



THE BRIGHTER DAYS PROJECT SAFEGUARDING POLICY

What is Safeguarding?

Safeguarding is the protection of individuals from abuse, ensuring their human and civil rights are upheld. Abuse can occur within any relationship and may lead to harm or exploitation. It can manifest in various forms, including physical, sexual, psychological, financial, or institutional abuse.

- **Physical Abuse:** The use of physical force or mistreatment that may or may not result in injury. This includes hitting, pushing, rough handling, exposure to extreme temperatures, force-feeding, improper medication administration, denial of treatment, misuse of restraint, and deprivation of liberty.
- **Sexual Violence and Abuse:** Any unwanted behaviour of a sexual nature that occurs without consent or understanding. This includes both non-contact and physical forms, such as indecent exposure, stalking, grooming, coerced involvement in sexually abusive material, or being forced to watch sexual acts. It may involve non-consensual penetration or non-penetrative actions like groping. Sexual violence affects individuals across all demographics, regardless of gender, age, ability, religion, race, or socio-economic background.
- **Psychological / Emotional Abuse:** Behaviour that causes psychological harm or mental distress through threats, humiliation, intimidation, or verbal and non-verbal actions. This includes shouting, swearing, ridiculing, provoking fear, controlling behaviour, coercion, and blame.
- **Financial Abuse:** The theft, fraud, or misuse of an individual's financial resources. This includes exploitation, embezzlement, pressure related to wills and inheritance, withholding pensions or benefits, and transactions obtained through coercion or deception.
- **Institutional Abuse:** Neglect or mistreatment within an organisation where adults at risk reside or receive care. It arises from poor care standards, rigid routines, inflexible systems, and a disregard for dignity, privacy, and autonomy. Institutional abuse involves a collective failure to provide safe and appropriate services, as well as the absence of necessary protective measures.

Along with the above, areas to also be aware of are:

Neglect: Which occurs when an individual intentionally or unintentionally fails to provide adequate care and support to another adult. This may result from a lack of

awareness, knowledge, or failure to take reasonable action based on available information. Neglect can manifest in various ways, including inadequate nutrition, heating, clothing, improper medication administration, restricted access to essential health or social care, and failure to intervene in dangerous situations—particularly when the individual lacks the capacity to assess risk.

Self-harm and self-neglect are not classified under the definition of an ‘adult in need of protection.’ Each case requires a professional Health and Social Care (HSC) assessment to determine the appropriate response, taking into account any underlying factors that may warrant intervention. In some cases, self-harm may stem from abuse by a third party, where the individual feels unable to disclose their experience.

Exploitation: Involves the deliberate maltreatment, manipulation, or abuse of power and control over another person, often for personal gain. It can take many forms, including slavery, servitude, forced labour, domestic violence, sexual abuse, and human trafficking.

This list is neither exhaustive nor ranked in priority. Other indicators should not be overlooked, as individuals experiencing harm in one way may also be suffering in other ways.

Minimum Safeguarding Expectations

At a minimum, any public service, voluntary, community, independent, or faith-based organisation offering recreational, social, sporting, or educational activities must safeguard adults at risk by:

- **Recognising** that harm to adults is unacceptable and must not be tolerated
- **Being aware** of the signs of abuse, exploitation, and neglect
- **Actively reducing** opportunities for harm to occur

At The Brighter Days Project, safeguarding is a fundamental priority. The organisation is committed to fostering a safe and supportive environment for all members of its community, ensuring their welfare and wellbeing is maintained.

Internal Governance – Policy and Procedures

Strong governance is the foundation of safe, high-quality care and must be rigorously implemented in any organisation delivering, commissioning, or contracting targeted services. The following policies and procedures are essential:

- **Robust selection and recruitment processes** to ensure appropriate staff appointments
- **Effective staff management, supervision, and training** to maintain high standards of care
- **Collaborative safeguarding practices**, ensuring cooperation within the organisation and with external partners
- **Incident reporting and escalation mechanisms** for untoward or adverse events
- **Frameworks for handling comments, complaints, and suggestions**

Safeguarding must be guided by five key principles

A strong emphasis on a rights-based approach. This means upholding and protecting an individual's right to safety, freedom from harm and coercion, equal treatment, legal protection, privacy, confidentiality, and freedom from discrimination. These principles ensure that every adult is treated with dignity and respect while receiving the support they need.

An empowering approach focuses on enabling adults to make informed decisions about their lives. It ensures they have the greatest opportunities to engage in society, safeguard themselves from harm, and confidently manage their own choices regarding risk exposure. By prioritizing autonomy and informed decision-making, this approach supports individuals in living safely while maintaining control over their circumstances.

A person centred approach prioritizes adults' ability to make informed choices about their lives. It maximizes their opportunities to participate in society, safeguards their independence, and supports them in managing their own decisions regarding risk. By fostering confidence and self-determination, this approach ensures individuals have the tools and autonomy needed to stay safe and live fulfilling lives.

A consent-driven approach prioritizes a person's ability to give or withhold consent and make informed choices. It involves providing clear information, outlining options and alternatives, and ensuring support for individuals who may need assistance with communication, advocacy, or decision-making. Intervention against a person's wishes occurs only under specific legal circumstances and for clearly defined purposes, always respecting their rights and autonomy.

A collaborative approach recognizes that adult safeguarding is most effective when supported by the wider public and safeguarding partners across statutory, voluntary, community, independent, and faith sectors. Success depends on clear definitions of roles, responsibilities, and accountability, ensuring coordinated efforts. Working in partnership and adopting a person-centred approach go hand-in-hand to provide the best possible protection and support for individuals.

Safeguarding Policy & Procedure

1. Safeguarding Commitment

1.1 The Brighter Days Project (TBDP) is fully committed to safeguarding the welfare of all clients and staff by taking all reasonable measures to protect them from abuse.

1.2 TBDP is dedicated to the prevention, identification, investigation, and response to cases of abuse or suspected abuse involving adults or vulnerable adults engaged with the organisation.

1.3 All TBDP staff must consistently demonstrate respect and understanding for the rights, safety, and welfare of all individuals.

1.4 TBDP will provide support to all individuals—including clients and staff—who raise safeguarding concerns. Such concerns will be taken seriously and addressed in strict accordance with established safeguarding policies and procedures. Staff can access support and guidance from their supervisory council, such as The British Acupuncture Council (BACC)

1.5 TBDP acknowledges that, given the nature of its services, it holds a position of influence over its clients. The organisation is committed to ensuring that this responsibility is exercised with integrity and is never abused.

1.6 TBDP will actively contribute to inter-agency collaboration and multidisciplinary partnerships, including local authorities, and other relevant organisations, to facilitate comprehensive safeguarding efforts.

1.7 TBDP is committed to upholding the six fundamental principles of safeguarding from the Care Act 2014:

1. **Empowerment** – Upholding the presumption of person-led decisions and informed consent.
2. **Prevention** – Taking proactive measures to prevent harm before it occurs.
3. **Proportionality** – Implementing proportionate and least intrusive responses appropriate to the level of risk.
4. **Protection** – Providing support and representation for those in greatest need.
5. **Partnerships** – Collaborating with local services and communities to develop safeguarding solutions.
6. **Accountability** – Ensuring transparency and accountability in the delivery of safeguarding measures.

TBDP will ensure that these principles will be upheld by supervising all staff and ensuring they all follow BACC's Code of Professional Conduct policy <https://bacc-wp-media-library.s3.eu-west-2.amazonaws.com/wp-content/uploads/2024/02/13145427/21189-Code-of-Professional-Conduct.pdf> and their Code of Safe Practice <https://bacc-wp-media-library.s3.eu-west-2.amazonaws.com/wp-content/uploads/2022/07/21182828/21119-The-Code-of-Safe-Practice.pdf>

1.8 The safeguarding policy and procedures will be reviewed annually at a minimum.

Reporting and Recognizing Abuse

2.1 Responsibility to Report

TBDP staff members are required to report any concerns regarding abuse. It is not their role to determine whether abuse has occurred; rather, their duty is to relay all concerns to the appropriate authorities.

2.2 Understanding Abuse and Perpetrators

Staff should recognize that abusers are not always strangers—they may include parents, carers, family members, friends, individuals in positions of trust or authority (e.g., mentors), children, or young people..

2.3 Diversity Amongst Perpetrators

While statistical data indicates that most abusers are men, women can also commit abuse. Perpetrators come from all backgrounds, races, socioeconomic classes, and professions.

2.4 Vulnerability of Disabled Individuals

Disabled adults and young people are at a heightened risk of abuse due to their reliance on intimate care. Their ability to communicate distress or escape from abusive situations may be limited.

2.5 Cultural and Religious Sensitivities

Misinterpretations or misunderstandings of cultural and religious practices can contribute to abuse going undetected, making children and young people from such backgrounds particularly vulnerable.

2.6 Identifying Abuse Indicators

Young people may display signs of abuse at different points in their lives, however, the presence of such indicators alone does not confirm abuse. Staff members are not responsible for making this determination but should report all concerns. Other life factors—such as bereavement or the arrival of a new sibling—can also trigger behavioural changes.

Types of Abuse

2.7 Physical Abuse

Physical abuse includes, but is not limited to:

- Hitting, shaking, throwing
- Poisoning, burning, scalding
- Drowning, suffocating
- Fabricating symptoms of illness or deliberately inducing illness

2.8 Sexual Abuse

Sexual abuse involves coercing or manipulating a person into sexual activities for the gratification of the abuser. This includes situations where the victim: a) Has not consented or does not wish to participate. b) Does not understand the nature of the activity and is incapable of providing informed consent. c) Has been coerced due to the abuser being in a

position of trust, power, or authority. d) Is subjected to acts that are against the law. e) Experiences sexual exploitation, where something (e.g. money, alcohol, and accommodation) is exchanged for sexual activity without genuine consent.

2.9 Emotional and Psychological Abuse

Emotional and psychological abuse involves behaviours that negatively impact an individual's mental health and wellbeing, including: a) Causing mental distress. b) Humiliating a person in private or public settings. c) Denying basic human and civil rights, such as self-expression, privacy, and dignity. d) Undermining an individual's choices, independence, and self-esteem. e) Engaging in behaviour that leads to isolation or over-dependence, causing harm to emotional health and development. f) Domestic violence, which is defined as any incident of threatening behaviour, violence, or abuse occurring between individuals in a relationship or within a family, regardless of gender or sexuality.

2.10 Financial and Material Abuse

Financial and material abuse occurs when a person's property, assets, income, or financial resources are used without their informed consent or authorization. This may include: a) Withholding money or resources. b) Unauthorized use of an individual's money or property. c) Disposal or sale of possessions without consent. d) Forcing a person into contracts or financial transactions (e.g., loans, gifts) that are not fully understood or that disadvantage them due to coercion. e) Ensuring that clients' property and finances are safeguarded during residential training weekends, while outside these circumstances, responsibility remains with the young man.

2.11 Discriminatory Abuse

Discriminatory abuse occurs when individuals or groups are denied opportunities based on their values, beliefs, race, sexuality, or culture, resulting in a misuse of power, whether intentional or not. Examples include: a) Denying access to education, healthcare, justice, civic participation, or essential services based on discriminatory factors. b) Exploiting an individual's vulnerability through repeated or pervasive treatment that excludes them from opportunities in society.

2.12 Modern Slavery

Modern slavery involves coercion, deception, and force to subject individuals to abuse, servitude, and inhumane treatment. Forms of modern slavery include: a) Sexual exploitation (primarily affecting women and children), forced labour, domestic servitude, and criminal exploitation, such as being forced to work in illegal activities like cannabis farming or pickpocketing. b) If a person is in immediate danger, call **999** and request police assistance. If there is no imminent threat to life, report suspected slavery as a safeguarding concern. The Modern Slavery Helpline (0800 0121 700) can also be used to report suspicions. c) Human trafficking is a component of modern slavery. Law enforcement agencies, particularly the Police, are responsible for managing responses to trafficking victims.

2.13 Allegations Against Carers Who Are Relatives or Friends

In cases where harm has been unintentionally inflicted due to lack of knowledge or support, carers may struggle to provide adequate care for the individual. In such instances:

- The carer may also have care and support needs and should be referred to the local authority for a carer's assessment.
- Allegations should be investigated with the same level of seriousness and diligence as other safeguarding concerns.

2.14 Hate Crime

The Metropolitan Police Service (MPS) defines hate crime as any incident that the victim—or any other person—perceives to be motivated by racism, homophobia, transphobia, religious intolerance, gender identity discrimination, or disability discrimination. Hate crime can encompass physical, emotional, or financial abuse, and staff members should be aware of the role of equality in safeguarding procedures.

2.15 Exploitation by Radicalisers Who Promote Violence

Adults with care and support needs may be vulnerable to exploitation by radicalisers seeking to recruit individuals into violent extremism. These individuals often use persuasion and charisma to influence and manipulate victims, embedding extreme ideological views to inspire harmful actions.

2.16 Abuse by Children

Where a child or children is responsible for causing harm to a vulnerable adult, the matter should be addressed to the local authority to ensure appropriate intervention.

2.17 Self-Neglect

Self-neglect refers to an individual's failure to care for their personal hygiene, health, or surroundings, including behaviours such as hoarding that pose risks to their wellbeing.

2.18 Self-Harm

Self-harm, while not inherently a safeguarding issue, may be a response to abuse. In cases where self-harm stems from abuse, the cause of the harm must be reported as a safeguarding concern.

2.19 Gang Involvement

While gang involvement is not a safeguarding issue on its own, it significantly increases risks such as:

- Victimization
- Drug and alcohol abuse

- Violent crime and incarceration
- Mental health struggles, with gang-affiliated young men being three times more likely to experience mental health issues

3. Confidentiality and Privacy

3.1 Respect for Privacy and Confidentiality

TBDP is committed to respecting the privacy and confidentiality for all people with the organisation. However, circumstances may arise where confidentiality must be breached to safeguard individuals.

- If a person voluntarily discloses information raising critical concerns, including reports of criminal activity affecting themselves or others, these concerns will be reported to the TBDP Management Committee and to the BAcC.

3.2 Secure Handling of Personal Information

- All personal information gathered about a person will be stored in a secure and confidential location, accessible only to individuals who require the information.
- If necessary, information may be disclosed to relevant authorities such as social services, their GP, Police or where appropriate parents, guardians, or carers.
- TBDP will seek the persons consent before disclosing information, ensuring they remain engaged in the decision-making process.
- In cases where serious risk of harm or potential danger to life is identified, a referral will be made without the young person's consent to protect their wellbeing.

4. Responding to Suspensions, Concerns, or Allegations

4.1 Confidential Reporting and Protection from Retaliation

All staff members have the right to report concerns or suspicions about a colleague confidentially, without fear of harassment, unfair treatment, or reprisal.