



# Screen Share Safeguarding Policy

Updated February 2025

## 1. Screen Share's Purpose

Screen Share's mission is to ensure every refugee in the UK has access to a connected device and the skills to use it to achieve their goals. We do this by providing digital inclusion services to refugees across the UK.

In so doing, Screen Share staff and volunteers interact with vulnerable adults in a variety of support contexts. There are also some limited circumstances in which we interact indirectly or inadvertently with children - i.e when children are brought by service users to the spaces we deliver our services, or when the devices we issue to service users are shared with their children.

For these reasons, we insist on a clear, transparent, comprehensive and authoritative safeguarding policy which explains our approach to safeguarding vulnerable adults and children.

## 2. The purpose of this policy

Screen Share is a strong advocate of refugee protection rights and believes in its responsibilities to safeguard vulnerable adults. This policy is a statement of our clear commitment to ensuring that those working with and benefiting from Screen Share are not harmed or abused in any way through contact with us.

It is a tool for everyone involved with Screen Share to understand our framework for protecting vulnerable adults and children from harm. It is a basic guide for people engaged with Screen Share on how to respond if they suspect someone engaged with Screen Share may be experiencing, or is at risk of experiencing, harm or abuse.

This policy indicates that we take responsibility for ensuring appropriate action is taken to prevent and respond to an individual we work with experiencing or at risk of harm or abuse. It is a measure of accountability to our service users, volunteers, staff, partner organisations, funders and local community.

This policy should be read with our privacy policy, Code of Conduct and Whistleblowing policy.

### 3. The scope of this policy

This policy applies to anyone engaged with a Screen Share service.

This includes individuals who come to Screen Share to receive a device or internet connectivity; are supported by our digital skills services online or in person; join our alumni network of digitally included refugees; attend our laptop repair training; and approach and engage with Screen Share for the purposes of tech repair.

This policy also applies to Screen Share volunteers. This includes our Digital Champions who provide 1:1 digital skills support; Techies who refurbish devices; Runners who deliver devices; Communications and Advocacy volunteers who work on our social media and messaging; our trustees and any other volunteer who has entered into a volunteer agreement with Screen Share.

The policy also applies to anyone employed by Screen Share, whether they work part-time or full-time and whether they are on a fixed term contract or employed on a permanent basis. It includes anyone employed by Screen Share on a freelance or temporary basis.

The policy also governs our engagements with partner organisations. This may be when collaborating with another refugee charity who is supporting our service users, or a company facilitating access to an initial accommodation hotel. We insist that partner organisations commit to and comply with our safeguarding policy when engaging with Screen Share. We will do the same with their safeguarding policy and identify any conflicts or omissions before the partnership begins and on an ongoing basis.

### 4. The meaning of key terms used in this policy

**Harm** is the negative or adverse impact that a person experiences as a result of an action or situation. It can take many forms, including physical, psychological, emotional, verbal and digital.

**Abuse** refers to any intentional or reckless behaviour that causes harm or injury to another person. It can take many forms, including physical, emotional and psychological, sexual, verbal discriminatory abuse, digital and financial and property abuse. It may be a single or repeated set of acts and be an act of neglect or an omission to act. The long-term consequences of being subjected to abuse include physical injury, emotional distress, and trauma.

Abuse can take place online and may be gender-based, racialised and/or systemic. Two or more types of abuse can form an intersection of abuse for one individual or a group of individuals. It may be particular to a specific culture and includes forced marriage, conversion therapy, honour-based violence and FGM.

**Child** means anyone up to the age of 18 years. This term may include particularly vulnerable groups, including Unaccompanied Asylum Seeking Children (UASC), Looked After Children (LAC), and individuals in the National Referral Mechanism (NRM)

**People/person seeking asylum** means anyone who has claimed asylum, and is therefore seeking international protection from persecution in their home country. People seeking asylum are often vulnerable due to their past experiences, as well as experiences of poverty and hardship while in the UK.

**Refugee**, in this document and for the purpose of legal matters, means anyone who has been granted Refugee Status or another form of Humanitarian Protection or Leave to Remain by the Home Office. Elsewhere in our communications and social media we use the term inclusively to also include those seeking asylum.

**Safeguarding** means ensuring that those benefiting from, or working with, a charity or organisation, are not harmed in any way through contact with it.

**Staff** means any and all paid employees of Screen Share.

**Volunteer** means any person who donates time and/or services to Screen Share.

**Vulnerable adult** is a person aged 18 or above who requires support, assistance, advice or counselling due to particular needs related to age, physical or mental health, including refugee or immigration status.

**Young person** means anyone up to the age of 25 years and may include particularly vulnerable groups including care leavers, young refugees, asylum seekers and survivors of trafficking.

## **5. The legal frameworks which underpin this policy**

Everyone has a right to be safeguarded from abuse or neglect. Screen Share is committed to upholding the relevant legal frameworks. These include The Children Act 1989 (as amended by section 53 of the Children Act 2004) and the Safeguarding Vulnerable Groups Act 2006.

Further guidance that sets out the requirements and expectations on professionals to work together to effectively safeguard children include Working Together to Safeguard Children (2015), Safeguarding Disabled Children: Practice Guidance (2009) and What to do if you're worried a child is being abused (2015) (Department for Education 2015). This policy document has been drawn up on the basis of this legislation and guidance, and a summary of it is available from [nspcc.org.uk/learning](http://nspcc.org.uk/learning)

## **6. A Commitment when enacting this policy**

The welfare of *all* vulnerable adults, young people and children is paramount in the work we do and in the safeguarding decisions we take. Each individual we engage with has an equal right to protection from all types of harm or abuse.

It is for this reason that we commit to protecting from harm those who engage with our service regardless of their age, disability, gender reassignment, race, religion, political belief, sex, gender or sexual orientation.

Furthermore, different elements of an individual's identity or situation creates a unique experience which our approach to safeguarding must serve. Harm and discrimination are not experienced equally. Some individuals may be at risk of a number of different types of abuse or harm.

Many individuals who use our services can be vulnerable to abuse and exploitation because of their personal difficulties and experiences. Their experience of harm, abuse and safeguarding may be subject to power structures of which we are a constituent element as an established charity. Our policy and approach must reflect that. The steps we take to ensure it does so are indicated below.

## **7. Our Actions as an Organisation**

Screen Share commits to taking the following actions with respect to the prevention, identification and response to harm and abuse:

### **7.1 Risk Assessment and Prevention**

- Maintaining a systemic approach to assessing risk which considers the likelihood of harm, the relationship to the service user, and the severity of harm.
- Acknowledging and thinking critically about the different relationships we have with different individuals with whom we interact, from direct relationships to outsourced, brokered, and tangential relationships.
- Taking a holistic approach to safeguarding, which includes the promotion of well-being in addition to the prevention of harm.
- Recognising that safeguarding is not a one-size-fits-all; there are differences in identifying, manifesting, and responding to safeguarding situations that concern children, young people, and adults. This includes but is not limited to: the difficulty children may have in identifying, understanding, and communicating about abuse; the amplified power

dynamic between children and adults; the limited options available to children to escape abuse.

- Making it easy and accessible for staff, volunteers, and service users to report a safeguarding situation by identifying and addressing barriers to disclosure, including but not limited to fear of not being believed, police or institutions, mental health stigma, or concerns over retraumatization. Please see the safeguarding reporting form attached as Appendix 1 to this Safeguarding policy.
- Approaching safeguarding situations when the age of the individual is disputed with extra care, remembering that children may identify, understand and communicate about abuse in a way which is different to adults, and that children being treated as adults will structure their experience in the UK, expose them to significant risks, and may contribute to their own self-understanding.

## **7.2. Safeguarding Leadership and Organisational Accountability**

- Establishing and regularly sharing the clear protocol that if any safeguarding concerns are raised, they are directed to the Designated Safeguarding Lead (Moses Seitler)
- Recognising that the welfare of recipients is paramount and has priority over all other interests.
- Conducting an internal review of this policy at every level of the organisation and seeking an external review from a safeguarding specialist.
- Appointing and continuously upskilling a Designated Safeguarding Lead (DSL), who has been subject to enhanced DBS checks and is experienced in working with vulnerable children and adults.
- Acknowledging that we have a duty not only to protect service users from abuse but also to protect staff and volunteers that may lead to an allegation of abuse.
- Embedding a culture of safeguarding awareness and openness at all levels of the organisation. This includes encouraging and initiating regular conversations about workload and pressure within different staff and volunteer teams.
- Maintaining developed relationships and communicating promptly with local safeguarding boards and sources of safeguarding support, including but not limited to Camden Care Choices, Camden Safeguarding Children Partnership, Safeguarding Adults Partnership Board, Channel Panel, local mental health services, or local police.

## **7.3. Collaborating and Communicating**

- Listening carefully to service users, respecting their rights, wishes, and feelings, including with respect to the information they choose to share with us, and encouraging them to be frank and honest with us.
- Acknowledging that some people we work with are additionally vulnerable and/or may face a number of different types of harm or abuse. This includes refugees and asylum seekers who may be impacted by their past experiences, have a level of dependency on support organisations, have specific communication needs, have insecure immigration status, be at risk of detention and deportation, and/or at risk of reprisal.

- Approaching safeguarding situations in partnership with the individuals concerned, centering their experience, and collaborating with people who are important to them.
- Making it clear to our service users that we are an organisation designed to support vulnerable adults. Service users are welcome to bring their children to our service spaces or share our resources and assets with them if they so choose, but are ultimately responsible for their well-being and safeguarding at all times.
- Collaborating with our partner organisations in the refugee support sector to prevent, identify, investigate, and respond to alleged, suspected, or confirmed abuse.

#### **7.4. Training and Capacity Building**

- Providing ongoing training regarding the harms faced specifically by our target service user group, including but not limited to those listed above.
- Providing regular safeguarding training for staff and volunteers to boost their confidence and skill in identifying and responding to safeguarding situations.
- Providing training to staff and volunteers on unconscious bias, cultural competency, and intersectionality to ensure our safeguarding responses are not discriminatory.
- Ensuring that our safeguarding responses are trauma-informed, survivor-centered, and culturally sensitive.
- Involving individuals with lived experience of the asylum system in shaping and reviewing this safeguarding policy.
- Committing to recruiting and retaining a staff and volunteer team who reflect the community they serve.
- Ensuring that all staff and volunteers receive comprehensive safeguarding training at least once a year, which empowers them to understand signs of abuse, as well as tailored training relevant to safeguarding in their specific roles (including for Digital Champions, Runners, Techies, and Communications Volunteers).

#### **7.5. Safe Recruitment and Staff Conduct**

- Maintaining thorough and safe recruitment practices, including seeking references and obtaining Disclosure and Barring (DBS) checks where appropriate. Furthermore, substantial unsupervised access to service users is not allowed until DBS checks are received. All DBS checks are refreshed at least every three years (or sooner, according to contractual requirements).
- Ensuring the staff and volunteers we work with understand and implement Screen Share's safeguarding policy without exception.
- Defining clearly the purpose and boundaries of our relationships with service users and volunteers, only engaging with them on the very specific terms agreed in the Tech Agreement (service users), Programme Participation Agreement (service users), Volunteer Code of Conduct, and Staff Code of Conduct. Any derogation from these terms should be recorded through the normal safeguarding report process (see Appendix 1)
- Ensuring every staff member and volunteer is working in line with the relevant Code of Conduct, which includes but is not limited to accepting that staff and volunteers must not, when interacting with service users and each other, ask overly personal or intrusive

questions, including those about age or appearance; share material that could be considered offensive, which includes material on social media sites; take an aggressive or bullying tone; have physical contact; operate in line with this policy, Screen Share's privacy policy without exception.

- Consideration of referring staff and volunteers to the police if safeguarding concerns relating to working with vulnerable adults is evident.

## **7.6. Data Protection and Safeguarding Record Management**

- Recording, storing, and using data—especially data concerning the management of safeguarding situations—securely as we would treat the data of a donor. All interactions with individuals' data will, at the very least, be in line with data protection legislation and our privacy policy.
- Ensuring that staff follow the procedures set out in section 9 below with respect to safeguarding recording

## **7.7 Reporting and External Coordination**

- Reporting safeguarding events to the relevant party listed above and to the Charity Commission via email or phone in a prompt and comprehensive manner.
- Ensuring any safeguarding referrals make clear why we are making the referral, whether there is a need for urgent action, full details of the harm, abuse, or neglect, and information regarding tools and individuals concerned when making safeguarding decisions, including but not limited to risk assessments; and what we know of the individual's situation and capacity to access support.

# **8. Our Actions as Individuals**

Screen Share staff, volunteers and those who engage with our service commit as individuals to taking the following actions with respect to the prevention, identification and response to harm:

## **8.1 Individual Responsibilities in Safeguarding**

- Recognising that people without exception have the right to protection from abuse, regardless of age, gender, ethnicity, disability, sexuality, beliefs, sexual orientation, immigration status, and all other personal and protected characteristics.
- Acknowledging that charities can cause harm to the service users they seek to serve; and avoid complacency regarding this fact.
- Centering the individual in immediate responses to safeguarding situations and seeking iterative consent from the individuals concerned when managing one.

- Attending and taking seriously all training at Screen Share designed to support my ability to safeguard effectively, including but not limited to the safeguarding training which takes place once a year; preparing for, contributing to, and reflecting on the safeguarding training.
- Contributing to a culture of safeguarding awareness and openness across our staff and volunteer teams.
- Remembering that, in order to raise a safeguarding concern, we need only a reasonable cause to suspect harm is happening, rather than a certainty that it is. The balance of probabilities that harm is taking place is not relevant.
- Discussing these reasonable causes with the designated Safeguarding Lead and other relevant colleagues in a kind and confidential way.
- Proceeding with a spirit of collaboration at all points, within the team and service user group and when engaging with partner organisations.
- Having taken advice, act quickly and confidently to minimise any further harm or abuse.
- Asking questions about and suggesting improvements to our policy and protocol; put pressure on our DSL to constantly iterate and improve our approach and enactment of safeguarding.

## **8.2. Incident Reporting and Record Keeping**

- Recording safeguarding incidents in a way which is clear and comprehensive. This means including details of who is involved; the context in which the situation took place; any and all evidence is saved and included; details are factual and not a matter of opinion; the report is written and submitted without delay and with maximum accuracy.
- Recording and storing information securely, in line with data protection legislation and our Privacy Policy.

## **8.3. Decision-Making and Information Sharing**

- Establishing and regularly sharing the clear protocol that if any safeguarding concerns are raised, they are directed to the DSL.
- Ensuring that only our DSL makes decisions about information sharing and maintaining a clear log of the rationale for doing so.
- Only sharing information from the person at risk with their consent—unless doing so would place them at increased risk of significant harm.
- Communicating clearly to service users from the outset and throughout the relationship that Screen Share is committed to respecting their privacy and not sharing their information with other agencies without their consent, and that there are certain circumstances in which our commitment to the public interest may override the principle of consent, including but not limited to when:
  - There is an emergency or life-threatening situation.
  - Other people are at risk as a result of their actions.
  - Seeking consent could place the individual or others at risk.
  - Sharing the information could prevent a serious crime.
  - A serious crime has been committed.



- In such a case, exploring the reasons why an adult does not consent to sharing information regarding their safeguarding; reassuring and explaining the role of information sharing in the management of safeguarding situations, and in principle respecting their wishes subject to the exceptions listed above; informing them if their consent has been overridden and for what reasons.

## 9. What does this look like in practice?

The actions we take above as an organisation and individuals are designed to create a positive safeguarding culture and environment in which staff and volunteers can prevent, identify and respond to safeguarding situations.

We are nonetheless realistic and expect that safeguarding situations will arise. For that reason we include below an example of the process we would undertake

Being alert to the indications of abuse as defined above, if a Screen Share volunteer or staff has a reasonable cause to suspect harm or abuse is happening, they will;

- Make an assessment as to whether the vulnerable adult or child is in immediate danger. If the individual is in need of urgent medical attention, contact the ambulance service immediately by calling 999. If the individual is in danger, and consents to you doing so, call the police. If they do not, separate the individual from the source of harm as soon as possible. Raise this with the Designated Safeguarding Lead (DSL) as soon as possible.
- In a situation where a vulnerable adult, young person, child or adult discloses to you that they are being abused, raise this with the DSL who will make a decision regarding further action and referral.
- Not attempt to engage in further discussion which may put the individual concerned at further risk if handled inappropriately.
- Not ask questions or try to solve their issue, other than asking how they would like to proceed and whether they consent to information sharing.
- Hold space for the individual, reassure them that you understand and believe them.
- Remember that a disclosure may be direct, indirect, indicated through deliberate or inadvertent behaviour and may be non-verbal. It may concern a range of different types of abuses, including but not limited to abuse which is in nature emotional, physical, financial, sexual and domestic. The individual may not wish to share if they know that the information will be shared with the Designated Safeguarding Lead. That is their prerogative but you should help them understand that you are duty bound to share information with the DSL.

- Make clear and detailed notes for submission to the DSL via the agreed digital channel (submission of Safeguarding Reporting form - see Appendix 1), within 24 hours of the incident and in accordance with the principles set out in Section 7.6 above.
- Work with the DSL to refer the case to external agencies if appropriate and necessary and with reference to Section 7.2 above. If no further action is taken, the staff member or volunteer will continue to provide support to the individual, which may include signposting to other avenues of support. They will continue to monitor the individual with the safeguarding event in mind.
- Hold the DSL to account, ensuring that the referral has taken place and been accepted in accordance with this policy and the local authorities statutory duty.
- Attend external follow-up and multi-agency meetings as required.
- Ensure records of the case, including conversations, observations and reasons for decisions. This applies to all decisions irrespective of whether further action was undertaken.
- In a situation where the reasonable cause to suspect harm is taking place concerns a staff member, you should immediately inform the DSL and the investigation will follow Screen Share's disciplinary procedure. Abuse of service users is an act of gross misconduct and may also be a criminal offence. If you are concerned about the behaviour of the DSL, refer to and take action in accordance with Screen Share's Grievance Policy.
- In a situation where the alleged abuser is a service user, a risk assessment will be carried out and possible safeguarding measures introduced. Such service users should still be supported through Screen Share services, other than in extreme circumstances where the risk to others is too great.

## **10. Policy monitoring and review**

This policy is approved and endorsed by the trustees of Screen Share UK. It is reviewed on an annual basis, or more frequently if the relevant legislation or the activities of Screen Share change significantly. This responsibility is owned by the Designated Safeguarding Lead.

**Date of last review:** 17/02/2025

**Date of next review:** 11/02/2026

# Appendix 1



## Safeguarding Report

Fill out this report in the event of a safeguarding incident.

The Designated Safeguarding Lead will receive an automatic notification and respond within 48 hours.

Please give as much detail as possible.

### Your Details

Your Name

Your Role at Screen Share

Date and Time of Incident

### Details of Adult

Name of individual involved in Safeguarding incident

What is their age?

What is their nationality?

What is their ethnicity?

Which language/s do they speak?

Do they have additional needs?

### Details of the incident

Are you reporting your own concerns or responding to concerns raised nby some else?

Are there any other agencies involved with this client?

Please provide details of the incident or concerns you have, including times, dates, description of any injuries, whether information is first hand or on the account of others, including any other relevant details:

Please detail the person's account/perspective, if possible:

Provide details of anyone who witnessed the incident and/or who shares the concerns:

Has the situation been discussed with the Designated Safeguarding Lead?

Did you involve the police?

Did you involve Local Authority Adult Social Care?

Details of any further steps taken to provide support to individual, child and family and any other agencies involved: