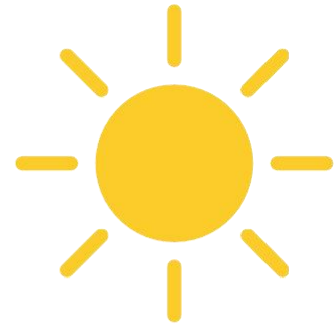


Plus Dane Housing

Safeguarding Policy

May 2024

NEI-POL-03-04



CONTENTS	PAGE
1 Policy Statement.....	2
2 Policy Aims	3
3 Link to Corporate Plan	3
4 Definitions.....	4
5 Our Approach	5
5.1 Prevention.....	5
5.2 Proportionality	7
5.3 Protection.....	7
5.4 Empowerment.....	7
5.5 Partnership.....	8
5.6 Accountability.....	8
6 Assurance.....	9
6.1 Risk Management.....	9
6.2 Performance management.....	9
6.3 Whistleblowing	11
6.4 Customer standards.....	11
6.5 Legal and Regulatory Compliance	12
7 Equality Impact Assessment.....	12
8 Modern Slavery & Human Trafficking	12

1 Policy Statement

We believe that anyone living in our homes and neighbourhoods has a right to live in safety, free from abuse.

We believe that all children and vulnerable adults have the right to protection from abuse, neglect and exploitation, that safeguarding children and vulnerable adults is everybody's responsibility, that doing nothing is not acceptable and working in partnership with relevant agencies has demonstrable results.

We are committed to creating and maintaining the safest possible environment for children, young people and adults at risk to access services or participate in activities and recognise our responsibilities to safeguard their welfare by committing to practices which protects each individual from all forms of abuse, emotional harm and from neglect or bullying. We are also committed to identifying and reporting suspected or abuse of children, young people and adults at risk.

We recognise our duties and responsibilities to work collaboratively with all Local Authorities within our area of operation and other partners to safeguard all children, young people and adults at risk involved in accessing Plus Dane Housing's services and provision and to ensure that they are free from harm. This may include responding to Local Authorities' requests to make enquiries where they suspect abuse or neglect may be happening.

We believe that safeguarding prevention work is based on our ability to raise awareness of our customers to what constitutes abuse, neglect and exploitation, and also our knowledge and understanding of the circumstances of individual customers and households where their wellbeing is at risk. To this end, we will support and monitor the welfare of vulnerable households to ensure that we make appropriate referrals.

We recognise that abuse and welfare concerns affect people of all ages, so this Policy applies to all children and vulnerable adults in all types or tenures of our accommodation and support services, applicants and visitors to our services. It supports the safeguarding processes of local authorities in whose areas we work and ensures that we have clear and effective joint working arrangements and defined areas of responsibility with all relevant agencies and partners.

The policy and its accompanying procedure and guidelines recognise that the safeguarding of children and vulnerable adults who live in our properties and use our services is the responsibility of all Plus Dane colleagues, our strategic partners Penny Lane Builders Limited (PLB), other contractors and volunteers, working together with other professionals and agencies in promoting their welfare and safeguarding them from abuse and neglect.

We understand our role to be that of prevention and early detection, and to report any suspicions or allegations of abuse or serious welfare concerns to the appropriate lead agency, which in most cases will be the local authority. We recognise that safeguarding adults is everyone's responsibility and understand that the lead co-ordinating role will be taken by the relevant Safeguarding Board (SB) in the case of potential abuse.

Our policy and supporting procedures are based on six key principles which underpin statutory safeguarding:

- Prevention – it is always best to act before harm occurs.
- Proportionality – the least intrusive response appropriate to the risk presented.
- Protection – support and representation for those in greatest need.
- Empowerment – people being supported and encouraged to make their own decisions and informed consent.
- Partnership – local solutions through 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.

This policy applies to all tenants and families of Plus Dane Housing and all users of our facilities or services. It also applies to young people and adults who may take placements or work experience, apprenticeships or other forms of work training or volunteer programmes with Plus Dane Housing. It applies to all colleagues and volunteers who work with, or come into contact with children, young people and adults at risk.

2 Policy Aims

The aims of this policy are to:

- Provide the safest possible environment for children, young people and adults at risk.
- Ensure that no act or omission on the part of Plus Dane Housing, or that of its employees, puts a child, young or vulnerable person inadvertently at risk.
- Protect young people and adults at risk from harm and significant risk.
- Protect young people from maltreatment and neglect.
- Prevent impairment of health or development of children, young people and adults at risk.
- Ensure that children and young people grow up in circumstances consistent with the provision of safe and effective care.
- Take action to enable all children, young people and adults at risk to have the best life chances and outcomes.
- Set out what actions colleagues should take if they have concerns or encounter a case of alleged or suspected child, young person or vulnerable adult abuse.

3 Link to Corporate Plan

This policy links to the Corporate Plan by ensuring that the organisation is responding appropriately to any safeguarding issues, and ensuring colleagues are adequately trained and supported for the organisation to fulfil its duty with regards to safeguarding children and adults at risk.

The Corporate Plan places a spotlight on social injustice and structural inequality, recognising the increasing vulnerability of many of our tenants and residents and the approach to safeguarding links into the 'inside out' approach to delivering our services to make the right decisions with the customer.

4 Definitions

This policy applies the following definitions we would consider through this policy:

Safeguarding is the right of every child and vulnerable individual accessing our services - to be protected from any form of abuse. Abuse occurs when the child's or vulnerable adult's rights are not respected.

Abuse is any behaviour towards a person that deliberately or unknowingly causes them harm, endangers life or violates their rights.

Abuse can take many forms including:

- Sexual
- Physical
- Emotional
- Psychological
- Discriminatory
- Financial or material
- Neglect or acts of omission
- Domestic abuse
- Self-neglect
- Modern Slavery
- Radicalisation
- Organisational abuse

It concerns the misuse of power, control and/or authority and can be perpetrated by an individual, a group or an organisation. It may involve people taking money without permission, or not looking after someone properly. It may involve cuckooing, modern slavery or exploitation through county lines. It may include poor care practices, bullying or humiliating, or not allowing contact with friends and family.

Abuse often involves criminal acts and can be a single act or may continue over a long period. It can be unintentional or deliberate, but will result in harm to the victim, either physically, emotionally or in its effect on the person's wellbeing or development.'

A **child** is any individual who has not yet reached their 18th birthday.

A **vulnerable adult** is someone of 18 years or over 'who is or may be in need of community care services by reason of mental or other disability, age or illness' and 'who is or maybe unable to take care of him or herself or unable to protect him or herself against significant harm or exploitation' (*No Secrets' Guidance 2000).

The Mental Capacity Act 2005 provides a statutory framework to empower and protect vulnerable people who are not able to make their own decisions. It makes it clear who can take decisions, in which situations, and how they should go about this.

The definition of abuse includes Domestic Abuse and forced marriage.

- Domestic Abuse is 'any incident of threatening behaviour, violence or abuse between adults who are, or have been intimate partners or between family members, regardless of gender or sexuality.
- Forced marriage is one in which one or both of the spouses do not consent to the marriage and some element of duress is involved, including the use of physical and emotional pressure. Forced marriage is not sanctioned within any culture or religion.

Some incidents of abuse could also be relevant to any domestic abuse policy and procedures, and we will be clear how we propose to manage any such incident.

Alert: external referral to lead agency, usually the local authority of a person or household where the harm caused meets the statutory definition of abuse.

Concern: internal referral of a person or household where the harm caused does not meet the statutory definition of abuse, but whose wellbeing is significantly compromised. Any Plus Dane colleague may identify a concern from a visit or phone call with a customer and raise it. This would usually be dealt with by the Tenancy Management team, Floating Support team or Older People's team depending on accommodation type with support from other frontline services. Plus Dane operates a rota of senior colleagues from across its customer facing teams who co-ordinate responses to deal with the concern that has been raised. Concerns are not usually statutory safeguarding, although depending on the outcome of the case response, it could lead to a statutory safeguarding referral. Generally, concerns are dealt with via internal interventions by Plus Dane colleagues.

Designated Safeguarding Officer (DSO): the colleague making an internal referral of a person of concern and/or making an external referral to the appropriate local Safeguarding Board or statutory agency.

A Person in a Position of Trust (PIPOT): is defined as a person who holds a position of authority or trust and uses that position to his or her advantage to commit a crime or to intentionally abuse or neglect someone who is vulnerable and unable to protect him or herself. Where a PIPOT is identified as having behaved or has been alleged to have behaved in this way, Plus Dane will immediately refer to the statutory safeguarding Local Authority and if the PIPOT is a member of Plus Dane colleague, an internal investigation will take place with Plus Dane's People Team.

5 Our Approach

5.1 Prevention

We will maintain a culture and standards that prevent the development of poor care and support practices.

Our procedures recognise that we have responsibilities as an employer of individuals who work with children and with vulnerable adults. They also recognise that any colleague may identify potential abuse or welfare concerns in their daily work.

Our recruitment and selection procedure requires references, proof of identity, and for our front-line services enhanced disclosure and three yearly re-checks for every colleague who works with vulnerable adults and children.

Our procurement processes require all contractors who deliver services into our homes to have a Safeguarding Policy where appropriate, and to provide colleagues with basic safeguarding training and to commit to Plus Dane's Guidelines on Behaviours when in our Customers' homes.

Our employment policies prevent barred persons from being employed in any position that involves working with vulnerable adults or children. Where DBS checks reveal any previous convictions that are not subject to barring, a risk assessment will be used to evaluate any potential threat.

All colleagues will work within the procedures that accompany this Policy and will receive training on this Policy at induction, customer facing colleagues will receive annual safeguarding training and also in their on-going personal development training, through:

- Reading and understanding the Safeguarding Policy and Procedure
- Workshops as required to update on changes to policy and practice
- Safeguarding eLearning for all customer facing employees
- Enhanced eLearning for specifically identified senior roles.

We have a named Safeguarding Lead, who is supported by a network of named Designated Safeguarding Officers with appropriate levels of training.

All of our Designated Safeguarding Officers will be trained to the equivalent of Level 3 Safeguarding Children, Young People and Adults at Risk of Abuse.

Our Designated Safeguarding Officers operate on a rota basis, each working day, to deal with referrals and concerns from colleagues and customers related to safeguarding and manage the response to each referral in conjunction with operational colleagues at Plus Dane. All concerns will be responded to the same working day, if they are made before 5pm, including any urgent referrals to the relevant local authority or Police, or within 24 hours, if after 5pm.

We also have a named Board member with lead responsibility for safeguarding. Contact details for Safeguarding lead will be promoted to colleagues on induction. Contact details for Safeguarding Officers are available on the intranet so that colleagues can report concerns (with appropriate cover for absence). We will have a named e-safety lead, with appropriate level of training.

We use Safer staffing practices to safeguard and protect children, young people and adults at risk from abuse, and to protect colleagues themselves against false allegations and to reduce the likelihood of allegations being made against them. We do this as follows:

- Our recruitment practice includes a probation period and an induction.

- All colleagues, following the probationary period, have 24hr access to confidential counselling, legal, health and wellbeing support.
- We ensure that appropriate Disclosure and Barring Service (DBS) checks are completed as part of recruitment for any worker, volunteer or placement that may come into unsupervised contact with children, young people or adults at risk, or who are required to do so under the scheme.
- We respond to allegations against colleagues. Where relevant, we will use Plus Dane Housing's own internal disciplinary procedures to investigate allegations and, where appropriate, make referrals to external organisations.
- We have in place a Whistle Blowing Code to reassure colleagues that it is safe for them to raise concerns of abuse or maladministration without fear of harassment or victimisation.

5.2 Proportionality

We will share information about individuals who may be at risk from abuse or serious harm where appropriate, with due regard to confidentiality and information sharing protocols.

We will deliver the principles of this Policy through the application of procedures which clearly distinguish between the safeguarding requirements for vulnerable adults and for children.

5.3 Protection

We will treat all concerns confidentially, on a need-to-know basis.

There are however limits to confidentiality and the well-being of adults at risk & children is paramount over all other considerations. Because of this, information may be shared without consent if it is to prevent or detect a crime or when the enquiry is urgent and seeking consent would cause delay which could lead to significant harm.

Capacity and consent are central themes in safeguarding. Every adult has the right to make their own decisions and a person is assumed to have capacity to do so unless it is proved that they do not.

The Mental Capacity Act 2005 sets out a clear test for whether a person lacks capacity to take a decision at a time. If there are concerns that a person being abused lacks mental capacity, we will make a referral to the local adult safeguarding Social Care Team so a Mental Capacity Assessment can be undertaken.

5.4 Empowerment

Individuals have the right to be in control of their lives, make decisions according to their capacity to do so, be treated with respect and consideration and have their confidentiality respected.

All children and vulnerable adults have a right to intervention, support and/or information which could make life better and/or safer for them and be involved in decisions that are made about them.

We will monitor and report on the protected and demographic characteristics of all individuals referred through our internal process, to ensure that we are minimising the risk

of abuse by being sensitive to cultural, gender and individual needs in our service delivery.

5.5 Partnership

We recognise that inter-agency cooperation is essential if children and vulnerable adults are to be protected effectively from abuse. We will work closely in partnership with key agencies and professionals, sharing information and developing appropriate strategies to respond to the needs of our tenants and customers.

We work actively within a multi-agency framework with agencies such as Social Services, health professionals and the Police to prevent, assess and investigate allegations of abuse or neglect. Where appropriate, colleagues will support and participate in Local Authority safeguarding investigations.

Our internal referral form which structures the investigation of reports of concerns requires that investigating officers consider the involvement of partners and stakeholders.

The wishes of the customer in relation to what information should be shared, and with whom, should be respected where possible.

However, we will work in line with the Data Protection Act 2018, which allows for disclosure (or withholding) of personal data without consent where there is a good reason to do so, and where this is necessary to protect the vital interests of an at-risk individual.

Where there is a concern that the customer may be suffering or is at risk of abuse or neglect, their safety must be shared with statutory authorities where there is any indication of abuse or neglect.

5.6 Accountability

All colleagues will be aware of, and comply with, local guidelines in relation to reporting concerns about children or vulnerable adults at risk. Where no such local procedures exist externally, we will provide our own.

All unexplained deaths of vulnerable adults at risk should be internally referred to the Director of Communities for the records and preparation of relevant information for the Safeguarding Board's Safeguarding Adults Review where required.

The Designated Safeguarding Officer (DSO) will report every instance of disclosed or suspected abuse to the appropriate social care contact in accordance with the appropriate Safeguarding Board procedures and will alert the Police or other emergency services as required.

In sharing information with local authority partners, we will take account of:

- Necessity and proportionality: personal information will only be shared where it is strictly necessary to the intended outcome and proportionate to it, according to the potential risks to an individual or the public.
- Consent: wherever possible the consent of the person concerned will be obtained before sharing any information about them.

- Data Protection and GDPR: we will ensure that we comply with our responsibilities under the Data Protection Act and any confidentiality obligations that exist.

We are committed to continuous improvement. We have a training plan in place to ensure all colleagues are made aware of how to recognise the signs of abuse and how to raise concerns with a mandatory e-learning course "Understanding the Safeguarding of Adults at Risk for Housing Associations." Records of training are maintained, and regular refresher takes place (at least every 3 years). Safeguarding officers and leads undergo mandatory level 2 & 3 safeguarding training as necessary.

We will review new legislation as it arises and continually review our procedures in line with good practice.

6 Assurance

6.1 Risk Management

We have a risk management process and risk assessments in place for activities which will identify any safeguarding risks and how they will be managed.

We provide training on safeguarding at the appropriate level for all relevant colleagues. We publicise our approach to safeguarding to customers.

We have an organisation-wide panel of Designated Safeguarding Officers in place which meets quarterly to ensure consistency, and to share learning.

Safeguarding forms part of the internal audit plan with regular reporting to the Executive Management Team, Purpose Committee and the Plus Dane Board.

6.2 Performance management

Robust processes are in place to ensure the recording and reporting of allegations or concerns relating to safeguarding and abuse across the business, the following performance measures are in place:

- An organisation-wide Safeguarding group meets regularly to monitor adherence to the policy and procedures across Plus Dane Housing.
- Regular monitoring reports are produced as part of the performance management framework identifying safeguarding reports and activity.
- The Designated Safeguarding Officers group reviews all referrals of concern irrespective of whether they lead to formal safeguarding cases at Local Authority level.

The procedures that deliver this Policy complement Safeguarding Board procedures in the areas that we operate, and will ensure that all colleagues engaged in delivering our services:

- Are alert to the possibility of abuse of a vulnerable adult or child in our services
- Are alert to abuse of a customer volunteer or service user of any Plus Dane service or provision
- Know how to recognise potential signs of abuse

- Understand the need to share information about concerns with agencies that need to know
- Understand professional boundaries
- Identify risks associated with lone working
- Know and use Safeguarding Board guidance
- Know how and where to report concerns
- Are aware of good practice.

Serious incident reporting procedures ensure that the Board is made aware of serious allegations involving colleagues.

Where there is potential significant risk to the wellbeing of a vulnerable individual or household, colleagues are expected to make an internal referral of concern to the Designated Safeguarding Officer (DSO), to follow up any recommendations for action to be taken in respect of the individual, and to review and report on the individual's circumstances at a frequency determined by the procedure.

Colleagues will always act in accordance and with the principles of the Mental Capacity Act 2005 when they believe that someone is being abused and in determining how to report that abuse.

We will ensure multi-departmental liaison and oversight of safeguarding practice through the Designated Safeguarding Officers (DSO) meeting, comprising representatives from customer facing teams, to:

- Scrutinise and sign-off of proposed corporate and departmental Safeguarding Policy and processes for approval by Executive Team and Board.
- Make practice-based recommendations for the safeguarding induction and training curriculum.
- Contribute to Safeguarding Board Safeguarding Reviews and other meetings.
- Analyse and disseminate "lessons learnt".
- Oversee departmental response to audit reports.
- Produce annual reports to the Purpose Committee to review performance, analyse data on the incidence of internal referrals and on those suffering from abuse or serious welfare concerns.

The annual Safeguarding report to the Purpose Committee will:

- Review the operation of safeguarding processes against the Policy and procedure.
- Review the performance of safeguarding processes against the six key principles in the Care Act.

- Evaluate the preventative approach of monitoring wellbeing concerns in preventing escalation to safeguarding alerts.
- Analyse the characteristics of individuals and households and consider whether our approach requires amendment to meet the needs of different communities.
- Gather feedback from Safeguarding Boards on performance.

We will inform customers of our services for vulnerable adults and children and of our Policy and procedures on vulnerable adults and children through our Safeguarding Statement on our website.

We will ensure our services are open and accessible, take users' views into account and promote equal access.

We will promote our safeguarding commitment to customers via our website and provide a contact telephone number to raise any safeguarding concerns.

We will display specific safeguarding posters in our office receptions and other public places where users visit. We will also publish our Safeguarding Policy on our website alongside a statement outlining our approach and how to raise concerns.

Safeguarding is a standard agenda item for service delivery team meetings and operational management team meetings.

Our procedures ensure that colleagues know the arrangements and contact details for reporting concerns to the relevant local authority Safeguarding Board teams within the areas we operate.

6.3 Whistleblowing

Plus Dane promote an open culture in which colleagues are encouraged to raise concerns relating to the safety of customers who use our services.

We have a robust Whistleblowing Policy in place for colleagues to use if they suspect that a customer is being abused, where there is a failure to respond appropriately to allegations of abuse, or where staff have concerns that a colleague or superior is responsible for the abuse.

There are clear lines of reporting for whistleblowing concerns, including routes to use if colleagues feel unable to report directly to their line manager or if they are concerned that appropriate action has not been taken in relation to a concern already raised.

6.4 Customer standards

The following standards are in place for the policy, we will:

- Treat all information confidentially, on a need to know basis
- Ensure trained colleagues are available to offer support, guidance and advice
- Ensure referrals are made appropriately where concerns are raised

6.5 Legal and Regulatory Compliance

The following acts and guidance documents are key Safeguarding

- Mental Health Act 1983
- Children Act 1989
- United Nations Convention on the Rights of the Child, 1991
- Further and Higher Education Act 1992
- Human Rights Act 1998
- Data Protection Act 1998
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Children Act 2004
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- The Forced Marriage (Civil Protection) Act 2007
- Equality Act 2010
- Education Act 2012
- Children and Families Act 2014
- Anti-Social Behaviour, Crime and Policing Act 2014
- Modern Slavery Act 2015
- Counter Terrorism and Security Act 2015 -Prevent Duty
- Children and Social Work Act 2017
- Data Protection Act 2018
- Mental Capacity (Amendment) Act 2019 (LiPS)
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

7 Equality Impact Assessment

An Equality Impact Assessment undertaken on this Policy has indicated there are no negative impacts arising from this Policy based on a customer's race, religion, disability, gender or gender identity, sexual orientation, marital or civil partnership status, pregnancy, or age.

8 Modern Slavery & Human Trafficking

Plus Dane has a zero-tolerance approach to human trafficking and modern slavery. As part of our commitment to the Modern Slavery Act, when we visit and interact with our tenants and our properties, during these visits we will consider signs of modern slavery and human trafficking, as well as any other welfare concerns which tenants or members of their household may have.

Where we have concerns, we will raise these concerns through the provisions of the Safeguarding Policy.