



## **BRISTOL REFUGEE RIGHTS**

### **SAFEGUARDING: BOUNDARIES AND ACCEPTABLE BEHAVIOUR POLICY AND PROCEDURE**

#### **THE POLICY**

##### **1. PURPOSE**

1.1 Bristol Refugee Rights has a responsibility to ensure the safety of all those using, working and volunteering for us. Appropriate boundaries to professional relationships developed at Bristol Refugee Rights are vital to this.

1.2 Warmth, openness and trust have always been key to BRR's ethos and working practices. This policy aims to ensure that these continue, while recognising and safeguarding against the risks that can arise when the boundaries on appropriate relationships and behaviour are not clear.

1.3 These risks mostly stem from the imbalance in power and privilege between BRR members and BRR volunteers and staff; the high levels of need and vulnerability among BRR members; the differences in cultural understandings of relationships; and the fact that we operate in a busy environment with a high ratio of members to volunteers and volunteers to staff and with high numbers of new members arriving every week. Remote working also adds increased risk due to challenges associated with having oversight that work.

1.4 The purpose of this policy is to clarify the kinds of behaviour which are not appropriate within professional relationships between members and staff/volunteers at BRR, to layout a framework for dealing with the range of behaviours which, though appropriate in some circumstances, are not in others: i.e. laying out the factors which mitigate towards impartial, safe and sustainable behaviour.

##### **2. GENERAL PRINCIPLES**

2.1 Bristol Refugee Rights believes that:

2.1.1 Every BRR member has the right to use BRR services in an



environment that is safe;

2.1.2 Every member of staff, volunteer and trustee has the right to work/volunteer in a safe, supportive environment

2.1.3 Other visitors/partners of BRR also have the right to a safe environment when visiting or working with BRR

2.2 This policy sets out guidelines which aim to provide clear boundaries for relationships between staff, volunteers, trustees and members. These boundaries are intended to allow for positive, supportive, professional relationships within Bristol Refugee Rights services, while limiting the exposure of members, staff, trustees and volunteers to risks such as abuse, burnout and vicarious trauma. Furthermore the guidelines are intended to help ensure that all those using the BRR's services are treated equally and are safe.

2.3 Bristol Refugee Rights will not tolerate acts of harassment, bullying or victimisation by any member of staff, volunteer or member against either another member of staff, volunteer or member or against any other individual within BRR.

2.4 The aims of this Policy are to eliminate forms of unacceptable behaviour by:

- Promoting behaviour which keeps everyone safe
- Raising awareness of the effects of such behaviour
- Promoting an environment in which people feel able to raise complaints without fear
- Stopping unwanted or inappropriate behaviour
- Ensuring appropriate action is taken in response to inappropriate behaviour.

2.5 Those who are found to have broken these guidelines may be dealt with in accordance with the procedure outlined in BRR's Disciplinary Policy. Staff, volunteers and trustees may use BRR's Grievance Policy to raise a concern. BRR members may use the Complaints Policy.

2.5.1 Where appropriate/necessary a referral may be made to external agencies including police, DBS, LADO

2.5.2 Where appropriate/necessary BRR partner organisations may be informed of actions taken



- 2.6 We recognise that there is a wide range of behaviours which might be in breach of these boundaries and there may be factors which mitigate one way or the other as to the acceptability of the action. This policy should be followed with this in mind and with the primary focus of creating warm, welcoming services for asylum seekers, refugees and other migrants which are safe and sustainable for all involved.
- 2.7 We are aware that friendships are formed at BRR but in accordance with our Equity, Diversity and Inclusion Policy we expect staff, volunteers and members to treat everyone equally, fairly and respectfully.
- 2.8 Staff, volunteers and trustees should be particularly careful around issues involving young people and be particularly aware of maintaining professional boundaries when working with children and young people.

### **3. DEFINITIONS**

- 3.1 Professional Relationships:** a relationship between a service user (member) and employee/volunteer/trustee. Such a relationship should be impartial and respectful.
- 3.2 Boundaries:** the limits to the behaviour which is appropriate within a professional relationship.
- 3.3 Acceptable behaviour:** all actions consistent with BRR's aims of creating a warm and welcoming space for our members, which are also clearly within the boundaries of a professional relationship.
- 3.4 Unacceptable behaviour:** actions which are in clear breach of the boundaries to acceptable behaviour in professional relationships, which may put members, volunteers, trustees or staff at risk or which undermine the equal treatment of members or the sustainability of BRR work. Unacceptable behaviour is further defined below at 4.
- 3.5 Borderline behaviour:** a wide range of actions which, dependent on the circumstances might be considered either acceptable or unacceptable.



Factors affecting this include: risk assessments, the degree to which managers have been informed, the capacity of the organisation to support and supervise the activity. Borderline behaviour is further defined below at 5.

#### **4. UNACCEPTABLE BEHAVIOUR**

Unacceptable behaviours are those which are clearly outside the boundaries of a professional relationship. Unacceptable behaviour will normally lead to disciplinary action. The following list is not exhaustive and if staff are in any doubt they should consult with the Child Protection/Safeguarding leads or in their absence, the Head of Services/CEO.

Behaviour that is unacceptable at BRR and in the Welcome Centre includes:

- **Sexual contact/behaviour of any kind including when accessing remote/virtual services**
- **Inappropriate Personal Disclosure:** staff and volunteers must not divulge inappropriate personal information about themselves or other staff members.
- **Failure to disclose information about members to colleagues** where there is a need-to-know, such as:
  - Concerns about harm and/or abuse
  - Referrals to partner agencies
  - Existing relationships between the member and volunteer/staff member
- **Misuse of Money/Property:**
  - Money should only be given out by staff, not volunteers, and only in accordance with agreed policies
  - Property should only be distributed with the agreement of a member of staff and always in a way which is accessible and fair to all members, as far as possible.
  - Phone top ups or tech may only be purchased by volunteers in agreement with staff.
- **Giving out medicine:** no medical treatment other than first aid should be administered by staff, trustees or volunteers at BRR. No medicine, including paracetamol or aspirin, should be given out.



- **Creating a Relationship of Dependence:** Staff and volunteers have a responsibility to discourage **over reliance** of the service user on one employee/volunteer/trustee and to encourage and enable the member towards independence. Building trusting relationships can be positive for members and mean that they are able to disclose issues they would otherwise not be willing to. However, this must be balanced with the fact that dependent relationships create the possibility for the abuse of power. Some examples which have the potential for creating a dependence include:
  - Offering repeat appointments with the same staff/volunteer when another would be equally/more suitable
  - Encouraging service users to rely on one particular employee/volunteer unless in line with specific project activities e.g. CLEAR
  - Giving priority to a particular member/members, where there is no objective justification for the priority e.g. where the member has a compelling urgent need
  - Using the service user for the employee's emotional needs
- **Offering to look after children:** members should be encouraged to take their children to the Early Years Project (EYP). When not in the EYP, children are the responsibility of their parent/carer and children must remain under their parent's supervision at all times.
  - Volunteers, members and staff should not pick up, carry or otherwise engage in physical contact with children to whom they are not related unless given the express permission of the child's parent.
  - Parents must not leave their child alone in the main hall unless in exceptional circumstances and where such circumstances arise the child should only be left with a member of staff or EYP volunteer.
- **Offering accommodation to a member:** accommodation should only be offered to members via the appropriate channels, i.e. Bristol Hospitality Network or Refugee Welcome Homes.
- **Misrepresentation of role:** all staff and volunteers are responsible for ensuring that members and partner organisations are clear on their role and the limits to what they can or cannot do.



- **Offering advice:** BRR staff and volunteers must not offer advice, especially legal advice (unless within the boundaries of a particular project and trained to do so).
- **Fighting, violence, verbal abuse, substance misuse, theft, threatening behaviour,** any sign of **harassment** including sexual harassment, homophobic acts, **bullying, and victimisation.**
  - Detailed definitions of each of these behaviours can be found in Appendix 1.
- **Racism, hate crime, incitement to racial hatred, incitement to religious hatred**
- **The disclosure of confidential information about a member** without that person's express consent. This includes the fact that an individual is a BRR member (See Information Sharing and Disclosure Policy/Data Protection Policy).
- **Any other activity which would be in breach of our policies on Child Protection/Safeguarding Adults Policies**
- **Dressing inappropriately/dressing insensitively** when delivering remote or face to face services.
  - This includes joining virtual groups in a state of undress
- **Inappropriate digital communications,** including:
  - **Posting anything about BRR on social media** without prior agreement of the Fundraising & Communications Manager/the CEO
    - Including creating social media pages in the name of/on behalf of BRR
  - Joining virtual groups from the bathroom/toilet, or whilst in bed
  - Sending explicit messages/images to staff/volunteers/members

## 5. BORDERLINE BEHAVIOUR

**5.1** Some behaviour falls on different sides of the boundaries around appropriate behaviour depending on the context. Key mitigating factors will be outlined below. It is also important to note the specific context in BRR:

- Many volunteers have been involved a long time and have developed friendships, the rules and context of BRR has also changed much during this time.
- Many volunteers are also members, making the divide between



members who use services and those who provide them often unclear: relationships between non-member volunteers and member volunteers may raise the same issues as those between volunteers and members in general; relationships of various kinds between member volunteers and other members are highly likely and again trouble the divide between member and volunteer/staff member.

- Members may also be Trustees and this may particularly create a tricky situation as it places them in a position of power whilst they continue to be members. It may also change the relationship they have with other staff and Trustees with whom they will be both colleagues and service users.
- The situation is also complicated where members of staff have been members or are otherwise interconnected with the communities coming to BRR.
- However, BRR has a high number of new members arriving on an annual basis. Due to remote working, staff/volunteers may never have met members in person.
- It is no longer possible as it was in the early days for coordinators to know all members personally and be aware of those with particular vulnerabilities/support needs.

**5.2** The following types of behaviour are discouraged and may in certain circumstances be treated as unacceptable behaviour, once all relevant information has been taken into consideration:

**5.2.1 Socialising outside BRR role:**

- In general the difference in power and privilege between a member of BRR and a staff member or non-member volunteer is so great as to make healthy friendships difficult.
- The risk of abuse/exploitation in this relationship is also high.
- However, there are many instances where members and volunteers/staff/trustees (especially those staff/volunteers/trustees who are themselves members or former members) will find themselves in social situations, e.g. public meetings, places of worship, local cafes.
- In the early years of BRR, the culture of the organisation meant that many longer-standing members and volunteers developed long established friendships.



- A number of volunteers are also hosts with BHN and therefore often meet members through this role.

### **5.2.2 Accompanying to appointments:**

- In general this is not a service BRR offer, but may be offered by specific projects, subject to risk assessment and approval by the line manager
- In general, the risks to both members and volunteers/staff and the difficulty of supervision and support make it too difficult.
- However, in certain circumstances it may be deemed both necessary and appropriate for a volunteer/staff to accompany a member to an appointment, i.e. when:
  - The need is particularly great
  - The time, date, mode of transport, etc. have all been agreed with relevant staff and the risks assessed
  - Both the member and the volunteer/staff consent to the arrangements
  - Accompanying without the express permission of the appropriate staff member will be considered unacceptable behaviour.

### **5.2.3 Visiting member's homes/inviting them to your home:**

- In general, this will fall outside of the boundaries of a professional relationship, given both the potential risks and the likelihood of unequal treatment between members and will therefore be considered unacceptable behaviour.
- If the visit is social this may be acceptable where there is an established social connection outside of BRR. However in these circumstances, every effort should be made to keep line managers aware of these relationships.
- If the visit relates to BRR work this is not acceptable unless:
  - The need is particularly great (as assessed by a member of staff)
  - The time, date, mode of transport, etc. have all been agreed with relevant staff and the risks assessed
  - Both the member and the volunteer/staff consent to the arrangements
  - In these circumstances, visiting without the express





permission of the appropriate staff member will be considered unacceptable behaviour.

#### **5.2.4 Giving out personal phone number to members/befriending on social media:**

- This will only be appropriate in circumstances where there is an established social connection outside BRR services. Volunteers and staff must inform their project coordinator/line manager where this is the case.
- Staff/volunteers using their personal phones to contact members in emergencies should ensure that their number is withheld before making calls and should not send text messages from personal phones.
- Whatsapp groups may only be set up by staff and clear guidance should be provided to members before inviting them to join the group.

#### **5.2.5 Accepting or giving gifts:**

- In general this is to be discouraged
- If a member offers a gift to a volunteer or member of staff the first suggestion should be that this is not necessary, we are only doing our role.
- If a member insists on giving a gift this gift should be something for the Welcome Centre, i.e. chocolates or a practical gift/donation
- If, on an occasion such as a staff member/volunteer leaving or going on maternity leave, members wish to bring gifts there should be a suggested limit to their value of £5
- **It is never appropriate for a volunteer or staff member to give a gift to a member**

#### **5.2.6 Not respecting people's personal space and having physical contact with people other than family members.**

- This includes using hugging and kissing as a way to greet people and is discouraged.

#### **5.2.7 Staff or volunteers working significantly beyond hours or outside of their job description**

- Overwork and burnout is a significant risk to BRR's staff and volunteers and we want to discourage this. Working significantly



beyond contracted hours and/or responsibilities may lead to impaired judgement on boundaries.

- We encourage staff to seek support if they are feeling the need to work beyond their hours or outside of the job description without the fear that this would become a disciplinary matter.
- Staff are encouraged to keep a record of their hours to assist in identifying situations where support is needed.

#### **5.2.8 Expecting staff members or volunteers to be available to assist with emergencies (e.g. detentions) outside of opening/office hours**

- BRR's staff and volunteers are very committed and it is often the case, particularly in an emergency situation, that people are willing to help outside of their normal working hours or volunteering shift. However, this should not be expected/asked of people unless that person has given their express consent to being involved/contacted.

#### **5.2.9 Meeting outdoors**

- Meetings outdoors may only take place in accordance with lone working policy and Health and Safety Risk Assessments.

## **6. ROLES AND RESPONSIBILITIES**

### **6.1 STAFF**

**6.1.1** It is the responsibility of all line managers to ensure their staff have a full understanding of this policy and the responsibility of the volunteer coordinators/managers to ensure that volunteers have a full understanding of this policy. Each project holder is responsible for ensuring that their volunteers adhere to the requirements of this policy.

**6.1.2** Immediately a member of staff or volunteer thinks that there is a risk of a potential breakdown of their professional boundaries they must bring it to the attention of the line manager. If staff/volunteers feel a colleague is at risk of potential breakdown of professional boundaries then they too have a duty to protect both the service user and staff/volunteers, and should bring the matter to a manager. Existing personal relationships between staff/volunteers and members should be brought to the attention



of a manager.

**6.1.3** It is the responsibility of all staff to ensure that allegations are reported to the appropriate person in a timely manner. It is the responsibility of all staff to model appropriate behaviour and challenge borderline/unacceptable behaviour.

**6.1.4** Allegations of unacceptable/borderline behaviour against staff, Trustees and non-member volunteers will be dealt with in accordance with the Disciplinary Policy.

## **6.2 THE BOARD OF TRUSTEES**

**6.2.1** The Board of Trustees will be responsible for monitoring the use of this policy and overseeing the operation of the Grievance Policy, Disciplinary Policy and Complaints Policy.

## **6.3 SERVICE MANAGERS**

**6.3.1** In respect of allegations of unacceptable behaviour/concerns about borderline behaviour by members (including non-member volunteers), visitors or partners it will be the responsibility of the relevant Service Manager to determine whether the alleged behaviour amounts to unacceptable behaviour and deal with it accordingly. All instances will be dealt with on a case-by-case basis and the outcome will not set expectations of behaviour by others.

## **7. RELEVANT LEGISLATION AND POLICIES**

This Policy complements, and should be considered along with other BRR Policies:

- *Safeguarding Adults*
- *Lone Working Policy*
- *Child Protection Policy*
- *Equity, Diversity and Inclusion Policy*
- *Volunteer Policy and Volunteer Handbook*
- *Information Sharing and Disclosure Policy*
- *Data Protection and Confidentiality Policy*



- *BRR Response if Member is Detained*
- *Grievance Policy*
- *Disciplinary Policy*
- *Complaints Policy*

This Policy is informed by the following legislative requirements:

- *Equality Act 2010*

## **8. SCOPE**

**8.1** This policy applies to everyone at Bristol Refugee Rights including staff, volunteers, members, Trustees, partners and visitors.

**8.2** Relationships and activity which predates this policy but would now be ruled out by this policy should be considered on a case-by-case basis.

**8.3** BRR Members may also be classed as adults at risk so BRR's Safeguarding Adults Policy may be also relevant and this policy should be considered in light of the requirements of BRR's other safeguarding policies.

## **THE PROCEDURE**

The Definition of behaviour as Unacceptable will determine the response and action to be taken including the impact it will have on the person's continuing involvement with BRR. The policy will be summarised in a format understandable to members and volunteers and clearly advertised in the centre (see Appendix 6).

Every member, volunteer and staff member should be able to access appropriate and accessible information and support around BRR policies.

Instances of unacceptable behaviour will be dealt with in line with BRR's Disciplinary Policy.

## **9. UNACCEPTABLE BEHAVIOUR BY STAFF**



**9.1** Unacceptable behaviour by staff including bank/temporary staff will be dealt with in accordance with BRR's Grievance and Disciplinary Policies and Procedures.

**9.2** In accordance with the Grievance and Disciplinary Policies and Procedures Unacceptable Behaviour as defined by this policy may after investigation be classed as Gross Misconduct for which the consequence may be dismissal.

## **10. UNACCEPTABLE BEHAVIOUR BY TRUSTEE**

**10.1** Unacceptable behaviour by a trustee will be dealt with in accordance with BRR's Disciplinary Policy.

## **11. UNACCEPTABLE BEHAVIOUR BY NON-MEMBER VOLUNTEER**

**11.1** Unacceptable behaviour by non-member volunteers will be dealt with in accordance with BRR's Grievance and Disciplinary Policies and Procedures.

**11.2** In accordance with the Grievance and Disciplinary Policies and Procedures Unacceptable Behaviour as defined by this policy should be classed as Serious Misconduct resulting in suspension pending investigation and may result in dismissal from volunteering duties.

## **12. UNACCEPTABLE BEHAVIOUR BY MEMBER VOLUNTEER/MEMBER**

**12.1** Unacceptable behaviour by member volunteers and members will be dealt with in accordance with the procedure set out at Appendix 2.

**12.2** In accordance with the procedure at Appendix 2 behaviour which is classed as Unacceptable Behaviour as defined by this policy should be classed as at least requiring a warning and period of Exclusion.

## **7.9 UNACCEPTABLE BEHAVIOUR BY THIRD PARTY E.G. PARTNER/VISITOR**

**7.9.1** Unacceptable behaviour by a third party will result in the third party be asked to leave immediately pending an investigation. An investigation will be carried out by the relevant Service Manager (in consultation with



the Head of Services if necessary) who will decide whether to uphold the allegation. If the allegation is upheld the third party will be informed that they are permanently excluded from BRR and the Welcome Centre.

7.9.2 If the person was visiting the Welcome Centre in their work capacity their employer will be informed of the reasons for exclusion.

## **7.10 INVOLVEMENT OF THE POLICE WHERE BEHAVIOUR MAY AMOUNT TO A CRIMINAL OFFENCE**

7.10.1 Where behaviour referred to in this policy may amount to a criminal offence the alleged victim will first be consulted on whether they wish to refer the matter to the police. If they do wish to refer the matter to the police they should receive the support of staff in doing so if needed. It will be the decision of the CEO in consultation with staff and the Board of Trustees if necessary as to whether to refer matters to the police where the alleged victim does not wish to do so. This decision will be taken in accordance with requirements of the Child Protection and Safeguarding Adults Policies. All incidents of significant harm/hate crime will be referred to the police. We will also report matters to the police in all cases where there is a duty to report.

## **7.11 MEMBERS WITH CONVICTIONS**

7.11.1 To ensure the safety of our members, staff and volunteers people applying for jobs at BRR or to volunteer at BRR are asked to disclose convictions as part the recruitment process – this process is dealt with under a separate policy. From time to time staff, volunteers or members may become aware of alleged offences committed by members. These concerns should be raised with the Service Managers. A Service Manager will investigate and will act accordingly. If the allegations are confirmed then a risk assessment will be carried out to ensure the safety of all using BRR.

7.11.2 We are committed to the fair treatment of our staff, volunteers and members, regardless of race, gender, religion, sexual orientation, age, disability or offending background. In rare cases the decision as to whether a member should be barred from BRR services will be taken on



a case by case basis and the decision will be made by the Service Manager and the Head of Services.

## **7.12 ACTIONS TO BE TAKEN BY STAFF REGARDING CONCERNS ABOUT MEMBER BEHAVIOUR**

7.12.1 If BRR staff become aware of any activity about which they are concerned and/or which may fall under the Safeguarding or Child Protection policies, the staff member should enter details about the incident in Lamplight and email other staff to inform them a record has been created. If there is a matter which other members of staff need to know about urgently such as a serious safety concern, a text message should be sent to the relevant staff members immediately.

## **7.14 IMPLEMENTATION AND MONITORING**

**7.14.1** All existing volunteers and staff will be given a copy of the summary of this policy (appendix 6) and asked to agree to comply with it.

**7.14.2** All new volunteers, trustees and staff will be given a copy of the summary of this policy (appendix 6) and asked to agree to comply with it.

**7.14.3** It will be the responsibility of project holders to ensure that their volunteers are acting in line with this policy – debrief meetings, one-to-ones, and team meetings will provide opportunities to check and remind volunteers of their responsibilities.

**7.14.4** Where a staff member, trustee or volunteer becomes aware of behaviour which may breach the child protection/safeguarding adults they must report this in line with reporting process set out in those policies.

This policy will be reviewed annually by the Staffing Sub-Committee.

Date of last review: November 2023



## Appendix 1 – Detailed definitions of certain types of behaviour

**Fighting:** Includes where an individual has threatened to or has physically assaulted another individual whilst on BRR premises.

**Violence:** Includes where an individual has acted or threatened to act violently whilst on BRR premises (for example kicking doors, throwing tables).

**Verbal abuse:** Includes where an individual is verbally abusive to another individual whilst on BRR premises (including for example using racist or sexist language, swearing).

**Substance misuse:** Includes where an individual is under the influence of drink whilst on BRR premises. These instances are dealt with in accordance with the Smoking, Drug and Alcohol Policy.

**Theft:** Includes where an individual dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it.

**Harassment:** The definition of harassment used in this Policy is based on the definition used in anti-discrimination legislation.

Harassment is defined as:

- Unwanted conduct that has the purpose or effect of either violating another person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.
- Harassment does not need to be deliberate; it can be unintentional. A single incident may constitute harassment whilst in other circumstances repeated or sustained incidents may become harassment.
- Harassment may be related in some way to one of the following grounds: gender; gender identity or gender reassignment status; sexual orientation; race (which also includes colour, nationality, national origin or ethnic origin); disability; religion or belief (or lack of a religious belief); age; marital status, civil partnership or relationship status; pregnancy status, parental or carer status; part-time employment or study status; fixed-term contract status, or trade union membership status/activities.





- Harassment that is targeted at an individual or group of individuals may occur on the grounds of:
  - A person's actual personal characteristics
  - A person's perceived personal characteristics
  - A person's link to one of the personal characteristics via someone else
- The perceptions of the complainant and person whose behaviour is being complained about will be taken into consideration but whether or not the behaviour amounts to harassment will be objectively assessed.
- Examples of harassment include:
  - Unwelcome physical contact
  - Unwelcome verbal conduct
  - Intrusive questioning
  - Unwelcome written, visual or physical interaction
  - Non-verbal conduct
  - The deliberate exclusion of an individual from an activity
  - Oppressive or bullying behaviour which is linked to a personal characteristic of the complainant

**Sexual harassment:** The definition of harassment will cover some cases of sexual harassment, however the following is a specific definition of sexual harassment:

“Unwanted verbal, visual, or physical conduct of a sexual nature, or other conduct based on sex, which affects a person's working or learning conditions or creates a hostile or humiliating working or studying environment for that person.”

**Bullying:** Offensive, intimidating, malicious or insulting behaviour which intentionally or unintentionally undermines, humiliates, denigrates or injures the recipient. Bullying may be obvious or it may be more covert. Bullying does not need to be deliberate; someone may demonstrate bullying behaviour which falls within the above definition, without intending to.

- Bullying is normally characterised by the emergence of a pattern of behaviour but a single incident, if serious enough, could amount to bullying behaviour.

Examples of bullying:



- Verbal abuse or threats
- Steps taken to make someone's working life unreasonably difficult
- Intimidating behaviour
- Making threats or comments about job security without foundation
- Unwarranted disparaging, ridiculing or mocking comments and remarks
- Physical violence or an explicit or implied threat of violence
- The deliberate exclusion of an individual from activities

**Victimisation:** involves treating someone less favourably than other people because that individual has:

- made, in good faith, a claim of harassment or bullying
- suggested or complained that, in some other way, he/she has, or may have been, discriminated against, bullied or harassed or that the BRR's equal opportunities policies have, or may have, been breached in some way
- helped some other person who is making such a claim, perhaps by providing evidence or some other form of support to that other person

Examples of victimisation:

- penalising someone for making a complaint of discrimination, harassment or bullying.
- excluding a person from work-related activities or conversations in which they have a right or legitimate expectation to participate because they have made a complaint of discrimination, harassment or bullying.
- creating a difficult or oppressive environment for an individual because they have made a complaint of discrimination, harassment or bullying.

**Threatening Behaviour:** includes intimidation or [intentional](#) behaviour that causes another person to [fear injury](#) or [harm](#).



## **Appendix 2 – Procedure for dealing with Unacceptable Behaviour by Members/Member Volunteers**

### **Recording incidents :**

When a member of staff or volunteer is concerned about the behaviour of a member they should feel able to take interim action to keep themselves safe and not be subject to abuse (this could include for example ending a phone call, meeting). If any incident occurs they should talk to their line manager as soon as possible to establish what follow up action should be taken.. If the member's behaviour is unacceptable/inappropriate then the staff member will:

- 1) Write in Red Flag to their Lamplight profile** with a very brief description of what happened, e.g. verbally abusive to staff. **Write a summary** on to Lamplight as a safeguarding casenote
- 2) Inform Projects staff**
- 3) If it is decided necessary tell other appropriate agencies** so they are aware of the incident (for example Borderlands/BHN).

If a member of staff has been told by another agency that a member is known to have a history of violence, they should inform the Service Managers and Head of Services who will decide if and how this information is to be acted on. Others should be informed on a 'need to know' basis. An individual risk assessment should be carried out

### **Actions following an incident:**

All incidents of concern (including both unacceptable and inappropriate behaviour) to a member of staff should be recorded. Actions which the staff member can take forward with the member concerned include:

- 1) Nothing** – The incident is recorded, and the member is informed but no action is taken with the member.
- 2) Blocking** - Block someone from calling your personal number pending a wider conversation about whether they are still permitted to call Helpline. Individuals should only be blocked from calling the Helpline with permission of the Head of Services and having established with the individual other ways that they can access help/support.



- 3) **Warning** – Service Manager talks to the member about the incident reminding them what types of behaviour are inappropriate/unacceptable at BRR. The member can be shown/sent posters which clearly explain this. A warning can be given by email/letter. See appendix 3 and 4
- 4) **Exclusion** – The member is asked to not to come to the Welcome Centre/attend BRR activities for a certain amount of time and / or until a condition is fulfilled. See appendix 3 and 4.
  - Substance abuse (drink or drugs), the member must leave the premises immediately and is excluded for the rest of that day.
- 5) **Apology** - Following an exclusion the person concerned will be asked to apologise and take responsibility . See appendix 5
- 4) **Permanent Exclusion** – The person concerned is no longer be welcome in to the Centre/BRR services. This decision will be made by the Service Managers after consultation with staff as appropriate.

**NB:** Unacceptable Behaviour should be classed as at least requiring a warning and period of Exclusion.

If a member is suspended or excluded from BRR the Service Managers may seek some other form of support service for that person through BRR's partner agencies or statutory services.

#### **Communication of actions taken :**

If a member is suspended or excluded they will be given a standard letter from BRR explaining why the action has been taken, for how long, and what the consequence of further examples of unacceptable/inappropriate behaviour will be. This should be translated if possible and if not an interpreter should be found to explain the action.

#### **Decision making and team consultation:**

Decisions to suspend or exclude a member from BRR should not be made lightly. However, Bristol Refugee Rights also has a duty to protect other



members staff and volunteers. The Service Managers are responsible for making sure that incidents reported by staff or volunteers are acted on, by talking with those people involved.

It is not necessary for all members of the team to be consulted about every incident. However the Service Managers, through team meetings and supervision, will endeavour to remain aware of staff member's general views and feelings in such incidents. Any member, volunteer or member of staff who is affected by such an incident will be offered de-briefing support, including one-to-one sessions as needed.

Coordinators will ensure that volunteers affected by violent or aggressive incidents have the opportunity to de-brief on their experience. Care will be taken not to discuss such incidents/individuals in forums with people who are unaffected by the incident.



**Appendix 3 – Notes to staff on issuing Warnings and Exclusions to members who break our Safety and Well-being Guidelines**

1. Give one to the member and casenote
2. Give the member a copy of the guidelines as a reminder/explanation
3. Make sure it is clear whether it is a warning or exclusion and DATE the notice!
4. Inform the Safeguarding leads and other staff email or text
5. Ensure follow up for enforcing exclusion



## Appendix 4 – Warning and Exclusion Letter

Dear (full name) .....

On (date).....you broke the Safety and Well-Being Guidelines of Bristol Refugee Rights as follows:

### **This is a formal warning**

If you break the rules of BRR again (see below) we will exclude you from accessing BRR services and activities for a minimum of 7 days. You will be asked to apologise to anyone you have abused and to BRR for breaking the rules before returning.

### **This is an exclusion notice**

You have broken the rules after a formal warning, and you may not access BRR services for        days, i.e. until ...../...../..... We also ask you to apologise to those you have abused, and to BRR through one of the Coordinators **before** returning.

(delete as appropriate)

Name ..... Signed .....  
Date ...../...../.....

Warning Date	Exclusion Date	Return date
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## **Appendix 5 – Draft Member Agreement re-commitment**

Bristol Refugee Rights (BRR) Welcome Centre is a safe space for everyone. At BRR/the Welcome Centre we treat all our members with respect and we ask and expect the same behaviour from all our members.

I have read and understand the rules of acceptable and appropriate behaviour at BRR/the Welcome Centre. I understand that the rules apply to everyone who comes to BRR/the Welcome Centre.

I understand that if I do not observe the rules of acceptable behaviour while I am at BRR/the Welcome Centre, then I will be asked to leave again.

Signed.....

Date.....





## Appendix 6 Boundaries Policy Summary – for members and volunteers

This policy aims to: 1) Keep everyone at BRR/in the Welcome Centre safe; 2) Give some clear rules about what not to do; 3) Maintain the warm, welcoming spirit of BRR; 4) Ensure that members are treated equally and impartially; and 5) Not set up expectations that we are unable to keep

### **Unacceptable Behaviour:**

For staff or volunteers to do things which could put members or volunteers at **risk of harm or abuse**, or which **treats members unequally** is never ok. This will result in disciplinary action for the staff member or volunteer and includes:

- Any sexual contact/behaviour
- All harassment, bullying, theft, violence or discrimination
- Giving out money
- Offering accommodation (except via BHN, Refugees at Home, or similar organisations)
- Failing to pass on information about possible abuse of a vulnerable person

### **Borderline Behaviour:** *If you are ever unsure, check first*

Because people at BRR know each other in different ways, there are some things which might be ok in one situation but not in another. For example: a volunteer who hosts a member through BHN or a volunteer who goes to the same church, mosque or community group as a member.

These kinds of connection must be taken into consideration. However, this does not mean that we should ignore behaviour which would otherwise not be ok.

Behaviour which is not normally appropriate between a staff member/volunteer and a member, but may be acceptable in some circumstances – for example where there is an established connection outside the Welcome Centre – includes:

- Giving out personal telephone numbers
- Befriending on social media
- Home visits between members and volunteers/staff
- Breaching confidentiality – sometimes this is necessary to support members and keep them safe



If you have a connection like this with a member you should inform your line manager or the volunteer manager.

Sometimes there is a need for a member to have extra support which is not offered to other members. This should be agreed with staff in advance to assess risks and includes:

- Accompanying members to appointments
- Offering lifts to members

*If you are ever unsure, please speak with, (in person, email, text or call) a Coordinator*

### **Member Volunteers**

Because member volunteers may both be using and delivering the services at BRR they are in a more complicated position than other people at the Welcome Centre. They are more likely to have established social connections with members than other volunteers. They are also more likely to establish social relationships with other volunteers than most members. Differing cultural expectations may also lead to accidental incidents of inappropriate behaviour. Any disciplinary action around unacceptable behaviour would take into account their particular position within the Welcome Centre.

What happens when these rules aren't followed?

1. A meeting:

The first step would be a meeting between the volunteer and the volunteer manager. This would usually be quite an informal chat to find out what has happened and explain how and why any rules were broken.

In a case of a more serious concern, for example if we were worried that a volunteer was putting themselves or others at risk, this meeting would be more formal. This would be made clear to the volunteer and they would be invited to bring along a friend to support them if they wished.

2. Follow up action:

Following the meeting the volunteer would be informed of any steps which need to be taken. This might include:

- An agreement that a particular behaviour will not happen again

This would be made clear to the volunteer and reviewed after a period of time to ensure that good professional boundaries are being maintained

- A period of time off/break from volunteering

Reasons for a period of time off could include any or all of the following: to allow the volunteer time away from the welcome centre to de-stress or reflect on things; to allow time for staff to look in to the issue in more depth; to allow time to decide on the appropriate next steps.



- Termination of the volunteer's role at BRR

In the case of a serious concern about a volunteer's behaviour it may be necessary to require a volunteer to stop volunteering at BRR. This would be done in circumstances where there is a potential risk to members, the organisation or the volunteer themselves posed by their continued volunteering. In cases of serious risk, we may be required to inform other organisations about what has happened.

BRR members are at the heart of this policy

The primary purpose of this policy is to ensure that members are treated fairly, kept safe and to give some clear guidelines for volunteers to follow. Where the policy is broken the response will always be with these aims in mind.

Any disciplinary actions will be decided to be taken on a case by case basis. Every effort will be made to resolve the issue in a satisfactory way for all involved. Needs of members and the organisation as a whole will ultimately take priority.

If a volunteer feels unfairly treated in respect of this policy they can appeal to the CEO or the Board of Trustees. A full copy of the volunteer policy and the organisation's grievance and disciplinary policy are available on request.

**\*This summary sheet does not cover all the issues and volunteers/staff should refer to the full policy or their line manager if unsure about what to do.**