



Friends of Refugees London Safeguarding Policy

1. Purpose, principles, and scope of this policy

The purpose of this policy is:

- a. To protect the clients who engage with Friends of Refugees London in any way. This includes, but is not limited to, clients who request support online and/or offline, clients who are referred to us by a partner organisation, and everyone who receives support from any of our volunteers or paid team members.
- b. To provide our team – including volunteers, trustees, and staff – guidelines for ensuring the safety and protection of the clients we support, and for ensuring their own safety in being part of and conducting the activities of Friends of Refugees London.

This policy adheres to the six principles of safeguarding as embedded in the Care Act 2014:

1. **Empowerment:** People being supported and encouraged to make their own decisions and informed consent.
2. **Prevention:** It is better to take action before harm occurs.
3. **Proportionality:** The least intrusive response appropriate to the risk presented.
4. **Protection:** Support and representation for those in greatest need.
5. **Partnership:** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
6. **Accountability:** Accountability and transparency in safeguarding practice.

The scope of this policy is as follows:

- a. To protect all of our clients whatever their legal status, with regard to particular vulnerabilities including (but not limited to) experiences of displacement, persecution, violence, and abuse.
- b. To protect all of our staff, trustees, and volunteers.
- c. To apply to anyone who operates as a publicly identified representative of Friends of Refugees London, including all paid staff, trustees, and volunteers.
- d. To be applied to online (including social media and online contact) and offline activities (including one-to-one meetings, accompaniment to formal meetings, training, and events).

2. Policy Statement

The mission of Friends of Refugees London is *to support refugees and other migrants start their new life in London through befriending and advocacy services to promote social inclusion and participation in local communities.* Refugees and other migrants are at the centre of our work, which means we have a fundamental responsibility and duty of care to ensure their safety and protection.

Anyone under the protection of this policy will be:

- respected and heard;
- safe in any face-to-face activity conducted under the Friends of Refugees London banner, and in any space that has been created and managed by Friends of Refugees London;
- protected in any online communications, including social media, direct mailings, our website, our database and its management, and all one-to-one communications;
- comfortable in their understanding of the ways in which Friends of Refugees London works to keep them safe and protected should they ever encounter a breach of these standards.

We deliver this in the following ways:

- Appointing and publicising named, trained protection and safeguarding leads in the trustee team.
- Training relevant staff, trustees, and volunteers on ways to work with our clients which protect their rights to safety and privacy.
- In line with UK law, ensuring staff, volunteers, and trustees who work with our clients have undergone appropriate Disclosure and Barring Service (DBS) checks.
- Implementing a code of conduct for staff and volunteers working on behalf of Friends of Refugees London at any level.
- Maintaining an accessible online safety policy, developed using good practice from the UK.
- Creating physical and online spaces which are physically and emotionally safe and accessible for clients to feel able to fully participate. This includes creating an anti-bullying, anti-discriminatory environment which must be maintained by all those operating on behalf of Friends of Refugees London.
- Ensuring physical spaces which are used for meetings and events held under the Friends of Refugees London banner meet clear health and safety regulations, and preventing the use of any physical space which could place anyone at risk.
- Upholding our commitments to safeguarding by delivering a robust monitoring and accountability procedure, with clear risk assessment, whistleblowing, reporting, and recording mechanisms.
- Making sure all clients, their families, and other support networks are aware of the ways in which we work to protect them, and the ways in which they can report concerns or breaches.

3. Mitigating Risk

3.1 Recruitment and training

Recruitment

- Job or role descriptions for paid staff and volunteers must provide clear information regarding the position or role's responsibilities to meet the requirements of the organisation's safeguarding policy.
- For any paid job or role which involves working directly with clients, Friends of Refugees London shall request or conduct DBS checks as it deems appropriate and as permitted by law. These roles include but are not limited to face-to-face volunteering, and handling of data. All interviews for such roles will include a discussion on safeguarding, and the candidate's understanding of this. Offers for these roles are dependent on DBS checks.

Training

- All induction programmes for staff, trustees, and volunteers must include the safeguarding policy, and a requirement to sign the Code of Conduct.
- For staff, trustees, and volunteers organising meetings or events, the safeguarding and protection lead will ensure that a safeguarding risk assessment is conducted.

3.2 In face-to-face contexts with clients (one-to-one meetings, accompaniment to formal meetings, events):

- Meetings with clients will normally be organised with 2-7 days notice. In the case of emergencies, a message must be sent to the appropriate representative of Friends of Refugees London and acknowledged and agreed by them in advance of the meeting, regardless of where the meeting takes place.
- Initial meetings will be supervised by a staff member, trustee, or experienced volunteer.
- Initial meetings with clients should ideally be outside of their homes, and should be conducted in a location which is open to the public. Examples include community centres, cafes, restaurants, government buildings, parks, and libraries.
- Some clients' circumstances may require you to have the initial meeting in their home - people with disabilities, with small children, or those who feel more comfortable in their own home. This will be discussed and agreed with you in advance.
- The nature of the work of Friends of Refugees London means that meeting with clients in their homes is likely to be a regular occurrence, after most initial meetings. All home visits conducted by staff, volunteers, or trustees should be registered with Friends of Refugees London in advance of the meeting, with notice given to the designated representative and to the client within the above time frame.
- Where children are present in the home of a client, trustees, staff members, and volunteers must endeavour to ensure they are not left alone with the children.
- No one-to-one meetings should take place at the home of a staff member, volunteer, or trustee in the first three months of the relationship with the client. After this period, all visits by the client should be registered

with Friends of Refugees London in advance of the meeting, with notice given to the designated representative of Friends of Refugees London and to the client within the above time frame.

- All group events under the banner of Friends of Refugees London must be held in institutions and venues normally open to the public. Examples include community centres, cafes, restaurants, government buildings, parks, and libraries.
- Where a group event under the banner of Friends of Refugees London is held in a private home, at least one trustee or staff member must be present with one or more volunteers, or two trustees must be present.

Travel to and attendance at formal meetings

- If you are accompanying a client to a formal meeting (job interview, benefits assessments, meeting with school/college etc.), staff, trustees, and volunteers should meet the client at the location.
- If the client wishes to travel with the staff member, trustee, or volunteer, this should be done on public transport.
- If it is not possible to travel on public transport, and the staff member, trustee, or volunteer would like to drive the client to the meeting, a formal request must be made to Friends of Refugees London stating the date, time, location, and your car registration number at least 2 days in advance of the meeting, and the request must be acknowledged and accepted.
- Staff, trustees, and volunteers attending formal meetings as advocates for clients are bound to confidentiality and must not disclose the contents of the meeting, regardless of any agreement by the client, with the exception of any behaviours or activity in the meeting which could be deemed illegal or put the client at significant risk. In this instance, please speak directly to your volunteer manager.
- Behaviour of staff, trustees, and volunteers as advocates at formal meetings is guided by the Friends of Refugees London Handbook.

3.3 Communicating with clients and volunteers

For staff and trustees of Friends of Refugees London:

Responding to emails or other direct contact with Friends of Refugees London

- All official email communications with the organisation must be made using a Friends of Refugees London email address.
- Once a volunteer is allocated to the client, emails between the client and volunteer should CC the relevant staff member or trustee.

Communicating through social media

- Only the designated communications lead(s) for Friends of Refugees London should respond to messages received through social media, either through messenger services or on posts made publicly by potential or existing clients/volunteers.
 - It is acknowledged that volunteers may respond to questions or comments made on public posts; the designated communications lead(s) for Friends of Refugees London should however still make an 'official' response using the admin account for the relevant social network.

Phone messaging groups

- No client or volunteer should be added to a phone messaging group without their permission, and their understanding that their phone number will be visible as part of that group.
- At least two people should be designated admin of any phone messaging group, of which at least one should be a trustee and the other should be a staff member or trustee.

Photography

- Staff and trustees may wish to take photos during social events for use in official communications materials. Photos should only be taken if consent is given by everyone in the photo you wish to take, including any children. Consent must be given to both be in the photo and for the photo to be used in communications materials.
- No photos which are taken and used on Friends of Refugees London social media accounts should tag any client at any time, even if consent has been given.
- If staff and trustees wish to take photos during any client work, please use the guidelines on photography for volunteers below.

Email groups/mailers

- No client or volunteer should be added to a mailing list without their permission.
- At least two people should be designated admin of any mailing list service (e.g. Mailchimp), of which at least one should be a trustee and the other should be a staff member or trustee.
- Email groups/mailers for clients must be sent blind.

Children:

- No child (i.e. anyone who has yet to reach their 18th birthday) should be contacted directly by Friends of Refugees London, unless a child has contacted us in the first place. In this case, the respondent should be a trustee or staff member and they should copy in the designated safeguarding lead(s). This includes phone, email, or social media contact.
- No child can be added to a phone messaging group or mailing list.

For volunteers:

Email communications with clients

- Once volunteers are allocated to a client, emails between the client and volunteer should CC the relevant staff member or trustee.
- No email address received by a volunteer from Friends of Refugees London or directly from a client should be shared, other than with the relevant staff member/trustee of Friends of Refugees London. If anyone asks you to share an email address, volunteers must let the person know they are not allowed to do this and refer them to the relevant staff or trustee of Friends of Refugees London. Examples include other volunteers, representatives of a partner organisation, or staff of government organisations.

Communicating through social media

- It is advised, but not compulsory, to make your social media profiles private if you have not done so already.

- In the first three months of a relationship with a client who is part of the befriending service, volunteers should not communicate with clients, or follow, friend, or accept requests from clients on any social media platform.
- After the initial three month period, please follow the guidance below regarding posting of photos or tagging/sharing names of clients on social media.
- At no point should a volunteer communicate with clients, or follow, friend, or accept requests from clients on any social media platform if they are only part of the accompaniment service.

Phone messaging directly and in groups

- No phone number received by a volunteer from Friends of Refugees London or directly from a client should be shared, other than with the relevant staff member/trustee of Friends of Refugees London. If anyone asks you to share a telephone number, volunteers must let the person know they are not allowed to do this and refer them to the relevant staff or trustee of Friends of Refugees London. Examples include other volunteers, representatives of a partner organisation, or staff of government organisations.
- No client or volunteer should set up a phone messaging group without discussion and approval of the trustees of Friends of Refugees London.
- If a volunteer receives permission to set up a phone messaging group, at least one admin should be a trustee or a staff member of Friends of Refugees London.

Photography

- For volunteers who are working with clients as part of the befriending service, it is possible that you and/or your client will want to take pictures of each other, as your relationships develop. Volunteers should only take photos if consent is given by everyone in the photo you wish to take, including any children. Volunteers should only be part of a photo if you have consented.
- With regard to the three-month rule for social media above, if photos are taken and either the client or the volunteer wishes to put the photos on social media, consent must be given by all parties. Similarly, if you have become friends with each other on social media, consent must be given by all parties if anyone is to be tagged.

Email groups/mailers

- No client or volunteer should create a mailing list without the permission of the trustees of Friends of Refugees London.
- No client or volunteer should be added to a mailing list without their permission.
- At least two people should be designated admin of any mailing list service (e.g. Mailchimp), of which at least one should be a staff member or trustee.
- Email groups/mailers for clients and volunteers must be sent blind.

Children:

- No child (i.e. anyone who has yet to reach their 18th birthday) should be contacted directly by any volunteer. If a child has initiated contact with a volunteer, please do not respond and notify the relevant safeguarding lead from the trustee or staff team. This includes phone, email, or social media contact.
- No child can be added to a phone messaging group or mailing list.

3.4 Data protection, online and offline

All data is managed and stored in the UK and is compliant with both the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR). At present, the GDPR offers the most recent and most stringent set of standards for protecting data in the world. This section of the policy should be read in conjunction with the [Friends of Refugees London Privacy and Data Protection Policy](#).

Data collection

- All personal data collected by Friends of Refugees London is stored in a database hosted in the United Kingdom.
- No separate data collection mechanisms should be set up by any representative of Friends of Refugees London.
- The data stored is accessible to the named lead staff or trustees after a data protection and usage agreement has been completed.
- For each client meeting held by a trustee, staff member, or volunteer, a dedicated interface will be used to report back and be submitted into the database in order to update individual client records. This interface will not give the user access to the full database.
- No personal data should be collected directly from any child below the age of 13, which at present is an international standard for the digital age of consent.
 - Online, this means the administrator of the Friends of Refugees London website will delete any personal data submitted by children below the age of 13.
 - Offline, no data should be collected from individuals younger than 13.
- Where information regarding children is pertinent to the client's situation, this may be recorded with the consent of the client where the client is the legal guardian of the child(ren).

Please see the [Friends of Refugees London Privacy Policy](#) for the types of personal data which can be collected.

Data storage

- In line with UK GDPR and the Friends of Refugees London Privacy Policy, all data on clients, trustees, staff, and volunteers will be held electronically by the staff and trustees of Friends of Refugees London.
- Any offline data which is collected must be inputted electronically to the database within 5 working days after the data was collected, and all paper copies subsequently destroyed.
- If personal data is collected from an individual who has made initial online contact but does not subsequently engage formally with Friends of Refugees London, this data will be archived after one year.
- When data is used for electronic communications – for example, circulation of a monthly email or group update – this must be done through an approved communications tool, such as Mailchimp. This allows data to be sent directly from the database to the communications tool without the need for downloading the data.
- Data can only be downloaded by or with the written permission of the communications lead(s) of Friends of Refugees London, which shall be given on a case by case basis.

- Personal data will be stored for a maximum period of 5 years. If, within those 5 years the client, trustee, staff member, or the volunteer ceases their relationship with Friends of Refugees London, their record will be archived and not visible in the main database.

Data and information sharing

For staff, trustees, and volunteers, please see the [Seven Golden Rules of Information Sharing and the other relevant guidelines as provided by the UK Government](#).

For staff and trustees, it is likely that Friends of Refugees London will need to share client data and information as part of the referral process, both for clients in the befriending service and in the accompaniment service. It is also possible that data and information will need to be shared with other agencies if any advocacy on behalf of a client is undertaken.

- Any formal agreement with a partner organisation to enter into a referral process must include a clause on data and information sharing.
- Where data sharing is required as part of the referral process, the client must be made aware of this and agree at the outset of the relationship with Friends of Refugees London.
- Where advocacy is requested by the client, or where advocacy is suggested to the client by a representative of Friends of Refugees London, consent must be given by the client for information to be shared with the relevant authority. For example, if the client has an issue with their housing and has requested support from Friends of Refugees London, the client must give consent for their volunteer or another representative of Friends of Refugees London to share their information with the local council.
- Under the UK GDPR and Data Protection Act 2018, information can be shared *without* consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. In such situations, a case must be made to the trustees for information sharing, keeping the client anonymous as far as possible. If the trustees agree that information should be shared, a staff member or trustee will take the matter forward.

For volunteers:

- Please follow the guidelines as provided in the Communicating with Clients section above regarding sharing of contact information.
- Volunteers are expected to share information with the relevant staff member and/or trustee regarding each contact with a client as part of the reporting process, and this is done using an online form which submits directly to the database. Clients will be made aware of this at the outset of their relationship with Friends of Refugees London.
- Where you feel other information should be shared, due to safety concerns for example, information can be shared *without* consent under the UK GDPR and Data Protection Act 2018. In such situations, please report this verbally to a staff member or trustee in the first instance, keeping the client anonymous as far as possible. The staff member or trustee will take the matter forward as appropriate, and volunteers should not be involved further unless explicit reasons are given for them to remain involved - for example, where the client only feels comfortable speaking to their volunteer.

4. Concerns for the safety of clients

In any situation where a client or a family member of the client is in immediate danger, appropriate action should be taken - e.g. calling 999 to summon police, ambulance, fire service. The safeguarding lead should be made aware of any such action within 24 hours of the incident.

4.1 Identifying situations of risk

- It can be difficult to recognise harm. As such, staff, trustees, and volunteers should be alert to changes in a client's disposition or demeanour.
- Staff, trustees, or volunteers may witness harm, overhear indications of harm, or be informed directly.
 - If you witness harm, do not place yourself or anyone else at risk. In practice, do not involve yourself directly in the situation. If you are immediately at risk, call the emergency services.
 - If you have heard of incidents of harm, this must be recorded on the visit report and the source and date of the information must be included. This includes anonymous information or information from people who do not want to be identified.
 - Any incidents of harm, witnessed or heard of, must be reported to the safeguarding lead using a safeguarding report form.
- 'Harm' includes but is not limited to instances of the following happening to clients or any adults or children related to the client : physical abuse, sexual abuse, domestic abuse, emotional and psychological abuse, financial and property abuse, institutional abuse, victimisation, discrimination, bullying and harassment, neglect and self-neglect, self-harm, radicalisation, and modern slavery.

5. Behaviours of representatives of Friends of Refugees London

Staff and other identified representatives of Friends of Refugees London must adhere to the Safeguarding Code of Conduct. In addition, they should never:

- verbally, physically, or sexually assault or abuse clients or adults related to the client. This includes engaging in sexual activity regardless of consent.
- place children at risk of any of the above abuses.
- develop relationships with clients or adults or children related to the client which could in any way be deemed exploitative or abusive, including informal employment and lending/borrowing money.
- behave in a manner which is physically or otherwise inappropriate.
- condone or participate in activities or behaviour with clients or adults or children related to the client which are unsafe or illegal.

The list above is not exhaustive.

6. Reporting, investigating, and accountability

All representatives of Friends of Refugees London have a duty of care to clients. Therefore, we all have a duty to report breaches of this policy to the relevant safeguarding and protection lead.

If you believe a breach has occurred:

- Report this to the safeguarding lead, a staff member, or a trustee, either face-to-face or by calling them.
- If you are the safeguarding and protection lead, ensure one trustee or one staff member is aware, and record who this is to prevent conflict of interest in assessing the breach.
- Ensure you create a report within 24 hours of the incident which clearly states:
 - Date, time and location of the incident
 - Type of incident (e.g. verbal abuse, physical abuse, emotional abuse, sexual abuse/harassment)
 - Details of incident
 - Any actions taken to end the abuse and to support the child subsequently
 - Any immediate help or actions that must be undertaken by Friends of Refugees London.

Investigating incidents and reports:

- All suspected breaches of the policy will be investigated by the safeguarding lead, who will assess the situation and support the individual who recorded the incident.
- The safeguarding lead may hold discussions with the board of trustees of Friends of Refugees, the client themselves, and/or the relevant support agencies (referring agency, local council services, national helplines *et al*) to receive guidance and understand next steps.
- Where a breach may have resulted in serious harm to the individual, or may do serious harm, legal advice should be sought by the safeguarding lead as soon as possible.
- Where there is suspicion of breach of UK law, the safeguarding lead must ensure the investigating organisation notifies the relevant authority.
- Where it is found that there has been a breach of the policy by a staff member, trustee, or volunteer, there will be a disciplinary process.
- Where it is found that there has been a breach of the policy by a client, or an individual related to the client, the board of trustees will discuss next steps, where potential outcomes include ceasing the relationship with the client, reporting the incident to the referring partner, and reporting the incident to the relevant authorities.

Organisational accountability:

- All reports of breaches and the progress of any subsequent investigation must be reported appropriately at board level.
- Trustees must recuse themselves from voting on further action where they are:
 - the reporting witness to the breach
 - the subject of the incident - either as the person reported to have done or to have had harm done to them

- the safeguarding lead
- part of the due process in a reported breach (i.e. the person notified by the safeguarding lead in order to ensure transparency).
- Where an individual who is subject to the breach, either as the person reported to have done or to have had harm done to them, is unsatisfied with the outcome of the board's actions, they may appeal in the first instance to the Chair of the board, and beyond this to the Charity Commission.