



Safeguarding Policy – Peckham Sponsors Refugees

Ratified by **Peckham Sponsors Refugees and Citizens UK/Sponsor Refugees (Lead Sponsor)**
July 18th 2018

To be reviewed annually

This policy applies to the core group and all volunteers of Peckham Sponsors Refugees, and to anyone working on behalf of the group.

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Introduction

Peckham Sponsors Refugees believes that a refugee child, young person or vulnerable adult/adult at risk should never experience abuse or exploitation of any kind. All members of our group have a responsibility to promote the welfare of any refugee children, young person or vulnerable adult/adult at risk that we are sponsoring and to keep them safe. We are committed to work in a way that protects them.

Peckham Sponsors Refugees believes that:

- All refugee children/young people/vulnerable adults/adults at risk have the right to be protected from harm;
- All refugee children/young people/vulnerable adults/adults at risk need to be safe and to feel safe;
- All refugee children/young people/vulnerable adults/adults at risk need support which matches their individual needs, including those who may have experienced abuse, torture and trauma;
- All refugee children/young people/vulnerable adults/adults at risk have the right to speak freely and voice their values and beliefs;
- All refugee children/young people/vulnerable adults/adults at risk have the right to be supported to meet their emotional and social needs;
- Community Sponsorship Groups and the organisations they work with can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extremism, discriminatory views and risk taking behaviours;
- All volunteers in a Community Sponsorship Group have an important role to play in safeguarding refugee children, young people and vulnerable adults/adults at risk.

Legal framework

The basis for this policy and the way that Peckham Sponsors Refugees will fulfil their responsibilities is guided by legislation, guidance and procedures that seek to protect and promote the safety of children and vulnerable adults/adults at risk, including:

- [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (HM Government 2015)
- [Working Together to Safeguard Children](#) (DfE 2013)
- [Keeping Children Safe in Education](#): Statutory guidance for organisations and colleges (DfE April 2014)
- [The Children Act 1989](#)
- [Children and Families Act 2014](#)
- [The Human Rights Act 1998](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Data Protection Act 1998](#)

- [Sexual Offences Act 2003](#)
- [The UN Convention on the Rights of the Child 1989](#)
- [The Care Act 2014](#)
- [The Care and Support Statutory Guidance](#)
- [Prevent](#)
- [Public Interest Disclosure Act 1998](#)
- [General Data Protection Regulations 2018/Data Protection Act 2018](#)
- [London Child Protection Procedures and Guidance 5th Edition 2017](#)
- [London Multi-Agency Adult Safeguarding Policy and Procedures 2015](#)

In addition, Peckham Sponsors Refugees' Designated Safeguarding Lead (DSL) (Philippa Bow) will keep up to date with any specific guidance issued by the Community Sponsorship, Resettlement, Asylum Support & Integration Directorate and will attend any appropriate training.

Definitions

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and/or vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.

Abuse involves acts of oppression, injustice, exploitation and manipulation of power over a child or vulnerable adult. It can be caused by those who inflict harm and those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.

It can take a number of forms, including the following:

- Physical abuse
- Emotional abuse
- Neglect
- Sexual abuse
- Child sexual exploitation
- Female genital mutilation
- Domestic abuse
- Bullying/cyberbullying
- Discriminatory Abuse
- Financial or material abuse
- Modern Slavery
- Human trafficking
- Organisational abuse

A child is anyone who has not yet reached their 18th birthday.

A vulnerable adult/adult at risk of abuse or neglect is a person aged 18 years or over who for whatever reason is unable to take care of themselves or protect themselves from harm or from being exploited. This may include (but is not restricted to) a person who:

- Is an older person
- Has a mental illness, including dementia or a personality disorder
- Has a physical or sensory disability
- Has a learning disability
- Has a long-term health condition
- Is a substance misuser
- Is a victim of domestic abuse, sexual exploitation or modern slavery
- Is a victim of human trafficking
- Is homeless
- Is a refugee

The Designated Safeguarding Lead (DSL) is the named person (Philippa Bow) within Peckham Sponsors Refugees who takes lead responsibility for child and adult protection. All volunteers, Coordination Group members and others working with the organisation will be aware of how to contact the DSL or an alternate member of the Safeguarding Group in order to raise or discuss a safeguarding concern.

Associated policies

Coordination Group members and volunteers of Peckham Sponsors Refugees will also be aware of and comply with organisational policies that support their work and provide guidance:

- Complaints Procedure
- Data Protection
- Guidance on managing and reporting sensitive cases
- Volunteer Registration process and code of conduct

Objectives

This policy will contribute to safeguarding any refugee family sponsored by Peckham Sponsors Volunteers and promoting their welfare by:

- Clarifying responsibilities and standards expected of all members of the group;
- Contributing to the establishment of a safe, resilient and robust ethos in the sponsorship group, built on mutual respect, and shared values;
- Implementing robust and deliverable safeguarding and protection policies and procedures;
- Working in partnership with other agencies in our area who have expertise in working with vulnerable people, children and refugees, including the local authority and the police
- Encouraging all members of the group to participate by:
- Alerting the DSL to any signs and indicators that all might not be well with a member of any sponsored refugee family

- Developing awareness among the group of the causes of abuse;
- Developing awareness of the risks and vulnerabilities refugees may face;
- Addressing concerns at the earliest possible stage; and
- Reducing the potential risks that any sponsored refugee family might face of being exposed to prejudice, victimization, hate, extremism or exploitation.

This policy will contribute to supporting any sponsored refugee family by:

- Identifying the individual needs of children, young people and vulnerable adults within any sponsored refugee family
- Designing plans to meet those needs.
- Working co-operatively with parents, unless this is inconsistent with ensuring their child's safety.

All volunteers with Peckham Sponsors Refugees will be:

- Aware of this safeguarding policy and their responsibility for safeguarding
- Subject to appropriate background checks where appropriate
- Provided with safeguarding training and induction to include familiarisation with the procedures to respond to safeguarding concerns.
- Alert to signs and indicators of possible abuse (See Appendix One for some of these indicators);
- Aware of the requirement to record concerns and give the record to the DSL
- Advised to deal with a disclosure of abuse from a child, young person or vulnerable adult/adult at risk in line with the guidance in Appendix Two – and to be aware they must inform the Designated Safeguarding Lead immediately, and provide a written account within 24 hours.

Responsibilities for Safeguarding

Sponsorship Group

The Coordination Group of Peckham Sponsors Refugees, with the DSL taking the lead, has direct responsibility for ensuring that the safeguarding policy is implemented, with its Lead Sponsor organisation, Citizens UK/Sponsor Refugees providing oversight, back-up and support.

The Coordination Group will ensure that:

- PSR's Safeguarding Policy meets the requirements of the government's Community Sponsorship, Resettlement, Asylum Support & Integration Directorate
- At least one senior member of the Coordination Group acts as a Designated Safeguarding Lead (DSL) – replacing the DSL if necessary
- The DSL attends the appropriate training session as advised by the Government's Community Sponsorship, Resettlement, Asylum Support & Integration Directorate

- Arrangements are put in place in the event of a complaint against the DSL by the refugee family or vice versa
- All other volunteers are made aware of the organisation's arrangements for child protection and safeguarding of vulnerable adults and are provided with training and guidance to support the implementation of this policy
- PSR reviews its policies/procedures annually and remedies any deficiencies or weaknesses brought to its attention without delay; and

Safer Recruitment and Selection

Peckham Sponsors Refugees takes seriously and has policies in place to ensure that its volunteers working with refugee children, young people and vulnerable adults (in particular the DSL) are selected safely. Measures to ensure this include:

- Scrutinising individuals who volunteer for these roles, by verifying identify, any relevant qualifications for the role, checking employment or volunteering history and obtaining references. (This includes people acting as interpreters for the group).
- Where necessary, and on guidance from the government's Community Sponsorship, Resettlement, Asylum Support & Integration Directorate, individuals will be required to undertake appropriate checks through the Disclosure and Barring Service (DBS) via the Lead Sponsor Citizens UK/Sponsor Refugees.

The Designated Safeguarding Lead (DSL)

The DSL of Peckham Sponsors Refugees (Philippa Bow) has lead responsibility and accountability for safeguarding within the group.

- The DSL will be responsible for liaising on safeguarding matters with the local authority, the local police safer neighbourhood team, with local refugee/faith groups (where appropriate) and with the Lead Sponsor Citizens UK/Sponsor Refugees
- The DSL will undertake regular (monthly) reviews of vulnerability issues within the sponsored family. Written records of these reviews will be kept in secure files. Issues will be reported to the Lead Sponsor Citizens UK/Sponsor Refugees where necessary.
- If and when there are safeguarding concerns about any member of the sponsored family the DSL will decide what steps should be taken and advise the group on escalation steps, referral, and informing the Lead Sponsor, Community Sponsorship, Resettlement, Asylum Support & Integration Directorate and/or bringing in expert, outside agencies.
- Safeguarding and child protection information will be dealt with in a confidential manner. The DSL may have to act through an interpreter but in that case the interpreter should be aware of the need for confidentiality.
- Other members of the group will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual and / or family. A written record will be made of what information has been shared with whom, and when.
- All written records will be stored on secure files in a central place separate from project material. Where files are necessary, individual files will be kept for individual. The DSL

will not keep family files. Files will be kept for at least the sponsorship period and beyond that in line with current data legislation and guidance.

- Access to these records by volunteers other than the DSL will be restricted, and a written record will be kept of who has had access to the records and when.
- Parents will be made aware of information held about their children and kept up to date regarding any concerns or developments. General communications will give due regard to which adults have parental responsibility for children.
- The following principle will apply: **The DSL will not disclose to a parent any information held on a child if this would not be consistent with keeping the child safe.**
- The DSL will have overall responsibility for liaising with outside agencies, including the police and the Home Office, in the unlikely event that the refugee family are regarded as open to radicalisation (See Appendix 4 and 5)
- The DSL will ensure any Sensitive Cases are reported to the Community Sponsorship, Resettlement, Asylum Support & Integration Directorate (Contact Officer) and will act as the point of contact with them

If or when the DSL steps down from their role within Peckham Sponsors Refugees, there should be a full face to face handover/exchange of information with the new DSL – or suitable alternative arrangements will be made.

Lead Sponsor

The Lead Sponsor organisation, Citizens UK/Sponsor Refugees, has overall responsibility for the implementation of PSR's Safeguarding Policy, has been involved in drawing up the policy and provides oversight and support. It will operate as the first point of contact in the event that the DSL of PSR feels the need to escalate a safeguarding issue. The Lead Sponsor is also responsible for:

- Registering all volunteers from Peckham Sponsors Refugees who are part of the Coordinating Group or the Welcome Team (which will have direct contact with the refugee family)
- In conjunction with the DSL, deciding who needs to have DBS checks (and at what level) and ensuring that these checks are carried out

Who we connect with for Safeguarding

Peckham Sponsors Refugees has individuals within the group who have experience and expertise in safeguarding from their professional careers or other volunteer activities. Our Safeguarding Group and other members include those with relevant experience in:

- Health
- Education
- Children's Services
- Police service

However we recognise that we need to make links with agencies and bodies in our locality with expertise in safeguarding and in working with volunteers. We have therefore made contact

with the following to inform of our application to sponsor a refugee family Local Authority Children and Adult Services Team:

Southwark Council's Children's Services	Referral and Assessment Team (Child Protection)	You can make a referral the following ways: <ul style="list-style-type: none"> • during core hours 9am to 5pm - phone 020 7525 1921 • out of hours - phone 020 7525 5000 • email MASH@southwark.gov.uk
	Local Authority Designated Officer /Quality Assurance Unit Service Manager	QAU Service Manager (LADO): 020 7525 0689 (For allegations against volunteers/those working with children) (Duty Number: 020 7525 3297)
Southwark Council's Adult Social Care (Any safeguarding referrals go to individual teams)	Older Persons & Physical Disability Team	For older people and those with physical disability/long-term physical health needs email: OPPDContactteam@southwark.gov.uk phone: 0207 525 3324
	Adult Mental Health Division	email: MentalHealthDivisionASC@southwark.gov.uk phone : 020 7525 0088
	Learning Disability & Autism Team	For adults with a learning disability or living with autism: email: LearningDisabilitiesDuty@southwark.gov.uk phone: 020 7525 2333
Police Safer Neighbourhood Team – Dulwich Village	PC Daniel McLynn	020 8721 2446 Village.snt@met.police.uk Emergency: Dial 999

In the event of safeguarding issues arising in the refugee family that we are sponsoring we can go for advice as to how to act appropriately from these contacts.

What we do when we are concerned

In any situation where a child or adult is in immediate danger, appropriate action will be taken - e.g. calling 999 to summon police, ambulance, fire service - before notifying the DSL and Project Manager.

In all cases where there is a concern, the DSL should be alerted within 24 hours.

Where risk factors are present but there is no evidence of a particular risk the DSL will advise Peckham Sponsors Refugees on preventative work that can be done within the group to help the refugee child, young person or vulnerable adult.

If a child is involved the DSL will talk to parents, sharing the organisation's concern about the young person's vulnerability and how the family and group can work together to reduce the risk.

If the risk seems greater, the DSL on behalf of Peckham Sponsors Refugees will take steps to seek advice and/or refer the individual concerned to the appropriate agency outlined above. This includes concerns about a young person who is affected by the behaviour of a parent or other adult in their household.

For guidance on information sharing, see next section.

Information Sharing

It is important that concerns about children and young people are shared, as it is only when all the pieces of information are put together that a full picture of the situation can be obtained and proper judgements made. A key factor in serious case reviews has been a failure to record information, to share it, to understand the significance of the information shared and to take appropriate action in relation to known or suspected abuse or neglect.

Peckham Sponsors Refugees will ensure that group members/ volunteers working with children and vulnerable adults are in no doubt that where they have a reasonable cause to suspect that a child or vulnerable adult may be suffering or may be at risk of suffering significant harm, they must share these concerns, and issues of confidentiality should not override the need to safeguard the child/adult.

The seven golden rules to sharing information

1. Remember that the Data Protection Act and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible. (Remember you may contact NSPCC for advice without disclosing identity).

4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

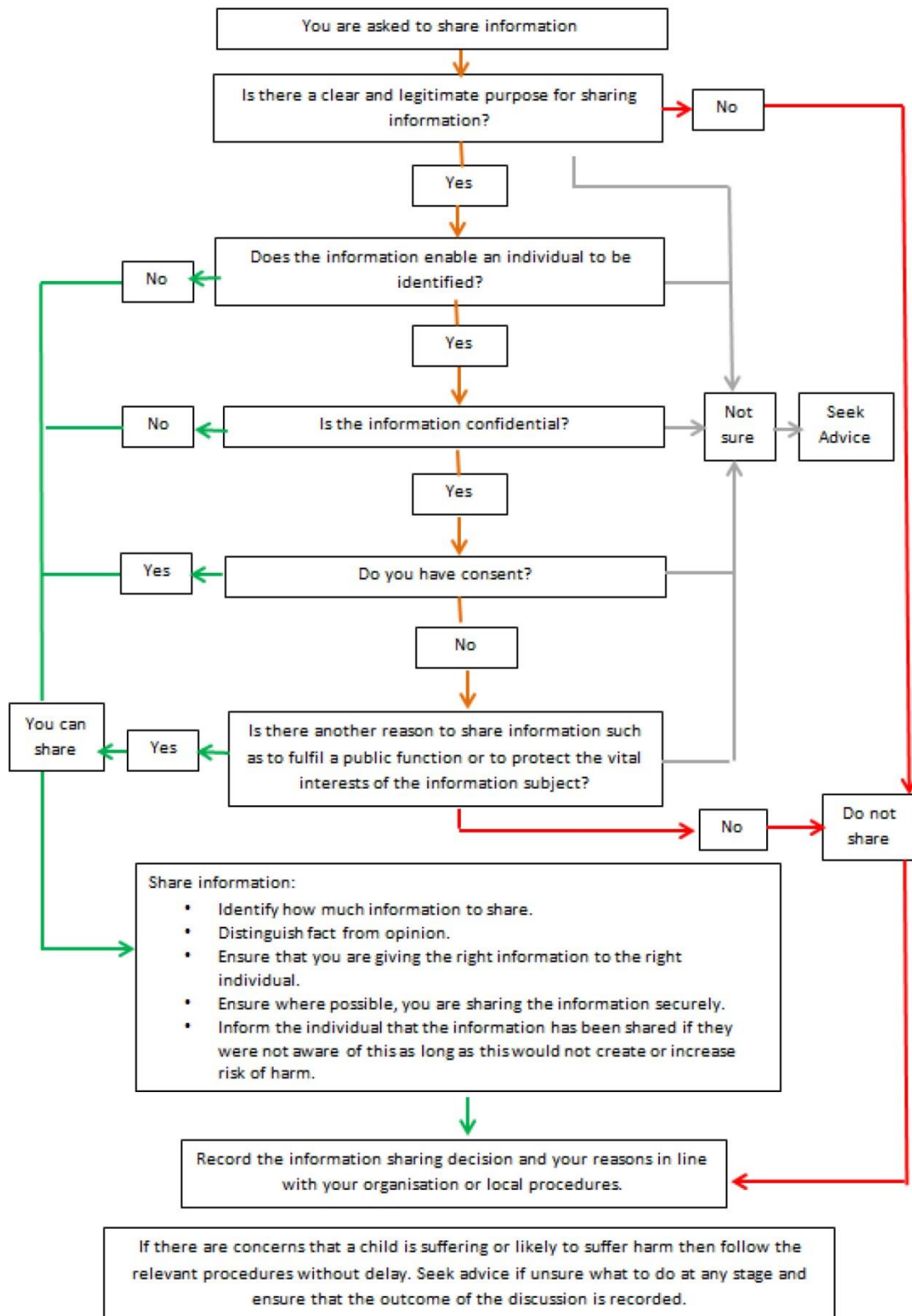
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

See next page for Information Sharing flowchart:

Information Sharing Flowchart

Flowchart of when and how to share information



Source: Information Sharing (HM Government March 2015)

Appendices

Appendix One: Indicators of Abuse and Trauma

1. Issues Arising From Refugee Experience

Refugees may have undergone many stressful experiences, including imprisonment, torture, loss of property, malnutrition, physical assault, extreme fear, rape, and loss of livelihood, as well as the stress of living in camps or precarious situations, and the stress of being resettled. It is also common for refugees to suffer from many physical and psychological symptoms and disorders, partly because of the stressful experiences they endure.

Assessing the variety of experiences, symptoms, and disorders refugees suffer from is challenging. Furthermore, differences in language and culture can act as a barrier against treatment. When refugees resettle to a host country, it is usually in a place that's not of their choosing. Refugees must adapt to a new place and language under uncertain circumstances and face uncertain futures. Re-establishing a home and identity, while trying to juggle the tasks of daily life is yet another challenging experience refugees must endure. Refugees are at a higher risk than the general population for a variety of mental health disorders. Some studies show refugees are at 10 times the risk of post-traumatic stress disorder (PTSD), depression, chronic pain, and other physical complaints. Exposure to torture is the strongest instigator of PTSD among refugees.

Disillusionment, demoralization and depression often occur due to migration-associated losses, or later, when initial hopes and expectations of relocating are not realized. Events that evoke memories of past trauma and loss can contribute to the emergence of anxiety, depression, or PTSD.

Though mental health disorders like anxiety, depression, and PTSD are not uncommon, the way in which they sprout and manifest in refugees can be complicated and atypical. Symptoms and signs include (this is not designed to be used as a checklist):

- Inability to sleep and nightmares
- Social withdrawal/unwillingness to interact
- Angry or violent outbursts
- Drug or alcohol abuse

2. Neglect

Neglect is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, such that it is likely to result in the serious impairment of the health or development.

Neglect with a child may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The same indicators can apply to a vulnerable adult.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor attendance or often late for organisational activities;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;

3. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical abuse may include restraint (unlawful or inappropriate use of restraint or physical interventions).

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child or the person in their care.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bruises to a baby or other non-mobile child or adult
- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;

- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying;
- Isolation from peers.

4. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit act of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Bruises or scratches in the genital area.

5. Sexual Exploitation

Sexual exploitation occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing sexual activities, or another person performing sexual activities on them.

The presence of any significant indicator for sexual exploitation should trigger a referral to children’s services. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity);
- Entering and/or leaving vehicles driven by unknown adults;
- Possessing unexplained amounts of money, expensive clothes or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology;
- Having unexplained contact with hotels, taxi companies or fast food outlets.

6. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the emotional development or wellbeing. It may involve conveying to person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the vulnerable child or adult the opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on the person. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing a person participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing a child or vulnerable adult to frequently feel frightened or in danger, or the exploitation or corruption of a vulnerable individual. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child or vulnerable adult consistently describes him/herself in very negative ways –as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self-harming, drug or solvent abuse;
- Fear of parents or other family members being contacted;

- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia;
- Soiling, smearing faeces, enuresis.

N.B. Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

7. Unusual Responses from Parents

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed;
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home; or
- Violence between adults in the household.

8. Individuals with Disabilities

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Unwillingness to try to learn a child’s means of communication;
- Ill-fitting equipment. for example callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child’s finances; or
- Inappropriate invasive procedures

Appendix Two: Dealing with a Disclosure of Trauma or Abuse

When a refugee tells you about the stress or trauma s/he is feeling or abuse s/he has suffered, you must remember (particularly if you are the DSL):

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Offer reassurance. Tell her/him you are pleased that s/he is speaking to you.
- Tell her/him that you believe them. S/he may have tried to tell others and not been heard or believed.
- Tell her/him it is not her/his fault.
- Encourage her/him to talk but **do not interrogate**, do not ask "leading questions" or press for information.
- Listen and remember.
- Do not agree to keep this confidential to yourself – you will need to share information, but only with those who need to know.
- Check and clarify to ensure you have understood correctly what s/he is trying to tell you. (You may need to get advice from the interpreter you are using where interpretation is necessary)
- Communicate that s/he was right to tell you and right to be safe and protected.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the individual, particularly a child, may retract what s/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the individual again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the phrases s/he used as far as possible. Include any questions you may have asked. Do not add any opinions or interpretations.

Even if you think the issue is minor, the DSL or others in the group may have more information that, together with what you know, represents a more serious worry. It is never your decision alone how to respond to concerns – but it is always your responsibility to share concerns, no matter how small.

- Decide whether you need to find out more by asking the child / young person, or their parent to clarify your concerns, being careful to use open questions: ...beginning with words like: 'how', 'why', 'where', 'when', 'who'?
- Let the child / young person / parent know what you plan to do next if you have heard a disclosure of abuse or you are talking with them about your concerns. Do not promise to keep what s/he tells you secret. ...for example, 'I am worried about your bruise and I need to tell person x so that s/he can help us think about how to keep you safe'
- Inform the DSL immediately. If the DSL is not available or you are the DSL, speak to another member of the Safeguarding Team or a senior person in the group. If there

is no other member of group available, you must make the referral yourself – however it is very unlikely that you will need to make this decision alone.

- Make a written record (using Group Welfare Concern Form or similar format) as soon as possible after the event, noting:
 - Name of person
 - Date, time and place
 - Who else was present
 - What was said / What happened / What you noticed ie speech, behaviour, mood, drawings, games or appearance
 - If child, vulnerable person or parent spoke, record their words rather than your interpretation
 - Analysis of what you observed & why it is a cause for concern

Pass this to the DSL within 24 hours of the event

The DSL makes the referral to the First Response Service – such as the local authority or police - having taken advice as necessary where it is unclear whether the threshold for a referral has been reached (see '[Who we connect with..](#)' above). The referral will note all previous intervention by the group with the child or vulnerable adult, any relevant history relating to them, their siblings or the family.

If the DSL is not available to make the referral another member of Peckham Sponsors Refugees Safeguarding Group or any PSR volunteer will make the referral, using the relevant local authority contact details in '[Who we connect with..](#)' above or 999 for the Police. A referral made verbally must be confirmed in writing within 24 hours.

The DSL shares information with relevant professionals, recording reasons for sharing information and ensuring that they are aware of what action the other professionals will take as a result of information shared.

(If a child is involved) The DSL informs parent and seeks their consent where appropriate before making the referral. The First Response Service may suggest to delay informing the parent in cases of suspected sexual abuse, or where informing the parent might put the child at further risk, to prevent the child being harmed or intimidated (and retracting their disclosure). In cases of suspected Fabricated or Induced Illness by proxy, the parent is not informed that this is being considered.

The DSL remains in close communication with professionals around the child / young person/vulnerable adult and with the family, in order to share any updates about the child / young person/vulnerable adult.

The next page includes a Group Welfare Concern Form members of the group can use to record concerns

Peckham Sponsors Volunteers Group Welfare Concern Form

Use this form to record any concern about an individual's welfare and hand or forward it to the DSL of your group.

In particular if you suspect a child may be suffering abuse or neglect, or you have received a disclosure of abuse from a child, or you have heard about an allegation of abuse, ensure the information reaches the DSL or deputy **immediately and at the latest within 24 hours**.

Full name

Date of this record

Why are you concerned about this individual?

What have you observed and when?

What have you heard and when?

What have you been told and when?

Have you spoken to the person? Yes / No

What did they say? Use the person's own words

Have you spoken to anyone else about your concern? Yes / No

Who?

Is this the first time you have been concerned about this individual? Yes / No

Further details

Date and time you handed this form to the DSL

Your name and designation

Signature

Appendix Three: Allegations about a Volunteer

Peckham Sponsors Refugees ensures that a distinction is made between allegations, any other concerns about a volunteer which may need to be addressed but which fall short of allegations, and complaints where no allegation is made.

An allegation relates to a person who works with children or who is in a position of trust and has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

The alleged behaviour could include, but is not limited to, harm which is:

- **Physical;** For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
- **Emotional;** For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.
- **Sexual;** For example, sexualised behaviour towards a child under 18, sexual harassment, sexual assault and rape, grooming, sexual exploitation, sexualised behaviour by text, messaging, social media etc.
- **Neglect;** For example, failing to act to protect a child or vulnerable adult, failing to seek medical attention or failure to carry out an appropriate risk assessment.

If an allegation is made about a volunteer, the Chair and DSL or other member of the core group of the Peckham Sponsors Refugees should be informed immediately. The DSL and Chair/core group should carry out an urgent initial consideration and, unless it is clear that the allegation has no substance, the DSL will ensure that the allegation is referred to the Designated Officer/Team at the Local Authority (LADO). Peckham Sponsors Refugees will not investigate the allegation themselves and will co-operate with any investigation by the Local Authority and/or Police.

The core group must exercise, and be accountable for, their judgement on the action to be taken, as follows:

- At any stage if the core group is uncertain whether the actions of a volunteer raise credible child protection or other safeguarding concerns, advice may be taken from the Local Authority's Designated Officer
- If the actions of the volunteer and the consequences of the actions do not raise credible child protection concerns, but do raise other issues in relation to the

conduct of the volunteer these should be addressed through the group's own internal processes.

Management of an allegation may involve any or all of:

- A police investigation into a possible criminal offence
- Enquiries and assessment by children's social care about whether a child is in need or protection or in need of services
- Consideration by an employer of disciplinary action in respect of the individual

In the event of an allegation, the Chair/DSL or core group will make a decision whether the volunteer should be suspended from involvement with the beneficiary family and children, and whether they may remain involved in any of the activities of the organisation while the allegation is investigated.

The volunteer will be offered:

- Support when an allegation is made and while an investigation into the allegation is ongoing
- Information – to be kept informed about the progress of the investigation and procedures to be followed. The LADO or Police may require that the volunteer is not informed of the nature of the allegation until this is disclosed during investigation.
- Confidentiality – every effort will be made to maintain confidentiality and guard against publicity while an allegation is being investigated and considered.

The family will be offered:

- Parents/carers of a child or children involved should be told about the allegation as soon as possible (if they do not know about it already).
- They should be kept informed about the progress of a case, and told of the outcomes where there is not a criminal prosecution, including the outcome of any disciplinary process.

If the volunteer removes themselves from the organisation or refuses to co-operate with an investigation, this will not prevent the allegation being investigated and a conclusion being reached.

In the case of substantiated allegations, Peckham Sponsors Refugees will be aware of their responsibility under the Safeguarding Vulnerable Groups Act 2006 to make a referral to the DBS when they have dismissed or removed a person, including a volunteer, from working with children or vulnerable adults (or would have done, if the person had not resigned) because of concerns over their behaviour towards children. Advice on this may also be sought from the LADO.

The DSL will keep a clear and comprehensive summary of any allegations made together with details of how they were followed up and resolved.

Appendix Four: Indicators of Vulnerability to Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as the demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

People may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that volunteers and members of Peckham Sponsors Refugees are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the person is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – local community tensions; and events affecting the young person’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the person may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Need – a young person may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Appendix Five: Preventing Violent Extremism

The DSL of Peckham Sponsors Refugees is responsible for:

- Ensuring the members of the group are aware that s/he is the lead in relation to protecting members of the sponsored family from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing members of the sponsored family from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness within the group about the safeguarding processes relating to protecting people from radicalisation and involvement in terrorism;
- Acting as the first point of contact between the group and outside agencies if there are any signs that a person may be at risk of radicalisation or involved in terrorism;

Appendix six – Handling and Reporting on Sensitive Cases

Background

The Community Sponsorship Agreement which has been entered into with the Home Office requires Peckham Sponsors Refugees, as a community sponsor, to put in place a process for managing **Sensitive Cases** and reporting them to the Secretary of State for the Home Department.

Definitions

‘Contact Officer’ means [NAME], being the officer at the Home Office who is responsible for community sponsorship bodies in the [REGION] of England. [ADD CONTACT DETAILS]

‘Lead Officer’ means [NAME], being the individual at the Home Office who is named as the lead officer in the Community Sponsor Agreement to which Peckham Sponsors Refugees is a party. [ADD CONTACT DETAILS]

‘Lead Sponsor’ means [NAME], who is named as the lead sponsor in the Community Sponsor Agreement to which Peckham Sponsors Refugees is a party.

‘Project Manager’ means [NAME], who is the project manager of [Sponsor Group] for the time being.

‘Resettled Person’ means a person resettled in the UK for whom [Sponsor Group] is responsible in its role as a community sponsor.

‘Sensitive Cases’ means any incidents involving members of a resettled family as a victim, perpetrator or observer, where the outcome or consequence is likely to result in:

- * serious harm to any individual;
- * significant impact on a community; or
- * significant impact on public confidence in the community sponsorship scheme.

Table 1 provides a non-exhaustive list of the types of situations which could amount to Sensitive Cases.

Procedures

- All volunteers working with Peckham Sponsors Refugees must immediately report information in relation to a Resettled Person if it could reasonably be believed to indicate a Sensitive Case, or if it otherwise gives rise to concern for the safety or well-being of a Resettled Person.
 - If the nature of the information indicates a safeguarding concern, it must be reported to the DSL in accordance with the Safeguarding Policy.
 - If the nature of the information does not indicate a safeguarding concern, it must be reported to the Lead Sponsor or the Project Manager.
- If the situation gives rise to a safeguarding concern, the DSL must proceed in accordance with the Safeguarding Policy and will liaise with the Lead Sponsor and/or the Project Manager in deciding what immediate steps are required to mitigate and manage the situation. If the situation does not give rise to a safeguarding concern, the **Lead Sponsor and/or the Project Manager** will decide what immediate steps are required to mitigate and manage the situation. In either case, it may be appropriate for immediate contact to be made with, for example, the Police, the local authority and / or the GP.
- The **Lead Sponsor and / or the Project Manager** must inform Peckham Sponsor's Refugees' Contact Officer as soon as reasonably possible (but no later than the end of the next working day) of the situation using Sensitive Cases Referral Form. In the event that the Contact Officer is unavailable, the Lead Officer must instead be informed.
- The **Lead Sponsor / Project Manager** must provide the Contact Officer with regular updates on the situation reported until the case has been closed by the Home Office.

Table 1: Examples of incidents which would amount to Sensitive Cases

Type of incident	Suggested sources information and support on reporting procedures
Breakdown of relationship between sponsor and resettled family	Contact Officer
Domestic violence	Contact Officer Police Local/National Support Groups
Divorce or split of a family	Contact Officer Local Authority Local groups such as Relate / relationship counselling
Safeguarding Concerns	Contact Officer Local Authority Children’s Services / Initial Referral and Assessment Team / Police Childline, NSPCC
Hate Crime (e.g. involving disability, gender identity, race, sexual orientation, religion, or any other perceived difference).	Contact Officer Police Local authority Specialist support groups for particular issues

Incidents that challenge or raise concerns about potential community cohesion	Contact Officer Local Authority Police
Concerns related to a vulnerable person being radicalised and/or drawn into or supporting terrorism	Contact Officer Local Authority Local Police Contact
Gender-based violence, exploitation, or modern slavery	Contact Officer Local Police Contact
Any other incidents of actual or possible unlawful activity, including those potentially relating to concerns about National Security	Contact Officer Police Local Authority
Incidents relating to the health and safety of one or more resettled family members (e.g. threatening or inappropriate behaviour carried out by or directed at family members, being sectioned under the Mental Health Act)	Contact Officer Local Authority GP and/or Police if assessed as appropriate
Potential breaches of Home Office processes affecting immigration of resettlement policy, such as information that comes to light after a resettlement decision is made	Contact Officer
Proposed or actual travel to Syria, Egypt, Iraq, Jordan, Lebanon or Turkey	Contact Officer Local Authority

Sensitive cases referral form

In instances, where an incident is deemed serious and/or referred to an outside agency, the DSL of Peckham Sponsors Refugees will inform the government's Community Sponsorship, Resettlement, Asylum Support & Integration Directorate (Contact Officer) and act as the point of contact with them

Sensitive cases referral form:

Date of Referral	
Referring Officer and contact details	
VPR Number / Name	
Community Sponsor	
Details of concerns and or incident (including date)	
Police Contact Details and incident reference number, (if applicable)	
Any other information	

Please forward this form to your Contact Officer within 24 hours of any incident, or as soon as you have any concerns you wish to raise. Thank you.