

## TFT SAFEGUARDING POLICY V0.7

### INTRODUCTION AND ROLES

#### SAFEGUARDING STATEMENT

The staff and *Trustees* of True Freedom Trust (TFT) are committed to promoting a safe environment and culture for all TFT staff, *Trustees*, volunteers, members and enquirers.

#### THE IMPORTANCE OF SAFEGUARDING

The National Council for Voluntary Organisations describes safeguarding as follows<sup>1</sup>:

*Creating a safe and welcoming environment, where everyone is respected and valued, is at the heart of safeguarding. It's about making sure your organisation is run in a way that actively prevents harm, harassment, bullying, abuse and neglect. It's also about being ready to respond safely and well if there is a problem. Everyone in the organisation has a role to play in safeguarding. It should become part of your day to day activities.*

*Every organisation that delivers charitable activities has a duty to safeguard volunteers, staff members, participants and donors.*

Safeguarding should be given prominence because:

- Abuse, harassment, harm and neglect can happen, even to adults and even within a Christian community.
- We have a moral and statutory duty (via the Charity Commission) to make safeguarding a priority.
- Doing safeguarding well builds trust in the organisation and often gives opportunities for pastoral care. Poor safeguarding can allow harm to occur and damages the reputation of the organisation.

#### SCOPE OF THIS POLICY

Because TFT has only exceptional contact with children, which is clearly addressed in the existing Code of Practice, this policy focuses exclusively on safeguarding adults. Appendix A sets out the understanding of “Adults at risk” around which this policy is constructed. Appendix B lists the various types of abuse described under the Care Act 2014.

As outlined in Appendix A, any adult within TFT could potentially be “at risk” in certain contexts. Therefore, this policy should be considered as applying to everyone with whom TFT interacts.

#### BULLYING AND HARRASSMENT

Incidents of bullying may be reported in line with this Safeguarding Policy or (for staff team, *Trustees* and volunteers) through the Anti-harassment and Bullying Policy.

However, it is important to distinguish bullying from other behaviour, such as:

- Respectfully challenging or disagreeing with someone else’s beliefs or behaviours,
- Setting reasonable expectations with regard to work deadlines and activities,
- Taking legitimate disciplinary action,

<sup>1</sup> [www.ncvo.org.uk/help-and-guidance/safeguarding/getting-started-with-safeguarding/what-is-safeguarding](http://www.ncvo.org.uk/help-and-guidance/safeguarding/getting-started-with-safeguarding/what-is-safeguarding), accessed 20-2-25

- Adults upsetting other adults, even if this is a result of a person's immature character or clashing personality types. We will seek to address these interpersonal clashes through discipleship rather than through the safeguarding/bullying process, unless they involve a significant power imbalance or the abuse of a power relationship.

Complaints falling outside of this scope should be dealt with using our Complaints Policy instead. Such behaviour may bring into question the person's suitability for leadership roles, and he/she may need challenging. But being abrasive/unkind/rude/judgemental etc is not in itself a safeguarding matter.

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## SAFEGUARDING ROLES

There will be a minimum of two *Safeguarding Officers* within the staff team to implement this policy across TFT activities. This will include training volunteers to be familiar and confident with this policy and associated guidelines. The Director will normally be the Designated Safeguarding Lead (strategic lead). Other safeguarding appointments within the staff team will be *Safeguarding Officers* (operational lead).

There will be at least one *Safeguarding Trustee* who will be responsible for overseeing the work of the *Safeguarding Officers* and providing impartial guidance to the *Safeguarding Officers* on anonymised versions of more complex or risky safeguarding cases.

Each team of *Safeguarding Officers* and each team of *Safeguarding Trustees* should, where possible, include at least one male and one female.

The *Safeguarding Team* will consist of the *Safeguarding Officers* and *Safeguarding Trustees*. This team will aim to meet quarterly to discuss safeguarding cases, in order to share responsibility and to collaborate on more complex safeguarding cases. In these team meetings, detailed case information will only be shared across the whole *Safeguarding Team* as much as is necessary for informed decision making and accountability.

Each person who works on the staff team or operates as a volunteer or *Trustee* will be required to agree to abide by this policy and associated guidelines. All staff, *Voluntary Workers* and *Trustees* will:

- Be vigilant in monitoring anyone at a TFT event or group who may pose a safeguarding threat to others at TFT, particularly to those we would consider to be adults at risk.
- Listen carefully to any safeguarding concern and take the complainant seriously.
- Pass on any safeguarding concern to the appropriate *Safeguarding Officer* within 24 hours.

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## TRAINING AND PROMOTION

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### TRAINING

New volunteers and staff will be trained so that they are familiar with principles of safeguarding and the *Safeguarding Policy*. Additional training will be required whenever major changes are made to the *Safeguarding Policy*. Existing volunteers and staff will be required to attend a refresher training at least every three years, in addition to the annual review (see "Oversight of Volunteers" subsection below).

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### PROMOTING SAFEGUARDING

The *Safeguarding Officers* will:

- Establish and maintain a "Cause for concern" process/form for reporting safeguarding concerns subsequently or remotely. This process/form will be clearly advertised to members and enquirers.
- Ensure that this *Safeguarding Policy* will be prominent and available to all visitors to the TFT website.

- Advertise prominently at each residential event (and day events where appropriate) to all delegates who are the *Safeguarding Officers* present and how to report safeguarding concerns.

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## OVERSIGHT OF VOLUNTEERS

Each VW will be reviewed annually to ensure understanding of both this *Safeguarding Policy* and the *Safeguarding Detailed Guidance*. The annual review will include highlighting to the VW any changes to this policy.

## HANDLING SAFEGUARDING CONCERNS

The process set out below is for reporting safeguarding incidents, concerns and disclosures.

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## REPORTING MECHANISM

A safeguarding concern can be reported to a *Safeguarding Officer* using any of the following mechanisms:

- In person (or via a phone call) to a *Safeguarding Officer*
- You can contact our two *Safeguarding Officers* for advice, or to submit a cause for concern, at [safeguarding@truefreedomtrust.co.uk](mailto:safeguarding@truefreedomtrust.co.uk)  
If, for any reason, you would prefer not to contact the *Safeguarding Officers* you may contact the *Director* at [director@truefreedomtrust.co.uk](mailto:director@truefreedomtrust.co.uk)
- Completing an online “Cause for concern” form, which will be seen by the *Safeguarding Officers*

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## PROCESSING SAFEGUARDING CONCERNS

The *Safeguarding Officer(s)* dealing with a safeguarding concern will:

- Produce a written account as soon as possible after the event/report, if this has not already been submitted. This then needs to be kept up to date with actions taken subsequently.
- Review carefully all reports of the safeguarding concern
- Take steps to protect adults at risk, including promptly notifying another *Safeguarding Officer/Trustee* (and statutory agencies, where appropriate)
- Keep the complainant informed with details of how their concern is being handled, and always to consider their needs and wishes
- Offer support to survivors of abuse (and other affected persons) regardless of the type of abuse, when or where it occurred
- Offer support to anyone who has been accused of inappropriate behaviour, including keeping them informed about any decisions and action taken regarding the case
- Refer to any regulatory organisation (or ask another member of the *Safeguarding Team* to do this)

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## CONFIDENTIALITY AND RECORD KEEPING

All records of safeguarding matters must be kept secure and confidential and only be accessible to *Safeguarding Officers* and others responsible for safeguarding. Where it is necessary for the investigation to proceed effectively, it may sometimes be necessary to share details of the case with others, but only on a need-to-know basis.

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## COMPLAINTS AND ESCALATION

A complex or high-risk safeguarding case may be taken by a *Safeguarding Officer* to the *Director* and/or a *Safeguarding Trustee* for impartial guidance. The *Safeguarding Trustee* consulted should preferably not be one

who has been previously consulted on the case. Case details passed to a *Safeguarding Trustee* should be anonymised wherever possible, in order to assist with impartiality and confidentiality.

If the alleged person of concern is a member of staff, then any investigation into their alleged conduct will take place in accordance with the *Disciplinary Policy* set out in their employment contract.

The “*Complaints Procedure*” in the *Code of Practice* can be used to process any safeguarding concerns that have not been resolved to the satisfaction of any party involved.

## RELATED DOCUMENTS

The following documents provide further detail of TFT’s safeguarding approach:

- *Safeguarding Role Descriptions*
- *Safeguarding Detailed Guidance* (which presents the key areas of safeguarding risks alongside the proposed mitigation activities)

The following documents contain related policies:

- *Anti-harassment and Bullying Policy*
- *Disciplinary Procedure*
- “*Complaints Procedure*” within the *Code of Practice*

## DOCUMENT HISTORY

This policy and associated guidelines will be formally reviewed every three years or sooner in the event of legislative changes or revised policies and best practice.

### DOCUMENT HISTORY

Version	Date	Contributors	Comments
0.1	15-6-20	Stuart Parker	Created following action from <i>Trustees</i> meeting 27-3-20
0.2	8-7-20	<i>Trustees</i>	Amended with minor comments from <i>Trustees</i> meeting 26-6-20. Compliance Monitoring subsection added.
0.3	16-7-20	Staff team	Minor changes following document review
0.4	17-7-20	Stuart Parker	Updated for website
0.5	17-9-20	Stuart Parker	Included minor feedback from VW July training
0.6	9-10-20	Stuart Parker	Updated following review with Christian Safeguarding Services
0.7	20-2-25	Stuart Parker	Included comments from 11-11-24 <i>Trustees</i> meeting

## APPENDIX A – ADULTS AT RISK

Safeguarding adults and children, whilst having many common principles, are now seen as distinctive<sup>2</sup>. As such, organisations should have separate policies for safeguarding adults and children. This section sets out TFT's understanding of an "Adult at risk", which is the term that supersedes the term "Vulnerable Adult".

It is important to note that people with capacity can also be at risk. The degree of risk is determined by a range of interconnected factors including personal characteristics, factors associated with their situation or environment and social factors.

At TFT, many members who would not otherwise be considered vulnerable could be considered at risk specifically around their same-sex attractions. They have chosen to join the TFT membership, a community of people who have committed themselves to the TFT Basis. As such, TFT members attending a Barnabas Group or conference may, to some extent, "lower their guards" when it comes to unhelpful sexual advances. For another member to take advantage of this is a breach of trust.

An "Adult at risk" may be a person who:

- is elderly and frail due to ill health, physical disability or cognitive impairment
- has a learning disability
- has a physical disability and / or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness / condition misuses substances or alcohol
- is a carer, where the person meets the definition
- is unable to demonstrate the capacity to make a decision and is in need of care and support.

This does not mean that just because a person is old or frail or has a disability they are inevitably 'at risk'. For example, a person with a disability who has mental capacity to make decisions about their own safety could be perfectly able to make informed choices and protect themselves from harm. In the context of safeguarding adults, the degree of risk is related to how able they are to make and exercise their own informed choices free from duress, pressure or undue influence of any sort, and to protect themselves from abuse, neglect and exploitation.

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<sup>2</sup> Based on the published Surrey County Council guidance

## APPENDIX B - TYPES OF ABUSE AS DEFINED UNDER THE CARE ACT (2014)

There are different types and patterns of abuse and neglect, and different circumstances in which they may take place. The [Care Act 2014](#) identifies the following as an illustrative guide and is not intended to be an exhaustive list as to the sort of behaviour which could give rise to a safeguarding concern:

1. **Self-neglect** – this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
2. **Modern Slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
3. **Domestic Abuse and coercive control** – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. It can occur between any family members.
4. **Discriminatory Abuse** – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.
5. **Organisational Abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
6. **Physical Abuse** – including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
7. **Sexual Abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.
8. **Financial or Material Abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection to wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
9. **Neglect** – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
10. **Emotional or Psychological Abuse** – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

### ***Not included in the Care Act 2014 but also relevant:***

**Cyber Bullying** – cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

**Mate Crime** – a 'mate crime' as defined by the Safety Net Project as 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.