

Safeguarding Policy

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Contents

1. Purpose	3
2. Scope	3
3. Other Relevant Information.....	3
3.1. Legislation and Guidance	3
3.2. Other Policies and Procedures	Error! Bookmark not defined.
4. Roles and Responsibilities	4
4.1. Safeguarding is Everyone’s Responsibility.....	4
4.2. Designated Safeguarding Officers (DSOs).....	4
4.3. The Designated Safeguarding Lead (DSL) and Deputies.....	4
4.4. Trustees	5
5. Training, Learning and Development.....	5
5.1. Distributing This Safeguarding Policy	5
5.2. Induction	6
5.3. Safeguarding Learning and Development for Staff.....	6
5.4. Safeguarding Training for Designated Safeguarding Officers.....	7
5.5. Safeguarding Training for the Designated Safeguarding Leand and Deputies.....	7
5.6. Safeguarding Training for Specific Roles.....	7
6. Sharing Safeguarding Information.....	8
6.1. Information Sharing within Likewise.....	8
6.2. Information Sharing Externally.....	8
6.3. Safeguarding Records.....	8
7. Procedures for Safeguarding Concerns.....	9
7.1. Responding to an Emergency.....	9
7.2. Responding to a Non-Emergency Safeguarding Concern	9
7.3. Procedures for Responding to a Safeguarding Report (DSOs/DSL & Deputies)	10
Appendix 1: Procedure Flowchart for Responding to a Safeguarding Concern.....	12
Appendix 2: Procedure Flowchart for Responding to a Safeguarding Report	13

Appendix 3: Key Contacts for Safeguarding..... 14



1. Purpose

This policy is to provide an outline of Likewise's commitment to safeguarding and detail how we uphold our responsibility for safeguarding people in our community. This policy should create transparency around this and allow us to be held accountable for putting it into practice.

2. Scope

This policy applies to everyone working for or with Likewise, including Trustees, staff, placement workers and volunteers – hereafter for ease, they will be called 'staff'. It is expected that this policy will be read, understood and applied by all staff.

Everyone has a right to equal protection from all types of harm or abuse, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, identity, or any other difference. This policy will be applied equally to everyone regardless of these characteristics.

3. Other Relevant Information

3.1. Legislation and Guidance

Our safeguarding policy is underpinned by English law and statutory guidance which includes:

- * Charity Commission Safeguarding Guidance 2019
- * Data Protection Act 2018 and the GDPR 2018
- * Safeguarding Vulnerable Groups Act 2006
- * Care Act 2014
- * Care & Support Statutory Guidance 2021
- * Mental Capacity Act 2005
- * Protection of Freedoms Act 2012
- * Counter Terrorism and Security Act 2015
- * Sexual Offences Act 2003
- * Serious Crime Act 2015
- * Female Genital Mutilation Act 2003
- * Modern Slavery Act 2015

4. Roles and Responsibilities

4.1. Safeguarding is Everyone's Responsibility

Everyone working for or with Likewise is responsible for safeguarding. All staff must:

- * Read and apply this Safeguarding Policy
- * Be aware of our position of trust and our duty to our community
- * Be alert to potential signs of abuse or neglect and to possible risk posed by people
- * Respond to any safeguarding concerns, however small they may appear, in line with the expectations of their role at Likewise

4.2. Designated Safeguarding Officers (DSOs)

Wellbeing Support Workers are named DSOs at Likewise and have operational responsibilities for safeguarding including:

- * Promoting a safeguarding and listening culture across Likewise
- * Maintaining awareness of changes in safeguarding both at Likewise and in the local multi-agency arrangements for safeguarding
- * Providing advice and support on safeguarding matters for staff
- * Managing individual safeguarding cases including make decisions about individual cases, seeking specialist advice, referring to police or social care when necessary, working with external agencies on safeguarding cases, escalating concerns if required and managing record keeping
- * Alerting the Designated Safeguarding Lead (DSL) to any safeguarding concerns relating to allegations against staff; poor practice concerns, staff training needs or any other matters relating to the management of safeguarding at Likewise

4.3. The Designated Safeguarding Lead (DSL) and Deputies

The Co-Director (Services) is the named DSL at Likewise, and the Community Lead, Learning Programme Lead and Core Teams Lead are named deputies. They have operational and strategic responsibilities for safeguarding across Likewise, including those of the DSOs (see section 4.2) in addition to:

- * Keeping up to date with changes in safeguarding law and best practice
- * Identifying emerging themes in safeguarding across Likewise
- * Developing the safeguarding policy and procedure, ensuring it is reviewed annually, implementing it and monitoring how it is delivered
- * Implementing related procedures such as Code of Conduct, Whistleblowing and Safer Recruitment
- * Ensuring effective safeguarding systems are in place, including secure recording systems, recruitment processes, appointing DSOs
- * Setting out required safeguarding induction and training, ensuring this is provided and keeping a record of attendance

- * Providing advice and support on safeguarding matters to DSOs and other staff
- * Overseeing the work of the DSOs
- * Managing and responding to safeguarding allegations against staff or poor practice concerns
- * Leading enquiries when required by the local authority
- * Reporting to the trustee board each quarter about the level of safeguarding risk within our risk register

4.4. Trustees

The Trustees are ultimately responsible for the governance of safeguarding at Likewise, ensuring that the organisation is legally compliant and that it is delivering services safely. This includes ensuring:

- * A culture of safeguarding exists at Likewise whereby people can raise concerns and feel supported
- * A Safeguarding Policy and Procedure is in place which is annually reviewed, available to and applied by all; Code of Conduct and Whistleblowing policies are in place
- * Safeguarding concerns are managed effectively; systems are in place for its management; there is resourcing of safeguarding including for training; a DSL is appointed whose role is stated in their job description
- * A Lead Safeguarding Trustee maintains regular contact with and supports the DSL
- * Safeguarding risk is included in the risk register, and remedial actions are identified and progress tracked
- * The Chair undertakes enquiries in the event of an allegation made against one of the Directors
- * Compliance with the Charity Commission serious incident notification requirements, and requirements of other relevant bodies such as regulators, commissioners, grant-makers and insurance companies

5. Training, Learning and Development

5.1. Distributing This Safeguarding Policy

This policy will be made available at induction, saved for everyone to access on the Slack policies channel and a copy will be placed on Likewise's website. Staff will sign to say that they have read and understood this policy and are able to apply it when needed before conducting any lone work with adults at risk, or within two weeks of their start date, whichever is sooner. A record of this will be held centrally by the Office Manager.

When an update is made to this document, this will be distributed to all staff via the Slack policies channel and staff should confirm that they have read and understood it within two weeks of receiving it. The central record will be updated accordingly.

5.2. Induction

All staff will receive a copy of this policy at induction, along with a briefing that covers:

- * The definition of safeguarding, including how to define an “adult at risk”
- * How to identify abuse and neglect, including the different categories and signs and indicators that these might be taking place
- * How safeguarding concerns may arise at Likewise
- * What their role is in relation to safeguarding at Likewise
- * What to do if they think they have identified a safeguarding concern, or if a concern is disclosed or escalated to them
- * Recording safeguarding information

5.3. Safeguarding Learning and Development for Staff

Within 6 months of starting their role, all staff will attend an extended workshop on Safeguarding Adults and Children. This will include a deeper look at and conversation about the topics covered at induction (see section 5.2) and:

- * Why safeguarding matters and the aims of safeguarding
- * Barriers to speaking out about and hearing safeguarding concerns
- * The six principles underpinning adult safeguarding work – empowerment, prevention, proportionality, protection, partnership and accountability – and how we embody these at Likewise
- * How their role in safeguarding fits with the roles of others at Likewise and in the wider multi-agency safeguarding landscape
- * How safeguarding decisions are made at Likewise
- * The legislation and guidance underpinning safeguarding and where to find these
- * Best practice in safeguarding
- * Managing our own emotional responses to safeguarding concerns

All staff will be updated and refreshed on safeguarding, including any changes to this policy, at least annually. Regular learning and development spaces including reflection, supervision and team meetings also provide opportunities for staff to develop their knowledge, skills and practice in safeguarding.

5.4. Safeguarding Training for Designated Safeguarding Officers

Staff named as DSOs will receive additional training on managing adult and child safeguarding within 3 months of starting this role, which will include:

- * The purpose and importance of the DSO role
- * Making decisions about safeguarding
- * Responding to concerns and disclosures, including making safeguarding referrals
- * The inter-agency process and importance of partnership working
- * Consent, confidentiality and information sharing
- * The emotional impact of working with safeguarding, and how to support ourselves and others with this
- * Individual values and beliefs and organisational values and approaches in the context of safeguarding, and the impact these can have
- * Promoting a safeguarding culture

5.5. Safeguarding Training for the Designated Safeguarding Lead and Deputies

Staff named as DSLs or Deputy DSLs will also receive training on managing adult and child safeguarding within 3 months of starting this role, which will include topics covered at DSO training (see section 5.4) in addition to:

- * The purpose and importance of the DSL/Deputy DSL role and key responsibilities
- * Leading or contributing to safeguarding enquiries
- * Managing and responding to allegations against staff
- * Adult abuse investigation process (Section 42 Enquiry – Adults at Risk)
- * Principles of the Mental Capacity Act 2005
- * Deprivation of Liberty Safeguards (Liberty Protection Safeguards as of 01/04/22)
- * The interaction of safeguarding with different Safeguarding Arrangements (e.g., MARAC, MAPPA, Prevent Duty, FGM Duty, etc.)
- * Criminal offences and safeguarding

5.6. Safeguarding Training for Specific Roles

Staff who lead on or take part in recruitment must attend a briefing or induction into 'safer recruitment' and understand safer recruitment best practice.

The Lead Trustee for safeguarding will receive training to be able to fulfil their safeguarding governance responsibilities within 6 months of starting the role and will be updated and refreshed every two years.

6. Sharing Safeguarding Information

6.1. Information Sharing within Likewise

All information about safeguarding concerns must be shared internally with the DSOs and DSL at Likewise. It is important to remember that client confidentiality is never held by an individual member of staff, but by the organisation, so all information can be shared internally within Likewise. A key principle in safeguarding at Likewise is that safeguarding decisions should not be undertaken alone and should be discussed within the safeguarding team.

6.2. Information Sharing Externally

We will apply the law on confidentiality and information sharing when sharing information about service users with external agencies.

Service users have a right to expect that their personal information is not shared with other agencies without their consent and that they are asked what they would like to happen when information may be shared. This principle is important to support service users to develop trusting relationships with Likewise and help them to engage openly when using our services. There are exceptions to this, and information may legally be shared without consent in certain circumstances. In these instances, confidentiality is not offered absolutely, and we have a duty to make reports and share information. Circumstances where this applies include:

- * When an adult is at risk or has experienced abuse/neglect
- * Where they do not have mental capacity to consent or make decisions
- * Where seeking consent could place them or others at risk
- * Where there has been an allegation and seeking consent may mean the detection of the crime may be jeopardised
- * Where a crime has been committed

If information cannot be shared because consent has not been given and the above does not apply, staff should work in a person-centred way to support the client, e.g., with advice, signposting and guidance. Further opportunities to discuss matters, including concerns about safeguarding and to share information in future should be given.

6.3. Safeguarding Records

Recording is a key task in safeguarding practice, and it includes recording concerns, decisions, actions and reasoning. Records may be used in future legal proceedings and be accessed by all parties to proceedings and be scrutinised.

Safeguarding records should be made on the service users' notes on Views, using the Safeguarding questionnaire. All staff receive training on best practice for recording safeguarding information at induction.

Likewise has a data protection policy which sets out procedure for data retention and storage guidelines. Refer to this policy for more information on this and how to manage/hold records.

7. Procedures for Safeguarding Concerns

7.1. Responding to an Emergency

If emergency support is needed (i.e. there is imminent serious risk to anyone) follow these steps immediately:

1. Ring 999 and ask for the emergency service required - police and/or ambulance and/or fire department.
2. As soon as possible once emergency services have been involved, follow the steps below (section 7.2) for non-emergencies

7.2. Responding to a Non-Emergency Safeguarding Concern


For safeguarding concerns that are not emergencies, follow these steps:

1. Speak to a DSO (Wellbeing Support Worker) about your concern, however minor it may seem. This should be done on the same day that you identify the concern or immediately afterwards. If a DSO is not available, you should contact the DSL or deputies (Co-Director for Services, Community Lead, Learning Programme Lead or Core Teams Lead) and they will carry out the responsibilities of the DSO for the remainder of this procedure.
2. The DSO will talk through and clarify the concerns and relevant background and will make decisions about the next steps to take (see section 7.2). If they ask you to do anything, you must follow this action and include this in your notes.
3. Record all relevant details on the safeguarding form on VIEWS, including how the concern came about, who you have passed it on to and any actions or decisions that have been taken.
4. Consider your own wellbeing after responding to a potential safeguarding concern and use support structures such as supervision and check-ins with other staff as needed. The DSO will debrief staff and offer support and supervision during and after any safeguarding incidents.
5. If you have raised a safeguarding concern with the DSO which you think has not been referred to an external agency when it should have been, you should raise the matter with the DSL or deputies. If they also decide not to refer, any staff member can make the referral themselves to an external agency but must inform the DSL that they have done so.

7.3. Procedures for Responding to a Safeguarding Report (DSOs/DSL & Deputies)

When a safeguarding report is made to a DSO, the DSL or deputies they will follow these steps:

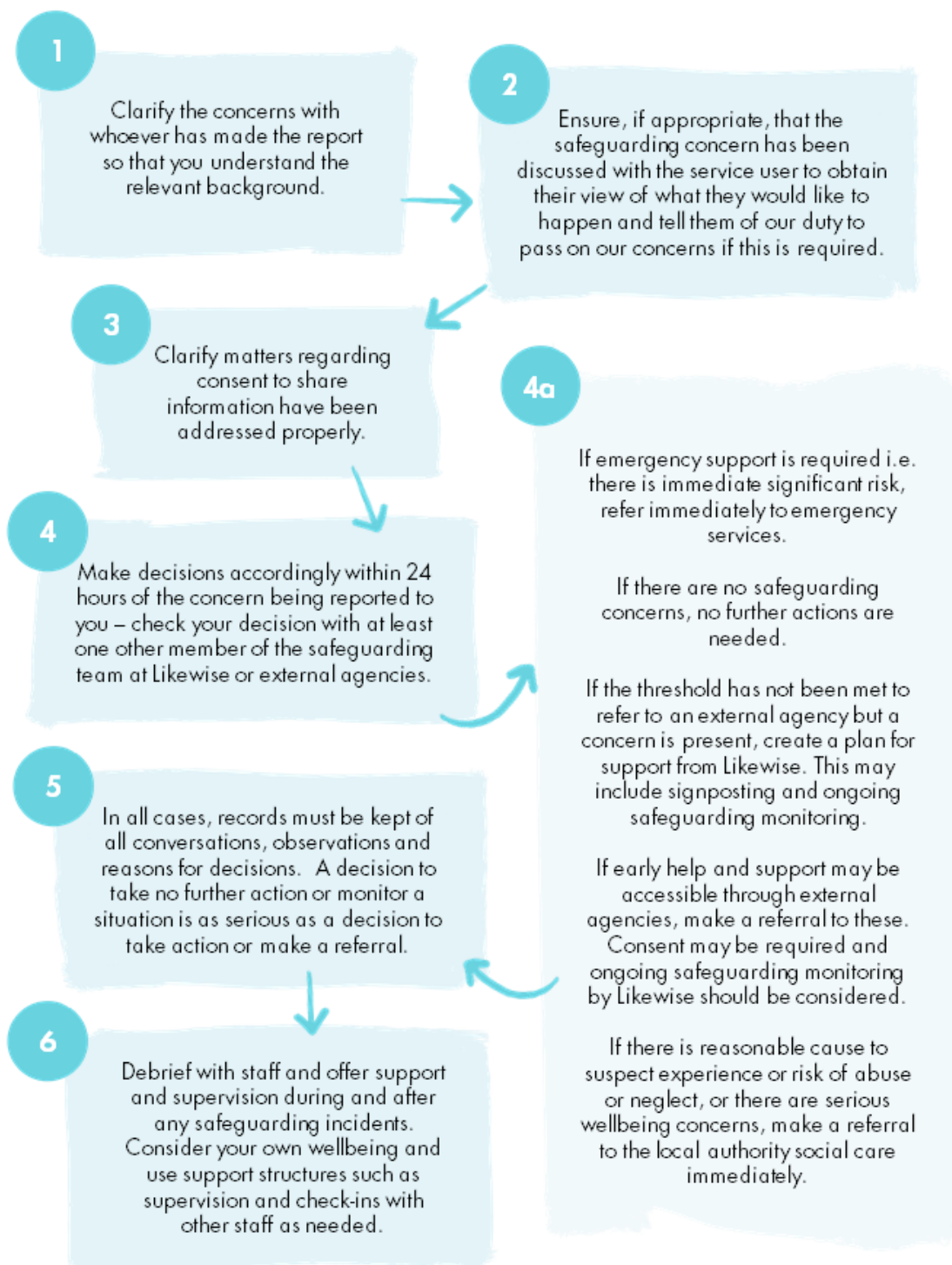
1. Clarify the concerns with whoever has made the report so that they understand the relevant background.
2. Ensure, if appropriate, that the safeguarding concern has been discussed with the service user to obtain their view of what they would like to happen and tell them of our duty to pass on our concerns if this is required.
3. Clarify matters regarding consent to share information have been addressed properly.
4. Make decisions accordingly within 24 hours of the concern being reported to them. Decisions should be checked with at least one other member of the safeguarding team at Likewise or external agencies e.g. the local authority and/or other statutory partners (see appendix 3), and the DSO can seek advice from these parties at any time. The DSO/DSL may make any of these decisions:
 - i. Immediate referral to emergency services (e.g. Police, Ambulance, Fire). This is because the situation requires emergency support as there is immediate significant risk.
 - ii. There is no further action to take. This is because there are no safeguarding concerns.
 - iii. The threshold has not been met to refer to an external agency. Likewise will continue to provide support to the individual adult and may include signposting the person to other sources of help. It may involve ongoing monitoring of safeguarding for the person.
 - iv. Referral to other agencies, (voluntary or statutory), for support and early help. Such referrals may require the informed consent of the service user. This decision may involve ongoing monitoring of safeguarding for the person by Likewise.
 - v. Referral to the local authority social care. This is if there is reasonable cause to suspect that the person has experienced or is at risk of abuse or neglect or there are serious concerns about the wellbeing of the person.
 - a. The referral must be made immediately by the DSO and telephone referrals should be confirmed in writing within 24 hours.
 - b. The local authority should acknowledge the referral within one working day of receiving it and if the DSO has not heard from them within 3 days, further follow up contact must be made with them.
 - c. If a referral is not accepted, the local authority should tell the DSO and give reason for their decision. If the DSO remains concerned, they should be proactive in pursuing further discussions with the local authority and consider escalating their concerns through the multi-agency safeguarding adults procedure.

- d. After the referral has been made, ongoing work by the DSO may be required, including providing further reports or attendance at meetings, in line with the multi-agency procedures.
 5. In all cases, records must be kept of all conversations, observations and reasons for decisions. A decision to take no further action or monitor a situation is as serious as a decision to take action or make a referral.
 6. Debrief with staff and offer support and supervision during and after any safeguarding incidents.
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Appendix 1: Procedure Flowchart for Responding to a Safeguarding Concern



Appendix 2: Procedure Flowchart for Responding to a Safeguarding Report



Appendix 3: Key Contacts for Safeguarding

Safeguarding Lead Key Contacts at Likewise			
Designated Safeguarding Lead			
Name:	Hugo Reggiani	Tel:	07401 116983
Job Title:	Co-Director (Services)	Email:	hugo.reggiani@likewise.org.uk
Deputy Designated Safeguarding Leads			
Name:	Paulina Zielinska	Tel:	07974 840157
Job Title:	Core Teams Lead	Email:	paulina.zielinska@likewise.org.uk
Name:	Toni Wilkey	Tel:	07729 102386
Job Title:	Wellbeing Support Worker	Email:	toni.wilkey@likewise.org.uk
Name:	Lily Naddaf	Tel:	07495 135201
Job Title:	Placements and Community Lead	Email:	Lily.naddaf@likewise.org.uk
Name:	Joe Hughes	Tel:	07718 652920
Job Title:	Wellbeing Support Worker	Email:	Joseph.hughes@likewise.org.uk
Chair of Trustees			
Name:	Hilary Wendt	Tel:	07531 306011
Title:	Chair of Trustees	Email:	hilarywendt@yahoo.co.uk
Lead Trustee for Safeguarding			
Name:	Letizia Mattanza	Tel:	07543 824908
Title:	Trustee	Email:	sz.mattanza@gmail.com
Designated Safeguarding Officers			
All of our Wellbeing Support Workers are trained as Designated Safeguarding Officers.			
The Likewise Hub – Front Office			
Address:	8 Fairhazel Gardens, NW6 3SG	Tel:	020 7278 4437

Safeguarding Roles & Responsibilities: Key External Contacts		
Police, Ambulance, Fire Service		
Emergency Services	In emergency situations where there is imminent threat of significant harm	Tel: 999
Police Non-Emergency	Contact for police when an immediate response is not necessary and/or will not serve any purpose.	Tel: 101
NHS 111	For urgent but non-emergency medical issues.	Tel: 111 Online service: https://111.nhs.uk/
London Fire Brigade Non-Emergency	Non-emergency assistance and enquiries for the Fire Brigade	Tel: 020 8555 1200 (Mon-Fri 8.30am-5pm) Online form: https://www.london-fire.gov.uk/contact-us/
UK Anti-Terrorism Hotline	If you've seen or heard something that you think could suggest terrorist activity.	Tel: 0800 789 321
Crimestoppers	Anonymous reporting of crimes or suspicious behaviour	Tel: 0800 555 111 Website: crimestoppers-uk.org
Victim Support		Tel 0808 168 9111 www.victimsupport.org.uk
Local Authority		
Camden Safeguarding Adults Partnerships Board	Statutory multi-agency board holding overall responsibility for co-ordinating safeguarding adult matters and ensuring that partner agencies carry out safeguarding adults work.	Tel: 020 7974 4000 (option 1) Email: adultsocialcare@camden.gov.uk Link for London multi-agency adult safeguarding policy & procedures: https://www.camden.gov.uk/documents/20142/0/London+Multi-Agency+Adult+Safeguarding+Policy+%26+Procedures.pdf/9a4727af-aa29-7842-

		b0e5-c706dec3d394?t=1619620436296
Camden Children & Families Contact Service	Single access point providing advice, information and support for children and young people who may need extra help or who are vulnerable and at risk.	Tel: 020 7974 3317 (9am to 5pm) Out of hours: 020 7974 4444 Email: LCMASHAdmin@camden.gov.uk Secure Email: LCMASHAdmin@camden.gov.uk.cjism.net
London Government Directory	Map and contact information for all boroughs and their local authorities in London, to find Safeguarding Adults Partnerships Boards and contacts in other boroughs.	Web: https://directory.londoncouncils.gov.uk/
Camden Homelessness Prevention Service	For adults who are homeless or at risk of becoming imminently homeless.	Tel: 0207 974 4444
Cindex	Directory of services local to Camden, sorted by categories.	https://cindex.camden.gov.uk/kb5/camden/cd/home.page
General Safeguarding & Signposting		
Ann Craft Trust	Resources and support for safeguarding adults	Tel: 0115 951 5400 Web: http://www.anncrafttrust.org/safeguarding-adults-sport-activity/
Disclosure & Barring Scheme	Executive non-departmental public body supporting employers with safer recruitment decisions. Processes and issues DBS checks and maintains Barred Lists.	Web: https://www.gov.uk/government/organisations/disclosure-and-barring-service

MIND	Helpline and support, particularly around mental health issues.	Tel: 0300 123 3393 Text: 86463 E-mail: info@mind.org.uk Web: www.mind.org.uk
Samaritans	Listening service for those who need someone to talk to.	Tel: 116 123 Email: jo@samaritans.org Letter: Freepost SAMARITANS LETTERS Samaritans Self-Help App: https://selfhelp.samaritans.org/
Domestic and Childhood Abuse		
Camden Safety Net	Provides services to survivors of domestic abuse and/or sexual violence and their families who live, work or study in the London Borough of Camden. Safety planning, risk assessment, finding legal advice, emotional support, criminal justice, housing and social care.	Tel: 020 7974 2526 (Mon-Fri 9am-5pm) Email: camdensafetynet@camden.gov.uk
Galop	Supporting LGBT+ people who are victims of domestic abuse, sexual violence, hate crime, so-called conversion therapies, honour-based abuse, forced marriage, and other forms of abuse.	LGBT+ Hate Crime Helpline: 0207 704 2040 Conversion Therapy Helpline: 0800 130 3335 LGBT+ Domestic Abuse Helpline: 0800 9995428 Email: help@galop.org.uk
Respect Men's Advice Line	Support and advice for victims, family members and friends regarding male victims of domestic abuse.	Tel: 0808 8010327 (Mon-Fri 9am-8pm) Email: info@mensadvice.org.uk
Respect Phoneline	Information and advice line for domestic violence perpetrators looking for help to stop their violence and abuse.	Tel: 0808 802 4040 (Mon-Fri 9am-8pm) Web: https://www.respect.uk.net/
National Domestic Violence Helpline	Advice line – trained female advisers with language translation options.	Tel: 0808 2000 247

NAPAC (National Association for People Abused in Childhood)	Helpline and online support	Tel: 0808 801 0331 (Mon-Thurs 10am-9pm; Fri 10am-6pm) Email: support@napac.org.uk
Women's Aid	National charity supporting women and children experiencing domestic violence.	Live Chat (10am-6pm): https://chat.womensaid.org.uk/ Email (specialist support workers): helpline@womensaid.org.uk Directory of Camden services: https://www.womensaid.org.uk/domestic-abuse-directory/
FGM, Forced Marriage and So-Called "Honour-Based" Abuse		
FORWARD	African women-led organisation working to end violence against women and girls. Training and support with affected communities	Tel: 020 8960 4000 Email: forward@forwarduk.org.uk
IKWRO	Confidential advice on issues including FGM, forced marriage, child marriage and so-called "honour-based" abuse. IKWRO helps Middle Eastern, North African (MENA) and Afghan women and girls who are living in the UK. Languages available: Farsi, Kurdish, Arabic, Dari, Pashto, Turkish and English.	Tel: 0207 920 6460 (Mon-Fri 9.30am-5.30pm) For out-of-hours emergencies call: Kurdish / Arabic/ English: 07846 275246 Farsi / Dari / English: 07846 310157 Email: info@ikwro.org.uk
Forced Marriage Unit	Government unit offering advice and assistance on forced marriage in the UK or overseas.	Tel: 0207 008 0151 Out of office hours contact: 0207 008 1500 (ask for Global Response Centre).
Karma Nirvana	Honour-based abuse helpline	Tel: 0800 5999 247 (Mon-Fri 9am-5pm)

		Email: support@karmanirvana.org.uk
Internet Safety/Online		
The UK Safer Internet Centre	Provides advice for professionals and responds to reports about sexual abuse images of children online	Tel: 0844 381 4772
Get Safe Online	Practical advice on how to protect yourself, your computers and mobiles device and your business against fraud, identity theft, viruses and many other problems encountered online.	Web: https://www.getsafeonline.org/
Modern Slavery		
UNSEEN	Specialist charity for advice and support about Modern Slavery	Telephone: 0303 040 2888 Helpline: 08000 121 700 Website: https://www.unseenuk.org/
Neurodiversity, Learning Difference and SEN		
British Institute of Learning Disabilities	Training and resources around complex needs and learning disabilities.	Tel 0121 415 6960 www.bild.org.uk
Mencap Direct	Advice and information about learning disability and help to find the right support and services in the local area	Tel: 0808 808 1111 E-mail help@mencap.org.uk www.mencap.org.uk
National Autistic Society	Helpline and support for those with Autism Spectrum Condition	Tel 0808 800 4104 Website www.autism.org.uk
Radicalisation		
HM Govt	Report radicalisation concerns	Report online: https://act.campaign.gov.uk/ Tel: 0800 789 321

Home Office	Radicalisation e-learning module	Web: https://www.elearning.prevent.homeoffice.gov.uk
Sexual Assault and Abuse		
The Havens	Service for victims of rape/sexual assault (within last 12 months). Offer of medical advice, forensic medical examinations for collection of evidence, screening for infections, counselling and psychosocial assessment.	Urgent advice/appointments tel: 020 3299 6900 Non-urgent info: 020 3299 1599 (Mon-Fri 9am-5pm)
Survivors UK	National charity offering help and support to adult male or non-binary victims of sexual abuse, childhood sexual abuse, rape and sexual assault.	Text: 020 3322 1860 (Mon-Sun, 12pm-8pm) Online Chat: https://m2.icarol.com/ConsumerRegistration.aspx?org=56520&pid=248
NAPAC (National Association for People Abused in Childhood)	Helpline and online support	Tel: 0808 801 0331 (Mon-Thurs 10am-9pm; Fri 10am-6pm) Email: support@napac.org.uk
Galop	Supporting LGBT+ people who are victims of domestic abuse, sexual violence, hate crime, so-called conversion therapies, honour-based abuse, forced marriage, and other forms of abuse.	LGBT+ Hate Crime Helpline 0207 704 2040 Conversion Therapy Helpline 0800 130 3335 LGBT+ Domestic Abuse Helpline: 0800 9995428 Email: help@galop.org.uk
Rape Crisis	Feminist organisation working to improve services and promote the needs and rights of women and girls who have experienced sexual abuse, rape and all forms of sexual violence. Safe spaces, counselling, advocacy and support.	Web: https://rapecrisis.org.uk/get-help/ Tel: 0808 802 9999 (Mon-Sun 12-2.30pm and 7-9.30pm)