

SAFEGUARDING POLICY

Policy Statement

The Maggie Oliver Foundation (the “Foundation”) is committed to providing services that respect and uphold the safety and human rights of the people it supports (its “Service Users”). The Foundation works in their interests to promote their welfare, and to put in place safeguards and measures to protect them.

What is Safeguarding?

Safeguarding means protecting an individual’s right to live in safety free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect while at the same time making sure that the individual’s well-being is promoted.

Who needs Safeguarding?

The Foundation provides services to adult survivors of sexual abuse and exploitation, and does not provide services to children under the age of eighteen. Adult Service Users might be at risk of abuse or exploitation as a result of their prior or current experiences, including domestic violence, sexual exploitation, mental health issues, or alcohol or substance misuse. For the purpose of this policy, “adult at risk” or “vulnerable adult” refers to someone over the age of eighteen who:

- has care and support needs
- is experiencing, or at risk of, abuse or neglect
- as a result of their care or support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Service Users might also disclose, to the Foundation, information about a child or children in their care or the care of others who are at risk and who the Foundation would have a responsibility to safeguard.

Commitment to Safeguarding

The Foundation is committed to good practice and through its policies and procedures it works hard to ensure that the people it supports are guarded from any form of abuse whether intentional or unintentional. In providing services for Service Users, the Foundation will endeavour at all times to minimize risk to them and to ensure that they are as safe as the Foundation can make them.

The Foundation recognizes that it has a duty to act on reports or suspicions of abuse and undertakes to raise awareness, promote appropriate reporting of concerns and to respond to concerns raised in a robust, proportionate and timely manner.

Responsibility for Safeguarding

It is the duty of all staff, trustees and volunteers to ensure that Service Users are protected from any harm. All employees, volunteers, trustees, contractors, agents or other members or associates of the Foundation must comply with this Policy and to follow the Foundation’s Safeguarding Procedures (Appendix B of this Policy). The Foundation maintains Safe Working Practice Guidance and a Code of Conduct which all staff, volunteers and trustees must follow.

We expect all staff, volunteers and trustees to safeguard vulnerable adults by:

- Valuing them, listening to them and respecting them
- Taking disclosures made by or about vulnerable adults or children seriously, discussing them with the Safeguarding Officer or Deputy Safeguarding Officer and recording them appropriately
- Reporting all concerns as soon as possible to the Safeguarding Officer or Deputy Safeguarding Officer
- Making clear to all Service Users when the Foundation must break confidentiality and share information
- Supporting and empowering all Service Users to make their own decisions.

The Foundation will work with local/national agencies to put in place appropriate procedures for reporting, making referrals, and accessing training and specialist support, as and when required.

Safe Recruitment

To aim to protect its Service Users, the Foundation recruits staff, volunteers and trustees using appropriate procedures, safeguards and checks. All applicants will be interviewed to assess their suitability for the role for which they have applied. The Foundation will take up at least two references for all staff, volunteers and trustees prior to appointment.

Every new employee, volunteer or trustee is subject to a Disclosure & Barring Service (“DBS”) check prior to appointment. Where a role is eligible for an Enhanced DBS check, this will be carried out. The Foundation will assess any criminal record information disclosed in line with its Data Protection, Equal Opportunities and Diversity, and Rehabilitation of Offender policies.

The Foundation will regularly review its recruitment and other human resources procedures in response to changes in legislation and systems external to the Foundation, e.g. DBS checks.

Induction and Training

All new employees, volunteers and trustees will be provided with an induction programme including safeguarding training as well as an overview of the organization to ensure that they know and understand the Foundation’s purpose, values, services and structure.

All new staff, volunteers and trustees will be provided with this Policy, and associated policies, procedures and guidance. The induction will make it clear to them that they have an obligation to implement this Policy and to learn about protection issues and their related responsibilities. Staff, volunteers and trustees will be provided with ongoing/refresher training at regular intervals (and at least every two years), to enable them to undertake their roles safely, effectively and confidently.

Before taking up their role, all employees and volunteers will be given a clear description of the requirements and responsibilities of their role and the person recruiting them will discuss their role with them to ensure that they understand what is expected of them. All volunteers will be supported by the Foundation’s Service Coordinator, who will maintain regular contact with them. Any volunteer roles which would be Regulated Activity if unsupervised will be appropriately supervised in accordance with statutory guidance.

Safeguarding Officer

The Foundation's appointed Safeguarding Officer is its Operations Manager, Hannah Coban, supported by its Emotional Support Manager, Charlene Downey-Warwick, as Deputy Safeguarding Officer. They will have access to appropriate training to support them in these roles, especially if providing training to employees or volunteers. They will be available to staff, volunteers, trustees and Service Users to speak to when they have any concerns, issues or complaints regarding the safety, wellbeing or conduct of Service Users, staff, volunteers or trustees.

In the event of an urgent concern, issue or complaint and the Safeguarding Officer or Deputy Safeguarding Officer are unavailable (or where the concern relates to them), such concern, issue or complaint may be reported to the trustee with responsibility for safeguarding, Joanne Pennington, or ultimately to the Foundation's Chair, Maggie Oliver.

Reporting and Recording

The Foundation expects all volunteers, employees and trustees to promptly report to the Safeguarding Officer or Deputy Safeguarding Officer any of the following:

- a disclosure i.e. information about a person at risk of or suffering from harm,
- a concern i.e. a worry, issue or doubt about practice or treatment of a Service User or colleague or their circumstances, or
- an allegation of an incident which might have caused harm or put an individual at risk of harm.

They should receive, reassure and respond to any of these in accordance with the Foundation's Safeguarding Procedures (Appendix B of this Policy).

Where a person is under immediate danger they should contact the police by calling 999.

The Safeguarding Officer will be responsible for maintaining accurate and up-to-date records of any concerns, disclosures or allegations.

Confidentiality

All reports and logs will be kept securely and confidentially according to the Foundation's Data Protection and Confidentiality Policies, until or unless it is necessary to share this material with external or statutory agencies to safeguard an individual.

The legal duty of the Foundation to disclose ongoing abuse is not absolute and therefore, working within the remit of the Foundation's Data Protection and Confidentiality Policies, Service Users who remain in abusive environments will not face disclosure to external agencies without their consent unless it is felt there is significant risk to the Service User or to the welfare of a child or another vulnerable adult. In these circumstances, any sharing of information will be discussed and explored with the Service User prior to the disclosure of such information to external agencies. The matter will, however, be dealt with as swiftly as possible for the safety of those concerned.

The Foundation cannot promise confidentiality to the individual (Service User, employee, volunteer or trustee) reporting a safeguarding concern, disclosure or allegation where it has to be shared with any external or statutory agencies. Staff and volunteers must be clear with Service Users where boundaries lie. Service Users can be reassured that no information can be disclosed without their

consent, unless related to a significant risk to their life, the lives of others or the welfare of a child or vulnerable adult. If confidentiality cannot be maintained, the information will only be shared on a “need-to-know” basis. The Service User will be informed and supported appropriately.

Communication by the Foundation about safeguarding and this Policy

The Foundation will communicate this Policy (using appropriate methods, formats and language to communicate the substance of it) to all of its staff, volunteers and trustees. It will make it available on its website.

To encourage everyone involved in the Foundation to understand that safeguarding is the business of everyone, and to assist staff and volunteers to learn about protection issues and their related responsibilities, the Foundation will provide regular updates to staff and volunteers about safeguarding policies and procedures, place safeguarding on the agenda for meetings of the board of trustees, and provide other opportunities for discussion about issues and concerns.

Useful Contacts

Safeguarding Officer:	Hannah Coban 0161 441 3942 hannah@themaggieoliverfoundation.com
Deputy Safeguarding Officer:	Charlene Downey-Warwick charlene@themaggieoliverfoundation.com
Safeguarding Trustee:	Joanne Pennington joanne@themaggieoliverfoundation.com

Adoption and Review

This Policy was approved by the Foundation’s trustees on 1st October 2025 and comes into effect on that date. It will be reviewed annually.

This Policy should be read in conjunction with:

- Appendix A (Types and Signs of Abuse)
- Appendix B (The Foundation’s Safeguarding Procedures)
- The Foundations other policies, procedures and guidance, specifically: Safe Working Guidance and Code of Conduct

APPENDIX A: Types and Signs of Abuse

The Foundation has a responsibility to act if it comes to light that Service Users, or a child or vulnerable adult may be subject to abuse or risk of abuse.

What is abuse?

The term “abuse” is intended to include any situation where there is grave concern regarding the well-being of a vulnerable adult or child. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. A vulnerable adult or child may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet).

Forms of Abuse

Given that the Foundation provides a service specifically for survivors of sexual abuse, it will in most cases be very clear that Service Users are reporting sexual abuse, whether that abuse is recent, ongoing or historic. Those communicating with a Service User may, however, find it more difficult to recognise other forms of abuse.

Below are some examples of signs of the most common forms of abuse. This section is for illustrative purposes only and not meant to be exhaustive or prescriptive.

Physical Abuse

The non-accidental infliction of physical force that results (or could result) in bodily injury, pain or impairment.

Sexual Abuse

Direct or indirect involvement in sexual activity without consent.

Psychological / Emotional Abuse

Psychological abuse is that which impinges on the emotional health and development of individuals. Psychological/emotional abuse might also occur as a result of the other forms of abuse.

Domestic Violence

Includes psychological, physical, sexual, financial, emotional abuse; and so-called ‘honour’ based violence, between adults who are or have been intimate partners or family members, regardless of gender or sexuality.

Human Trafficking and Modern Slavery

This encompasses forced labour, sexual exploitation (e.g. pole dancing/lap dancing; prostitution; phone and internet sex chat rooms); enforced criminality (e.g. drug dealing/benefit fraud); trade in human organs; and domestic servitude. This list is not exhaustive and illegal adoption, female genital mutilation (FGM), and forced marriage could also be indicators of human trafficking.

Female Genital Mutilation (FGM): This is defined by the World Health Organisation as the partial or total removal of external female genitalia for non-medical reasons. FGM is also known as female circumcision, cutting or Sunna. Sometimes religious, social or cultural reasons are put forward for this happening, but it is abuse and a criminal offence, to a woman or child. The term covers all harmful procedures to the female genitalia for non-medical purposes.

Gang Exploitation: Across the country, young people and vulnerable adults are being exploited by gangs to move and sell drugs on their behalf in suburban areas, market towns and coastal regions.

This criminal activity is known as 'county lines', as people travel to different regions where they're unknown to the police and can therefore operate undetected. These people are often subjected to threats, violence, and sexual abuse by the gangs. The signs to spot include: persistently going missing from home, or being found out-of-area; unexplained acquisition of money, clothes or mobiles phones; excessive receipt of texts or phone calls; relationships with controlling older people or gang association; suspicion of self-harm, physical assault or unexplained injuries; and self-harm or significant changes in emotional well-being.

Hate Crime: Hate crimes and incidents can be against the person or property. Hate Crime can be motivated by the offender's hatred of people who are seen as being different. An adult or child may be a victim because of race, religion, disability, age, sexuality or gender.

Mate Crime and grooming: Mate Crime occurs when someone 'makes friends' with a person and goes on to abuse or exploit that relationship. This may be for financial or sexual gain. The relationship is likely to be of some duration and, if unchecked, may lead to a repeat and worsening abuse. The person may not be aware that this is happening to them.

Cuckooing: Is a practise where people take over another person's home, usually to sell or store drugs, use the home for sex work or to live in the property themselves. Sometime move into the home to financially abuse the person.

Online Safeguarding: This is not just an IT issue; it is about safeguarding young people and adults in the digital world as part of our safeguarding responsibilities. The focus should be on building resilience to online risk in order for people to feel safe and confident using online services; and requires professionals, carers, advocates etc., to build their own understanding of the digital world.

Risks that can be encountered through online activity include:

- Exposure to inappropriate, harmful or illegal material e.g. gambling content, violent content, pornography or indecent images of children.
- Bullying via technology (often known as cyber-bullying)
- Creating and sharing sexual images of self or others (known as sexting).
- Possible danger from making contact with unsuitable people via social networking sites, gaming, instant messaging or chat rooms.
- Problematic internet use - addiction.
- Exposure to content that promotes worrying or harmful behaviour e.g. suicide, self-harm or eating disorders.
- Becoming a victim (or perpetrator) of cybercrime such as hacking, scams/hoaxes, fraud and identity theft.
- Radicalisation or extremism online
- Publishing too much personal information online.

Financial / Material Abuse

The unauthorised, fraudulent obtaining and improper use of funds, property or any resources of a person at risk.

Neglect or Acts of Omission

Ignoring or withholding physical or medical care needs.

Self-Neglect

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Abuse of Individual Rights/Discriminatory Abuse

Abuse of individual rights is a violation of human and civil rights by any other person or persons.

Discriminatory abuse consists of abusive or derisive attitudes or behaviour based on a person's race, gender and gender identity, age, disability, sexual orientation or religion; and should be suspected when adults at risk:

- are not treated equitably and do not have equal access to available services
- experience humiliation, violence or threatening behaviour related to protected characteristics
- are not provided with the support they need, for example, relating to their religious or cultural beliefs
- are denied access to independent advocacy

Institutional and Professional (Organisational) Abuse

Institutional abuse refers to repeated instances of poor or inappropriate care or support and may be an indication of more serious problems. Institutional abuse occurs when the systems, processes and/or management of these is failing to safeguard individuals leaving them at risk of, or causing them, harm. Institutional abuse can also occur when the routines, systems and norms of an organisation override the needs of those it is there to support or fails to provide those individuals with an appropriate quality of care. This can be the product of both ineffective and/or punitive management styles, creating an environment within which abuse can take place, intentional or otherwise.

Professional abuse is the misuse of therapeutic power and abuse of trust by professionals, the failure of professionals to act on suspected abuse/crimes, poor care practice or neglect in services, resource shortfalls or service pressures that lead to service failure and culpability as a result of poor management systems/structures.

Radicalisation

PREVENT: The Government's Counter-Terrorism strategy CONTEST is based on four areas of work: Pursue, Prevent, Protect and Prepare. 'Prevent' aims to stop people becoming terrorists or supporting terrorism or violent extremism by responding to the ideological challenge we face from terrorism, providing practical help to prevent people from being drawn into terrorism and works with a wide range of sectors where there are risks of radicalisation. Extremism may be related to any religion, faith, political group, or environmental issues. There is no single route into extremism, nor is there a single profile that may fit an individual who is drawn into extremism. If there are concerns that a vulnerable adult is at risk of radicalisation or extremism a referral should be made to the Local Authority Prevent Team who will arrange support through the 'Channel process'. This involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

APPENDIX B: Safeguarding Procedure

It is the responsibility of the Safeguarding Officer, supported by the Deputy Safeguarding Officer, to:

- coordinate action in the Foundation and liaise with appropriate local and national agencies over suspected or actual cases of abuse
- identify the signs and symptoms of suspected or actual cases of abuse and when to make a referral
- ensure that employees, volunteers and trustees observe and implement the Foundation's agreed procedures
- facilitate training for all staff, volunteers and trustees
- contribute to relevant policies and procedures
- keep full and accurate records of concerns, reports and referrals made and report these in summary to the trustees on a regular basis
- keep confidentiality where appropriate
- adhere to and promote this Policy within the Foundation, and
- support or provide access to support for individuals suffering from harm or abuse.

It is the responsibility of employees, volunteers and trustees to:

- be vigilant in order to identify potential incidents of abuse
- report immediately to a designated named person
- complete documentation for external agencies as appropriate.

It is not the individual staff member, volunteer or trustee's role to investigate suspected abuse, but to recognise it and refer it as appropriate to the Safeguarding Officer or Deputy Safeguarding Officer.

Dealing with a disclosure from a vulnerable adult Service User

A disclosure may come from someone telling you:

- they have or are being abused
- they have concerns about someone else
- they are themselves abusing or likely to abuse someone else.

Sometimes you may just feel concerned about a vulnerable adult, or child or another vulnerable adult who they talk about, but do not know whether to share your concerns or not. In this situation you should always raise your concerns with the Foundation's Safeguarding Officer or Deputy Safeguarding Officer who will help you to decide what to do and will make the final decision about whether or not to pass this information on.

In responding to a disclosure of abuse, a 3-step approach should be followed: Receive, Reassure, Respond.

- *Receive:*
 - Listen, do not look shocked or disbelieving
 - Do not be judgmental
 - Take what they are saying seriously and believe them
 - Do not make the Service User feel bad, for example by saying things like "you should have told me earlier"

- *Reassure*
 - Stay calm, tell them they have done the right thing in telling you
 - Acknowledge how hard it must have been to tell you
 - Tell them they are not to blame
 - Empathise – but don't tell them how they should be feeling
 - Don't promise confidentiality – explain that if you need to tell someone about the disclosure, only those who need to know will be told
 - Be honest about what you can and cannot do
 - Helpful things to say:
 - "I am glad you have told me"
 - "It's not your fault"
 - "I believe you"
 - Avoid saying:
 - "Why didn't you tell anyone before"
 - "I can't believe it"
 - "Are you sure this is true?"
 - Never make false promises
 - Never make a statement such as "I am shocked" or "Don't tell anyone else"
- *Respond*
 - Follow the further steps below to assess the current or ongoing risk to a Service User. If in any doubt, contact the Safeguarding Officer or Deputy Safeguarding Officer.

Assessing whether there is a current or ongoing risk of abuse

The Foundation deals directly with survivors of sexual abuse, and other potential forms of abuse. In some cases, the Service User may not still be at risk but may make a partial disclosure by talking about past abuse. In these cases, you must establish that the person making the disclosure is actually safe and not at further risk of abuse, and nor are other vulnerable adults or children. An example might be a Service User who discloses abuse by a family member with whom they are no longer in contact, while the alleged perpetrator may still have contact with other children. Disclosures of historic abuse will, therefore, in most cases, require the same safeguarding response as disclosures of current abuse.

Responding to disclosures of abuse

You should:

- Report the disclosure to the Safeguarding Officer or Deputy Safeguarding Officer immediately.
- If you are concerned about the immediate safety of a Service User or another individual, you should report this to the police immediately by dialing 999, and contact the Safeguarding Officer or Deputy Safeguarding Officer.
- Explain to the Service User what will happen next (unless this could increase the risk to the person you are concerned about) ensuring the Service User has been told and understands, as far as possible, the response of the Foundation and the reasons for it. Where this

includes informing third parties, inform the Service User that the Foundation intends to do this in advance, unless it is clear that this is not possible or practicable.

- Record the date, time and any information given to you. Always use the words said to you and avoid interpreting what was said or putting it in your own words (this information could be used as evidence). You must record this information and pass on to the Safeguarding Officer within 24 hours of disclosure.
- ***It is the personal duty of staff or volunteers who identify FGM, breast ironing, or receive a disclosure to make a crime report to the police. If an employee or volunteer has either been told that the woman or girl has had FGM s/he should personally report the matter to the police by calling 101. If you think the woman or girl is at imminent risk or has recently been cut you should take immediate action which may involve calling 999***

Actions of Safeguarding Officer (or Deputy Safeguarding Officer)

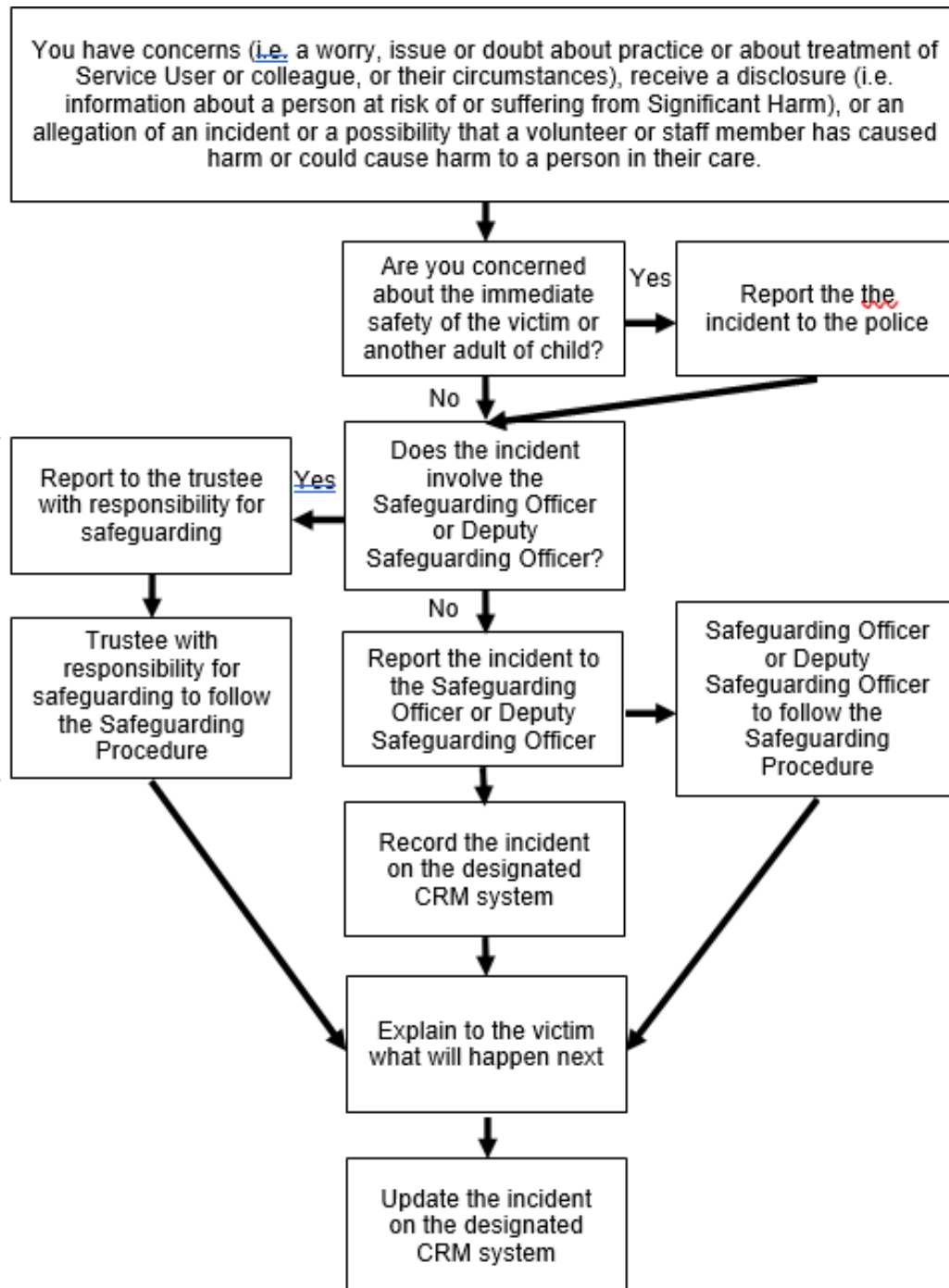
- If there is a concern about the possible current or continuing abuse of a child or vulnerable adult, the local authority social services department should normally be the first point of contact, unless it is deemed that this will put the individual in further harm.
- Alternatively, when the concern is about the welfare of a child or vulnerable adult at risk from schools, colleges, health providers, GP practices, prisons or social care setting, you should refer to that organisation's safeguarding lead in the first instance.
- If you are concerned about someone's immediate safety, you should report this to the police by calling 999, and (where relevant) social services immediately.
- When reporting it is important to give as much of the following information as possible. In an emergency situation all of this information may not be available, but unavailability of some information should not prevent a referral being made.
 - Reporting person's name, telephone number, position and request the same of the person to whom you are speaking.
 - Full name and address, telephone number and date of birth of person at risk.
 - Gender, ethnicity, first language, any special needs.
 - The names of professionals known to be involved with the individual eg: GP, health visitor, school.
 - The nature of the concerns and the foundation for them including exact wording used in the disclosure where possible.
 - An opinion on whether the individual may need urgent action to make them safe.
 - Reporting person's view of what appears to be the needs of the individual.
 - Whether the consent of the individual (or parent with parental responsibility in the case of a child at risk) has been given to the referral being made.

In these circumstances:

- ensure that an accurate record of concern(s) is made at the time and kept
- put concerns in writing to social services following the referral (within 48 hours)
- accurately record the action agreed in the Foundation's CRM database.
- Record any concerns or disclosures referred to you in the Foundation's CRM database as soon as possible, and in any case within 24 hours, along with details of any referrals made to external agencies.
- In cases of allegations against a person with "duty of care" towards a child or vulnerable adult, the Local Authority Designated Officer (LADO) will co-ordinate with the next procedural steps.

- Record clearly what you did next and with whom you shared the information and ensure that this information is saved in the Foundation’s CRM database.
- Try to follow things through yourself in terms of updating the Service User and seeking further information, so that the Service User does not need to repeat their story to other members of the Foundation.

SAFEGUARING PROCEDURE FLOWCHART



Signed by: Maggie Oliver - Founder, and Chair of The Maggie Oliver Foundation

Signature: *M. Oliver*

Dated: 1/10/2025