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# Safeguarding Policy

March 2023

**Important**

Policies and procedures must be coordinated through the Business Development Team for compliance, auditing and control purposes. A Policy Registration Form must be completed before any revisions are made by contacting the Business Development Team at [NH.Policy@networkhomes.org.uk](mailto:NH.Policy@networkhomes.org.uk)

Document name: Safeguarding Policy	Status: V.4.0	Page 1 of 12
Issue Date: 20 March 2018	Last Review Date: December 2021	Next Review Date: July 2023

**Title: Safeguarding Policy**

<b>Document status (Version/Draft/Final)</b>	<b>V.3.0</b>	
<b>Document reference</b>	<b>CS.Po8.SAF.14.v3.0</b>	
<b>Reason for review</b>	<b>Review of policy to take into consideration changes in the way we deliver Safeguarding across the organisation</b>	
<b>Approved by (Board/ELT/Committee)</b>	<b>ELT</b>	
<b>Approved date</b>	<b>July 2021-original approval date March 2018</b>	
<b>Effective from (Date)</b>	<b>July 2021-originally March 2018</b>	
<b>Policy author</b>	<b>Director of Housing</b>	
<b>Policy owner</b>	<b>Director of Housing</b>	
<b>Accountable officer</b>	<b>Executive Director of Customer Services</b>	
<b>Date of next review</b>	<b>July 2023</b>	
<b>Consultation: internal</b>	<b>Heads of Neighbourhood Management</b>	
<b>Consultation: residents</b>	<b>None</b>	
<b>Equality Impact Assessment (EIA)</b>	<b>Date completed</b>	<b>25/03/2021</b>
	<b>Initial/ Full EIA</b>	<b>Initial Full EIA to be completed by Sept 2021</b>

**Version Control – Change Record**

<b>Date</b>	<b>Author</b>	<b>version</b>	<b>Reason for change</b>
<b>23/12/2016</b>	<b>Transformation Director</b>	<b>1.1</b>	<b>Amalgamation of the Adults Safeguarding and Child Protection policy into one Policy</b>
<b>Mary Larbie</b>	<b>Transformation Director</b>	<b>v.2.0 – 23/02/17</b>	<b>Changes occurred throughout document</b>
<b>July 2021</b>	<b>Service Quality Manager and Heads of Neighbourhood Management</b>	<b>Version 3</b>	<b>As a result of Internal Audit and three yearly review</b>

Document name: Safeguarding Policy	Status: V.4.1	Page 2 of 12
Issue Date: 20 March 2018	Last Review Date: March 2023	Next Review Date: July 2025

<b>Contents</b>	<b>Page</b>
<b>1. Summary of the Safeguarding Policy</b>	<b>4</b>
<b>2. Introduction</b>	<b>4</b>
<b>3. Aims and Objectives</b>	<b>5</b>
<b>4. Policy Statement</b>	<b>5</b>
<b>5. Definitions</b>	<b>6</b>
<b>6. Partnership working</b>	<b>8</b>
<b>7. Monitoring and responsibilities</b>	<b>9</b>
<b>8. Training</b>	<b>10</b>
<b>9. Related documents</b>	<b>11</b>
<b>10. Legislation and regulation</b>	<b>11</b>
<b>11. Complaints</b>	<b>12</b>
<b>12. Performance Monitoring</b>	<b>12</b>
<b>13. Equality and diversity</b>	<b>12</b>
<b>14. Review</b>	<b>12</b>

**Appendices:**

**None**

Document name: Safeguarding Policy	Status: V.4.1	Page 3 of 12
Issue Date: 20 March 2018	Last Review Date: March 2023	Next Review Date: July 2025

## 1. Summary of the Safeguarding Policy

The summary provides easy access to the key points in this Policy. However, we would suggest that if you wanted a full understanding of the policy that you read the whole of the policy.

Safeguarding is protecting a person's right to live in safety, free from abuse and neglect. Network Homes will record all cases of safeguarding concerns following our procedures.

The Safeguarding Champions will report, monitor and review safeguarding concerns. Frontline staff will receive specialist training, and all Network Homes staff will be fully knowledgeable and trained to respond promptly and proportionately to any safeguarding concern.

Network Homes will raise awareness about the abuse and / neglect of children, young people and adults at risk. And develop a culture that does not tolerate such abuse, and which encourages people to raise concerns of what they see, hear, are told or have a gut feeling.

Network Homes will apply the Department of Health's six key principles which underpin safeguarding work: Protection, prevention, proportionality, partnership working, empowerment, and accountability.

## The Safeguarding Policy

### 2 Introduction

- 2.1 This policy outlines our approach to preventing and reducing the risk of harm to our residents and their households, including children, who are experiencing, or are at risk from abuse or neglect.
- 2.2 Network Homes recognises we have a responsibility to keep our residents safe from harm.
- 2.3 The Safeguarding policy is an overarching policy applied across all of our tenures at Network Homes. It is the responsibility of each person working on behalf of Network Homes to consider the safety and welfare of the adults and children that we come into contact with.
- 2.4 This policy sets out how Network Homes will use the department of Health's six principles which underpin safeguarding work.
- 2.5 All Safeguarding case management will be overseen by local Safeguarding Champions and via local Safeguarding Panels.
- 2.6 This policy complies with the Social Housing Regulator's Tenancy Involvement and Empowerment Standard.

Document name: Safeguarding Policy	Status: V.4.1	Page 4 of 12
Issue Date: 20 March 2018	Last Review Date: March 2023	Next Review Date: July 2025

### 3. Aims and Objectives

3.1 The aims & objectives of this policy are to:

- Outline Network Homes' approach to dealing with Safeguarding adults and children at risk of harm, abuse or neglect who use or are connected to our services.
- Raise awareness of the abuse and neglect of children, young people and adults at risk.
- Develop a culture that does not tolerate such abuse, and which encourages people to raise concerns of what they see, hear, are told or have a gut feeling about.
- 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 Network Homes' procedures to respond promptly and proportionately to any safeguarding concern.
- Ensure, the Safeguarding Champions report, monitor and review safeguarding concerns.

3.2 This Policy applies to all Network Homes Network Homes' partners from whom we commission external services. We expect them to have appropriate safeguarding procedures in place.

3.3 The Safeguarding Policy extends to members of staff at Network Homes or those working on behalf of Network; should there be concerns about the well-being of an employee, please contact HR. In addition the help and support of our Mental Health Liaison Team and Mental Health First Aiders can be sought.

3.4 If a Safeguarding concern relates to an allegation against a member of staff, it will be dealt with in line with the disciplinary procedure.

### 4. Policy Statement

4.1 Network Homes 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 take action 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.

4.2 With all safeguarding suspicions or allegations including neglect and abuse, Network Homes will complete a Safeguarding Concerns Report (see **Apollo Form**). If significant risk is identified the concerns will be forwarded to the appropriate Local Authority for further investigation (refer to 6.1 MASH). The Local Authority has a duty to receive the alert and decide whether a safeguarding enquiry is necessary or not. Housing providers have a duty to co-operate with Local Authorities implementing their statutory duties around safeguarding. This may include: carrying out 'enquiries' into incidents; information sharing; and participating in statutory local Safeguarding Boards.

## 5. Definitions

5.1 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 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. Under the Children Act 1989, a child is anyone under eighteen regardless of personal circumstances, e.g. living independently or being a member of armed forces.

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

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.

Document name: Safeguarding Policy	Status: V.4.1	Page 6 of 12
Issue Date: 20 March 2018	Last Review Date: March 2023	Next Review Date: July 2025

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	Threats of harm or abandonment • deprivation of contact • humiliation • blaming • controlling • intimidation • coercion • harassment • verbal abuse • cyber bullying • isolation • unreasonable and unjustified withdrawal of services or supportive networks
Physical abuse	Assault • hitting • slapping • pushing • misuse of medication • restraint
Sexual abuse	Rape • indecent exposure • sexual harassment • inappropriate looking or touching • sexual teasing or innuendo • sexual photography • subjection to pornography or witnessing sexual acts • sexual assault • sexual exploitation and/or acts to which the adult has not consented or was pressured into consenting
Financial or material abuse	Controlling someone's possessions Controlling how someone spends their money • Restricting someone's access to a bank account • Coercion around inheritance and wills • theft • fraud • internet scamming
Domestic abuse	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 • so called 'honour' based violence • female genital mutilation (FGM) • forced marriage.
Discriminatory abuse	Harassment • slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, religion
Institutional or organisational abuse	Neglect and poor care practice within an institution or specific care setting such as a hospital or care home • neglect and poor care practice in relation to care provided in one's own home • neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation
Modern slavery	'Trafficking in persons' and 'human trafficking' for the act of • recruiting • harbouring • transporting • providing • obtaining a person for compelled labour or commercial sex acts through use of • force • fraud

	<ul style="list-style-type: none"> <li>• coercion</li> </ul>
Exploitation / grooming	The act of using an adult / child for • profit • labour • sexual gratification • or some other personal or financial advantage.
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.
Neglect and acts of omission	The act includes <b>not being provided with enough food or with the right kind of food, or not being taken proper care of.</b> Leaving you without help to wash or change dirty or wet clothes, not getting you to a doctor when you need one or not making sure you have the right medicines all count as neglect.
Self-neglect	<p>ing unable to feed, hydrate or medicate self (where necessary), or to protect themselves from serious harm (fire), or with hygiene so poor that their health or the health of others is compromised.</p> <p>Self-neglect includes cases of hoarding where the OCD Foundation's Clutter Image Rating scale rating exceeds '4' (in accordance with Network Home's Hoarding Procedure).</p>

## 6. Partnership Working

6.1 Network will work closely with a number of partners and agencies responsible for Safeguarding those at risk. This will include but are not limited to:

- **MARAC- Multi-Agency Risk Assessment Conference** which aim to protect those affected by domestic violence
- **Local Safeguarding Children Boards-** which aim 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)** – single point of contact for all professionals to report safeguarding concerns.

Document name: Safeguarding Policy	Status: V.4.1	Page 8 of 12
Issue Date: 20 March 2018	Last Review Date: March 2023	Next Review Date: July 2025



- **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.

## 6.2 Mental Capacity

The Mental Capacity Act applies to everybody who has dealings with people who may lack capacity, and particularly if they have a professional relationship with the person. We will comply with the requirements set out in the Mental Capacity Act 2005 and will consider the Act's five key principles during interactions with customers:

- A presumption of capacity – every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise
- Supporting individuals to make their own decisions – a person must be given all practicable help before anyone treats them as not being able to make their own decisions
- Unwise decisions – just because an individual makes what might be seen as an unwise decision, they should not be assumed to lack capacity to make that decision
- Best Interests – an act done, or decision made under the Act for or on behalf of a person who lacks capacity must be done in their best interests.
- Least restrictive option – anything done for or on behalf of a person who lacks capacity must consider whether it is possible to decide or act in a way that would interfere less with the person's rights and freedoms of action, or whether there is a need to decide or act at all.

We will take the opportunity to confirm capacity when appropriate (eg.at tenancy sign up, review and termination; during arrears discussions, anti-social behaviour incidents and complaints).

We will engage our partners to carry out an assessment when a person's capacity is in doubt, either because their behaviour causes concern or about lack of capacity.

## **7. Monitoring and responsibilities**

7.1 Staff that are required to be familiar with this policy include:

7.2 Heads of Neighbourhood Management

Both roles are responsible for the implementation and compliance of this policy and our separate Safeguarding procedure and for ensuring that staff training is provided. They will provide an annual report to the Director of Housing on the effectiveness of this policy. Both roles are Safeguarding Leads and they will also deputise for each other, in the case of absence.

Document name: Safeguarding Policy	Status: V.4.1	Page 9 of 12
Issue Date: 20 March 2018	Last Review Date: March 2023	Next Review Date: July 2025

- 7.3 Team Leads are responsible for the implementation and compliance of this policy. They are to monitor all cases and discuss cases prior to closure.
- 7.4 Scheme Managers, the Mental Health Liaison Team, Property and Neighbourhood Managers are responsible for completing referrals and referring them to their local panels. 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
- 7.5 The following are responsible for the implementation of this Policy and the supporting procedure:
- Director of Housing
  - Director of Leasehold Service Charges and Rent Accounting
  - Head of Intermediate Rents and Agency Services
  - Head of Income and Support services
  - Head of Neighbourhood Services
  - Head of Older Person Services
  - Director of Customer Contact Centre
  - Customer Centre Operations Managers
  - All Housing Management Managers & Team Leaders
  - Safeguarding Champions
- 7.6 Network Homes will record all cases of safeguarding concerns by using our Safeguarding procedure. Cases will be reviewed and monitored at monthly Safeguarding meetings. The meetings are used to close cases where Network have sign posted cases to external agencies or cases where it is felt that Network are not required to carry out any further actions.

## **8. Training**

- 8.1 All staff at Network Homes will receive basic, online safeguarding training because Network Homes recognises that Safeguarding is everyone's responsibility.
- 8.2 Frontline staff (e.g. Neighbourhood Officers/Property Managers/Scheme Managers) will receive specialist Safeguarding training.
- 8.3 Safeguarding Champions will provide "tool-box talks" for contractors which cover safeguarding, including domestic abuse. The toolbox talks will ensure the contractors feel confident to raise any concerns they may have visiting Network Homes properties.

Document name: Safeguarding Policy	Status: V.4.1	Page 10 of 12
Issue Date: 20 March 2018	Last Review Date: March 2023	Next Review Date: July 2025

## 9. Related documents

9.1 This policy should be read in conjunction with the following Network Homes policies

- Data Protection Policy
- ASB Policy and Procedure
- Equality and Diversity Policy
- Grievance and Whistleblowing Policy
- Code of Conduct for Employees
- Disciplinary and Dismissal Policy
- Recruitment and Selection Policy
- Health and Safety Policy
- Lone Working Policy
- Allocations and Lettings Policy
- Mental Health First Aider Procedure
- Mental Health Liaison Policy

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

## 10. Legislation and regulation

The legislation listed below is not intended to cover all legislation applicable to this policy. To meet the required Social Housing Regulator Governance & Financial Viability outcome on adherence to all relevant law, Network 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.

- Department of Health's Care and Support Statutory Guidance 2017
- Care Act 2014
- Mental Capacity Act 2005
- Mental Health Act 2007
- Children Act 1989 & 2004
- Sexual Offences Act 2003
- Human Rights Act ( 1998)
- Protection of Freedoms Act 2012
- Data Protection Act (2018)
- Modern Slavery Act 2015
- Equality Act 2010

Document name: Safeguarding Policy	Status: V.4.1	Page 11 of 12
Issue Date: 20 March 2018	Last Review Date: March 2023	Next Review Date: July 2025

- Safeguarding Vulnerable Adults Act 2006
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Housing Act 1985 & 1996
- Deprivation of Liberties Safeguards 2007
- Disability Discrimination Act 2003
- Safeguarding Adults – National Framework of Standards 2005
- Every Child Matters: Change for Children 2004
- Children and Families Act 2014

## 11 Complaints

Any resident or other stakeholder who is dissatisfied with how we have managed their safeguarding is able to submit a complaint using our Complaints process. Once our Complaints process has been exhausted, and if they remain dissatisfied, then they can contact the Housing Ombudsman Service, who can consider if we have acted appropriately. (Please see Complaints Policy [here](#) for more details)

## 12. Performance Monitoring

Each individual case is reviewed at our Safeguarding and Intervention Panels. More high-level performance information regarding the: number of cases, the case type and the length of time the case was open are submitted to the Director of Housing on a quarterly basis. An Annual performance report is submitted to our Customer Services Committee and to our Local Panels

## 13. Equality and diversity

- 13.1 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.

## 14. Review

- 14.1 This Policy will be reviewed on every 2 years from July 2021, or sooner if there is a specific legislative, regulatory or service requirement or change in guidance, law or practice.

Document name: Safeguarding Policy	Status: V.4.1	Page 12 of 12
Issue Date: 20 March 2018	Last Review Date: March 2023	Next Review Date: July 2025