



Safeguarding and Protection from Sexual Exploitation and Abuse reporting policy

Purpose and scope

The purpose of this document is to provide procedures for dealing with reports of a breach of Baraka Community Partnerships Safeguarding and PSEA(Protection from Sexual Exploitation and Abuse) Policies, where the violation is:

- Against staff, associated personnel, beneficiaries or members of the public
- Perpetrated by staff, beneficiaries or associated personnel.

Procedures

1. Report is received

1.1 Reports can reach the organisation through various routes. This may be in structured format such as letter, e-mail, text or private message on social media. It may also be in the form of informal discussion or rumour. If a staff member hears something in an informal discussion or chat that they think is a safeguarding or PSEA concern, they should report this to the appropriate staff member in their organisation.

1.2 If a safeguarding or PSEA concern is disclosed directly to a member of staff, the person receiving the report should bear the following in mind:

- Listen
- Empathise with the person
- Ask who, when, where, what but not why
- Repeat/ check your understanding of the situation
- Report to the appropriate staff member (see below)

1.3 The person receiving the report should then document the following information, preferably using the Incident Report Form:

- Name of person making report
- Name(s) of alleged survivor(s) of incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Dates(s), times(s) and location(s) of incident



1.4 The person receiving the report should then forward this information to the Safeguarding Lead and Director of Operations within 24 hours. If the report is regarding someone in this position then the report should be made to the Baraka Community Partnerships chair of trustees. Contact details for all 3 are available at the end of this document.

1.5 Due to the sensitive nature of safeguarding and PSEA concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only.

1.6 If the reporting staff member is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report, either up the management line, to the Board, or to an external statutory body. The staff member will be protected against any negative repercussions as a result of this report.

2. Assess how to proceed with the report

2.1 The Safeguarding Lead will appoint an Investigator for handling the report.

2.2 Determine whether to take this report forward

- Does the reported incident represent a breach of Safeguarding or PSEA policy?
- Is there sufficient information to follow up this report?
- Has there been a breach of local law?

2.3 If the reported incident does not represent a breach of Baraka Community Partnerships Safeguarding or PSEA Policies, but represents a safeguarding risk to others (such as a child safeguarding incident), the report should be referred through the appropriate channels (eg. local authorities) if it is safe to do so.

2.4 If there is insufficient information to follow up the report, and no contact details for the person who made the report, the report should be filed in case it can be of use in the future, and look at any wider lesson learning we can take forward.

2.5 If the report concerns children under the age of 18, consider other agencies who may need to be involved and seek expert advice as necessary.



2.6 Clarify what, how and with whom information will be shared relating to this case. Confidentiality should be maintained at all times, and information shared on a need-to-know basis only. Decide what information needs to be shared with whom-information needs may be different.

2.7 Check the obligations on informing relevant bodies when you receive a safeguarding or PSEA report. This could include funding organisations or statutory bodies. When submitting information, think through the confidentiality implications carefully.

2.8 False Allegations.

If a member of staff or associated personnel is found to have raised allegations which they knew to be false they will be subject to disciplinary action, up to and including termination of employment or their contract will be discontinued.

2.9 Complaints about BCP's partners

If BCP receives a complaint about a partner organization, we will expect the partner to respond quickly and appropriately. BCP should assist the partner to ascertain its obligations under local law to refer the matter to the police or other statutory authorities for criminal investigation.

Where appropriate BCP should work with the partner to address the issue through an independent investigation.

3. Appoint roles and responsibilities for case management

3.1 The Investigator should not be implicated or involved in the case in any way.

3.2 If the report alleges a serious safeguarding violation a meeting should be held with the:

- Investigator
- Person who received the report
- Director of Operations
- The Safeguarding Lead
- Any Safeguarding advisor if necessary

This group should decide the next steps to take, including any protection concerns and support needs for the survivor.

4. Provide support to survivor where needed/requested



4.1 Provide appropriate support to survivors of safeguarding incidents. This should be provided as a duty of care even if the report has not yet been investigated.

4.2 Decision making on support should be led by the survivor and available to the survivor even if they initially turn this down.

5. Assess any protection or security risks to beneficiaries

5.1 For serious incidents: undertake an immediate risk assessment to determine whether there are any current or potential risks to anyone involved in the case.

5.2 Continue to update the risk assessment and plan on a regular basis throughout and after the investigation as required.

6. Decide on next steps

6.1 The Director of Operations (if the report does not implicate this person) decides the next steps. These could be (but are not limited to):

- No further action
- Further investigation is required
- Immediate disciplinary action
- Referral to relevant authorities

6.2 If the report concerns associated personnel (need clarification on who this is exactly), the investigating process will be different. Although associated personnel are not staff members, we have a duty of care to protect anyone who comes into contact with any aspect of Baraka Community Partnerships from harm. We cannot follow disciplinary processes with individuals outside our organisation, however decisions may be made for example to terminate a contract with a supplier based on the actions of their staff.

6.3 In the case of survivors who are not children or vulnerable adults, the decision about whether to refer to local police or local statutory authorities will be made by them alone. The BCP team will support the survivor regardless of whether they wish to report to the local police or statutory authorities or not.

6.4 If someone's life is in danger or the matter relates to a child or adult at risk, then some decisions may have to be taken by BCP for the survivor(e.g.



reporting to local police). As far as possible and appropriate the survivor will be engaged in the conversation about their own welfare.

7. Manage the investigation

- 7.1 Collect relevant documentary evidence where possible. Ensure this is returned to the owner or custodian as soon as possible following examination.
- 7.2 Ensure reports are written up in a timely fashion and filed adequately with respect to confidentiality.
- 7.3 It may be necessary to request that staff and associated personnel submit electronic or technical equipment assigned to them by Baraka Community Partnerships. This would be to assist with finding evidence to support the initial allegation.
- 7.4 Visit the site of the allegation to help ascertain if it is possible for the allegation to have occurred in the way it was described. It is important to do this early on in the investigation. A report of this visit should be written up and filed with the rest of the investigation notes and reports.
- 7.5 Evaluate information for consistency and reliability throughout the investigation.
- 7.6 New information may come to light during the investigation that requires a change of plan or direction for the investigation. Be prepared for this possibility.
- 7.7 The complainant and subject of complaint should be interviewed as well as any potential witnesses or those who can corroborate a claim by either party. Interviews should be conducted with 2 people present and 1 person should take accurate notes through the interview. Ideally the subject of complaint should be interviewed last and should not know of the initial investigation. This is so they are unable to tamper with evidence or intimidate witnesses or the complainant. They do have a right to know the allegations made against them when the time of interview does arrive.
- 7.8 Following the interviews and document gathering, a report should be written detailing the investigation and its' findings. The conclusion should indicate whether or not the evidence supports each complaint as alleged.
- 7.9 It is likely that there will be issues to follow up on after an investigation. It maybe that the investigation highlights some problems in certain areas that need addressing. If this is the case, responsibility for making these changes should be handed to the relevant member of staff to action and a follow up meeting arranged.
- 7.10 For more comprehensive guidance on managing an investigation, please consult:https://www.chsalliance.org/files/files/Investigation-Guidelines-2015_English.pdf



8. Make a decision on outcome of investigation report

8.1 The Director Of Operations makes a decision based on the information provided in the investigation report.

8.2 If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities unless this may pose a risk to anyone involved in the case.

9. Conclude the case

9.1 Document all decisions made resulting from the case clearly and confidentially.

9.2 Store all information relating to this case confidentially, and in accordance with Baraka Community Partnerships policy and local data protection law. Anonymise data if necessary for further reporting or learning exercises. Staff members who breach confidentiality will be subject to disciplinary action.

9.3 Staff who are found to contravene BCP's clearly stated expectations of their conduct will be subject to disciplinary action that may result in dismissal. Volunteers, contractors and other representatives will have their relationship with BCP terminated.



Incident Report Form

If someone is disclosing sensitive information to you please bear this in mind:

- Listen to what they are saying to you.
- Empathise with the person.
- Ask-WHO/WHEN/WHERE/WHAT but not WHY.
- Repeat back to the person to check your understanding of the situation
- Use this reporting form to accurately record the conversation.
- See if there's any support the person feels they need.
- Don't make promises to the person but explain you will do all you can to support them.

Your name:	
Your role:	
Contact information (you):	
<u>Address:</u>	<u>Postcode:</u>
<u>Telephone number:</u>	
<u>Email address:</u>	
Name of person affected:	Date of birth of person affected:
Does the person have a disability? If so, please state.	Gender:
Parent/carer name (If person affected is under 18):	Contact information for parent/carer or survivor: <u>Address:</u> <u>Telephone number:</u> <u>Email address:</u>
Have parents's/carer's been notified of the incident? If YES please provide details of what was said and action agreed:	
Are you reporting your own concerns or responding to concerns raised by someone else? <input type="checkbox"/> Reporting my own concerns <input type="checkbox"/> Responding to concerns raised by someone else	
If responding to concerns raised by someone else: Name of person: Relationship to the person affected: <u>Telephone number:</u> <u>Email address:</u>	



Date and times of incident:			
Details of the incident or concerns: <i>Include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion, allegation or rumour.</i>			
Account of the incident by the person affected:			
Any witness accounts of the incident? If yes, please provide details:			
Witness name: <u>Address:</u> <u>Telephone number:</u> <u>Email address:</u>			
Please provide details of any person involved in this incident or alleged to have been involved in the incident: Name: Position in Baraka Community Partnerships(if applicable)?: <u>Address:</u> <u>Telephone number:</u> <u>Email address:</u>			
Your Signature:		Print name:	
Date:			