



# Protecting People from Harm (Safeguarding) Policy

**Responsibility:** Assistant Director of Housing Management

**Approval date:** January 2020

**Approved by:** Board

**Review date:** January 2023

## Policy summary

We consider the abuse of anyone to be unacceptable and fully recognise the harmful effect that abuse has, not just on the victim but also their families and the wider community. As a housing association and employer, we have a crucial role to play in the support, identification and reporting to relevant authorities about adults and children who may be at risk of harm.

It is the responsibility of all representatives of CHP to raise any concerns you have or those which are reported to you. It is not your responsibility to investigate or decide whether or not vulnerable adult or child abuse has occurred. CHP's safeguarding lead is Assistant Director of Housing Management. Employees should contact the Safeguarding Lead Officer (or the Anti-social Behaviour (ASB) Team Leader, Housing Management Team Leader or Housing Services Team Leader in their absence) if they have concerns regarding safeguarding or if a concern is reported to them. If concerns relate to employees, advice and support may be sought from the HR team.

Any customer or partner can report a safeguarding issue to us through any contact you have with us, for example, through our website, by telephone (0300 555 0500), by email ([safeguarding@chp.org.uk](mailto:safeguarding@chp.org.uk)), in person or in writing.

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## 1. Policy purpose

- 1.1 We consider the abuse of anyone to be unacceptable and fully recognise the harmful effect that abuse has, not just on the victim but also on their families and the wider community.
- 1.2 Safeguarding is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the person’s wellbeing is being promoted and that their views, wishes, feelings and beliefs are considered in deciding on any action.
- 1.3 As a housing association and employer we have a crucial role to play in the support, identification and reporting of people who may be at risk of harm. Knowing what to look for, who to contact and how to help, can reduce the risk of harm happening to our customers. This policy sets out our approach to safeguarding people from risk of abuse and harm.

## 2. Policy scope

- 2.1 This policy applies to all customers in CHP-owned homes, regardless of tenure, to all CHP employees, including agency and contract staff, to members of the governing body and to anyone else working with CHP.
- 2.2 Further details of the regulatory and corporate context of this policy are set out in Appendix 1.

## 3. Safeguarding adults

- 3.1 Safeguarding is defined as ‘protecting an adult’s right to live in safety, free from abuse and neglect’. Safeguarding in broader terms is about acting responsibly to recognise and report possible risks of harm to:
  - Children and young people (A child or young person is defined as someone who is under 18 years old as set out in the Children Act 1989).

- Adults with care and support needs (Care and support needs may relate to disability, mental health, age-related frailty or illness, or domestic abuse as set out in the Care Act 2014).
- 3.2 We have signed up to the principles set out within the Southend, Essex and Thurrock (SET) Safeguarding Adults Guidelines, which has the following Vision:
- “That people are able to live a life free from harm, where the community has a culture that does not tolerate abuse, works together to prevent abuse and knows what to do when abuse happens”
- 3.3 Our safeguarding duties apply to an adult who:
- a) has needs for care and support (whether or not the authority is meeting any of those needs),
  - b) is experiencing, or is at risk of, abuse or neglect, and
  - c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
- 3.4 Abuse can be something that is done to a person or it can be something that is not being done (neglect). Different types of abuse are set out in Appendix 2.

## 4. Safeguarding children

- 4.1 Safeguarding adults is different from safeguarding children in many ways. The main difference is that adults with mental capacity (ability) have the right to make their own decisions even if they are felt by others to be an unwise decision. The welfare of children must always be paramount in any situation regarding safeguarding. We have a duty to co-operate and refer under Section 11 of the Children’s Act 2004.
- 4.2 We have a duty of care when we have contact with children and members of their families. We will make a referral to local authority Children's Social Care if there are signs that a child or an unborn baby:
- is suffering significant harm through abuse or neglect
  - is likely to suffer significant harm in the future.
- 4.3 Employees should, in particular, be alert to the potential need for early help for a child who:
- is disabled and has specific additional needs
  - has special educational needs
  - is a young carer
  - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
  - is frequently missing/goes missing from care or from home
  - is at risk of modern slavery, trafficking or exploitation
  - is at risk of being radicalised or exploited
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing drugs or alcohol themselves
  - has returned home to their family from care

- is a privately fostered child.

## 5. Taking action

- 5.1 We will take action to identify and prevent abuse from happening, responding appropriately when abuse has taken place or is suspected. We will ensure that safeguarding procedures are followed and that they adhere to the six principles, established by the Care Act 2014:
- **Empowerment:** people being supported and encouraged to make their own decisions and informed consent
  - **Prevention:** it is always preferable to take action before harm occurs
  - **Proportionality:** the least intrusive response appropriate to the risk presented
  - **Protection:** support and representation for those in greatest need
  - **Partnership:** local solutions through services working with communities, who can have a key part to play in preventing, detecting and reporting abuse and neglect
  - **Accountability:** accountability and transparency in delivering safeguarding.
- 5.2 Customers can report a safeguarding issue to us through any contact you have with us, for example, through our website, by telephone, by email, in person or in writing, to any member of staff. Information provided through any means will be communicated directly to CHP's Safeguarding Lead Officer to ensure the correct reporting process is followed and to monitor the progress of reports made.
- 5.3 CHP's Safeguarding Lead Officer is Assistant Director of Housing Management, who will manage reports of safeguarding (alongside the ASB Team Leader, Housing Management Team Leader and Housing Services Team Leader in their absence). It is the responsibility of all representatives of CHP to raise any concerns you have or those which are reported to you. It is not an employee's responsibility to investigate or decide whether or not vulnerable adult or child abuse has occurred.
- 5.4 Employees should contact the Safeguarding Lead Officer (or the ASB Team Leader, Housing Management Team Leader or Housing Services Team Leader in their absence) if they have concerns regarding safeguarding or if a concern is reported to them. If an employee suspects that any other employee is involved in any safeguarding issue you can also raise a concern through CHP's Employee Whistleblowing Policy, which is communicated to all employees.
- 5.5 We are committed to taking all complaints and concerns of safeguarding seriously. We will always listen and respect the person reporting a safeguarding concern. Disclosures and suspicion will always be acted upon swiftly, and if there is an urgent situation then immediate protective action will be taken.
- 5.6 Our first priority the immediate safety and welfare of the person. If a person is in danger we have to inform others.
- 5.7 For all safeguarding issues we will alert the Adult Safeguarding Board or the local authority Children's Social Care, as appropriate (contact details are listed in Appendix 3). They will work with us to investigate proportionately so that the situation is not

made worse for the person at the centre of the concerns. They will ensure the adult (or their advocate) is involved in any decisions about them.

- 5.8 An overriding principle in safeguarding is to ensure that we are at all times person-centred and not process-driven; it is about outcomes not just a tick box or form filling exercise.

## **6. Safeguarding employees**

- 6.1 As part of our duty of care to employees, we are committed to developing a workplace culture that recognises that some employees may be experiencing abuse and that the workplace should be a place of safety. Employee safety will be prioritised, and appropriate support measures put in place.
- 6.2 We are committed to supporting employees through their experience and will respond sympathetically, confidentially and effectively to any employee disclosing they are suffering abuse by offering appropriate information, support and advice. Sources of support include our free, confidential Employee Assistance Programme (EAP) and signposting to other organisations, as well as using the expertise of the Human Resources (HR) team, Health and Safety Advisor, Mental Health First Aiders, occupational health and trade union representatives.
- 6.3 We will encourage all employees to report if they suspect a colleague is experiencing or perpetrating abuse. Employees should speak to their line manager or HR about their concerns in confidence.
- 6.4 CHP respects employees' right to privacy. Whilst we will strongly encourage employees who have experienced abuse to make a disclosure for the safety of themselves, we will not force them to share this information if they do not want to. In circumstances where CHP must breach confidentiality, this will be done lawfully in line with the Data Protection Act 2018.

## **7. Victim support**

- 7.1 We will always treat people with dignity, respect and without prejudice.
- 7.2 We will support victims of abuse and will offer them help when needed either through CHP or external partners. This support will be based on their individual needs. This could include access to interpreters and translations of information into other languages or other formats as needed.
- 7.3 We will make reasonable adjustments in relation to property security to ensure homes are safe and secure.

## **8. Working in partnership**

- 8.1 Safeguarding is a multi-agency approach which depends upon effective joint working. We will work collaboratively with other agencies to safeguard and protect the welfare of people who use our services, sharing information and attending meetings. We will

alert statutory authorities regarding concerns, allegations and suspicions of abuse that we identify or that are reported to us.

8.2 Information will only be shared with people who need to know. We will adhere to the relevant Information Sharing Protocol, to ensure compliance with CHP's Data Protection Policy. It is important to remain focused on outcomes rather than just the process of safeguarding. The outcomes should be to:

- promote wellbeing and prevent abuse and neglect from happening in the first place
- ensure the safety and wellbeing of anyone who has been subject to abuse or neglect.

## **9. Training of employees**

9.1 We will ensure that all employees receive training in relation to safeguarding at a level needed for their role and will have clear methods of raising concerns about welfare. This will be delivered through a variety of formats. Awareness training will be refreshed regularly.

9.2 We will provide support, advice, information and resources to employees in responding to safeguarding issues. We will inform staff of any local/national issues on safeguarding. We will ensure employees know how to identify and report safeguarding issues when in customers' homes or in the workplace, and are aware of their responsibilities to share information. We will ensure employees are aware of the Whistleblowing Policy and how to raise a concern via this.

9.3 We will support employees if they make a disclosure under the Public Interest Disclosure Act.

9.4 We will obtain references for all employees and ensure all those who come in contact with customers have appropriate safer recruitment employment checks in line with the requirements of the Disclosure and Barring Service. These checks will be reviewed every three years.

## **10. Prevention of abuse**

10.1 We will take the following actions to help prevent abuse in our communities and workplace:

- Train all front-line staff to identify safeguarding issues and have clear methods of raising concerns
- Encourage all employees to report safeguarding concerns and support those who make disclosures
- Alert statutory authorities regarding concerns, allegations, and suspicions of abuse
- Be aware of possible cases of abuse, what to look for and where to get help and advice
- Be willing to support victims of abuse and offer them help when needed
- Make reasonable adjustments to security to ensure customers' homes and workplaces are safe and secure.

## **11. Disciplinary action**

- 11.1 Employees who are found to contravene this policy will be subject to disciplinary action that may result in dismissal. Volunteers, contractors and other representatives will have their relationship with CHP terminated.

## **12. Equalities considerations**

- 12.1 An equality impact assessment has been carried out to identify positive and negative impacts of this policy.
- 12.2 A section in the policy outlines the support available to ensure all people involved are supported. This support will be based on individual needs, working with partners as required. Through their training, employees and partners will understand how diversity, beliefs and values of people who use the services we provide may influence the identification, prevention and response to safeguarding concerns.

## **13. Policy consultation, approval and review**

- 13.1 Customers were consulted as part of this policy review, and changes made in accordance with their comments.
- 13.2 This policy will be reviewed every three years, or as legislation changes.

## Appendix 1: Policy context

<b>Corporate Strategy</b>	This policy supports the Corporate Strategy objectives, in particular 'delighting customers' by providing warm, safe and affordable homes and being a 'great place to work'.
<b>Standards</b>	<p>This policy supports the <a href="#">Regulatory Standards</a>, which registered providers of social housing must meet</p> <p>In particular, the Neighbourhood and Community Standard sets out the requirement for local area co-operation by working with relevant partners.</p>
<b>Legislation</b>	<p>This policy supports the following legislation:</p> <ul style="list-style-type: none"><li>• Care Act 2014</li><li>• Children's Act 1989 and 2004</li><li>• Data Protection Act 2018 and GDPR</li><li>• Deprivation of Liberty Safeguards 2009</li><li>• Equality Act 2010</li><li>• Mental Capacity Act 2005</li><li>• Modern Slavery Act 2015</li><li>• Public Interest Disclosure Act</li></ul>
<b>Related policies</b>	<p>This policy is linked to the following policies:</p> <ul style="list-style-type: none"><li>• Anti-social Behaviour and Hate Crime Policy</li><li>• Code of Conduct</li><li>• Domestic Abuse Policy</li><li>• Domestic Abuse Support for Employees Policy</li><li>• Employee Disciplinary Policy</li><li>• Whistleblowing Policy</li></ul>
<b>Related documents</b>	<p>This policy is linked to the following documents:</p> <ul style="list-style-type: none"><li>• Southend, Essex and Thurrock Safeguarding Adult Guidelines</li><li>• Protecting our Customers &amp; Employees from Harm (Safeguarding) Procedures</li></ul>

## Appendix 2: Types of abuse

<b>Physical</b>	People being hit, kicked or kept in their rooms against their will
<b>Sexual</b>	People being sexually exploited by others, either on or off the premises
<b>Emotional/ psychological</b>	Verbal abuse, being controlled, intimidated, threats and harassment
<b>Neglect and acts of omission</b>	Failing to provide care or look after children or other members of the family
<b>Financial or material abuse</b>	Theft, fraud, taking control of other people's finances, people having debit or credit cards belonging to others
<b>Discriminatory</b>	Treating people unfairly because of their age, race or gender
<b>Organisational</b>	Neglect or poor care practice within an organisation or an individual's own home
<b>Domestic abuse</b>	Psychological, physical, sexual, financial or emotional abuse incl. 'honour' based violence; female genital mutilation; forced marriage
<b>Modern slavery</b>	People forced into work, being kept under control by others e.g. domestic servitude. An individual may not always be aware they are being abused or being taken advantage of so staff should be aware of potential signs of abuse, for example: cuckooing, grooming and county lines
<b>Self-neglect</b>	Failing to look after oneself, personal hygiene, health or surroundings and includes behaviour such as hoarding

## Appendix 3: How to raise a safeguarding concern

### To raise a safeguarding concern at CHP:

Email: [safeguarding@chp.org.uk](mailto:safeguarding@chp.org.uk)

Phone: 0300 555 0500 (ask to raise a safeguarding concern)

### To raise an Adult Safeguarding concern in the Essex area (not including Southend and Thurrock) contact:

Email: [Socialcaresdirect@essex.gov.uk](mailto:Socialcaresdirect@essex.gov.uk) (send a completed SETSAF form)

Phone: 0345 603 7630

Out of hours: 0345 606 1212

Fax: 0300 123 0778

### To raise an Adult Safeguarding concern in the Southend local authority area:

Email: [accessteam@southend.gov.uk](mailto:accessteam@southend.gov.uk) (send a completed SETSAF form)

Phone: 01702 215008 (option 1)

Out of hours: 0345 606 1212

Fax: 01702 534794

### To raise an Adult Safeguarding concern in the Thurrock local authority area:

Email: [SafeGuardingAdults@thurrock.gov.uk](mailto:SafeGuardingAdults@thurrock.gov.uk) (send a completed SETSAF form)

Phone: 01375 511000

Out of hours: 01375 372468

Fax: 01375 652760

### To raise a Children's Safeguarding concern in the Essex local authority area (not including Southend and Thurrock):

Online portal: <https://www.essexeffectivesupport.org.uk/request-support/>

Consultation Line: 0345 603 7627 (ask for the consultation line. For professional advice and guidance only)

Emergency: 0345 603 7627 (ask for the Children and Families Hub Priority Line)

Emergency Out of Hours: 0345 606 1212

### To raise a Children's Safeguarding concern in Southend local authority area:

Telephone: 01702 215007

Emergency Team/Out of Hours: 0845 606 1212

### To raise a Children's Safeguarding concern in Thurrock local authority area:

Telephone: 01375 652802

Emergency/Out of Hours: 01375 372468