



# **SAFEGUARDING ADULTS AT RISK POLICY AND PROCEDURE**

***Revision prepared by Simon Fairhall (Head of Governance) – April/May 2026 using materials produced by the Ann Craft Trust.. Reviewed by Safeguarding and Centre Teams – May 2026. Ops Co, 11<sup>th</sup> May 2026 and for Board 18<sup>th</sup> May 2028***

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# Greenhouse Sports Safeguarding Adults at Risk Policy and Procedures

## Foreword

The safety and well-being of all participants is at the heart of everything we do at Greenhouse Sports. Greenhouse Sports recognises and values greatly the safety of all adults involved in any programme and activity that we deliver. We particularly recognise the specific needs to safeguard adults at risk in accordance with the Care Act 2014. We take full responsibility and work tirelessly to ensure that best practice is implemented across all the charity's operational, administrative and development activities without compromise. This policy, together with the accompanying guidance notes and training programme, is a clear and unequivocal statement of intent that demonstrates our commitment to all adults at risk.

The development and communication of this policy is a clear step in providing everyone working as part of the Greenhouse Sports team with a clear understanding of what is expected from them when working with our adult participants. To ensure awareness and understanding of the changes to the policy and the practical application of it to working practices at all levels, a comprehensive training and development for all members of our team will follow its publication. The Board of Trustees will also ensure that we not only continue to change our team of people with employing all the good practice guidelines and principles set out within the policy at all times, but also continue to develop and improve our policies and practices by constantly reviewing and updating our procedures as and when legislation or other reasons require it.

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# **1. Introduction to the Policy**

Greenhouse Sports is committed to the belief that all adults have a right to protection and the specific needs of disabled adults and others who may be particularly vulnerable must be taken into account.

Greenhouse Sports is committed to maintaining a strong safeguarding culture in which the safety, welfare and wellbeing of all adults and particularly adults at risk is considered in all that we do. Safeguarding is everyone's responsibility and is embedded across all areas of the organisation. Our culture is one where:

- People feel safe, listened to and supported.
- Staff understand their safeguarding responsibilities.
- Concerns are taken seriously and acted upon.
- Safeguarding practice is regularly reviewed and strengthened.

Greenhouse Sports has a duty of care to safeguard directly from harm all adults involved in any our programmes and activity that we deliver and will do this through the operation of our Policy & Procedures in line with standards in this document and related policies and procedures.

The aim of the policy is to not only prevent harm but also to promote good practice, providing adults with appropriate safety and protection whilst in the care of Greenhouse Sports and to allow all staff to make informed and confident responses to specific safeguarding issues.

Greenhouse Sports also has the responsibility to ensure that any partner organisation must also have established policies and provide protection to adults at risk.

## **1.1. Policy Statement**

Greenhouse Sports is committed to the following:

- Everyone has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.
- Creating and maintain a safe and positive environment to enable everyone to participate in any Greenhouse Sports activity.
- Taking all reasonable steps to protect people from harm, discrimination and degrading treatment, and to respect their rights, wishes and feelings.

- Creating an environment where people feel able to share their concerns and taking all suspicions and allegations of poor practice or abuse seriously and responding to swiftly and appropriately.
- Recognising that safeguarding is everybody's responsibility and providing guidance and training pertaining to adult safeguarding.

## 1.2. Principles

The guidance given in the policy and procedures is based on the six principles of adult safeguarding as set out in the Care Act 2014:

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

## 1.3. Guidance and Legislation

The practices and procedures within this policy are based on the relevant legislation and government guidance including:

- The Care Act 2014,
- Mental Capacity Act 2005,
- The Human Rights Act 1998,
- The Data Protection Act 2018 and the General Data Protection Regulations 2018.

## 1.4. Definitions

To assist working through and understanding this policy several key definitions need to be explained. In recent years there has been a marked shift away from using the term 'vulnerable' to describe adults potentially at risk from harm or abuse. Rather, individuals may be classed as adults at risk.

1.4.1 **Adult at Risk** is an individual aged 18 and over who:

- (a) has needs for care and support (whether or not a local authority is meeting any of those needs),
- (b) is experiencing, or at risk of, abuse or neglect, and,

(c) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

1.4.2 **Abuse** is a violation of a person's physical, emotional or mental integrity by any other person. See section 4 for further explanation.

1.4.3 **Adult** is anyone aged 18 years or over.

1.4.4 **Adult safeguarding** is work to prevent and stop abuse and neglect of adults.

1.4.5 **Mental Capacity** is the ability to consider relevant information, make and communicate a decision. It refers to the ability to make a decision at a particular time, for example when under considerable stress but the starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (Mental Capacity Act 2005).

1.4.6 **Centre** is the Greenhouse Centre at 35 Cosway Street, London NW1 5NS.

1.4.7 **DSL** is the Designated Safeguarding Lead and **Deputy DSL** is the Deputy Designated Safeguarding Lead.

## **1.5. Communication of the Policy**

To ensure the successful implementation of this policy it is essential that we at Greenhouse Sports communicate to our entire staff, partners, adults, especially adults at risk, their families and carers, our commitment to safeguarding.

Access to the Policy is available to all staff, partners, participants, their families and carers, and the general public at large, via the Greenhouse Sports website. This ensures anyone can access this information and can understand how the policy will be implemented and the process they should follow should an issue arise.

## **1.6. Monitoring and Review**

The implementation of procedures will be regularly monitored and reviewed. The Designated Safeguarding Lead will regularly report progress, challenges, difficulties, achievements, gaps and areas where changes are required to the Trustees via the Operations Committee as part of the Greenhouse Centre Report. The Board will review this Policy every year or whenever there is a major change in the organisation or in relevant legislation.

# **2. Organisation**

## **2.1 The Greenhouse Centre**

The Greenhouse Centre is a community and sports facility in Westminster where we deliver high-quality programmes and host partner and community activities. Although the vast majority of our work is with children and young people and through our School Programmes (and Children and Young People Safeguarding Policies and Procedures) it is at the Greenhouse Centre that we offer and support

programmes involving adults, including adults at risk and it is for this reason that we have this Adults at Risk Safeguarding Policy and Procedures. Although the two Policies and Procedures are similar, which helps everyone to better understand what to do in the event of a safeguarding concern, they are also different, especially in highlighting the different forms of abuse that Adults at Risk are susceptible to and the particular steps to take in reporting a safeguarding concern involving an Adult at Risk.

## **2.2 Greenhouse Sports Designated Safeguarding Team**

This is the Greenhouse Sports Designated Safeguarding Team for dealing with adult safeguarding at the Greenhouse Centre:

### **Greenhouse Centre Designated Safeguarding Lead:**

- Arianna Billines, Head of Centre & Operations  
[Arianna.Billines@greenhousesports.org](mailto:Arianna.Billines@greenhousesports.org)  
T : 07506 245417

### **Greenhouse Centre Deputy Designated Safeguarding Leads:**

- Maria Ingles, Head of Centre Coaching  
[Mania.Ingles@greenhousesport.org](mailto:Mania.Ingles@greenhousesport.org)  
T : 07944 645803
- Jemell Williams, Centre Manager  
[Jemell.Williams@greenhousesports.org](mailto:Jemell.Williams@greenhousesports.org)  
T : 07506 244470

### **Extended Safeguarding Team members**

The Designated Safeguarding Lead for Children & Young people is:

- Saba Jaleel, Safeguarding & Partnerships Manager,  
[Saba.Jaleel@greenhousesports.org](mailto:Saba.Jaleel@greenhousesports.org) T : 07983 238510

A number of other team members are trained as **Deputy Designated Safeguarding Leads** ('Deputy DSLs') including representatives of the Senior Leadership Team:

- Prof Camilla Knight, Director of Impact, Innovation, and Engagement. Senior Leadership Team member with oversight for safeguarding.  
[Camilla.Knight@greenhousesports.org](mailto:Camilla.Knight@greenhousesports.org)  
T : 07774 666058
- Jason Sugrue, Director of Coaching  
[Jason.Sugrue@greenhousesports.org](mailto:Jason.Sugrue@greenhousesports.org)  
T : 07506 244792
- Don Barrrell, Chief Executive Officer  
[Donald.Barrrell@greenhousesports.org](mailto:Donald.Barrrell@greenhousesports.org)  
T : 07977 261920

If you cannot contact any of the above, in an emergency, please contact the Emergency Duty Contact on **0208 600 9990** or your Line Manager

The Greenhouse Sports Board of Trustees, Senior Leadership Team and Safeguarding Team demonstrate the commitment to Safeguarding through clear leadership, accountability and a culture of openness where concerns can be raised safely and confidently. There is a structured safeguarding framework which ensures that safeguarding concerns are responded to promptly, appropriately, and in line with statutory guidance and best practice and which includes:

- Designated Safeguarding Leads (DSLs),
- Deputy Designated Safeguarding Leads (Deputy DSLs),
- Wider Safeguarding team members,
- Trustee Safeguarding Champion.

### ***3. Arrangements for dealing with safeguarding concerns***

#### **3.1 Introduction - Responding to Suspicions and Allegations**

**It is not the responsibility of anyone working at Greenhouse Sports in a paid or unpaid capacity to decide whether or not abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate people and authorities so that the necessary inquiries and actions are followed to protect all adults and particularly adult at risk.**

#### **3.2. Receiving Evidence of Possible Abuse**

3.2.1 Greenhouse Sports staff may become aware of possible abuse in various ways - they may see it happening, may suspect it is happening because of signs that have been noticed, or may have it reported by someone else or directly by the adult affected.

3.2.2 When an adult reports directly to a Greenhouse Sports member of staff it is particularly important for the member of staff to respond appropriately especially if they say or indicates that they are being abused. Staff should:

- **Stay calm** so as not to frighten them and discourage them from reporting.
- **Reassure** them that they are not to blame and that it was right to tell.
- **Listen to them**, showing that you are taking them seriously.
- **Keep questions to a minimum** so that there is a clear and accurate understanding of what has been said. (The law is very strict and abuse cases have been dismissed where it is felt that the adult at risk has been led and ideas have been suggested when questioning). Only ask questions to clarify.

- **Inform** them that you have to tell other people about what they have told you. Tell them that this is to help stop the abuse continuing.
- **Ask** them what they want to happen, but explain what you would like to do next.
- **Safety of the adult at risk** is paramount. If they are in immediate danger contact the Police or Adult Social Care. If they need urgent medical attention call an ambulance, inform the doctors of the concern and ensure they are made aware that this is a safeguarding issue.
- **Record** all information on the Incident Referral Form (Appendix B).
- **Report** the incident to a Centre Designated Safeguarding Lead (DSL) who will then deal with the safeguarding concern. If the Centre DSL is not available, another member of the Designated Safeguarding Team must be contacted. In the unlikely event of no-one being available contact the Emergency Duty Contact or your Line Manager.

### **3.3. Recording Information**

3.3.1 To ensure information is as helpful as possible, a detailed record should always be made at the time of the disclosure / concern (Appendix B). In recording you should confine yourself to the facts and distinguish what is your personal knowledge and what others have told you. Do not include your own opinions.

3.3.2 Information should include the following:

- The person's name, age and date of birth.
- The person's home address and telephone number.
- Whether or not the person making the report is expressing their concern on someone else's.
- The nature of the allegation, including dates, times and any other relevant information.
- A description of any visible bruising or injury, location, size etc. Also, any indirect signs, such as behavioural changes.
- Details of witnesses to the incidents.
- The person's account, if it can be given, of what has happened in as much detail as possible.
- Has anyone else been consulted? If so, record details.
- Has anyone been alleged to be the abuser? Record details.

### **3.4. Reporting the Concern**

3.4.1 All suspicions and allegations **MUST** be reported immediately to the Centre DSL using the Safeguarding Reporting Tool.

It is recognised that strong emotions can be aroused particularly in cases where sexual abuse is suspected or where there is misplaced loyalty to a colleague. It is important to understand these feelings but not allow them to interfere with your judgement about any action to take.

3.4.2 In the unlikely situation that no-one from the Greenhouse Sports Safeguarding Team is available or it is an emergency immediately seek advice from the local Adult Social Care department or the Police (for key local authority numbers see Appendix D). Adult Social Care has a legal responsibility under The Care Act 2014 to investigate all safeguarding referrals by talking to the adult and family (where appropriate), gathering information from other people who know the person and making inquiries jointly with the Police if appropriate.

Greenhouse Sports staff members are not safeguarding experts and it is not their responsibility to determine whether or not abuse has taken place. The Greenhouse Sports DSL will ensure that suspicions and allegations are shared with professional agencies that are responsible for safeguarding as appropriate.

**If there is any doubt, you must report the incident: it may be just one of a series of other incidents which together cause concern.**

### **3.5. Concern about a Greenhouse employee or volunteer**

Any suspicion that someone has been abused by a Greenhouse Sports employee or a volunteer should be reported immediately to the DSLs using the Safeguarding Reporting Tool. They will then take appropriate steps to ensure the safety of the person in question and anyone else who may be at risk. If the DSLs is not available, the Director of Impact or a member of the Senior Leadership Team will deal with the matter.

The DSL will:

- Remember to involve the Adult at Risk throughout the process wherever possible and gain consent for any referrals if the person has capacity.
- Contact the Greenhouse Sports Director of Impact or a member of the Senior Leadership Team to implement any immediate HR proceedings that may be needed.
- Refer the matter within 24 hours to the appropriate Local Authority Designated Officer (LADO) and the Disclosure and Barring Service.
- Include details of the allegation on a secured file.
- Contact the carer / family of the Adult at Risk as soon as possible following advice from the Adult Social Care team, LADO or other appropriate expert partner.
- If applicable, the relevant sport's national governing body will be notified.

Notwithstanding the need to contact the people listed above, it is vital to maintain confidentiality on a need-to-know basis.

### **3.6. Allegations some time after an event**

Allegations of abuse can be made some time after the event. When such allegations are made, you should follow the same procedures. This is because other adults may be at risk from the alleged abuser.

### **3.7. Concerns outside the immediate environment**

3.7.1 You may become concerned about possible abuse to an adult at risk which is taking place outside the immediate Greenhouse Sports environment such as abuse at home or a residential or day care centre. You must still report your concerns to the Centre DSL using the Safeguarding Reporting Tool who will follow up on the concern.

### **3.8. Confidentiality & information sharing**

3.8.1 Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. This includes the following people:

- The Greenhouse Sports Designated Safeguarding Team.
- The Senior Leadership Team.
- The Emergency Duty Officer.
- Adult Social Care / Police.
- The carer / family of the Adult at Risk (unless the allegation involves a carer / family member).
- The person making the report or allegation.
- And where appropriate the Trustee Lead for Safeguarding.

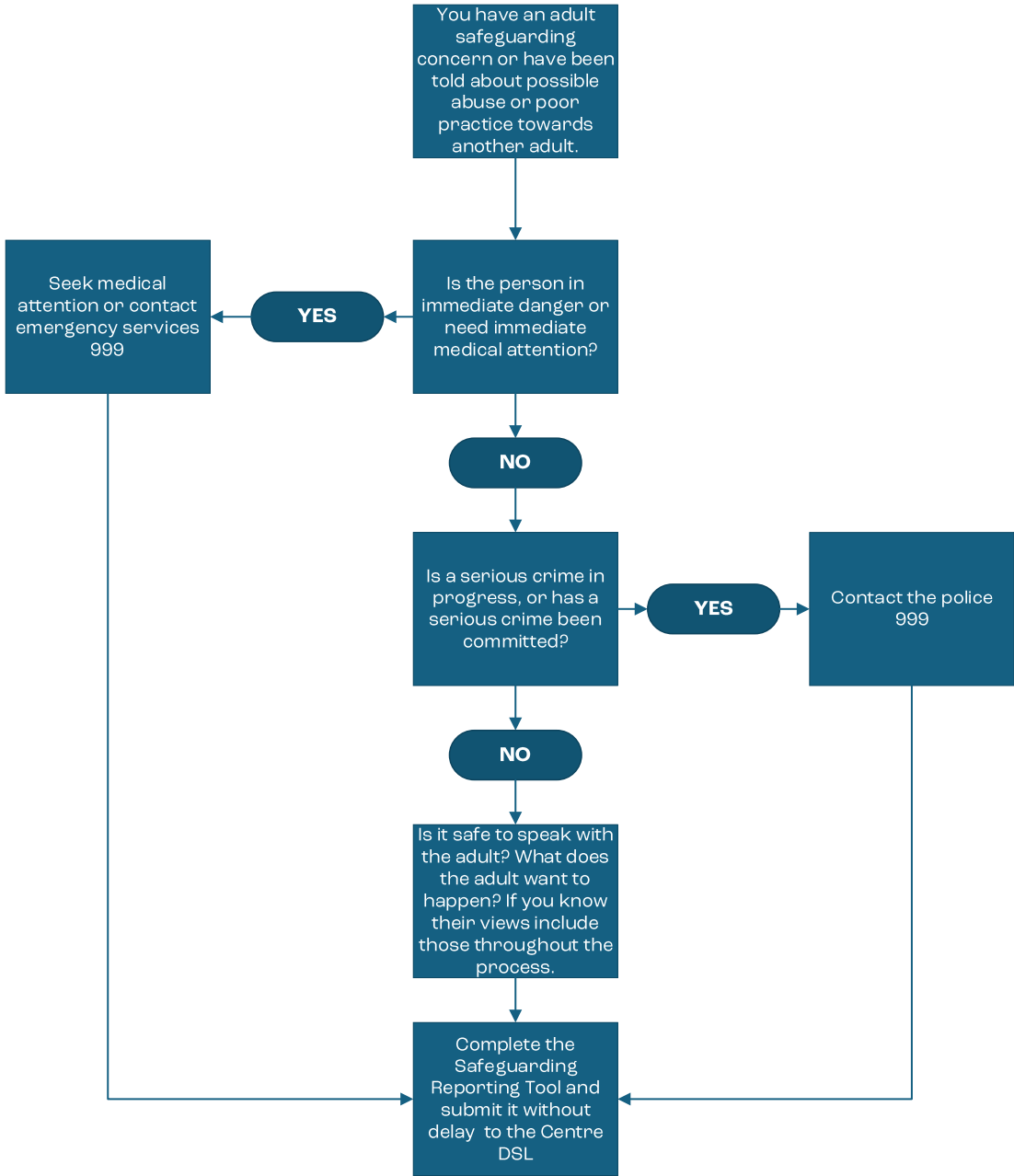
3.8.2 All information should be given to the Greenhouse Sports Designated Safeguarding Lead and stored in a secure place for a minimum of 10 years with limited access to designated people, in line with data protection laws. Information classified as strictly confidential may only be exchanged electronically both within Greenhouse Sports and in exchanges with third parties if the information is strongly encrypted prior to exchange.

3.8.3 Timely information sharing is essential to effective safeguarding. The Data Protection Act (DPA) 2018 and the General Data Protection Regulation 2018 (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping adults at risk safe. This includes allowing practitioners to share information without consent.

3.8.4 The government's [information sharing advice for safeguarding practitioners](#) includes seven 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If you are in any doubt about sharing information, you should speak to a member of the Designated Safeguarding Team.

**3.9 Process for responding to suspicions and allegations concerning an Adult at Risk including process for responding to suspicions and allegations concerning any person working with Adults at Risk**

# Adults Safeguarding Flowchart



**Remember to involve the adult at risk throughout the process wherever possible and gain consent for any referrals to Adult Social Care if the person has capacity**

### **3.10. Internal Inquiries and Suspension**

3.10.1 The Greenhouse Sports Designated Safeguarding Lead in conjunction with the Director of Impact and HR will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further Police and Social Care team inquiries. The Safeguarding Trustee shall be informed.

3.10.2 Irrespective of the findings of the Adult Social Care and or Police inquiries, the Greenhouse Sports will assess all individual cases to decide whether a member of staff can be reinstated and how this can be sensitively handled. This may be a difficult decision; especially where there is insufficient evidence to uphold any action by the Police. In such cases a decision based upon the available information which could suggest that, on the balance of probability, it is more likely than not that the allegation is true. The welfare of the Adult at Risk should remain of paramount importance throughout.

### **3.11. Duty of care to employees**

Greenhouse Sports has a duty of care to its employees to ensure their safety and wellbeing. An employee receiving evidence of abuse will be assisted by the Centre DSL or a member of the wider Greenhouse Designated Safeguarding Team or HR who will put in place an action plan to support that employee throughout the process.

## ***4. About abuse of Adults at Risk***

### **4.1. Introduction - Types of abuse**

It is not always easy to distinguish poor practice from abuse. It is therefore NOT the responsibility of employees or participants at Greenhouse Sports to make judgements about whether or not abuse is taking place. It is however their responsibility to identify poor practice and possible abuse and act if they have concerns about the welfare of any adult in the manner explained above.

This section will help to identify what is meant by abuse of Adults at Risk.

### **4.2. What is Abuse?**

4.2.1 Abuse is a violation of an individual's human and civil rights by another person or persons. It can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Any of the following types of abuse may be perpetrated as the result of deliberate intent, negligence, omission or ignorance.

4.2.2 The categories of abuse include the following: Physical, Sexual, Psychological, Neglect and Financial. Abuse can take place in any relationship and there are many contexts in which abuse might take place, such as Institutional Abuse, Domestic Abuse, Forced Marriage, Human Trafficking, Modern Slavery, Sexual Exploitation, Radicalisation, Hate Crime, Mate Crime, Cyber Bullying, Scams.

4.2.3 Adults at Risk, including those with disabilities may be at increased risk of abuse through various factors such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves or adequately communicate that abuse has occurred.

4.2.4 Abuse can take place within a sporting context and the person causing it may be a member of staff, a volunteer, a participant or a spectator. Some examples of abuse within sport include:

- Harassment of a participant because of their (perceived) disability or other protected characteristics,
- Not meeting the needs of a participant eg training without appropriate breaks,
- Striking a participant,
- Controlling a participant with threats,
- Threats of harm or persistent blame of another participant for, for example, poor performance.

4.2.5 Equally abuse or neglect can take place outside the sporting environment and be carried out by a spouse, partner or family member, neighbours, friends, acquaintances or strangers, those providing care and support. Often the perpetrator is known to the Adult at Risk and may be in a position of trust and / or power.

### **4.3. Types of Abuse and Neglect - Definitions from the Care Act 2014**

The information include below is from the Ann Craft Trust -

<https://www.anncrafttrust.org/resources/types-of-harm/> - and full information on their website includes types of abuse, the signs of, who commits it, who is at risk of it and further information or links to further information.

#### **4.3.1 Self Neglect**

This covers a wide range of behaviour around neglecting to care for one's personal hygiene, health or surroundings which might include:

- A refusal or inability to cater for basic needs, including personal hygiene and appropriate clothing.
- Neglecting to seek assistance for medical issues.
- Not attending to living conditions – letting rubbish accumulate in the garden, or dirt to accumulate in the house.
- Hoarding items or animals.

#### **4.3.2 Modern Slavery**

Modern slavery is a complex crime that operates on a huge scale across multiple countries and can include:

- Slavery.
- Human trafficking.

- Forced labour and domestic servitude.
- Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

#### 4.3.3 Domestic abuse

Domestic abuse can be:

- **Emotional** – belittling, isolating from friends and family, controlling where someone goes and who they talk to.
- **Threats and Intimidation** – threatening to hurt or kill, harassing or following.
- **Physical** – hitting, shoving, throwing things at someone, choking them.
- **Sexual** – pressuring someone into having sex, touching in a way that isn't wanted.
- **Financial** – controlling the use of money, not giving someone enough money to survive.
- **Coercion** – controlling behaviours that include assault, threats, humiliation and intimidation to harm, punish or frighten someone to obtain compliance.

#### 4.3.4 Discriminatory Abuse

Discriminatory abuse may involve race, gender, disability, or any of the protected characteristics in the Equality Act which are:

- Age,
- Gender reassignment,
- Marriage status (including civil partnerships),
- Being pregnant or on maternity leave,
- Disability,
- Race (including skin colour, nationality, or a person's ethnic or national origin)
- Religious belief,
- Sex, and sexual orientation,

In UK law, it's illegal to discriminate against anyone based on these protected characteristics and discriminatory abuse might involve harassment, slurs, or similar treatment based on the difference or perceived difference.

#### 4.3.5 Organisational Abuse

Organisational abuse can be either a one-off incident or an ongoing culture of ill treatment which includes taking away a right to choose. The abuse can take many forms, including neglect, and poor professional practices as a result of the structure, policies, processes and practices in an organisation and might include:

- Inappropriate use of power or control.
- Inappropriate confinement, restraint, or restriction.
- Lack of choice – in food, in decoration, in lighting and heating, and in other environmental aspects.
- Lack of personal clothing or possessions.
- No flexibility of schedule.
- Financial abuse.

- Physical or verbal abuse.

#### **4.3.6 Physical Abuse**

Physical abuse includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It might also involve improper use of sanctions, particularly those that involve physical restraint or activity. Instances of physical abuse can be isolated incidents or ongoing.

#### **4.3.7 Sexual Abuse**

Sexual abuse includes a number of coerced sexual acts including:

- Rape.
- Indecent exposure.
- Sexual harassment.
- Inappropriate looking or touching.
- Sexual teasing or innuendo.
- Sexual photography.

It can also include subjecting someone to pornography, or witnessing sexual acts, indecent exposure or sexual assault. A factor that links all of these examples is that the person does not consent, or they felt pressured into consenting.

#### **4.3.8 Financial Abuse**

The Care Act 2014 describes 'financial abuse' as a type of abuse which includes having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused. It can involve or is associated with:

- Someone taking or misusing someone else's money or belongings for their own gain.
- Harming, depriving or disadvantaging the victim.
- Controlling someone's purchases or access to money.

#### **4.3.9 Neglect**

Neglect is a form of abuse that includes several acts of omission which might include:

- Ignoring medical or physical care needs.
- Ignoring a person's cultural, religious or ethnic needs.
- Failing to provide access to appropriate health, social care, or educational services.
- Withdrawing the necessities of life, such as medication, glasses, hearing aids, dentures, adequate nutrition, and heating.
- Refusing access to visitors.
- Ignoring or isolating a person.
- Preventing a person from making their own decisions.

Neglect and acts of omission basically means failing to ensure privacy, dignity, and individuality for an Adult at Risk.

#### **4.3.10 Emotional Abuse**

Emotional or psychological abuse may include:

- Threats of harm or abandonment.
- Deprivation of contact or refusal of visitors.
- Humiliation.
- Restricting personal choice and refusing to respect privacy.
- Blaming, controlling, or intimidating behaviour.
- Coercion and harassment.
- Verbal abuse, or the use of infantilising language.
- Removing mobility or communication aids, or intentionally leaving someone unattended when they need assistance.
- Forced isolation, or withdrawal from services or support networks.

Bullying and Cyber bullying are other example of emotional abuse.

**Bullying** is defined as deliberate, hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. There are four main types of bullying: physical (hitting, kicking, slapping), verbal (racist or homophobic remarks, name-calling, graffiti, threats, abusive text messages), emotional (tormenting, ridiculing, humiliating, ignoring, isolating from the group), or sexual (unwanted physical contact or abusive comments).

**Cyber bullying** can be defined as the use of internet and / or mobile technology to harass, intimidate, or cause harm to another. Cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities. The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

There are additional types of harm that are not included in The Care Act, but are also relevant to safeguarding adults.

#### **4.3.11 Forced Marriage**

A forced marriage is where one or both spouses either do not, or cannot, consent to the marriage. Forced marriage of people with learning disabilities often concerns the ability (or capacity) to consent to marriage, as well as the willingness to consent.

#### **4.3.12 Hate Crime**

Disability hate crime is motivated or perpetrated by a hatred or prejudice towards a person because of their actual or perceived disability. People with learning disabilities are also at high risk of 'mate crime' which is a form of disability hate crime in which the victim is abused and manipulated by someone they believed to be their friend.

#### **4.3.13 Cuckooing**

Cuckooing might also be referred to as “home takeover”, or “home invasion” and involves criminals taking control of another person’s home in order to use it for criminal activity. This could involve offences relating to drugs, sexual abuse, and weapons or use the property to store money or stolen goods, or simply as a place to sleep. Cuckooing can be part of County Lines activity.

#### **4.3.14 Radicalisation**

The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.

#### **4.3.15 ‘Honour based’ violence**

So-called ‘honour based’ violence encompasses crimes which have been committed to protect or defend the honour of the family and / or community, including Female Genital Mutilation; forced marriage; and practices such as breast ironing, virginity testing and hymenoplasty (stitching or surgery, undertaken to reconstruct a hymen). All forms of so-called Honour Based Violence are abuse, regardless of the motivation and should be handled and escalated as such.

#### **4.3.16 Homelessness**

Homelessness is the lack of a safe, stable, and permanent home, extending far beyond just rough sleeping to include people in temporary accommodation, hostels, "sofa surfing" with friends, or living in unsafe/unsuitable conditions. It is a lack of security, safety, and a foundation for a healthy life. The Greenhouse Centre Team are aware of the contact details and referral routes into the Local Housing Authority.

#### **4.3.17 Upskirting**

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person’s clothing without consent and with the intention of observing, or enabling another person to observe, the victim’s genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose. A “specified purpose” is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim’s genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

“Operating equipment” includes enabling, or securing, activation by another person without that person’s knowledge, eg a motion activated camera.

Any incidents of upskirting at the Greenhouse Centre will be reported in accordance with this policy and a decision will then be made on the next steps to take, which may include police involvement.

#### **4.4. Indicators of Abuse**

4.4.1 Indicators of Abuse. Even for those experienced in working with abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that an Adult at Risk is being abused may include one or more of the following:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- An injury which is unexplained or the explanation seems inconsistent.
- The Adult describes what appears to be an abusive act involving them.
- Another Adult expresses concern about the welfare of another adult / adult at risk.
- Unexplained changes in an Adult's behaviour eg becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper.
- Inappropriate sexual awareness or engaging in sexually explicit behaviour.
- Distrust of others, particularly those with whom a close relationship would normally be expected.
- Difficulty in making friends.
- Being prevented from socialising with others.
- Displaying variations in eating patterns including over-eating or loss of appetite.
- Losing weight for no apparent reason.
- Over tiredness.
- Suicidal thoughts or behaviour.
- Displaying frequent unexplained minor injuries.
- Unexplained gifts or new possessions.
- New relationships with individuals and groups or a change in friendships.
- Signs of self harm.
- Becoming increasingly dirty or unkempt.

4.4.2 Signs of bullying include:

- Behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go training or enter competitions.
- An unexplained drop in performance.
- Physical signs such as stomach aches, headaches, difficulty in sleeping, bed-wetting, scratching and bruising, damaged clothes, bingeing e.g. on food, alcohol or cigarettes.
- A shortage of money or frequent loss of possessions.

4.4.3 Signs of grooming behaviours towards an Adult at Risk include:

- Being over friendly.
- Having favourites.
- Taking photographs of Adults at Risk on a personal mobile phone.
- Engaging with an Adult at Risk on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating or offensive language (including, but not limited to, making comments on body shape and using terms such as babe and princess).

It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place.

## **5. Operational and Good Practice**

### **5.1. Good Practice**

By promoting good practice the occurrence of abuse of Adults at Risk should be reduced and this should also protect Greenhouse Sports staff, thus reducing the likelihood of allegations arising. All personnel should adhere to the following principles and action:

- Complete a course in basic awareness in working with Adults at Risk if requested by Greenhouse Sports.
- Where an activity/ action requires consent, this must be from the Adult themselves if they have capacity to do so.
- Always work in an open environment (eg avoiding private or unobserved situations and encouraging open communication with no secrets).
- If involved in a 1:1 (mentoring) situation, give some thought before the meeting to the venue and environment where the meeting will take place. Avoid private, closed places; instead meet in an open, transparent space. If privacy is needed, make sure that the room/office has windows and is situated in a natural walkway. Always inform a colleague of your meeting.
- Make the experience of your sports programme or session fun and enjoyable: promote fairness, confront and deal positively and pro-actively with bullying, harassment or any other inappropriate behaviour.
- Treat all people equally and with respect and dignity.
- Always put the welfare of the Adult at Risk first.
- Always use the mobile phone and tablet supplied to you by Greenhouse Sports (for further detail on E-safety/use of media - covering safeguarding procedures for photography, video, publishing and on-line work, please refer to the Greenhouse Sports policies).
- Maintain a safe and appropriate distance with participants (eg it is not appropriate for staff or volunteers to have an intimate relationship with an Adult at Risk).

- Avoid unnecessary physical contact with an Adult at Risk. Where any form of manual/physical support is required, it should be provided openly and with the consent of the adult. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the adult's consent has been given.
- In extreme cases where an adult is becoming a danger either to themselves, to others or to you, physical contact/restraint may be required, however to be judged lawful the force of restraint used must be proportionate to the consequences it is intended to prevent.
- If appropriate, involve family and carers wherever possible, eg where Adults at Risk need to be supervised in changing rooms and if groups have to be supervised in changing rooms always ensure to work in pairs.
- Keep up to date with the technical skills, qualifications and insurance in sport.
- Never transport an Adult at Risk unless in an emergency; in this case it is the coach's responsibility to obtain consent from the adult (if he/she has capacity) or the adult's family or carers AND a Centre DSL BEFORE they transport the Adult. In such circumstances, always transport the Adult at Risk in the back seats of the car and ideally there should be at least one additional adult to the driver acting as an escort.
- Be an excellent role model: this includes not smoking or drinking alcohol in the company of Adults at Risk.
- Always give enthusiastic/ constructive feedback rather than negative criticism.
- Recognise the developmental needs and capacity of all participants, do not risk sacrificing welfare in the desire for team/personal achievements. Avoid excessive training or competition and pushing them against their will.
- Do not undertake any medical treatment unless qualified to do so. Gain the Adult at Risk's consent and, where appropriate, the consent of relevant family or carers, in writing, to administer emergency first aid or other medical treatment if the need arises.
- Keep a written record of any injury that occurs, along with details of any treatment given.
- All participants must be registered using the Participant Registration Form.
- All staff must seek clarification from Operational Support team or their Line Managers regarding the appropriate risk assessment documents they should use for each activity / site / venue.
- All activities/events must comply with the ratios set by the relevant Governing Body. Greenhouse Sports staff will always adhere to these ratios, as well as consulting with the appropriate host agency when working with people with a disability.
- It is recommended that no adult should be treated in any situation when on his/her own in a treatment room with the door closed. It is Greenhouse Sport's policy that all treatment procedures should be 'open' ie. the door remains open and only undertaken by appropriately qualified members of staff.

- Prior to medical or health treatment being carried out consent from the Adult must first have been obtained if they have the capacity to give it and if not, from their family or carer, unless it is an emergency. All treatment procedures must be explained fully to the Adult at Risk before they are carried out.
- It is recommended that, if treating an area of the body which is potentially embarrassing (ie the groin), another suitable adult (ideally a family member or carer) acting as a chaperone, must be present.
- It is important to maintain medical confidentiality and patient dignity at all times.

## 5.2. Poor Practice

5.2.1 The following should be avoided except in emergencies.

- Do not transport Adults at Risk in your car unless in a medical emergency and even so, permission **MUST WITHOUT FAIL** be obtained from the Adults themselves if they have capacity to consent or parent/ family **AND** a Centre DSL beforehand. Ideally there should be at least one additional adult to the driver acting as an escort.
- Avoid spending time alone with the adult away from others.
- If cases arise where these situations are unavoidable, they should only occur with the consent of the adult and the full knowledge of the Centre DSL or appropriate person from the activity/event (and the adult's family / carer if the adult does not have capacity to consent). For example, an injury requiring hospital treatment, or a carer or family member fails to arrive to pick up at the end of a session. In all cases, such incidents should always be recorded.

5.2.2 The following are regarded as poor practice and should be avoided by all personnel:

- Engaging in rough, physical or sexually provocative games, including any forms of inappropriate behaviour.
- Use of your personal mobile phone or tablet other than in extreme emergencies.
- Over-friendly behaviour/nature with participants.
- Allowing or engaging in inappropriate touching of any form.
- Allowing inappropriate language to be used unchallenged.
- Making sexually suggestive comments, even in fun.
- Reducing an adult to tears as a form of control.
- Allowing allegations made to go unchallenged, unrecorded or not acted upon.
- Doing things of a personal nature that the adult can do themselves.
- Sharing a room with an Adult at Risk.

5.2.3 If during your care you accidentally hurt an Adult at Risk, they seem distressed in any manner, appear to be sexually aroused by your actions and/or if they misunderstand or misinterpret something you have done, report any such incidents

as soon as possible to the Centre DSL, as well as making a written note of it. If appropriate the Centre DSL should then inform the person's carers or family of the incident.

### **5.3. Use of the Greenhouse Centre premises for external activities**

Where Greenhouse Sports hires or rents out space at the Greenhouse Centre to organisations or individuals to run community activities it will ensure that appropriate arrangements are in place to keep participants safe.

Where activities are provided separately by another body, Greenhouse Sports will:

- seek assurance that the body concerned has appropriate safeguarding policies and procedures in place, including inspecting these as needed.
- ensure that there are arrangements in place to liaise with the body on these matters where appropriate.
- ensure safeguarding requirements are included in any agreement such as a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.

Those hosting activities and clubs will be expected to work in collaboration with Greenhouse Sports to effectively safeguard participants and adhere to local safeguarding arrangements. Staff and volunteers running external activities and clubs should be aware of their safeguarding responsibilities and promote the welfare of participants. They should understand how to respond to safeguarding concerns and how to make a referral to the relevant bodies including the Police, if necessary.

## **6. Training**

If requested by Greenhouse Sports, all staff working with Adults at Risk must, as a minimum requirement, complete a course in basic awareness. This is in addition to our children and young people specific safeguarding training (details of which can be found in our Safeguarding and Child Protection Policy and Procedures on our website).

## 6. Version History

Version	Date	Status	Approved
4	2 <sup>nd</sup> May	Approved	Operations Committee
4	14 <sup>th</sup> June	Final approval from the Board, as recommended by Ops Co.	Board of Trustees
5	9 <sup>th</sup> Nov	Annual review (GC)	SCP sub-co.
6	29 <sup>th</sup> Sept	Annual Review (GC)	SCP sub-co.
7	7 <sup>th</sup> Jan 2022	Annual Review (GC)	
8	10 <sup>th</sup> Jan 2023	Annual Review (GC)	
10	30 <sup>th</sup> April 2024	Annual review (SF). Converted to new brand	
11	April / May 2026	Full review and refresh (SF)	

## **APPENDIX A**

### **GREENHOUSE SPORTS CODE OF CONDUCT**

**If a concern arises through observation, reporting, a phone call, email or letter, record the information on an Incident Referral Form then immediately tell the Centre Designated Safeguarding Lead. Never just ignore it.**

**All Greenhouse Sports staff, workers and volunteers must adhere to the following good practice guidelines:**

#### Participant Relationship

- Never engage in a personal relationship with a Greenhouse Sports participant.
- Never engage in any behaviours that are seen as 'grooming'. The signs of grooming include:
  - being over friendly,
  - having favourites,
  - taking photographs on your personal mobile phone,
  - engaging with a participant a one-to-one basis in a secluded area or behind a closed door,
  - using inappropriate sexualised, intimidating or offensive language (including, but not limited to, making comments on body shape and using terms such as babe and princess).
- Develop an appropriate working relationship with participants, based on mutual trust and respect.
- Maintain a professional relationship at all times, including outside of working hours.

#### Communication

- When communicating to a participant by phone, only ever use your work mobile. Ensure that the conversation/text is only ever regarding your programme and never encourage them to reply back, except when appropriate. In no circumstances should you use your personal mobile/iPad.
- Do not accept a participant as a friend on any social media site. If you currently have a participant as a friend on a social media site, please delete them immediately. All social media communication must be undertaken through the official Greenhouse Sports channels.

#### Transportation

- Never transport a participant in your car unless in an emergency; in this case it is your responsibility to contact the family or carers AND your line manager BEFORE you transport them. In such circumstances, always transport them in

the back seats of the car and ideally there should be at least one additional adult to the driver acting as an escort.

#### Health & Safety

- Ensure the safety of all participants by providing effective supervision, proper pre-planning of coaching sessions and using safe methods at all times.
- Consider the wellbeing and safety of participants before the development of performance.
- Administer minor first aid in the presence of others and where required call the Emergency Services.
- Have access to a telephone for immediate contact to emergency services if required.
- Establish and address the additional needs of disabled participants or other vulnerable groups.

#### Behaviour

- Encourage and guide participants to accept responsibility for their own performance and behaviour.
- Encourage all participants not to discriminate on the grounds of religious beliefs, race, gender, social classes or lack of ability.
- Do not allow any rough or dangerous play, bullying, or the use of bad language or inappropriate behaviour.

#### Safeguarding Professional Conduct

- Treat all people fairly and ensure they feel valued.
- Appreciate the efforts of all participants and do not over-train them. Never exert undue influence over performers to obtain personal benefit.
- Be positive, approachable and offer praise to promote the objectives of the Greenhouse Sports at all times.
- Never use sanctions that humiliate or harm people.
- Do not abuse members physically, emotionally or sexually.
- Maintain confidentiality about sensitive information.
- Respect and listen to the opinions of participants.
- Take time to explain rules and techniques to ensure they are clearly understood.
- Create an environment where every individual has the opportunity to participate in a sport in an environment free of fear and harassment.
- Recognise the rights of all participants to be treated with respect and as individuals.
- Be a positive role model for participants at all times and ensure that the environment is as safe as possible, taking into account and minimising any possible risks.

#### Sharing Concerns and Recording Incidents

- Do not let any allegations of abuse of any kind or poor practice go unchallenged or unrecorded. Incidents and accidents must be recorded in the line with Greenhouse/school's procedures.
- Report accidents or incidents of alleged abuse or poor practice to the Centre Designated Safeguarding Lead.

Greenhouse Sports is committed to providing a high quality, safe and participant friendly environment for staff, volunteers, workers and participants and therefore operates a zero-tolerance policy in connection with the above.

I ..... confirm that I have read don't mix these things up the above statement. I agree to comply with the Greenhouse Sports Adults at Risk Safeguarding Policy & Procedures and adhere to all the areas of good practice listed above. In addition, I confirm I will inform Greenhouse Sports of any personal / family relationship with a Greenhouse Sports participant.

.....  
Signed

.....  
Dated

# APPENDIX B

## INCIDENT REFERRAL FORM

Your name:	
Your position in organisation:	
Contact Tel No's: Home:	Mobile:
Work:	
Address:	
Email:	
Person's name:	
Address:	
Date of Birth:	Male or female?
Parent / carers name:	
Does the person have a disability? If so, please detail:	
Date and time of the incident:	
Your observations:	
Exactly what the Adult at Risk says and what you said ((Remember, do not lead the Adult at Risk – record actual details. Continue on separate sheet if necessary)	
Action taken so far:	
Information on the alleged abuser:	
<b>You should refer all concerns immediately by speaking with Greenhouse Sports' DSL and then sending this form to <a href="mailto:safeguarding@greenhousesports.org">safeguarding@greenhousesports.org</a></b> Have you contacted any external agencies yet? If so, please complete below.	
<b>Social services</b>	Name and contact number: Date and time: Details of advice received:
<b>Local Safeguarding Partner</b>	Name and contact number: Date and time: Details of advice received:

<b>Police</b>	Name and contact number: Date and time: Details of advice received:
Local Authority	If yes – which: Name and contact number: Date and time: Details of advice received:
<b>NGB</b>	If yes – which: Name and contact number: Date and time: Details of advice received:
<b>Other</b>	Which: Name and contact number: Details of advice received:
Signature:	
Print name: <span style="float: right;">Date:</span>	

*Once completed, please make sure that you then immediately forward it onto to the Designated Safeguarding Lead by emailing [safeguarding@greenhousesports.org](mailto:safeguarding@greenhousesports.org)*

## **APPENDIX C**

### **LEGISLATION & GOVERNMENT INITIATIVES**

#### **Sexual Offences Act 2003**

<http://www.legislation.gov.uk/ukpga/2003/42/contents>

The Sexual Offences Act introduced a number of new offences concerning vulnerable Adults and children. [www.opsi.gov.uk](http://www.opsi.gov.uk)

#### **Mental Capacity Act 2005**

<http://www.legislation.gov.uk/ukpga/2005/9/introduction>

Its general principle is that everybody has capacity unless it is proved otherwise, that they should be supported to make their own decisions, that anything done for or on behalf of people without capacity must be in their best interests and there should be least restrictive intervention. [www.dca.gov.uk](http://www.dca.gov.uk)

#### **Safeguarding Vulnerable Groups Act 2006**

<http://www.legislation.gov.uk/ukpga/2006/47/contents>

Introduced the new Vetting and Barring Scheme and the role of the Independent Safeguarding Authority. The Act places a statutory duty on all those working with vulnerable groups to register and undergo an advanced vetting process with criminal sanctions for non-compliance. [www.opsi.gov.uk](http://www.opsi.gov.uk)

#### **Deprivation of Liberty Safeguards**

<https://www.gov.uk/government/collections/dh-mental-capacity-act-2005-deprivation-of-liberty-safeguards>

Introduced into the Mental Capacity Act 2005 and came into force in April 2009. Designed to provide appropriate safeguards for vulnerable people who have a mental disorder and lack the capacity to consent to the arrangements made for their care or treatment, and who may be deprived of their liberty in their best interests in order to protect them from harm.

#### **Disclosure & Barring Service 2013**

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

Criminal record checks: guidance for employers - How employers or organisations can request criminal records checks on potential employees from the Disclosure and Barring Service (DBS). [www.gov.uk/dbs-update-service](http://www.gov.uk/dbs-update-service)

#### **The Care Act 2014 – statutory guidance**

<http://www.legislation.gov.uk/ukpga/2014/23/introduction/enacted>

The Care Act introduces new responsibilities for local authorities. It also has major implications for adult care and support providers, people who use services, carers and advocates. It replaces No Secrets and puts adult safeguarding on a statutory footing.

## **APPENDIX D**

### **USEFUL CONTACTS & SOURCES OF FURTHER INFORMATION**

#### **Westminster City Council**

- Phone the safeguarding helpline 020 7641 2176
- Email: adultsocialcare@westminster.gov.uk

**Email:** adultsocialcare@westminster.gov.uk

#### **Ann Craft Trust (ACT)**

A national organisation providing information and advice about adult safeguarding. ACT have a specialist Safeguarding Adults in Sport and Activity team to support the sector

T: 0115 951 5400

E: Ann-Craft-Trust@nottingham.ac.uk

www.anncrafttrust.org

#### **Ann Craft Trust eLearning Courses**

An Introduction to Safeguarding Adults - eLearning

An Introduction to Safeguarding Adults in the Sport and Activity Sector - eLearning

Understanding Financial Capability & Recognising Financial Abuse - Free eLearning course

UK Coaching - Safeguarding Adults For Coaches in Physical Activity and Sport - eLearning

An Introduction to the Mental Capacity Act

#### **Action on Elder Abuse**

A national organisation based in London. It aims to prevent the abuse of older people by raising awareness, encouraging education, promoting research and collecting and disseminating information.

T: 020 8765 7000

E: enquiries@elderabuse.org.uk

www.elderabuse.org.uk

#### **Men's Advice Line**

For male domestic abuse survivors

T: 0808 801 0327

#### **National LGBT+ Domestic Abuse Helpline**

T: 0800 999 5428

### **National 24Hour Freephone Domestic Abuse Helplines**

T: 0808 2000 247

[www.nationaldahelpline.org.uk/Contact-us](http://www.nationaldahelpline.org.uk/Contact-us)

### **Rape Crisis Federation of England and Wales**

Rape Crisis was launched in 1996 and exists to provide a range of facilities and resources to enable the continuance and development of Rape Crisis Groups throughout Wales and England.

E: [info@rapecrisis.co.uk](mailto:info@rapecrisis.co.uk)

[www.rapecrisis.co.uk](http://www.rapecrisis.co.uk)

### **Respond**

Respond provides a range of services to victims and perpetrators of sexual abuse who have learning disabilities, and training and support to those working with them.

T: 020 7383 0700 or 0808 808 0700 (Helpline)

E: [services@respond.org.uk](mailto:services@respond.org.uk)

[www.respond.org.uk](http://www.respond.org.uk)

### **Stop Hate Crime**

Works to challenge all forms of Hate Crime and discrimination, based on any aspect of an individual's identity. Stop Hate UK provides independent, confidential and accessible reporting and support for victims, witnesses and third parties.

24 hours service:

T: 0800 138 1625

Web Chat: [www.stophateuk.org/talk-to-us/](http://www.stophateuk.org/talk-to-us/)

E mail: [talk@stophateuk.org](mailto:talk@stophateuk.org)

Text: 07717 989 025

Text relay: 18001 0800 138 1625

PO Box 851, Leeds LS1 9QS

### **Susy Lamplugh Trust**

The Trust is a leading authority on personal safety. Its role is to minimise the damage caused to individuals and to society by aggression in all its forms – physical, verbal and psychological.

T: 020 83921839

E: [info@suzylamplugh.org](mailto:info@suzylamplugh.org)

[www.suzylamplugh.org](http://www.suzylamplugh.org)

### **Victim Support**

Provides practical advice and help, emotional support and reassurance to those who have suffered the effects of a crime.

T: 0808 168 9111

[www.victimsupport.com](http://www.victimsupport.com)

### **Women's Aid Federation of England and Wales**

Women's Aid is a national domestic violence charity. It also runs a domestic violence online help service.

[www.womensaid.org.uk/information-support](http://www.womensaid.org.uk/information-support)