

Turn2us Safeguarding Policy

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1 Introduction

The purpose of Turn2us is: *So people can build financial sustainability and thrive, Turn2us gives people the information and support they need in face of life changing events, and collaborates to tackle the causes and symptoms of poverty.*

This means that as an organisation we commit to protecting people who come into contact with us from the different forms of injustice, discrimination, and abuse that they might be experiencing.

Our safeguarding approach at Turn2us covers our policies, the way we work, and our organisation's culture. We want all of these to work together in order to prevent and respond to any harm carried out by staff or those working on our behalf towards each other or people in contact with the organisation. Our approach also covers harm faced or experienced by those in contact with Turn2us when that harm is not directly perpetrated by Turn2us, including harm carried out towards themselves or by other people.

1.1 Purpose

The purpose of this policy is to protect people including staff, children, adults at-risk, and people for whom we exist from any harm arising during their contact with Turn2us.

This includes harm arising from:

- The conduct of Turn2us staff or those working on our behalf (e.g. financial abuse, sexual harassment in the workplace)
- The design and implementation of Turn2us's programmes and activities

This also includes harm arising from safeguarding concerns that are not caused by Turn2us staff or those working on our behalf, but rather:

- By people we come into contact with through our work towards themselves (e.g. suicide, self-harm, self-neglect)
- By other people towards those we come into contact with through our work (e.g. domestic abuse, physical abuse, psychological abuse)

The policy lays out the commitments made by Turn2us. It tells staff and other people working on our behalf what their responsibilities are in relation to safeguarding in the workplace and when in contact with people for whom we exist. This policy provides the safest way for staff to report a safeguarding concern, and for those concerns to be dealt with and managed in the safest and most appropriate way.

This policy addresses child and adult at-risk safeguarding together, rather than separately, as Turn2us's services are primarily aimed at adults. Turn2us recognises the particular challenges and risks of working with children, and these are highlighted throughout the policy.

Turn2us recognises that safeguarding affects all areas of our work. Keeping people safe is very important for all Turn2us activities. This policy sets high standards and we will learn from emerging practice to ensure that everyone that comes into contact with the organisation is kept safe from harm and is able to thrive.

1.2 Scope

This policy applies to:

- All staff contracted by Turn2us (full-time, part-time)
- Anyone working on behalf of Turn2us, including but not limited to trustees, volunteers, lived experts, contractors, partners, consultants, and donors.

Staff and people working on behalf of Turn2us will now also be referred to as personnel throughout this policy.

Safeguarding is everyone's responsibility. All personnel will receive a summary and/or the full version of this Safeguarding policy, a safeguarding induction, and training at the point they first join Turn2us. All personnel are expected to follow their responsibilities under this Safeguarding policy.

We take all safeguarding concerns and complaints seriously. Safeguarding concerns and complaints can be reported by both internal (e.g. personnel) and external people (e.g. people for whom we exist, members of the public).

The Turn2us Safeguarding Lead, Senior Leadership Team, and Board are responsible for this policy and its implementation. They are responsible for ensuring the policy is reviewed and updated as necessary. Updates to the policy will be recommended to the Turn2us Board through the Board's Audit, Risk, and Governance Committee and the Safeguarding Lead in consultation with the wider organisation (refer to *Appendix 1 Key Contacts* for further information).

Turn2us's performance management processes will check whether the policy is being adhered to.

1.3 Policy position

Turn2us is committed to safeguarding everyone involved in our charity and the work we do. We believe this is true whatever people's age, race, ethnicity, religion, sexual orientation, gender identity, class, ability (or disability), or background. We are especially committed to supporting those who are in situations where they are less able to protect their rights.

We will take every reasonable step to provide safe environments for all personnel and those involved in our charity and the work we do, whether online, over the telephone, or face to face. This includes ensuring we act to prevent harm and promote safety in the organisation in all aspects of our work. It also includes making sure we take appropriate steps if we have a concern about personnel, people for whom we exist, an adult at-risk, or a child, supporting them whenever this happens.

Through our safeguarding work, Turn2us wants to work with everyone to create a strong safeguarding culture and a psychologically safe environment to work so everyone can thrive. This means an environment where:

- Harm is prevented,
- People for whom we exist feel supported to thrive,
- Personnel and others feel able to raise concerns and complaints without fear of retribution,
- Imbalances of power are well understood, and

- The implementation of this Safeguarding policy is promoted in the workplace and beyond.

We believe safeguarding incidents are often rooted in an imbalance of power and a sense of powerlessness. Systems of patriarchy can reinforce these imbalances of power. These powerful systems of injustice constantly and actively oppress people, and mainly women. Other groups also experience the consequences of not holding power in society (e.g. LGBTQ people, children, people with disabilities) and are at a greater risk of harm as a result.

Turn2us takes a zero tolerance approach which means we will take all safeguarding concerns and complaints seriously and respond proportionately and robustly in every instance.

We will not tolerate harassment, exploitation, or abuse in any form by personnel and will apply the proportionate disciplinary action where breach of this policy has occurred (refer to the *Bullying and Harassment policy* for further guidance).

The Safeguarding policy is supported by other Turn2us policies, processes, and standards which inform Turn2us's Safeguarding work; from our values, to how we monitor and improve safeguarding issues. All Turn2us policies can be accessed via [Indigo](#) (the intranet site) or the HR Manager.

- A summarised version of this policy will be developed and come into effect alongside it once finalised. The key documents individually referred to throughout this policy will be developed and finalised before being appended to or coming into effect alongside this policy.

2 Confidentiality

2.1 Confidentiality in investigating complaints and concerns

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns and complaints.

Information relating to individuals, the concern, and subsequent case management will be shared on a "need to know" basis only. This means Turn2us will only inform those who need to be informed.

We will only share information with someone if:

- it is to support an investigation, or
- the individual holds overall accountability for the situation.

In these circumstances, the individual concerned will only receive the information they need in order to do their safeguarding related job effectively.

2.2 Data security when dealing with safeguarding incidents

Turn2us will comply with the *Data Protection and Confidentiality policy* when gathering, storing, or sharing any data relating to individuals involved in safeguarding incidents, and will follow its data protection policy and guidance on retaining incident management data.

2.3 Confidentiality when dealing with concerns about someone's safety

Turn2us has a duty of care and a legal obligation to ensure the safety and wellbeing of others in the workplace environment. Safeguarding cases will be assessed individually and, if necessary, action will be taken outside of standard confidentiality procedures to ensure the safety of a person or safety of others e.g. someone's life being in danger or a child at immediate risk of harm.

3 Survivor-centred approach

Turn2us has a duty of care to respond to every concern and complaint. If anyone has concerns that any individual is or has been at risk of being abused, exploited, harassed, or harmed in any way, they must report this immediately in line with the reporting procedures outlined in this policy.

In this policy 'survivor' is the person who has experienced the harm and 'complainant' is the person who is raising the concern or complaint. These may or may not be the same person.

We take a survivor-centred approach. This means that:

- Risk assessments will be conducted for each case to ensure that any survivor/complainant feels safe.
- The safety and wellbeing of the survivor is central to this process and as part of our survivor-centred approach, they will be informed and supported in the most appropriate way about the best approach for them.
- The survivor will be involved in the decisions regarding if, when, and how to make a report and taking formal action.
 - There may be occasions, in line with UK law, where Turn2us has a duty of care to respond even if the survivor/complainant does not want to take forward action. This will be managed on a case by case basis, following clear risk assessments, and the safety and wellbeing of the survivor/complainant will be paramount throughout.

There is no time limit on when a survivor/complainant can raise a concern about something they have experienced.

Turn2us will ensure that the safety, dignity, and rights of the survivor/complainant are respected at all times.

We are committed to carrying out robust and fair investigations that protect the rights of all involved, with a particular focus on the survivor/complainant and the subject of the complaint, ensuring that confidentiality is maintained and that the wellbeing of all is protected.

4 Roles and responsibilities

4.1 Organisational responsibilities

Turn2us **will**:

- Ensure we use high quality safeguarding standards and procedures when recruiting and managing personnel.
- Ensure all personnel have access to and are familiar with the Safeguarding policy, and receive training.
- Ensure trusted reporting and response mechanisms are in place that consider organisational ways of working and structures.
- Ensure we design and implement all programmes and activities in a way that protects people from harm.
- Follow up on safeguarding concerns and complaints promptly and according to due process and undertake the proportionate disciplinary action.
- Use a survivor-centred approach to safeguarding. If a safeguarding incident is reported, the wishes of the person who experienced the incident will help inform Turn2us's response.
- Learn from our experience, and other organisations' experiences, to ensure that the Safeguarding policy is reviewed and updated. We will learn from all safeguarding incidents, particularly from a survivor's perspective, to reinforce our positive safeguarding culture.

4.2 Personnel responsibilities

Personnel **are required to:**

- Ensure their behaviour is based on Turn2us's values
- Adhere to this policy and Turn2us's Code of Conduct, and
- Always uphold and promote the safety and wellbeing of personnel, people for whom we exist, children, and adults at-risk.

In particular, personnel are required to:

- Contribute to creating and maintaining a psychologically safe environment and positive safeguarding culture that prevents harm, supports people for whom we exist to thrive, understands power inequalities, and promotes the implementation of this Safeguarding policy in the workplace and beyond.
- Contribute to creating and maintaining a psychologically safe environment and positive safeguarding culture that enables open conversations about equality, diversity, and inclusion, and is welcoming to people from diverse backgrounds.
- Challenge poor practice or potentially abusive behaviour by Turn2us or partner personnel towards other personnel, people for whom we exist, children, or adults at-risk.
- Ensure that all activities are carried out in a way which seeks to minimise the risk to personnel, people for whom we exist, children, and adults at-risk (e.g. through carrying out routine risk assessments).
- Report any concerns or complaints regarding possible or actual safeguarding violations by Turn2us personnel to the appropriate personnel.
- Report any concerns or complaints regarding possible or actual abuse or harm involving people for whom we exist, children, or adults at-risk to the appropriate personnel using the reporting process in this policy.
- Take responsibility and be accountable for understanding, promoting, and implementing this policy and its corresponding plan and activities.
- Disclose any sexual relationship they have with other Turn2us personnel to the Safeguarding Officer and/or Lead. This may lead to a change in working practices if there is deemed to be a strong imbalance of power.

- Set a positive example, both on and off duty, which reflects their ability to carry out their role.

Personnel **must not:**

- Act in ways that may be or be perceived to be illegal, unsafe, harmful, abusive, or exploitative (physically, emotionally, neglectfully, psychologically, or sexually) towards other personnel, people for whom we exist, children, or adults at-risk.
- Directly exchange money, goods, or services with people for whom we exist.
- Engage in any commercially exploitative activities with children or adults, including child labour or trafficking.
- Engage in sexual activity with anyone under the age of 16. Mistaken belief in the age of a child is not a defence.
- Engage in any sexual relationships with people for whom we exist, since this would be based on inherently unequal power dynamics.
- Investigate a suspicion, concern, or complaint unless specifically tasked to undertake this by Turn2us.
- Abuse their position of power to withhold professional assistance or give preferential treatment.
- Use any form of technology (e.g. computers, mobile phones, digital cameras) to exploit, harass, or bully other personnel, people for whom we exist, children, or adults at-risk.
- Use Turn2us equipment to access, view, create, download, or distribute indecent images. Refer to the *IT Use Policy* for further information.
- Use language towards those other personnel, people for whom we exist, children, or adults at-risk that is inappropriate, harassing, abusive, sexually provocative or that is intended to shame, humiliate, or emotionally abuse.
- Disempower people for whom we exist, children, or adults at-risk. Personnel should discuss their rights with them, what acceptable and unacceptable behaviour towards them is, and what they can do if they encounter a problem when in contact with Turn2us.
- Seek to make contact or spend time with any person for whom we exist, child, or adult at-risk who they come into contact with as part of their work, except as part of the designated activities set out in their role.
- Do things for any person for whom we exist, child, or adult at-risk of a personal nature that they can do for themselves.
- Raise malicious complaints or use the policy for purposes other than what it is intended for.

4.3 Safeguarding roles and responsibilities

- *Safeguarding Lead*
 - Is accountable overall for the implementation of Turn2us's safeguarding work and communicating with the Board on behalf of the organisation on safeguarding.
- *Safeguarding Officer*
 - Supports Turn2us to embed a culture of psychological safety and confidence in safeguarding.
 - Develops and manages, in consultation with the wider organisation, the safeguarding plan.
 - Supports Turn2us to be compliant with the Charity Commission's safeguarding guidelines.

- Ensures policies, systems, referral mechanisms, and responsibilities are clear and embedded in Turn2us.
- *Safeguarding Committee*
 - Consults and advises on the safeguarding plan, policies, tools, and systems.
 - Is accountable for the implementation of the safeguarding plan, policies, tools, and system.
 - Promotes a proactive and positive safeguarding culture within Turn2us.
- *Lead Trustee for Safeguarding*
 - Ensures that Turn2us's strategic plans meet statutory regulations and expectations.
 - Ensures that effective safeguarding policy and practice is implemented.
 - Champions safeguarding and a positive safeguarding culture throughout Turn2us.
- *Chair of Trustees*
 - Ensures that the Lead Trustee for Safeguarding either has the required knowledge, skills, and experience or is supported to develop these.
 - Works with the Board to ensure that Elizabeth Finn Homes is meeting its statutory safeguarding requirements.

4.4 Human Resources responsibilities

Human Resources **are required to:**

- Work with others to create a psychologically safe environment where personnel and others feel a sense of equality, diversity, inclusion, and safety, and able to raise concerns and complaints without fear of retribution.
- Work with the Safeguarding Officer and Safeguarding Committee to ensure that this policy is displayed at prominent places within the office, as well as online, and to make it accessible, applicable, and understandable to all personnel.
- Work with the Safeguarding Officer and Line Managers to ensure that all inductions include a discussion of this policy.
- Ensure that the values, commitments, and procedures referred to in this policy are aligned with the recruitment policy, employee life cycle processes (including performance management, induction, training, and exit interviews), and other key workplace policies (e.g. grievance, disciplinary).
- Work with those overseeing and/or investigating safeguarding cases to provide strong employment law and employee relations advice, and ensuring that all relevant Turn2us policies and processes are followed correctly throughout the incident management process.
- Set a positive example, both on and off duty, which reflects their ability to carry out their role.

4.5 Line Manager responsibilities

Line Managers **are required to:**

- Create a psychologically safe environment in their area of responsibility and directly with the personnel they manage. This should ensure that personnel and others are aware of their responsibilities for reporting and the procedures for doing so, and feel able to raise concerns without fear of retribution.
- Ensure personnel in their line of authority receive an induction on this policy.

- Ensure that any concerns raised about personnel in the line of management are addressed through appropriate means (e.g. investigation, performance management).
- Ensure that personnel are aware of their responsibilities and accountability for the welfare of other personnel, people for whom we exist, children and adults at-risk during Turn2us activities.
- When recruiting, ensure that appropriate measures are put in place to prevent individuals who may harm personnel, people for whom we exist, children, or adults at-risk from entering Turn2us (i.e. through safer recruitment processes).
- Ensure the behaviour of personnel in their line of authority is based on Turn2us's values, adheres to this policy and Turn2us's Code of Conduct, and always upholds and promotes the safety and wellbeing of personnel, people for whom we exist, children, and adults at-risk.
- Set a positive example, both on and off duty, which reflects their ability to carry out their role.

4.6 Turn2us Board of Trustees

Part of the Board of Trustees' responsibilities include taking reasonable steps to protect from harm anyone who comes into contact with the charity through good governance.

The Board of Trustees **will**¹:

- Ensure Turn2us has a strong and effective safeguarding culture, safeguarding policy, Code of Conduct, and safeguarding procedures.
- Annually review and update Turn2us's safeguarding policy and procedures, learning from any serious incident or 'near miss', to ensure they are fit for purpose.
- Assess possible risks, including risks to people for whom we exist or to anyone else connected to Turn2us, and any emerging risks on the horizon.
- Consider how to improve the safeguarding culture within Turn2us.
- Ensure that everyone involved with Turn2us knows how to recognise, respond to, report and record a safeguarding concern.
- Ensure people know how to raise a safeguarding concern.
- Ensure any safeguarding training provided is regularly evaluated, so that it is current and relevant.
- Ensure posts within Turn2us are reviewed as to whether or not they require requests for self-disclosures of convictions and DBS checks.
- Ensure there is a risk assessment process in place for posts which do not qualify for a DBS check, but which still have contact with children or adults at-risk.

To support the Board of Trustees, Turn2us **will ensure**:

- Members of the Board have clear role descriptions, including safeguarding responsibilities.
- The trustees understand and are trained on their safeguarding responsibilities in accordance with external requirements and emerging practice.

¹ [Charity Commission's 10 actions trustee boards need to take to ensure good safeguarding governance](#)

- Reporting, escalation, and quality assurance measures on safeguarding takes place at Board level.
- The Safeguarding Committee reports to the Board on the safeguarding accountability and communication, and gives an overview of its personnel representation and consultation mechanisms.
- The Audit, Risk, and Governance Committee monitors and assures safeguarding measures are in place and followed, at least annually.
- The Risk Management policy is up-to-date and provides guidance to personnel on how to identify risks, risk thresholds, the organisational risk framework and accountability for risk.

5 Reporting safeguarding concerns

5.1 Reporting channels

Turn2us will ensure that safe, appropriate, accessible means of reporting safeguarding complaints and concerns are made available to personnel and the people for whom we exist.

Turn2us will accept complaints and concerns from external sources such as members of the public and statutory bodies.

Information on reporting safeguarding concerns will be available to members of the public and people for whom we exist via our website, newsletters, and email signatures of relevant personnel.

All Turn2us personnel have a duty to report any disclosure, suspicion, or risk of abuse or harm immediately. This may be observed in-person or online (including on social media, forums, or discussion boards), or disclosed to them verbally or in writing. Refer to *Appendix 3 Signs and symptoms of abuse* for further information.

Reporting of any concerns or complaints can be via the following channels:

- Discussing with the Safeguarding Officer (safeguarding@turn2us.org.uk)
- Discussing with your Line Manager, who can then raise with the Safeguarding Officer
- Emailing the confidential Safeguarding inbox (safeguarding@turn2us.org.uk)
 - This is accessed only by the Safeguarding Officer and Safeguarding Lead
- Following the Whistleblowing policy and procedure

Reporting can be done confidentially **in-person, by phone, or by email**. If you do not feel comfortable reporting to your Line Manager or the Safeguarding Officer, you may report the concern to the Safeguarding Lead, another manager, a member of the Safeguarding Committee, HR, or to a Board member (see *Appendix 1 Key contacts*). Turn2us will record and treat seriously every reported complaint and concern.

Any personnel reporting concerns or complaints through whistleblowing channels in line with the Turn2us *Whistleblowing (Public Interest Reporting) policy* (or if they request it) will be protected by the integrated reporting mechanisms of safeguarding and whistleblowing.

- A *Safeguarding reporting form* will be developed and finalised before being appended to this policy.

5.2 Retaliation against complainants, survivors, and witnesses

In line with the *Whistleblowing (Public Interest Reporting) policy*, Turn2us will take action against any personnel that carry out retaliatory action to try to do so (e.g. intimidation, threatening behaviour) against complainants, survivors, witnesses or any others involved or believed to be involved in an incident management process. Personnel who are found to have done this will be subject to disciplinary action, up to and including termination of employment and legal action.

5.3 False or malicious complaints

False or malicious allegations of harassment, exploitation and abuse are extremely rare.

However, if a Turn2us personnel is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment and legal action.

It is important to note that if a complaint is not investigated that does not mean the complaint was false, rather that there was insufficient evidence to support the allegation.

6 Responding to safeguarding concerns

6.1 Immediate response to a disclosure, suspicion, or witnessing of abuse

Where a personnel, person for whom we exist, child, or adult at-risk discloses abuse or harm to a personnel, the personnel must:

1. **Recognise** – Identify that the person may be describing abuse, even when they may not be explicit.
 2. **Reassure** – Stay calm, listen and show empathy. Reassure them that it will be believed and taken seriously and explain that there is a duty to report the issues internally and what may happen next.
 3. **Record** – Take notes of the conversation clearly, factually, and as soon as possible, trying to capture as much of the conversation verbatim as possible and keeping the notes confidentially.
 4. **Report** – Contact the Safeguarding Officer or your Line Manager to share the details of a concern or complaint. Once the details have been confidentially recorded, any other notes should be deleted or destroyed.
- A *Safeguarding reporting form* will be developed and finalised before being appended to this policy.

Confidentiality must be maintained. Details giving rise to concerns or suspicions of abuse will only be shared on a “need-to-know” basis with the limited number of individuals who need them in order to make decisions about next steps and referrals. Beyond this, all details will remain confidential. Under no circumstances should personnel attempt to investigate any suspicions or disclosures of abuse, or confront or make contact with the subject of concern.

- Anyone who contacts Turn2us is formally recognised by the Charity Commission as our beneficiary. When they contact us they may choose to disclose abuse or harm to any personnel. This may be face-to-face, by phone or online. We have a duty to

respond appropriately and guidelines on how personnel can do that will be made available through the *Turn2us Responding to Risk of Harm Guide*, and will come into effect alongside this policy once finalised

6.2 Incident management and referrals

Turn2us will follow up safeguarding concerns and complaints according to its policies and procedures, and legal and statutory obligations. Turn2us will apply appropriate and proportionate disciplinary measures to personnel found in breach of policy. The principles Turn2us will follow when responding to concerns and complaints are that:

- All concerns and complaints will be taken seriously and responded to as a matter of urgency.
- All concerns and complaints will be treated with the strictest of confidence and only those directly involved will be aware of details on a “need to know” basis.
- All concerns and complaints will be triaged and assessed as to whether or not a full investigation is required. Other actions that can be taken to help address concerns include offering support to the survivor/complainant, awareness raising, and developing new ways of working.
- Investigations will be conducted by either experienced, quality assured external investigators or Turn2us personnel who have been fully trained.
- Those involved directly with the case will be appropriately informed on how the case is progressing. Timeframes will be explained and adhered to as much as possible.
- All investigations will take into account good practice set out by ACAS.²
- Local safeguarding authorities, the NSPCC, and law enforcement will be informed about serious cases as required.
- Turn2us may suspend a subject of concern from duties while investigation and any disciplinary procedures take place (refer to the *Disciplinary policy* for further information)
- Where an investigation finds that there was a breach in safeguarding policy and practice, Turn2us disciplinary procedures will be used.
- The Safeguarding Officer and others involved in case management will ensure that lessons are learnt in the most appropriate way and that these lessons inform future organisational practice.
- The appropriate support options will be provided to all those involved with the case.

Any external referrals (e.g. to police, social services) will be made by the most appropriate personnel depending on the severity of the case (e.g. Safeguarding Officer, Safeguarding Lead, CEO, Chair of the Board). The referral will be made by phone, using a secure email, or online form and the personnel who made the referral will ensure it has been received by someone able to act on the information (e.g. a social worker). Turn2us will follow the local authority or police guidance and retain documentation relating to the concern or complaint in line with the *Data Protection and Confidentiality policy*. The local authority and/or the police will carry out their enquiries or investigation.

- An incident management and referral process for use across Turn2us will be developed and finalised before being appended to this policy.

² <https://www.acas.org.uk/investigations-for-discipline-and-grievance-step-by-step>

6.3 Out-of-hours responses

The Safeguarding Officer's email and contact information operate from Monday to Friday (9am – 5pm, excluding bank holidays).

Any safeguarding issues raised out-of-hours will be responded to as an immediate priority when working hours start again. This is unless there is an immediate and serious risk of harm which can then be raised as a matter of urgency with the Senior Leadership Team.

If a child (anyone under the age of 18) is at immediate risk, their consent is not necessarily required in order to contact the emergency services on their behalf. If, at any time, anyone believes that a child is at immediate risk of harm and the situation is too serious to wait until the next working day they should refer immediately to the police, by calling 999.

7 Support options

Turn2us will provide support to survivors of harm, regardless of whether a formal internal response is carried out (such as an investigation).

Survivors can choose if and when they would like to take up the support options available to them. This can include specialist psycho-social counselling, medical support, legal support and/or access to other specialist and appropriate support as needed.

Turn2us has a duty of care to those involved in safeguarding incidents, including witnesses of harm or subjects of concern, and will also provide them with appropriate support.

Turn2us is committed to listening to and learning from survivors about what kind of support they want, and offering varied support options that meet the diverse needs of survivors. The following process will be followed upon receiving a safeguarding concern or complaint from a survivor or complainant.

Turn2us will ensure that cases involving children and adults at-risk are referred to appropriate professionals and organisations. Due diligence will be undertaken to ensure that they act in line with Turn2us's values and put the welfare and support of the child or adult at-risk as the highest priority.

Personnel adversely affected by anything that they have seen or heard in their work should let their Line Manager or HR know, and they can contact the Confidential Counselling and Advice Service contracted by Turn2us. If personnel have any questions about support options, they can contact the Safeguarding Officer or the HR Manager.

8 Partners providing Turn2us services

Good safeguarding practice will be a key element to any relationship Turn2us has with partners providing services on our behalf.

- A detailed list of those who provide services on our behalf will be developed and finalised before being appended to this policy.

The following activities will take place with each partner:

- Safeguarding due diligence is conducted at the tender and induction stages, and monitored throughout the partnership.
- Turn2us personnel who are responsible for the relationship with partners will help the partners to be aware of and understand Turn2us safeguarding policies and other related policies. Partners should have their own equivalent policies in place and if they do not we will support them to develop these, and a strong safeguarding culture, where we can.
- Turn2us's partners may interact with people for whom we exist, children, and adults at-risk and therefore be aware of sensitive information. Turn2us and these partners must have agreements in place to ensure that all sensitive information relating to those we come into contact with is shared in a secure, confidential, and need-to-know basis.
- Safeguarding risk assessments are conducted by Turn2us in relation to partner activities that are carried out on behalf of Turn2us.
- All memorandums of understandings (MoUs) and contracts with partners, and consultancy agreements, will include this policy as an appendix when starting any project. Breaches of this policy can lead to termination of contractual agreements.
- Concerns regarding partners' personnel must be reported immediately via the reporting mechanisms detailed below (refer to *5.1 Reporting channels*). If Turn2us receives a complaint regarding personnel at a partner's organisation, Turn2us will work with the partner to ensure this is responded to quickly and appropriately. If there is reason to believe that a complaint has been dealt with inappropriately or inadequately by a partner, Turn2us will carry out an investigation and make a decision on the most appropriate course of action.

9 Safer recruitment, training, and awareness raising

9.1 Safer recruitment

Good safeguarding practice must be incorporated with Turn2us safer recruitment practices. Stringent recruitment processes will be put in place in order to reduce the likelihood of engaging someone who may pose a safeguarding risk to people for whom we exist and to personnel within the organisation.

The *Recruitment policy* and *Recruitment guide* will be kept up-to-date by the HR Manager for recruiting managers who require guidance on recruitment and selection procedures and employee lifecycle processes. The policy and guide will refer to aspects of safer recruitment including, but not limited to, adverts, interviews, background checks (references/DBS checks), job offers, probations and personnel.

9.2 Training

All personnel will complete safeguarding training that explains the Turn2us safeguarding approach and policy (in more detail than the induction) in the context of their work, their responsibilities, types and symptoms of abuse, how to raise concerns and complaints, and the organisational incident management process. Training will also explain Turn2us's whistleblowing process, statutory obligations, and legislation that governs safeguarding in the UK.

Training will be a participatory process that encourages conversations and questions in an open environment in acknowledgment of individual personnel experiences that make up their collective understanding of safeguarding.

Any training that takes place within Turn2us will acknowledge the safeguarding awareness raising activities mentioned below (9.3 Awareness raising).

Enhanced safeguarding training and other relevant training will be given to personnel that have designated safeguarding responsibilities or work in high-risk roles.

Refresher safeguarding training will be provided to personnel annually. This allows for personnel to be updated on any change in Turn2us' safeguarding approach and ways of working, or relevant safeguarding legislation.

The Board of Trustees will be trained in safeguarding so that they have a full understanding of their responsibilities when carrying out their roles.

All safeguarding training materials and resources will be kept up-to-date and made accessible on the Turn2us intranet and website.

Evidence of training must be captured and retained (e.g. training attendance records, training materials).

The Safeguarding Officer will have an induction with all joining personnel on Turn2us's safeguarding approach and this policy, with particular reference to personnel responsibilities, no later than one month after they have been appointed. It is the responsibility of the individual's Line Manager to ensure that this induction is arranged and carried out. Depending on the nature of the role, more extensive inductions on the safeguarding approach, policy, and specific risks and challenges will be carried out.

9.3 Awareness raising

- All personnel will be given the Safeguarding policy to read and understand as part of their job offer or initial point of engagement with Turn2us.
- The Safeguarding Officer will keep the website and [Indigo](#) (the intranet site) updated with the policy, the organisational commitment to safeguarding, and processes on how to report a concern or complaint for access by people for whom we exist and personnel.
- New learning will be shared with personnel to ensure knowledge of safeguarding is constantly evolving and up-to-date.
- Safeguarding will be embedded into everyday activities, including team meeting agendas, project proposals, and project reports.
- The Safeguarding Officer will provide personnel with regular updates on new developments in the sector or policy revisions as appropriate.

10 Safer programming

Turn2us recognises that safeguarding our personnel, people for whom we exist, children, and adults at-risk must be integral to our work and that any of these people can be harmed as a result of poorly designed programmes and projects, and related activities.

Personnel responsible for programme or project design and implementation must ensure that safeguarding is accounted for at all stages of the programme/project cycle. It is important that safer programming measures such as risk assessments are carried out even for programme activities that do not explicitly engage people for whom we exist, children, or adults at-risk.

Turn2us **will**:

- Ensure coproduction with lived experts in assessing, planning, implementing, monitoring and evaluating programmes and projects.
- Ensure risk assessments are completed for Turn2us projects.
- Ensure that the digital risk involved in Turn2us's activities is understood throughout the organisation.
- Keep up to date in the area of safeguarding practices by following a safeguarding monitoring plan owned by the Safeguarding Committee.
- Recognise that harassment, exploitation, and abuse are often grounded in gender inequalities and other power imbalances. Turn2us will ensure that activities are conducted in a gender-sensitive manner and:
 - Create safe spaces for consultation and monitoring of programme activities, sharing ideas, and raising concerns for women, men, transgender, and gender non-binary people to raise concerns and share ideas.
 - Have a clear risk assessment in place for all programmes outlining safeguarding risks within the programme and putting in place measures to address these in programme plans (e.g. looking at where and when activities take place, assessing personnel awareness of risks, ensuring services are safe and accessible).
- Co-produce safeguarding reporting and response mechanisms that receive concerns and complaints raised internally and externally. These will be transparent, accessible, and ensure that concerns and complaints are responded to in a timely and robust manner.
- Ensure that all response processes are developed in a manner that balances respect for due process with prioritising the safety, dignity, and rights of survivors.
- Ensure that assistance for those affected is carried out in line with Turn2us's survivor-centred approach.
- Ensure that all personnel recognise their responsibility to maintain an environment that is free of harassment, exploitation, and abuse and to report any abuse they suspect or witness, whether within Turn2us or outside, in line with the reporting processes outlined in this policy.
- Ensure that a copy of this policy will accompany all partner MoUs and contracts, and discussions held with third parties to further embed understanding and compliance.
- Ensure that all those involved in our project and programme activities are informed about their rights (including in the process of content gathering and visits) and how to raise concerns. This can include content on: safe/unsafe touching, appropriate and inappropriate behaviours, consent, and how to go about spotting and reporting signs of abuse.

10.1 Risk assessments

At Turn2Us, we want to be a safe, secure and positive organisation for our personnel and people for whom we exist. This means taking an honest look at our programmes and activities and where the risks lie.

A Safeguarding risk assessment is a critical process and an effective preventative measure to keep personnel, people for whom we exist, children, and adults at-risk safe. Conducting a Safeguarding risk assessment at the planning phase allows programmes and activities to be designed with safeguarding in mind, and regularly reviewed as part of monitoring activities with the Board's Audit, Risk, and Governance Committee. By conducting such an assessment, teams can feel more confident about the programme or project activity being safe when implemented.

If it is not possible to put in place mitigation strategies to address significant safeguarding risks then the programme/activity will not proceed.

- Further information on safeguarding risk assessments will be made available through the *Turn2us Guide to Identifying Safeguarding Risks* and will come into effect alongside this policy once finalised.
- A *Safeguarding risk assessment template* will be developed and finalised before being appended to this policy.

10.2 Digital risk

Digital and online services are a core element of Turn2us operations and allow the organisation to carry out many of its central objectives. Digital risk, in general, covers a wide range of areas including device and platform usage, cyber security, deletion/retention/retrieval capability, and legal compliance. Turn2us recognises that this activity carries potential safeguarding risks which require specific mapping and mitigation.

Further information on digital risk will be made available through the *Turn2us Digital Safeguarding Plan*, which will come into effect alongside this policy once finalised, and the *Data Protection and Confidentiality policy*.

10.3 Monitoring, evaluation, and accountability

In order for Turn2us to continually learn, improve, and keep up to date in the area of safeguarding practices, we will follow a safeguarding monitoring plan owned by the Safeguarding Committee.

It is necessary to make sure that monitoring and improvement activities such as complaints mechanisms, focus groups, and surveys are suitable for completion by lived experts and people for whom we exist, that interviews are conducted sensitively, and parents and care-givers are involved where appropriate. From initial needs assessments to final project reports, monitoring and improvement activities are a vital part of safer programming and ensuring safe outcomes for children and adults at-risk.

The plan will include the following activities:

- Collecting feedback from personnel and those who use Turn2us services using pulse surveys, feedback from line managers and supervisors, focus groups, and personnel representatives.
- Setting up indicators and triggers in systems to red flag issues e.g. high turnover, absences, high number of complaints, health and safety incidents.
- Responding to feedback and indicators in a participatory way, involving personnel in the solutions e.g. through working groups, Safeguarding Committee.
- Sharing and learning with other Turn2us groups e.g. Equality, Diversity and Inclusion Committee.
- Coproducing everything Turn2us does with those who use the services.

10.4 Reporting, response, and incident management mechanism design

As part of embedding safeguarding into all of Turn2us's programme design and activities, the Safeguarding Officer and Safeguarding Committee will work together with the wider organisation to create, strengthen, and evaluate existing processes and mechanisms. This

will be done to ensure that personnel, people for whom we exist, children, and adults at-risk are able to raise concerns and complaints easily and safely.

It is critical that reporting, response, or incident management mechanisms assure people of confidentiality, are survivor-centred, and are accessible and inclusive (e.g. suitable for use by people with differing abilities (or disabilities)).

The Turn2us Safeguarding Officer and Safeguarding Committee will develop these processes and mechanisms, as detailed above, on an ongoing basis and they will come into effect alongside this policy when they are finalised.

10.5 Content gathering

Turn2us has a duty of care towards people who contact and interact with us, which extends to its approach to gathering, aggregating, and publishing any communications that could expose them to risk.

A risk assessment must first be conducted to assess whether someone is particularly at-risk and how to tell the stories (safely and/or anonymously) of anyone who is identified as at-risk e.g. a survivor of harassment, abuse, or exploitation.

The following are practices that personnel must follow in the collection, storage, and dissemination of communication materials concerning people for whom we exist:

- The person's best interests must always be the primary consideration, as discussed and understood by the person and the personnel gathering content.
- They must be in a safe environment protected from any kind of abuse.
- The content gathering must always be a positive experience for the person, providing potential for learning and enjoyment.
- Ensure fully informed parental or guardian consent is received before gathering or using any content relating to children (e.g. interviews, images or footage of children), in addition to the consent of the child where practical. The parent or guardian must understand the purpose of this activity and how the images or footage will be used without posing any risk to the child.
- Never photograph, video or interview a person at-risk, without their consent or parental/guardian consent. The person needs to fully understand why they are being interviewed and/or photographed.
- Never gather content that could cause harm for the person immediately or at a later date.
- Gifts must not be given to people who are the subject of case studies.
- Where possible only Turn2us encrypted devices will be used to take photos and videos, and any photos or videos on personal devices will be transferred to Turn2us servers and deleted from the personal device. No photos/videos will be taken for personal use.
- If a consultant or contractor is used to gather content, they need to have a contract with Turn2us and have been briefed on Turn2us's Safeguarding policy and signed Turn2us's Code of Conduct.

Refer to *Appendix 4 Content gathering consent form* for further guidance on obtaining consent when gathering content for Turn2us.

10.6 Donor visits

As part of our activities, donors may visit people for whom we exist. We need to make sure this is done safely:

- Donors will receive a briefing on the Turn2us values and Code of Conduct, and sign a copy. Donors will also receive a briefing on the Safeguarding policy with instructions on content gathering, appropriate behaviours, and how to raise concerns, before any visit to a person for whom we exist.
- Any person for whom we exist who is visited by a donor will fully consent to this visit in advance.
- Donors will be required to go through a DBS check should they wish to visit a child or adult at-risk.
- Turn2us personnel who are hosting donors are not permitted to leave a child or adult at-risk unattended with a donor.
- Turn2us personnel will always accompany a lived expert to donor meetings and external events.
- Donors will not post any photo or details of anyone they visit on social media. This is for the sake of protection and privacy.
- If a donor wishes to gather their own stories or visual content from a person for whom we exist, they need to follow Turn2us guidelines for doing so. All outputs need to be agreed from the start and will be signed off by Turn2us.

Appendix 1 – Key contacts

Safeguarding role	Name	Substantive Turn2us role
Safeguarding Lead	Sonya Ruparel	Director of Programmes & Partnerships
Safeguarding Officer	Andrew May	Safeguarding Officer
Safeguarding Committee	Simon Brasch	Information Manager
	Elena Dickie	Caseworker
	Anna Docherty	HR Manager
	Namita Harvey	Head of Supporter Development
	Joe Hunter	Volunteering Programme Lead
	Faye Ibbitson	Caseworker
	Andrew May (<i>Secretary</i>)	Safeguarding Officer
	Sonya Ruparel (<i>Chair</i>)	Director of Programmes & Partnerships
	Anna Stevenson	Welfare Benefits Specialist
Sara Willcocks	Head of Communications	
Lead Trustee for Safeguarding	Steven Hunter	-
Chair of Trustees	Sally O'Sullivan	-

Dated 18 May 2020

Appendix 2 – Definitions

The following definitions are terms used in this policy and more widely in safeguarding work. The purpose of sharing these definitions is to help create a shared understanding within Turn2us, and personnel can raise questions about any of the terms below with the Safeguarding Officer or through the Safeguarding Committee should they wish.

<p>Abuse</p>	<p>The following types of abuse can affect anyone, including children and adults at-risk:</p> <p><u>Discriminatory abuse</u> – Including forms of harassment, slurs, exclusion, or similar treatment which may be on the grounds of a person’s protected characteristics (please refer to <i>protected characteristic</i> and <i>hate crime</i> definition).</p> <p><u>Domestic abuse</u> – Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those who are or have been intimate partners or family members regardless of their gender and sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, financial, sexual and emotional, or so-called 'honour' based violence.</p> <p><u>Financial/material abuse</u> – Including theft, fraud, scamming, and coercion in relation to financial affairs such as property or financial transactions.</p> <p><u>Hate crime</u> – Any criminal offence that is motivated by hostility or prejudice based upon the victim’s disability, race, religion or belief, sexual orientation, or transgender identity.</p> <p><u>Neglect</u> – Including ignoring emotional or physical care needs, failure to provide access to appropriate healthcare or educational services, and the withholding of life necessities such as food.</p> <p><u>Organisational abuse</u> – Including neglect and poor care practice within an institution or special care setting such as a hospital or care home, or where care is provided within someone’s own home.</p> <p><u>Physical abuse</u> – Any manner of causing physical harm or fabricating symptoms of: assault, hitting, slapping, pushing, misuse of medication, inducing illness, restraint or inappropriate physical sanctions, administering or allowing access to drugs or alcohol.</p> <p><u>Psychological abuse</u> – Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber-bullying, isolation, or unreasonable and unjustified withdrawal of supportive networks</p> <p><u>Self-harm</u> – Self-harm is when somebody intentionally damages or injures their body, usually as a way of coping with or expressing overwhelming emotional/psychological distress.</p> <p><u>Self-neglect</u> – Self-neglect covers a wide range of behaviour, neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding.</p>
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	<p>Sexual abuse – Forcing or deceiving any person of whatever age to take part in any form of sexual activity, whether or not they are aware of what is happening; or behaving, or inducing a child or adult at-risk to behave, in sexually inappropriate ways.</p> <ul style="list-style-type: none"> - This includes, but is not limited to: rape, indecent exposure, inappropriate looking and touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, inappropriate sexual relationships with people in positions of power or influence, and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting. - Sexual abuse, and the examples given above, also encompass sexual harassment and sexual exploitation (please also refer to these definitions). - Turn2us strictly prohibits personnel from engaging in any kind of sexual activity with anyone under the age of 16.
Adult	Any individual aged 18 or over, in line with UK law.
Adult at-risk	<p>An individual aged 18 or over who, for physical, social, economic, or other factors can be more at-risk to abuse, exploitation or other harms.</p> <ul style="list-style-type: none"> - Some people for whom we exist may come under this definition. Recognising this, we will work to ensure that this is an empowering rather than a disempowering term, and that we use it to work with people to uphold the rights and dignity of those who may be at greater risk of harm, abuse, or exploitation. - The term ‘vulnerable adults’ is often used interchangeably with ‘adults at-risk’. We are choosing to use the phrase <i>at-risk</i> instead of describing individuals as <i>vulnerable</i>, as this can be a disempowering term if it suggests inherent vulnerability rather than reflecting on where this relates to systems of power.
Child	Any individual under the age of 18, in line with UK law.
Child abuse	<p>All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust, or power.</p> <p>The main categories of abuse are defined by the World Health Organisation as physical abuse; sexual abuse; psychological abuse; and neglect.</p> <p>An abused child will often experience more than one type of abuse, and it often happens over a period of time rather than being a one-off event.</p> <p>Please also refer to <i>abuse</i> definitions.</p>
Exploitation	Any actual or attempted abuse of power or trust for personal purposes, including, but not limited to, profiting commercially, monetarily, socially, or politically from the exploitation of another.
Harassment	<p>The Equality Act³ makes three types of harassment unlawful. These are:</p> <ul style="list-style-type: none"> - harassment related to a ‘relevant protected characteristic’ - sexual harassment - less favourable treatment of a worker because they submit to, or

³ [Equality and Human Rights Commission Guidance](#)

	<p>reject, sexual harassment or harassment related to sex or gender reassignment</p> <p>Separate, yet very similar, equality legislation to the rest of the United Kingdom applies in Northern Ireland.⁴</p>
Safeguarding	<p>The responsibility that organisations have to make sure their personnel, operations, and programmes do no harm to anyone they come into contact with, and that they do not expose anyone, including personnel, to the risk of harm and abuse. Turn2us extends this definition to include harm arising from safeguarding concerns that are not caused by Turn2us personnel or those working on our behalf, but rather by people we come into contact with through our work towards themselves, and by other people towards those we come into contact with through our work.</p> <ul style="list-style-type: none"> - Turn2us seeks to address harassment, exploitation and abuse, child abuse, and abuse of adults at-risk through its safeguarding work. - This work is founded on the understanding that these harms are abuses of power that result from imbalances of power that exist in interpersonal relationships, organisational systems, and societal structures. It also takes into account the different ways in which anyone can be at risk, and how these harms intersect. - Turn2us may come into contact with children as well as adults at-risk through its work. Where child safeguarding recognises children as inherently vulnerable, adult safeguarding takes into consideration multiple different factors before regarding an adult as being at-risk of harm. <p>Please also refer to <i>Child safeguarding</i> definition.</p>
Sexual exploitation	<p>Any actual or attempted abuse of power or trust for sexual purposes, including, but not limited to, profiting commercially, monetarily, socially, or politically from the sexual exploitation of another.</p> <ul style="list-style-type: none"> - This can represent a wide spectrum of examples including but not limited to invasion of someone's sexual privacy, forced transactional sex, non-consensual filming of a sexual act or exposure of genitals, online grooming, or knowingly spreading a sexually transmitted disease or infection. - It is important to understand that sexual exploitation is not limited to sexual intercourse, as detailed in some examples above, and includes acts of intimidation of a sexual nature that are intended to cause discomfort and embarrassment.
Sexual harassment	<p>Sexual harassment is unwanted conduct of a sexual nature. It can happen to anyone regardless of gender, sexuality, race or any other factor. Turn2us recognises that different forms of discrimination overlap and intersect and that this exacerbates the risk of sexual harassment within marginalised and threatened groups such as women, people of colour, people with disabilities and people in the LGBTQ community.</p> <ul style="list-style-type: none"> - Sexual harassment can be directed towards one person, groups of people, or towards everyone, and can occur as a one-off incident or as a pattern of behaviour. - Sexual harassment can be carried out with the effect of creating an intimidating, degrading, or offensive environment and/or to

⁴ [Equality NI Guidance](#)

	<p>violate the dignity of another person.</p> <ul style="list-style-type: none"> - An action or behaviour can still be considered sexual harassment even if the alleged harasser didn't intend for it to be harmful. When addressing allegations of sexual harassment, Turn2us is concerned with the impact of the behaviours on the complainant, not the intention of the subject of concern. <p>Sexual harassment can be physical, verbal, or non-verbal. Examples of this include, but are not limited to:</p> <ul style="list-style-type: none"> - Physical examples include touching, unwanted physical contact and assault (including attempts and threats) - Verbal examples include derogatory comments, jokes, questions about someone's sex life, remarks about someone's appearance - Non-verbal examples include sexual gestures, staring, and unwanted phone calls, letters, notes, and/or emails <p>The above examples are not exhaustive, and an individual can raise concerns via the procedures laid out in this policy if they believe they have experienced sexual harassment, exploitation, or abuse.</p>
<p>OTHER RELEVANT TERMS</p>	
<p>Child protection</p>	<p>This refers to activities or processes that focus on preventing and responding to violence, exploitation and abuse against children – including but not limited to commercial sexual exploitation, trafficking, child labour and harmful traditional practices.</p> <ul style="list-style-type: none"> - Child protection is part of wider safeguarding activities and refers to activities that are undertaken to protect specific children who are suffering or likely to suffer significant harm. This includes procedures which detail how to respond to concerns about a child. <p>Please also refer to definitions of <i>Child safeguarding</i> and <i>Safeguarding</i>.</p>
<p>Child safeguarding</p>	<p>Child safeguarding is the action that is taken to promote the welfare of all children and protect them from harm. In practice it means:</p> <ul style="list-style-type: none"> - protecting children from abuse and maltreatment - preventing harm to children's health or development - ensuring children grow up with the provision of safe and effective care - taking action to enable all children and young people to have the best outcomes - ensuring an organisation's processes or procedures do not deliberately or inadvertently cause harm to children <p>Please also refer to the definitions of <i>Safeguarding</i> and <i>Child protection</i>.</p>
<p>Child sexual exploitation</p>	<p>This can take the form of commercial and/or online sexual exploitation of children:</p> <ul style="list-style-type: none"> - Commercial sexual exploitation is sexual abuse enabled by a payment in cash or in-kind to the child or another person (or group of people). - The commercial sexual exploitation of children is a form of coercion and is a form of modern slavery. - Online sexual exploitation covers any act of sexual exploitation towards a child that has at any point been carried out online. It includes any use of technology (e.g. phones, computers, cameras,

	online platforms, social media) that causes a child to be sexually exploited and any material created using this technology to be produced, bought, sold, possessed, distributed or transmitted
Complainant	This is the person making a complaint; it may be the person who experienced what is being reported (the survivor), or it may be another person (a third-party complainant) who becomes aware of an issue and makes the complaint.
Complaint	The specific grievance of anyone who has been negatively affected by an individual's action towards them, or who believes that an organisation has failed to meet a stated commitment that is intended to keep them safe from harm. <ul style="list-style-type: none"> - Individuals can make a complaint on behalf of someone else as a third party, even if they were not directly affected by the alleged harm.
Concern	Turn2us uses this term to define safeguarding issues raised that are not, or not yet, a formal complaint. <ul style="list-style-type: none"> - For example, a group of personnel speaking about rumours they have heard regarding sexual harassment in the office. - It is vital that concerns raised are responded to and addressed as fully as possible (where the survivor/complainant wants this to happen and if action can be carried out given the level of information shared). This is a critical way of ensuring Turn2us listens to and trusts survivors/complainants and ensures that all voices are heard, does not wait only for formal complaints, and follows up on all issues as part of our commitment to creating safe working environments in which the rights of all are respected.
Female genital mutilation	Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. <ul style="list-style-type: none"> - FGM is recognised internationally as a violation of the human rights of girls and women. It reflects deep-rooted inequality between the sexes and constitutes an extreme form of discrimination against women. It is nearly always carried out on minors and is a violation of the rights of children. - The practice also violates a person's rights to health, security and physical integrity, the right to be free from torture and cruel, inhuman or degrading treatment, and the right to life when the procedure results in death.
Forced marriage	Marriages in which one and/or both parties, whether adults or children, have not personally expressed their full and free consent to the union.
Gender-based violence (GBV)	Gender-based violence is an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females. <ul style="list-style-type: none"> - Acts of gender-based violence are a form of sexual abuse and can affect anybody, whether personnel or people for whom we exist. - They are often carried out by men towards women and can result, in part, from power imbalances. Therefore, this is regarded as a significant safeguarding issue within the operating context of Turn2us.
Grooming	Grooming is when an individual deliberately tries to gain a child's or adult's trust for the purpose of carrying out sexual abuse or exploitation. <ul style="list-style-type: none"> - An offender may seek to build a sexual relationship with a child having purposefully built a trusting relationship with them in advance in order to enable this (e.g. favouring a child, giving them

	<p>gifts, using sexualised language or physical contact, or exposing the child to sexual concepts and sexualised language). This can happen face to face or online. It is common for children not to understand that they have been groomed or that this is a form of abuse.</p> <ul style="list-style-type: none"> - Offenders may also groom adults in order to enable the abuse of children in their care to take place (for example, persuading those around them that they are safe and responsible individuals so that they allow children in to their care or do not believe children when they raise concerns about this individual).
LGBTQ	LGBTQ is an acronym for lesbian, gay, bisexual, transgender and queer or questioning. These terms are used to describe a person's sexual orientation or gender identity. ⁵
Modern slavery	<p>Modern slavery covers different types of labour exploitation, ranging from the mistreatment of workers to human trafficking to child labour and forced sexual exploitation.</p> <ul style="list-style-type: none"> - Related terms include human trafficking, covering coercion and recruitment under false pretences, and bonded and forced labour, which is labour undertaken as a repayment or under threat of punishment respectively.
Protected characteristics	As detailed in the Equality Act 2010, the following characteristics are someone's protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
People for whom we exist	<p>Anyone who comes into contact with Turn2us, including but not limited to those:</p> <ul style="list-style-type: none"> - Applying for or receiving a grant - Using the grants search tool - Enquiring directly about grants and/or other forms of assistance - Using the Benefits Calculator - Contacting the Helpline - Engaging with our social media channels
Personnel	<p>This includes, but is not limited to, staff (full-time and part-time), trustees, volunteers, lived experts, contractors, partners, visitors, consultants, and donors.</p> <ul style="list-style-type: none"> - When we refer to personnel and those working on our behalf in the document, we are referencing this entire group. - This is not an exhaustive list and covers anyone who is a representative of Turn2us.
Subject of concern	<p>The person alleged to have carried out harm or abuse.</p> <ul style="list-style-type: none"> - This term is used rather than "accused" or "perpetrator" as it is less weighted as a term, and emphasises the importance of natural justice and fair and objective investigations.
Survivor	<p>A person who has experienced abuse, exploitation, or harassment.</p> <ul style="list-style-type: none"> - The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support sectors because it implies resiliency." - Turn2us uses the term survivor as part of our survivor-centred approach as it emphasises the power of the individual, which the term 'victim' can remove, and their agency. However, it is important that those affected by abuse, exploitation and

⁵ <https://gaycenter.org/about/lgbtq/>

	harassment can choose the term they prefer.
Survivor-centred approach	<p>Originating from feminist analysis of violence against women, a survivor-centred approach puts the survivor of violence or harm at the centre of any response and process. Recognising that violence, particularly sexual violence, is carried out in order to remove the power of the person experiencing the harm a survivor-centred approach works to place the power back with the survivor.</p> <ul style="list-style-type: none"> - Survivor-centred approaches consider the rights, choices, dignity, confidentiality, and safety of the survivor. This helps to ensure that the survivor does not come to any further harm as a result of having chosen to report an incident.
Trafficking	<p>Trafficking is a process of enslaving people, coercing them into a situation with no way out, and exploiting them.</p> <ul style="list-style-type: none"> - People can be trafficked for many different forms of exploitation such as forced transactional sex, forced labour, forced begging, forced criminality, domestic servitude, and forced marriage, and forced organ removal.
Transactional sex	<p>This is the exchange of money, employment, goods, or services for sex, including sexual favours.</p> <ul style="list-style-type: none"> - Transactional sex is strictly prohibited by Turn2us along with any other forms of humiliating, degrading or exploitative behaviour, including exchange of assistance that is due to people for whom we exist. - Turn2us does not make judgement against any people for whom we exist who choose to take part in such transactions but recognises the inherent unequal power dynamic and so prohibits personnel from exchanging money or anything else for sex.

Appendix 3 – Signs and symptoms of abuse

Children

The following signs and symptoms of abuse should be considered in context of the child's whole life (a child may also experience multiple types of harm and abuse at once). Signs and symptoms of abuse that may also affect children can be found in the *Adults* section, on the understanding that these lists are not exhaustive.

Neglect

- Under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care and hygiene, etc.
- Demonstrates lack of attachment to other adults or is very demanding of affection or attention; poor social skills; poor school attendance or performance

Psychological

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging; nervousness, frozen watchfulness; obsessions or phobias
- Depression, aggression, extreme anxiety
- Sudden under-achievement or lack of concentration; persistent tiredness
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour, running away, stealing, and lying

Physical

- Bruises on babies, bites, burns, fractures etc. which do not have an accidental explanation; cuts, scratches, prone to substance abuse and self-harm
- Injuries not consistent with the explanation given for them, occurring in places not normally exposed to falls/rough games, and that have not received medical attention
- Reluctance to change for, or participate in, games or swimming

Sexual

- Any allegations made concerning sexual abuse
- Excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour; age-inappropriate sexual activity through words, play, or drawing
- Child who is sexually provocative with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Eating disorders e.g. anorexia, bulimia; symptoms of urinary infections

Adults

The following signs could be indicators that abuse has taken place but should be considered in context of the person's whole life.

Discriminatory abuse

- Expectation of inappropriate remarks, comments or lack of respect
- Low self-esteem or withdrawn; anger
- Person puts themselves down in terms of their gender identity, sexuality, or other protected characteristic

Domestic abuse

- Unexplained injuries or 'excuses' for marks or scars
- Coercive, controlling and/or threatening relationship including psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence (refer to other abuse symptoms).

Financial/material abuse

- Disparity between assets and living conditions
- Unexplained withdrawals from accounts or disappearance of financial documents or loss of money
- Sudden inability to pay bills or getting into debt, and lack of understanding why
- Carers or professionals fail to account for expenses incurred on a person's behalf
- Recent changes of deeds or title to property; inappropriate granting and/or use of Power of Attorney
- Missing personal belongings

Modern slavery

- Having few personal possessions or ID documents; being forced to sign documents to receive social security benefits, credit agreements or loans; having no access to earnings; being under the perception that they are bonded by debt
- Depending on their employer for work, transport and accommodation without any choice; movement likely monitored, rarely being left alone, travelling early or late at night to facilitate working hours
- Acting as if instructed by someone else, allowing others to speak when addressed directly
- Being fearful of seeking help or trusting people; distrustful of the authorities; afraid of revealing immigration status

Neglect and self-neglect

- Deteriorating health and wellbeing despite apparent care
- Poor home conditions not meeting basic needs (for example no heating or lighting), clothing, or care and support; hoarding inside or outside a property
- Person appearing unkempt or dirty; neglecting personal hygiene; lack of medication or medical intervention
- Person is malnourished, has sudden or continuous weight loss and is dehydrated – constant hunger, stealing or gorging on food
- Person is dressed inappropriately for the weather conditions
- Dirt, urine, or faecal smells in a person's environment
- Suffering from depression

Organisational abuse

- No confidence in complaints procedures for personnel or service users
- Neglectful or poor professional practice
- Low self-esteem and withdrawn; anger; person puts themselves down in terms of their gender identity, sexuality, or other protected characteristic
- Experiencing symptoms of other forms of abuse encompassing psychological, physical, sexual, financial, emotional abuse

Psychological abuse

- Preventing someone accessing services, educational and social opportunities, religious needs, and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance; Threats of harm or abandonment

- Preventing someone from expressing choice and opinion, failure to respect privacy
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse; addressing a person in a patronising or infantilising way
- Silence when a particular person is present; withdrawal or change in the psychological state of the person; low self-esteem; insomnia
- Signs of distress; uncooperative and aggressive behaviour; apparent false claims, by someone involved with the person, to attract unnecessary treatment
- A change of appetite, weight loss/gain

Physical abuse

- History of unexplained falls, fractures, bruises, burns, minor injuries
- Signs of under or overuse of medication and/or medical problems left unattended
- Any injuries not consistent with the explanation given for them
- Bruising and discolouration - particularly if there is a lot of bruising of different ages and in places not normally exposed to falls, rough games etc.
- Recurring injuries without plausible explanation
- Loss of hair, loss of weight and change of appetite
- Person flinches at physical contact and/or keeps fully covered, even in hot weather
- Person appears frightened or subdued in the presence of a particular person or people

Self-harm

- Wearing long trousers or long-sleeved shirts, even on hot days
- Brushing off injuries as frequent “accidents” or as a result of being clumsy, including: scars, fresh scratches, cuts, bruises, broken bones, patches of missing hair
- Needing to spend a lot of time alone
- Challenges with friendships and romantic relationships
- Keeping sharp objects or implements of self-injury on hand
- Withdrawing from once-enjoyed activities
- Unpredictable, impulsive behaviors
- Ongoing questions about personal identity; a sense of helplessness, hopelessness, worthlessness
- Emotional numbing and instability; mood swings; depression; increased anxiety (especially when unable to self-injure); feeling of guilt, shame, and disgust

Sexual abuse

- Pregnancy in a woman who lacks mental capacity or is unable to consent to sexual intercourse
- Unexplained change in behaviour or sexually explicit behaviour
- Torn, stained or bloody underwear and/or unusual difficulty in walking or sitting
- Infections or sexually transmitted diseases
- Full or partial disclosures or hints of sexual abuse (that may be accompanied by some of the following additional symptoms):
- Self-harming; emotional distress; mood changes; disturbed sleep patterns
- Psychological abuse; alteration in psychological state e.g. withdrawn, agitated, anxious, tearful
- Intimidated or subdued in the presence of a particular person; fearful, flinching or frightened of making choices or expressing wishes; unexplained paranoia
- Changes in mood, attitude and behaviour, excessive fear or anxiety; changes in sleep pattern or persistent tiredness; loss of appetite
- Helplessness or passivity; confusion or disorientation
- Implausible stories and attention seeking behaviour; low self-esteem

Appendix 4 – Content gathering consent form

Turn2us produces a range of communications resources to help support our wider vision of helping people when times get tough. We like to share the experiences of real people who are using our services in our digital, marketing and fundraising communication as it helps to demonstrate the difference our work is making. By completing this form, you give us permission to use your story in our communications for the next three years. Thank you for your help.

Full name			
Date or year of birth			
Address			
		Postcode	
Telephone			
Email			

What will my story be used for? (Please tick the options you are happy with)

- Presentations:** Turn2us external presentations
 Turn2us internal presentations
Websites: Turn2us website and intranet
Social media: Turn2us social media pages [*include our social channels i.e. Twitter*]
Publications: Turn2us leaflets, posters, newsletters and other marketing materials
Print and online media: National, regional and local papers; magazines and news sites
Television and radio: National and regional television; national, regional and local radio

Can I remain anonymous?

You can choose to have your real name published with your story or remain anonymous (in which case, we will use a false name). Please tick one of the following options:

- I am happy for my real name to be used I do not want my real name to be used
 Please tick this box if you do NOT want to be featured in imagery or video footage

Are there any identifying features you do NOT want included in our communications work?

For example, your location or the age of your children – “ I don't want my husband or children to be identifiable so I'd prefer you to state our location as West Yorkshire only and our children's age category rather than actual ages (e.g. early twenties)”

Please let us know if there are any ways in which you do **NOT** wish to be represented or described:

I am happy to give my permission

Please sign this form to show you are happy to give permission for your story to be used by Turn2us for the purposes outlined above. Your story will not be used or stored for any longer than 3 years unless you ask us to stop using it before then.

Signature _____ Date _____

If you are under 18, we need written permission from a parent, guardian or responsible adult.

Signature of parent/guardian _____ Date _____

Data protection: The information that you provide here will only be used to contact you about sharing your story in our communications work. We will not pass the details recorded on this form on to any other organisation without your permission. We will not store your data for any longer than three years.

If you need to contact Turn2us regarding your story, please contact the Communications Team; email: media@turn2us.org.uk or call 020 8834 9263