



SAFEGUARDING POLICY

AUGUST 2021

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Approval Date:		Approved by:		Next Review:	2023

1. Introduction

- 1.2 The Safeguarding policy is an overarching policy applied across all of our tenures at SW9 CH. It is important that all staff, managers, directors, Board members, involved customers, SW9 contractors, and representatives such as volunteers are aware that it is everyone's 'responsibility' and that we all have responsibility to act on concerns of mistreatment, harm, abuse and neglect. SW9 have a duty to inform the Charity Commission and Social Services if there are any protection concerns about any of our residents, whether the concerns are identified by staff or directly reported to them. Social Services and the police are responsible for leading all investigations of abuse.
- 1.3 This policy applies to the protection of children, young people and adults at risk of mistreatment, abuse, harm or neglect across all tenures.
- 1.4 All staff, contractors, sub-contractors, agents and any other partners with whom we commission external services are expected to comply with this policy. We would expect contractors, sub-contractors, agents and any other partners with whom we commission external services to have appropriate safeguarding procedures in place.
- 1.5 The safeguarding policy extends to members of staff at SW9 CH should there be concerns about the well-being of an employee, please contact HR.
- 1.6 If a Safeguarding concern relates to an allegation against a member of staff, it will be dealt with in line with the disciplinary procedure.
- 1.7 SW9 CH recognises that we have a responsibility to keep our customers safe from harm.
- 1.8 This policy outlines SW9 CH's approach to preventing and reducing the risk of harm to our residents and children, who are experiencing, or are at risk from abuse or neglect.
- 1.9 SW9 CH recognises and is committed to working in partnership with external agencies to ensure a multi-agency approach where necessary. A Local Safeguarding Children Board (LSCB) and a Local Adult Safeguarding Board (LASB) operate at Lambeth Council and these take the lead role in co-coordinating and ensuring the effectiveness of services to safeguard children and young people/adults in our area of operation.
- 1.10 All Safeguarding case management will be overseen by the SW9 CH Safeguarding Champions.
- 1.11 Where we receive a report of potential radicalisation, this procedure is not to be used. Instead we will speak with the Safeguarding Champions and report to the Police by ringing 999 or 101.
- 1.12 Where we receive contact from a resident intimating they are considering suicide. We will contact the Police on 999 and inform the Tenancy Support Officer. A Customer Hub case should also be raised.

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2. Aims and Objectives

2.1 The aims & objectives of this policy are to:

- Outline SW9 CH's approach to dealing with Safeguarding.
- Raise awareness about safeguarding children, young people and vulnerable adults from the risk of mistreatment, harm, abuse and neglect.
- Develop a culture that does not tolerate such behaviour, and which encourages people to raise concerns of what they see, hear, are told, or have a gut feeling.
- Outline how we will work with our service partners to develop partnership working with other agencies to support safeguarding.
- Ensure that staff are fully knowledgeable and trained on SW9 CH procedures to respond promptly and proportionately to any safeguarding concern.

2.2 The Safeguarding Champions will report, monitor and review safeguarding concerns.

3. Policy Statement

3.1 SW9 CH will apply the Department of Health's six key principles which underpin safeguarding work:

Protection	Support and protection are key to safeguarding residents from harm, abuse and to protect those who are unable to make decisions about their own safety.
Prevention	Raising awareness and supporting people to protect themselves. It is preferable to act before harm occurs. Organisations have processes in place to protect and minimise the risk of abuse.
Proportionality	The least intrusive response appropriate to the risk presented.
Partnership Working	Local solutions through services with their communities. Communities have a vital role to play in preventing, detecting and reporting neglect and abuse.
Empowerment	People are supported to take control of their own lives and their consent is needed for decisions and actions designed to protect them.
Accountability	To demonstrate accountability and transparency in delivering safeguarding.

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3.2 With all safeguarding suspicions or allegations including neglect and abuse, SW9 CH will complete a Safeguarding Concerns Report (**see Safeguarding Procedure**). If significant risk is identified, the concerns will be forwarded to the appropriate Local Authority for further investigation (refer to 5.1 MASH). The Local Authority has a duty to receive the alert and decide whether a safeguarding enquiry is necessary or not. Safeguarding concerns may also be reported to the Charity Commission.

4. Definitions

4.1 Safeguarding is protecting a person’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of mistreatment, harm, abuse and neglect, while at the same time ensuring wellbeing is promoted, having regard to their views, wishes, feelings and beliefs in deciding on any action. This applies to adults, young people and children. A child is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently, is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under the Children Act 1989.

4.2 Abuse is the violation of an individual’s human and civil rights by any other person or persons.

4.3 Abuse can occur in any relationship and may result in significant harm to the person subjected to it. Abuse may consist of a single act or repeated acts, and it can be intentional or unintentional.

4.4 There are many types of abuse – the categories generally recognised in Adult Safeguarding and in the Safeguarding of Children & Young People are listed below. This list is not exhaustive.

- Psychological / emotional abuse
- Physical
- Sexual
- Financial or material
- Modern slavery: ‘trafficking in persons’ and ‘human trafficking’ for the act of recruiting, harbouring, transporting, providing or obtaining a person for compelled labour or commercial sex acts through use of force, fraud or coercion.
- Domestic abuse: encompasses controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners or family members, regardless of gender or sexuality. Includes so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage.
- Discriminatory abuse
- Institutional or organisational abuse
- Exploitation / grooming: the act of using an adult / child for profit, labour, sexual gratification or some other personal or financial advantage.

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Prevent Duty - Radicalisation / extremism: the act or process of causing someone to adopt radical positions on political or social issues. The aim of early identification and early intervention is to divert people away from being drawn into terrorist activity.

4.5 Mistreatment is cruel behaviour, especially by making someone suffer physically. Examples of mistreatment include but are not limited to:

- Harmful, injurious, or offensive conduct
- Verbal attacks
- Insults or unjustifiably harsh language in speaking to or about a person.

4.6 Harm is defined as all harmful conduct and/or behaviour that causes physical or psychological harm, for example:

- harassment and intimidation
- causing fear, alarm or distress
- unlawful conduct which adversely affects property, rights or interests such as theft, fraud or extortion.

4.7 Neglect is a failure to provide necessary care, assistance, guidance or attention that causes, or is reasonably likely to cause, physical, mental or emotional harm. Examples of neglect are:

- Act of omission
- Self-neglect – neglecting to care for one’s personal hygiene, health or surroundings, including behaviour such as hoarding.
- Failing to provide proper food, suitable clothing for the weather, supervision, a home that is clean and safe and medical care
- Failing to provide emotional support, love and affection.

4.8 More information can be found in Appendix 1.

5. Partnership Working

5.1 SW9 CH will work closely with a number of partners and agencies responsible for safeguarding those at risk. A list of these organisations can be found in Appendix 2.

6 Monitoring and responsibilities

6.1 All staff are required to be familiar with this policy. In particular:

- The Head of Operations is responsible for the implementation and compliance of this policy and ensuring that staff training is provided. They will provide an annual report to the Senior Leadership Team, the Services Committee and the SW9 Board on the effectiveness of this policy.

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- The Safeguarding Champions are responsible for the implementation and compliance of this policy. They will monitor all cases and discuss cases prior to closure.
- The Scheme Manager, Property Services Manager and Housing Services Manager are responsible for completing referrals and referring them to the Safeguarding Champions. They are responsible for investigating and monitoring cases, reviewing actions and reporting critical incidents or immediate concerns to the line Manager and making referrals to appropriate external services.

6.2 The following are responsible for the implementation of this Policy:

- The Executive Director
- Senior Leadership Team
- The Housing Services Manager
- Property Services Manager
- Supported Housing Scheme Manager
- Team Leaders
- Safeguarding Champions - the champions will amend our internal notices so colleagues can find out who their safeguarding champions are.

6.3 SW9 CH will record all cases of safeguarding concerns following our procedures. Cases will be reviewed and monitored at monthly meetings. The meetings are used to close cases where SW9 CH have signposted cases to external agencies or cases where it is felt that SW9 CH are not required to carry out any further actions.

7 Training

Safeguarding Training

7.1 All staff at SW9 CH will receive basic online safeguarding training because SW9 CH recognises that Safeguarding is everyone's responsibility.

7.2 The following levels of safeguarding training are provided for staff:

- Level 1 – Introduction and General Awareness
- Level 2 – Increased Awareness (able to make decisions regarding referrals and to make referrals to Local Authority).
- Level 3 – Designated Safeguarding Champion

7.3 The level of training that is required for individual role profiles has been assessed using a risk matrix of the level of contact with adults and children, and the responsibilities that are associated with each role profile.

7.4 Safeguarding training at all levels must be repeated every 3 years unless there are changes to legislation, when training will be provided as soon as possible. Line managers should ensure that training attendance is recorded on the training plans of

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those members of staff for whom they hold line management responsibility.

7.5 Safeguarding staff will encourage contractors to feel confident to raise any concerns they may have visiting SW9 CH properties.

8 Complaints

8.1 Any tenant, or other stakeholder who is dissatisfied with how we have managed their safeguarding concern or case is able to submit a complaint using our Complaints process.

9 Performance Monitoring

9.1 Each individual case is reviewed by the safeguarding champions and the Head of Operations. More high-level performance information regarding the number of cases, the case type and the length of time the case was open will be compiled by the Head of Operations and will be submitted to the Senior Leadership Team on a quarterly basis. An Annual performance report is submitted to the Services Committee and the Board.

10 Related documents

8.1 This policy should be read in conjunction with the following SW9 CH policies and procedures:

- Safeguarding Procedure
- Vulnerable Residents Policy
- Data Protection Policy
- ASB Policy and Procedure
- Equality and Diversity Policy
- Grievance Policy
- Whistleblowing Policy
- Code of Conduct for Employees
- Disciplinary Policy
- Recruitment and Selection Policy
- Health and Safety Policy
- Lone Working Policy
- Allocations and Lettings Policy
- Domestic Violence Policy
- Violence and Aggression Policy

8.2 This is not an exhaustive list, other relevant policies and procedures will also apply, depending on the relevant occupancy or tenure of individuals concerned

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11 Legislation and regulation

The legislation listed below is not intended to cover all legislation applicable to this policy. To meet the required RSH Governance & Financial Viability outcome on adherence to all relevant law, SW9 CH will take reasonable measures to ensure compliance with any and all applicable legislation by reviewing policies and procedures and amending them as appropriate. The legislation listed within this policy was considered at the time of the development of this policy, but subsequent primary and secondary legislation, case law and regulatory or other requirements will be considered and the policy reviewed and adopted in accordance with the requirements set out therein, even should such subsequent legislation not be explicitly listed within this policy. Any queries relating to the applicable legislation should be directed to the policy author.

- Care Act 2014
- Mental Capacity Act 2005
- Children Act 1989 & 2004
- Sexual Offences Act 1985
- Human Rights Act (1998)
- Protection of Freedoms Act 2012
- Data Protection Act 2018
- Modern Slavery Act 2015
- Equality Act 2010
- Safeguarding Vulnerable Adults Act 2006
- Counterterrorism and Security Act 2015 (Prevent Duty)
- Housing Act 1985 & 1996
- Domestic Abuse Act 2021
- Network Homes Tenancies, Share Owner and Lease Agreements

12 Equality and diversity

- 12.1 We will apply this policy consistently and fairly and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equality Act 2010.

13 Review

- 13.1 This Policy will be reviewed every 2 years, or sooner if there is a specific legislative, regulatory or service requirement or change in guidance, law or practice.

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Approved by:	HR&R Committee	
Approval Date:	31st August 2021	
Policy author:	Housing Services Manager	
Policy owner:	Head of Operations	
Adopted from Network Homes: y/n	Yes	
Review schedule (1, 2 or 3 years):	2 years	
Date of next review:	August 2023	
Equality Impact Assessment (EIA)	Date completed	
	Initial or full EIA	

VERSION CONTROL/CHANGE RECORD

Guidance: When a document has undergone **major changes** requiring approval, the version number must change – e.g., from V1.0 to V2.0. When a document has undergone **minor changes**, not requiring approval, only the number after the decimal point must change – e.g., from V1.1 to V1.2. When a document is reviewed but no changes are made, the number after the decimal point must still change.

Date	Reviewed by (name and title)	Version	Summary of changes
August 2021	Patricia Aihie, Housing Services Manager	V2	2 yearly review, updated to bring in line with current practice
December 2021	Lauren Stocks, Graduate Policy and Performance officer	V2.1	Minor amendments to bring in line with Network Homes Policy.

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Appendix 1 – Definitions of Abuse

There are many different types of abuse or neglect that a person may experience. This includes but is not limited to:

Physical abuse	Including hitting, slapping, pushing, kicking, misuse of medication, misuse of restraint, or inappropriate behaviour.
Sexual abuse	Including rape and sexual assault, or sexual acts to which the person has not consented, or could not consent, or where pressure was applied to secure their consent.
Emotional abuse	Including verbal abuse, psychological abuse, threats, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, isolation or withdrawal from services or supportive networks.
Financial or material abuse	Including theft, fraud, exploitation, pressure in connection with wills, property, inheritance, financial transactions, the misuse or misappropriation of property, possessions or benefits.
Domestic abuse	Psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.
Neglect (including acts of omission)	Including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, food, drink and heating.
Self-neglect	Covers a wide range of behaviour including neglecting to care for one's personal hygiene, health or surroundings and behaviour such as hoarding.
Discriminatory abuse	Including racist or sexist remarks or comments based on a person's impairment, disability, age or illness, gender reassignment, sex and sexual preferences, religious beliefs/domination, race, marriage/civil partnership, pregnancy and other forms of harassment, slurs or similar treatments.
Organisational abuse	Involves the collective failure of an organisation to provide an appropriate and professional service to vulnerable people. It can be seen or detected in processes, attitudes and behaviour that amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and stereotyping. It includes a failure to ensure the necessary safeguards are in place to protect vulnerable adults and maintain good standards of care in accordance with individual needs, including training of staff, supervision and management, record keeping and liaising with other care providers.
Cyber abuse	Involves using the internet and mobile technologies with the intention of bullying or threatening another person with the possible intention of harm.
Mate crime	Happens when someone is faking a friendship in order to take advantage of a vulnerable person. Mate crime is committed by someone known to the person. They might have known them for a long time or met recently. A 'mate' may be a 'friend', family member, supporter, paid staff or another person with a disability.

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Hate crime	Is defined as any crime that is perceived by the victim, or any other person, to be racist, homophobic or due to a person's religion, belief, gender identity or disability. It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence.
Modern slavery	Encompassing slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into life of abuse, servitude and inhumane treatment.
Honour based violence	Is a crime or incident, which has or may have been committed to protect or defend the honour of the family and/or community. It is a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/ or community by breaking their honour code.
Forced marriage	Is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of their parents or a third party in identifying a spouse. Forced marriage can be a particular risk for people with learning difficulties and people lacking capacity.
Female genital mutilation (FGM)	Involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life. The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy. FGM constitutes a form of child abuse and violence against women and girls and has severe physical and psychological consequences. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.
Exploitation by radicalisers who promote violence	Involves the exploitation of susceptible people who are drawn into violent extremism by radicalisers. Violent extremists often use a persuasive rationale and charismatic individuals to attract people to their cause. The aim is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. The Prevent Strategy, launched in 2007, seeks to stop people becoming terrorists or supporting terrorism.

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Appendix 2 – Partners and Agencies

Lambeth Social Services	Will arrange for a professional such as a social worker, nurse or someone that the person trusts, will talk to the adult at risk. They will discuss their situation and find out what the adult at risk thinks should be done to keep them safe and properly cared for.
MARAC- Multi-Agency Risk Assessment Conference	Aims to protect those affected by domestic violence.
Local Safeguarding Children Boards	Aims to protect children at risk
Multi- Agency Public Protection Arrangements	The mechanism through which statutory agencies aim to manage risk posed by sexual and violent offenders, in a co-ordinated way in order to protect the public
Safeguarding Adult Review (SAR)	Safeguarding Adult Boards must arrange a (SAR) when an adult dies as a result of, or has experienced, serious abuse or neglect, whether known or suspected and there is concern that partner agencies could have worked more effectively together. The aim of SAR is to identify learning and improvement action.
Multi-agency Safeguarding Hub (MASH)	A single point of contact for all professionals to report safeguarding concerns
Serious Case Review (SCR)	A SCR takes place after a child dies or is seriously injured and abuse or neglect is thought to be involved. It looks at lessons that can help prevent similar incidence from happening in the future.
Local Joint Action Groups	which are used to work in partnership with the police and other agencies to share information on and manage crime.

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