinated and effective safeguarding response.
- **Accountability:** Being transparent and accountable in all our safeguarding practices.

Differences between Safeguarding Children and Safeguarding Adults

While the overarching aim of safeguarding is to protect individuals from harm, there are key distinctions in the approach and legal frameworks for children and adults:

- **Legal Framework:**
 - **Children:** Safeguarding children is primarily governed by the Children Act 1989 and 2004, and guided by "Working Together to Safeguard Children" statutory guidance. The paramount principle for children is that their **welfare is paramount**.
 - **Adults:** Safeguarding adults is primarily governed by the Care Act 2014, which places statutory duties on local authorities to make enquiries where an adult with care and support needs is experiencing or at risk of abuse or neglect, and as a result is unable to protect themselves.
- **Consent and Self-Determination:**
 - **Children:** Children are generally presumed to need protection, and their consent is not required to initiate safeguarding actions if there are concerns about their safety. While their views should be considered and listened to (in line with their age and understanding), their right to protection overrides their right to choose to remain in an unsafe situation.



- **Adults:** Adults have a right to self-determination and to make their own decisions, even if those decisions are perceived as "unwise" by others, provided they have the mental capacity to make those decisions. Safeguarding interventions for adults should always seek to gain the adult's consent and involve them in decisions about their safety, unless there are significant concerns about coercion, undue influence, or lack of capacity.

Despite these differences, both children and adults at risk require a proactive, preventative approach, strong inter-agency collaboration, and a focus on the individual's voice and wishes where appropriate.

Roles and Responsibilities

- **Board of Trustees:** The Trustees hold ultimate responsibility for safeguarding within The Harbour Project. They will:
 - Ensure appropriate safeguarding policies, procedures, and resources are in place.
 - Appoint a **Safeguarding Trustee** who will oversee safeguarding at a governance level. See the *Contact Information Section* at the end of this document for the name and contact details of the Safeguarding Trustee.
 - Receive regular reports on safeguarding activities and concerns.
 - Promote a strong safeguarding culture throughout the organisation.
- **Designated Safeguarding Lead (DSL):** The DSL is always a permanent member of staff. See the *Contact Information Section* at the end of this document for the name and contact details of the DSL. Their responsibilities include:
 - Being the main point of contact for all safeguarding concerns.
 - Providing advice and support to staff and volunteers.
 - Having oversight of referrals made to appropriate external agencies (e.g., Local Authority Social Services, Police) in line with statutory guidance.
 - Maintaining accurate and confidential safeguarding records.
 - Ensuring the policy is regularly reviewed and updated.
 - Undertaking continuous professional development in safeguarding.
- **All Staff and Volunteers:** Everyone working for or on behalf of The Harbour Project has a responsibility to safeguard children and adults at risk. This includes:
 - Reading, understanding, and adhering to this safeguarding policy and related procedures.
 - Being vigilant for signs of abuse or neglect.
 - Reporting any safeguarding concerns immediately to the DSL.
 - Where appropriate, making referrals to external agencies.
 - Attending any mandatory safeguarding training.
 - Adhering to our Code of Conduct and maintaining professional boundaries.
 - Treating all individuals with respect and dignity.

Recognising and Responding to Concerns

All staff and volunteers must be aware of the signs and indicators of abuse and neglect, particularly those relevant to refugees and asylum seekers (e.g., indicators of trafficking, modern slavery, domestic abuse, exploitation due to insecure immigration status, mental health issues stemming from trauma).

If you have a safeguarding concern:

1. Listen:

- a. If someone discloses abuse, listen calmly and carefully. Do not interrupt, ask leading questions, or promise confidentiality. Reassure them that you take what they are saying seriously. Be clear and say that you need to report the abuse. Do not be judgemental and try to keep an open mind.



- b. If you hear about an incident of abuse from a third party (this is when someone else tells you about what they have heard or seen happen), encourage them to report it themselves, or help them to report the facts of what they know.
 - c. If you have a concern based on your own observation or experience, follow the same procedure detailed below.
2. **Do not investigate:** It is not your role to investigate the concern. This is the responsibility of the DSL and relevant statutory agencies.
 3. **Record:** Make a factual, objective record of what you have seen, heard, or been told as soon as practical. For this purpose, complete an **INCIDENT FORM**. A blank form is located on Google-Drive at BUSINESS OPS > PREMISES > Health & Safety > Incident Reporting Forms. Use the individual's own words where possible, including dates, times, and any specific details. Include a person's name, age, address, telephone number etc. as appropriate. Sign and date your record.
 4. **Report Immediately:** Report your concern to the DSL as soon as possible, ideally on the same day. If they are unavailable and the concern is urgent, follow the procedures for emergency contact.
 5. **Emergency Situations:** If an individual is in immediate danger or a crime is in progress, call the Police on 999. Then inform the DSL as soon as it is safe to do so.

The DSL will then:

- Assess the information received.
- Consult with relevant agencies (e.g., Local Authority Children's Social Care, Adult Social Care, Police) if a referral is deemed necessary.
- Ensure that the individual's wishes and feelings are considered, where they have the capacity to express them.
- Keep detailed and confidential records of all actions taken.
- Provide support to the staff member/volunteer who raised the concern.

See the *Contact Information Section* at the end of this document for Police and Local Authority contact details.

Safer Recruitment

The Harbour Project is committed to safer recruitment practices to prevent unsuitable individuals from working with children and adults at risk. Our recruitment procedures for trustee, staff and volunteer positions include:

- Robust application and interview processes.
- Requesting references and checking them.
- Adhering to government guidance on undertaking Disclosure and Barring Service (DBS) checks, and completing them where appropriate to the role.
- Clear job descriptions and person specifications that outline safeguarding responsibilities.

Training and Awareness

All trustees and staff receive appropriate safeguarding training upon induction and regular refresher training thereafter. This training covers:

- Recognising signs of abuse and neglect, specifically considering the vulnerabilities of refugees and asylum seekers.
- Our charity's safeguarding procedures and how to report concerns.
- The importance of professional boundaries and a Code of Conduct.
- Information sharing and confidentiality.
- Trauma-informed approaches when working with vulnerable individuals.



The DSL completes annual safeguarding training. Volunteers have to read this Safeguarding Policy as part of their induction and are provided with a copy for reference. Volunteers will receive safeguarding training as necessary depending on the role they undertake.

We promote understanding of this Safeguarding Policy and safeguarding practices to our Visitors, who may be unfamiliar with UK safeguarding legislation and their right to live free from abuse. To this purpose, we:

- Communicate using methods which take into account English language ability and which are age-appropriate.
- Use activities such as Women's Group and Youth Group to promote awareness.
- Keep a copy of this Safeguarding Policy available in the Advice Room for Visitors.
- Display posters in the Advice Room, on The Harbour Project's noticeboards in the reception area and in the cafe, which give details of the DSL and reporting procedures.
- Will support any Visitor who wishes to report a safeguarding concern, disclosure or allegation.

Additional Safeguards and Risk Assessments

The Harbour Project conducts risk assessments on the activities it provides for its Visitors which mitigate for safeguarding risks. General measures are also in place to minimise safeguarding risks. These include:

- The premises follows a locked-door policy. Only those permitted on site are granted access.
- All visitors to The Harbour Project must sign in at our reception desk.
- All service users must first register with The Harbour Project.
- Those under 16 must be accompanied by a parent/guardian when on The Harbour Project premises or on trips.
- Football and Youth Group (out-of-hours) activities are only open to those aged 16 or above.
- Children must be accompanied by a parent/guardian when participating in children's activities, e.g. Lego Club, Baby & Toddler Group.
- Volunteers must be aged 18 or older.

Confidentiality and Information Sharing

The Harbour Project is committed to maintaining confidentiality where appropriate. All staff, trustees and volunteers understand that any personal information that they learn in the course of their work, is confidential and should only be shared on a need-to-know basis. It is important that only those who need to know particular safeguarding concerns, allegations or disclosures actually know, to avoid rumour and gossip that could have a detrimental impact on the people involved.

However, safeguarding takes precedence, and information will be shared with relevant agencies where there is a concern about an individual's safety or wellbeing, in line with legal requirements and data protection legislation. Individuals will be informed about information sharing unless doing so would put them or others at greater risk.

Allegations Against Trustees, Staff or Volunteers

Any allegation of abuse or harm made against a trustee, staff member, or volunteer will be taken extremely seriously and dealt with promptly and fairly. Allegations should be reported to the DSL. If the allegation is about the DSL, it should be reported to the Safeguarding Trustee. The DSL will follow specific procedures for managing such allegations, which may involve consulting with the Local Authority Designated Officer (LADO) for child protection concerns and/or relevant adult safeguarding authorities. The individual accused may be suspended pending investigation, in line with The Harbour Project's HR policies.



All trustees, staff and volunteers have a responsibility to report staff actions which are abusive, exploitative, or unethical – for further information, see the Whistleblowing Policy. The Harbour Project promotes the reporting of concerns, including letting Visitors know how to report concerns to external organisations such as the police or statutory authorities.

Code of Conduct

All trustees, staff and volunteers will adhere to The Harbour Project's Code of Conduct that sets out expected professional behaviours and boundaries, reinforcing our commitment to safeguarding. This includes:

- Treating all individuals with respect and dignity.
- Maintaining appropriate professional boundaries.
- Avoiding situations that could be misinterpreted or put individuals at risk.
- Using appropriate language and communication.
- Prohibiting any form of discrimination, harassment, or bullying.

Recording and Storage of Information

Personal information for all people (staff, volunteers, trustees and Visitors), including all safeguarding concerns, referrals, and actions taken is recorded and stored securely, in compliance with data protection regulations on The Harbour Project's electronic database, *AirTable*, and digital storage on *Google Workspace*. Access to these records is restricted to authorised personnel only. Records are retained in accordance with The Harbour Project's Data Protection Policy.

Visitors for whom The Harbour Project has an active Safeguarding concern are added to a dedicated Safeguarding Register on *AirTable* and details of the concern captured there. Access to this register is restricted to Harbour Project staff. Staff members review the Safeguarding Register on a monthly basis in their regular staff meeting to ensure it is up to date and they are fully aware of the needs of the identified individuals. Signposting to an individual's record on the Safeguarding Register is noted on the individual's digital Visitor Advice Record, but no specific details are recorded there, as volunteers have access to these files.

The Harbour Project understands that the use of photos and videos of Visitors could pose a safeguarding risk for some of our Visitors, especially if they are posted online or on social media. Therefore, as part of the Visitor registration process, we ask Visitors to accept or decline consent for taking photos and videos. We also verbally check consent at the time of taking the photos/videos.

Review and Monitoring

This Safeguarding Policy will be reviewed annually by the Board of Trustees, or sooner if there are changes in legislation, guidance, or our charity's operations. The effectiveness of the policy and procedures will be regularly monitored through incident reporting and training feedback.

Communicating the Policy

This policy is available to all trustees, staff and volunteers. A hard copy is displayed on the noticeboard in the staff kitchen and is available digitally on The Harbour Project website. There is a copy available for Visitors in the Advice Room. Information on how to raise concerns is displayed and communicated via posters in the Advice Room, and on The Harbour Project noticeboards in the reception area and in the cafe.



Related Policies and Procedures

This Safeguarding Policy should be read in conjunction with the following The Harbour Project policies and procedures:

- Code of Conduct
- Complaints Policy
- Data Protection Policy
- Equality, Diversity & Inclusion Policy (Recruitment Section)
- Health and Safety Policy
- Lone Working Policy
- Social Media Policy
- Trustee Policy
- Volunteer Policy
- Whistleblowing Policy

Contact Information for Safeguarding Concerns

Designated Safeguarding Lead (DSL):

Nan Bains

Operations Manager

nan.bains@harbourproject.org.uk, (01793) 611682

Safeguarding Trustee:

Emma Graham

emma.graham@harbourproject.org.uk, (01793) 611682

Emergency Services: 999 (if someone is in immediate danger or a crime is in progress)

Non-Emergency Police: 101

Swindon Borough Council Children's Social Care: To discuss a concern in confidence or make a referral contact:

- Tel: (01793) 464646 (Out-of-hours: Emergency Duty Service 01793 436699)
- Email: contactchildrenandfamilies@swindon.gov.uk
- Link to download referral form: safeguardingpartnership.swindon.gov.uk

Swindon Borough Council Adult Social Care: To discuss a concern in confidence or make a referral contact:

- Tel: (01793) 463555 (Out-of-hours: 01793 436699)
- Email: adultsafeguarding@swindon.gov.uk

NSPCC Helpline: 0808 800 5000 (for concerns about children)

Refugee Council/Refugee Action: Refer to their websites for their own safeguarding information and contact details, which can also be a resource for advice.