

Imran Hameed
Salma Foodbank
Unit 8 Ash Court,
Crystal Drive,
Smethwick
B66 1QG

20th November 2018

Dear Mr. Hameed

Re: Serious Safeguarding Concerns relating to Salma Foodbank

I am writing to raise serious safeguarding concerns about the way Salma Foodbank is being operated under your direction. Through your voluntary food distribution service you are naturally coming into direct contact with the most vulnerable individuals in society such as victims of domestic abuse, victims of sexual exploitation and those who have a dependency on drugs. Such persons will naturally have difficulty in protecting themselves from abuse and harm, and it is therefore essential that any service provider (including voluntary initiatives such as yours) ensure that safeguarding measures are in place and strictly followed by all.

Having undertaken some research into your organisation, it appears that Salma Foodbank is not a formally registered entity (such as a registered charity, Community Interest Company or even a limited company). We are of course aware that it is perfectly acceptable in law for unincorporated associations to exist but we are surprised that given the nature, scale and length of Salma Foodbank's activities, that no steps have been taken to pursue an organisational structure that is more formal and regulated. Figures circulated in the media suggest that you have assisted from 1000 families and individuals to 8000 people and in our opinion, is therefore operating on a very large scale. Despite this, it also appears to us that Salma Foodbank does not have any formal structures, policies or even basic, guiding principles in place to ensure that it is operating within the required legal and statutory framework; you do not appear to have a constituted group with a governing committee that would have oversight and ensure competence, transparency and accountability in respect of your activities. Again from media reports we can ascertain that you have in the region of 85 volunteers involved; are you able to confirm if DBS checks have been carried out for all of them? What safeguarding training do they receive? In fact, what processes do you have in place for the safety and welfare of the volunteers given that it appears that individual volunteers are attending properties of people they do not know alone? We note that you refer to yourself as a director of Salma Foodbank on social media and we feel a reasonable layperson would presume that a foodbank which has a 'director' would at the very least be subject to some sort of formal process.

Given the nature of your work, we feel that the lack of formal structure and procedures is very concerning and in our opinion, has the potential to place vulnerable people referred to the Foodbank at risk. Should there be any safeguarding concerns, it appears that those involved in the Foodbank (including yourself) are currently accountable to no one and this is highly concerning. Additionally, you refer to your operations as both 'Salma Food bank' and 'Bearded Brothers' (which also does not have a formal structure) and even refer to both websites at the bottom of your emails. Please can you clarify which organisation is accountable if there are safeguarding concerns? Are they one and the same and interchangeable or do the two groups operate separately?

Most importantly, we wish to highlight and draw to your attention that serious complaints have recently been raised with us about your conduct, which in our opinion appears to amount clearly to inappropriate behaviour. The allegations have been raised by one of our service users (a young lone female who was a victim of abuse) who was referred by us to Salma Foodbank for food. It is alleged that:

- You visited the service user alone to drop off the food and that despite being a lone male and meeting her for the first time (and therefore previous acquaintances cannot be an explanation), you allegedly entered her property to drop off the food even though it was not necessary to go inside; the food could have simply been handed over to her without any need for you to enter the property
- Upon entering the property you allegedly asked her personal questions including how a beautiful woman like her was in such a situation and which room was her bedroom
- Upon hearing some of her story we are informed that you allegedly provided her with £50 in cash; we of course appreciate that this particular service user's personal experiences are especially traumatic but we still feel that to do so was inappropriate in the circumstances and the correct procedure in our opinion would have been to contact us to make a donation and we would have been able to assist accordingly. Moreover, it raises the question, if Salma Foodbank has a 'no cash' policy, how is it that Salma Foodbank are also able to make cash donations? Do you in fact obtain cash donations from the wider public and if so, how are such donations accounted for? (We trust you are aware that it is incumbent upon even an unincorporated charitable association to formally register once they have reached the £5,000 threshold). Or was this sum donated by you personally and if so, how often do you make such personal donations and do you keep any records for the purposes of transparency and accountability? You are after all portraying yourself as a director of Salma Foodbank and a reasonable individual would presume that a cash donation from an individual working with Salma Foodbank means that the donation is actually from the latter. As its representative you should be ensuring that policies are in place even if the cash donations are being made by you personally.

- Within days of dropping off the food, you allegedly starting making further contact with her through late night face time / phone calls and texts, and asking personal questions such as where she was and when she would be returning home
- When she refused to continue responding to you, we are told that you then allegedly proceeded to harass her and demanded that the £50 cash given to her is returned
- You then allegedly contacted her and were nice, to try and persuade her to volunteer for you and ultimately convinced her by telling her it would help her with her ongoing case if she was volunteering etc.
- When she volunteered for you, it is alleged that you continued making inappropriate comments such as commenting that she needed to get married again and wanting to know the real colour of her hair. It is alleged that you also consistently attempted to persuade her to go on a date with one of your male volunteers, and allegedly offering to 'pay for everything' on the said date. She states that as she felt uncomfortable she did not return to volunteer for you again. We are not disclosing the name of this volunteer for the purposes of this letter but please be rest assured that the name will be disclosed to the relevant authorities when required.
- A situation arose where our service user needed to find new accommodation and therefore contacted the same male volunteer we mention in the preceding bullet point for help. We are told that this volunteer suggested that you may be able to help and he passed the phone onto you. It is alleged that during this conversation you kept complaining that she was not willing to date the male volunteer and also commented to the volunteer, 'I will let you have her'. These comments and the overall conversation made our service user feel that she would only be helped if she would date the volunteer. Our service user informs us that when she complained to your male volunteer about your inappropriate comments and threatened to report her concerns, you allegedly made abusive and threatening phone calls to the service user, whom we wish to reiterate was a victim of abuse and in the process of emerging from a traumatic situation
- When our service user phoned the male volunteer to complain about your abusive and threatening calls, we are told that the phone was allegedly passed on to you and during this conversation you denied making the calls but then allegedly proceeded to use the exact same abusive language as the phone calls (using the same terms to describe our service user)
- Within days of making the alleged abusive phone calls, based on the information available to us we are of the understanding that you then allegedly made contact with another local charity (which we would describe as being religiously conservative) that was helping her and then had a video of her (socialising with friends at a restaurant) sent to them in what we consider to be an attempt to misrepresent and tarnish her character and lifestyle (i.e. as someone who parties and drinks and mixes with men – something which would be frowned upon by the charity providing her with financial assistance) so that her vital support is withdrawn

When we referred our service user to you, we expected professional boundaries to be maintained, which included not making further contact with our service user beyond arranging to drop food – after all, you are operating solely as a foodbank and should not be exceeding your remit in doing so. As a responsible and ethical charity, we take all safeguarding allegations seriously and the allegations against you are in our opinion particularly worrying. We have therefore taken steps to make further enquiries into your operations and as a result have been informed of other similar allegations which specifically relate to you. These collective allegations simply cannot be ignored and for reference include the following:

- Going inside properties of lone females to drop off food even when it is unnecessary to do so
- Not maintaining professional boundaries and instead phoning clients afterwards to build a rapport or relationship; it is alleged that you even get clients to volunteer for you to be able to maintain close contact
- Selectively giving money to certain individuals, especially women
- Making false allegations to tarnish the character of women who no longer want to engage with you
- Aggressive and abusive behaviour
- Behaviour that could be regarded as amounting to harassment and even stalking

Concerns have also been raised to us (which we also share) that you are allegedly persuading victims of domestic violence and other vulnerable adults to appear in your promotional videos. I am informed that when you received complaints in this respect earlier this year, that you started blurring the faces of the victims. However, the victims are still identifiable by their voices and your actions are therefore placing them at potential risk of harm, especially where abuse has already been involved. Such filming is unethical for many reasons and especially because these adults (due to their vulnerability) and lack of resources (e.g. food, money) and isolation, can often feel unable to make properly informed decisions. You may claim they are doing it voluntarily, however they may feel they have an obligation to agree with you especially if they require ongoing food donations. To put these individuals in such situations is unprofessional, unethical and is also putting them at risk of harm. We urge you to therefore immediately take down all your promotional films and other materials in which victims of abuse are featured.

Additional concerns have been raised in respect of the quality of some of the perishable food that is being donated by Salma Foodbank to third parties. It has been alleged that some of the food (such as fruit and vegetables) stored and donated by Salma Foodbank are past their 'use by' date and showing signs of decomposing. First of all, we hope that you are aware that by its very nature and scale of activities (allegedly distributing food to over thousands of families and individuals on a regular basis using a large number of volunteers as per media reports), Salma Foodbank would in our opinion fall within the definition of a 'food business' and therefore subject to both UK and EU laws and regulations. For ease of reference we refer to the Food Safety Act 1990, the Food Safety and

Hygiene (England) Regulations 2013, EC Regulation 178/2002 and the EC Regulation 852/2004. As such, Salma Foodbank needs to have been registered with the local authority, even if the food is not being distributed for profit. Please confirm that Salma Foodbank was duly registered within 28 days of commencing operations, and which local authority it is registered with.

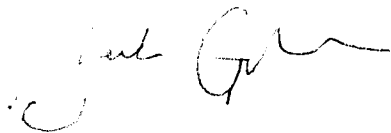
More importantly, as a result of the applicable laws and regulations you are required to adhere to certain safety and hygiene standards when dealing with the production, processing and distribution of food. In particular, it is a breach to make available food which is deemed unsafe due to being considered as 'injurious to health' or 'unfit for human consumption'. We must point out that unfitness for human consumption is not necessarily dependent upon establishing the effect of consumption of a food item on the health of an individual. We would argue therefore that on the face of it, distributing food which has surpassed its 'use-by' date is a breach of the relevant regulations. Moreover, Article 14(4) of the EC Regulation No 178/2002 specifically takes into account the particular health sensitivities of a specific category of consumers where the food is intended for that category of consumers and care needs to be taken when supplying food to certain categories of individuals, such as the elderly, infants under 5 years, pregnant women or people with a weakened immune system or those with certain food allergies and intolerances. We are concerned that if the allegations are true and you are not even following the basic procedure of ensuring only food within its 'use-by' date is being distributed, then to what extent will you be taking the specific needs of such individuals into account when delivering food to them? We ask that you clarify your storage, processing and distribution procedures and in particular, confirm what measures are in place to ensure that the food being distributed is not injurious to the health of those with particular health sensitivities.

Because the serious nature of the allegations involved, we feel that we have no option to take further action to ensure the protection of any vulnerable individuals and especially lone women. Please note that we will be reporting our concerns to the West Midlands Police at the highest levels and expect them to speak to other users of your service who may or may not have had similar experiences. We will also be bringing our concerns to the attention of the Food Standards Agency for their consideration. As a responsible, ethical charity which specifically works to end all forms of violence against women and girls and aims to protect all individuals from harm, we feel we are also obliged to share our concerns others who may be making referrals to you and/or Salma Foodbank, or would consider using your services. We appreciate that the allegations are not proven and dependent upon our service user's opinion of the situation and will make this clear in any information circulated by us and are of course willing to include any comments from you within the same in the interests of preserving balance and fairness. If the allegations all prove to be unfounded, we will of course be willing to circulate further information with such updates. We strongly believe in the rules of law and evidence in the UK, and will act accordingly but having carried out a balancing exercise, at this stage we feel we are compelled to raise the concerns relating to Salma Foodbank and you.

We strongly advise you not to make any contact with our service user directly or indirectly as it is unwanted and will be regarded as amounting to harassment; we ask that contact is only made with us. If contact is made with our service user then we will have no alternative but to report the matter to the police and also have a civil injunction taken out against you. Given that our service user has already been harassed and abused through phone calls and it is suspected that you may be involved either directly or indirectly, we will in any event be informing the police that our service user may now be at risk given the concerns she has raised about you and which we are bringing to your attention by way of this letter.

We appreciate that the contents of this letter may well cause you concern, but we would reiterate that we are acting in what we believe to be the best interests of very vulnerable service users, and in the circumstances – as a charity – we cannot ignore the information that has been brought to us. Having said this, we are more than happy to hear from you if there are inaccuracies in our understanding of what has happened and/or there is in fact some sort of legal structure to the Salma Foodbank to which we should be directing our concerns instead of you personally.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Shaista Gohir', with a stylized flourish at the end.

Shaista Gohir OBE
Interim Executive Director
Muslim Women's Network UK