

# Safeguarding Children & Adults at Risk Policy

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001	01/04/2024	New Policy
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003	07/05/2026	Updated policy for merged organisation following a review of previous entity policies

## Table of Contents

1.	Policy Objectives .....	3
2.	Roles & Responsibilities .....	3
3.	Legislative & Regulatory Requirements .....	5
3.1	Legislative.....	5
3.2	Regulatory .....	5
4.	Scope .....	6
5.	Chime Housing’s Approach to Concerns .....	6
6.	Definitions .....	7
6.1	Concern .....	7
6.2	Safeguarding .....	7
6.3	Adult at Risk (Care Act 2014).....	7
6.4	Child/Children .....	8
6.5	Female Genital Mutilation (FGM) .....	8
6.6	Forced Marriage .....	8
6.7	“Honour-Based” Violence.....	8
6.8	Abuse .....	8
7.	Safeguarding Principles.....	10
8.	Customer Profiling .....	10
9.	GDPR.....	11
10.	Recruitment .....	11
11.	Staff Training .....	11
12.	Wider Partnerships with Agencies.....	12
13.	Supporting Staff.....	12
14.	Reviewing Cases .....	12
15.	Equality & Diversity Considerations .....	12
16.	Policy Monitoring .....	12
17.	Appendices.....	13
18.	Related Documents .....	13

## 1. Policy Objectives

To protect children and adults at risk of abuse or neglect through appropriate awareness and application of this Policy and its associated Procedures by all staff (including temporary staff and staff working in our hubs and communities), Group Board and Committee members, volunteers and contractors who come into contact with Chime Housing customers (i.e. tenants and residents) and children who live in, visit our properties or use our services.

This Policy relates to concerns raised which may warrant a formal Safeguarding referral, either raised by an internal Chime Housing staff member or by an external agency. This Policy and its Procedure (Appendix 1) should be read in conjunction with the Concerns Procedure (Appendix 1.4 of the Safeguarding Procedure).

## 2. Roles & Responsibilities

The Directors of Housing are Chime Housing's Executive Safeguarding Champion. They have overall responsibility for maintaining an appropriate safeguarding approach across the organisation. Specifically, their role is to:

- Maintain our commitment to safeguarding as a key corporate concern
- Ensure we commit appropriate resources to recognising and responding to safeguarding concerns and risks
- Oversee the induction and training of staff
- Act as a source of support, advice and expertise to staff on complex cases
- Ensure all members of staff understand the Safeguarding Policy and Procedure and the requirements and expectations they impose
- Ensure all contractors working for or on our behalf are aware of the Safeguarding Policy and Procedure and the requirements and expectations they impose
- Address and implement any lessons learned through internal case reviews at the conclusion of all safeguarding cases
- Ensure the Safeguarding Policy and Procedure is reviewed annually and earlier where specific issues require

### All managers will:

- Contribute to developing a culture that encourages their team(s) to raise concerns
- Listen to and support staff who raise concerns
- Ensure that their team(s) are familiar with Chime Housing's agreed Safeguarding Policy and procedure and undertake necessary training Regularly auditing safeguarding cases and identifying 'lessons learnt'

For Safeguarding cases we have specific Case Handlers in the form of: All Housing Officers, ASB officers, Neighbourhood Officers, Temporary Accommodation Officers and Independent Living Officers. They have responsibility for:

- Reporting and managing concern cases assigned to them

- Ensuring Safeguarding referrals are raised to the appropriate agencies
- Work in partnership with agencies in safeguarding the individual

**All staff will:**

- Ensure they maintain clear professional boundaries at all times
- Be aware of the different types and indicators of abuse
- Be familiar with this policy and the supporting procedure
- Undertake any safeguarding awareness training, as appropriate to their role
- Keep factual records of any incident/ concern and raise any concerns they may have

The Housing Operations Manager (HOM) and Head of Housing have responsibility for ensuring all Safeguarding cases are regularly reviewed, updated and acted on within the timeframes set out in section 6.5 of the Concerns Procedure. The HOM will report on performance for safeguarding cases.

We have specific Safeguarding Leads including:

- Director of Housing
- Director of Customers and Communities
- Housing Operations Manager (HOM)
- Head of Housing Management
- Head of Homeownership & Management Partnerships
- Home Ownership Lead
- Market Rent Lead
- Service Charge Lead
- Income Protection Manager
- Onboarding and Tenancy Lead
- Relationship Management Lead
- Customer Relations Team Leader
- Income Protection Team Lead
- Lettings and TA Manger
- Area Housing Manager(s) (AHM)
- Senior Scheme Officer
- Senior Temporary Accommodation Officer
- Community and Customer Engagement Manager
- Customer Experience Manager
- Corporate governance and Health & Safety Manager

They have responsibility in advising and guiding relevant case handlers within their teams, who have been assigned the safeguarding case.

### 3. Legislative & Regulatory Requirements

#### 3.1 Legislative

- Care Act 2014 (and Statutory Guidance) Children Acts 1989 & 2004
- Domestic Violence, Crime & Victims Act 2004 Female Genital Mutilation Act 2003
- Forced Marriage (Civil Protection) Act 2007
- General Data Protection Regulation 2016 and Data Protection Act 2018 (together “Data Protection Law”)
- Human Rights Act 1998 Mental Capacity Act 2005 Modern Slavery Act 2015
- Public Interest Disclosure Act 1998
- Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012)
- Serious Crime Act 2015
- Working Together to Safeguard Children (statutory) Guidance 2015
- Safeguarding Vulnerable Groups Act 2006 - The HR team will advise on Chime Housing’s duties under this Act to refer any member of staff involved in abuse of a child or adult at risk to the Disclosure and Barring Service.

#### 3.2 Regulatory

- The Social Housing (regulation act 2023)
- (The Consumer standards 1 April 2024)
- The Transparency, influence and accountability standard:
  - i. **Fairness and respect:** Registered providers must treat all tenants with fairness and respect.
  - ii. **Diverse needs:** Registered providers must take action to deliver fair access to, and equitable outcomes of, housing and landlord services for all tenants.

Under the Care Act 2014, there are 6 principles to follow when safeguarding vulnerable adults:

- i. **Empowerment:** ensuring vulnerable adults are supported and confident in making their own decisions and giving informed consent regarding their care
- ii. **Protection:** providing support and representation for those in greatest need
- iii. **Prevention:** proactively preventing safeguarding concerns from developing in the first place
- iv. **Proportionality:** utilising preventative measures to respond to a safeguarding issue in the most unobtrusive way possible
- v. **Partnerships:** co-operating with local services to help prevent, detect, and report suspected safeguarding concerns
- vi. **Accountability:** taking responsibility for and being transparent about the safeguarding practices used to support vulnerable adults

Why does Chime Housing make safeguarding referrals against these principles:

- prevent death or serious harm
- coordinate effective and efficient response
- enable early interventions to prevent the escalation of risk
- prevent abuse and harm that may increase the need for care and support
- maintain and improve good practice in safeguarding
- reveal patterns of abuse that were previously undetected and that could identify others at risk of abuse
- identify low-level concerns that may reveal people at risk of abuse
- help people to access the right kind of support to reduce risk and promote wellbeing
- help identify people who may pose a risk to others.

#### 4. Scope

All children and adults at risk have the right to protection from abuse and neglect whatever their age, gender/gender identity, racial/ethnic origin, language, sexual orientation, religion or health status.

This Policy applies to the Chime Housing, including its subsidiary and joint venture companies. The Policy and its associated Procedures cover all customers who use our services and all children who live in or visit our properties and Joint Ventures.

The Policy and Procedure must be adhered to by all staff (including temporary staff), Group Board members, volunteers and contractors working for us.

Staff and contractors are expected to behave towards our customers, in a way which maintains strong professional boundaries and demonstrates their commitment to this Policy and Procedure. All our contractors will be required to read and sign the Policy and the Procedure in agreement with and commitment to our approach.

Failure to adhere to this Policy and Procedure could result in disciplinary action being taken following our Conduct Policy and a statutory bar from working with children or adults at risk and/or the termination of relevant contracts.

The Safeguarding Policy and Procedure aims to provide comprehensive guidance where it is known or suspected that abuse or neglect of a child or adult at risk is taking place or is likely to do so.

#### 5. Chime Housing's Approach to Concerns

Chime Housing staff should effectively identify, report and record concerns:

**RESPOND** - Take action to make sure the person is safe.

**REPORT** Concerns immediately to a manager and on the Housing Management system.

**RECORD** Concerns; Complete and record any safeguarding referrals. Officers should record any multi agency meetings, updates and referrals on the Housing management system.

**REVISIT** Referral – Case Officer should seek update from Local authority safeguarding team and other relevant agencies on status of the referral.

We will:

- a. Demonstrate leadership, accountability, and commitment in working with statutory partners to safeguard our residents, and those we engage with in the communities we work
- b. Ensure staff are well-trained, have the knowledge and confidence to identify and make safeguarding referrals
- c. Work proactively within our services to identify abuse and report this
- d. Develop robust local partnerships and multi-agency working to develop a pro-active approach to safeguarding and learn from best practice
- e. Participate in multi-agency risk assessment conferences and any other multi-agency meeting that require involvement to safeguarding our residents

## 6. Definitions

### 6.1 Concern

A Concern relates to all cases where it is suspected or known that an adult or child is at risk. All Concerns must be reported using the Concerns Procedure). All Concerns will be logged onto the Housing Management system and investigated by the Case Handler. Investigation of a concern may highlight the need for a formal safeguarding referral, or that a formal safeguarding referral already exists. This would escalate the case to a Safeguarding concern and the Safeguarding Procedure at Appendix 1 should be followed accordingly.

### 6.2 Safeguarding

A Safeguarding case are cases which have resulted in a Safeguarding referral. This could be completed by any Chime Housing staff member, Volunteer, Contractor or external agency e.g. the Police, Local authority, and/or Social Services.

### 6.3 Adult at Risk (Care Act 2014)

An individual aged 18/above with care and support needs who's experiencing, or at risk of experiencing, abuse or neglect which, due to their care and support needs, means they're unable to protect themselves from that abuse or neglect i.e. they lack the capacity to protect themselves from abuse. 'Care and support needs' in this context are needs arising from or related to a physical or mental impairment/illness.

The extent to which a person is at risk will be determined by a range of factors including their personal characteristics (mental capacity, ability to communicate, degree of physical dependence etc) and their situation (the extent of any support network around them, their access to help and information etc).

#### 6.4 Child/Children

Anyone who has not yet reached their 18th birthday (including unborn children) and children who may be living independently, in further education, in the armed forces, in hospital or in custody. Children can be abused in a family, institutional or community setting by a person or another child, a person known to them or (more rarely) a stranger.

#### 6.5 Female Genital Mutilation (FGM)

A procedure (other than an operation) involving the partial or total removal of the external female genitalia or injury to the female genital organs whether for cultural or other non-therapeutic reasons. FGM and the taking by a UK resident / national of a girl abroad (or assisting others to do so) are criminal offences under the Female Genital Mutilation Act 2003.

#### 6.6 Forced Marriage

The arrangement of a marriage without the consent of one or both parties. Some elements of (physical or psychological) duress is also involved. Forced Marriage is distinct from arranged marriage where both parties are free to choose whether to accept the arrangement.

#### 6.7 “Honour-Based” Violence

An incident/crime that may have been committed to protect or defend the “honour” of a family or community. It’s often linked to family members or acquaintances mistakenly believing someone has brought “shame” on their family or community by offending their traditional cultural beliefs.

#### 6.8 Abuse

The violation of a person’s civil or human rights by another person. Abuse may be just one act / omission or a series of them. It can occur in any relationship and can lead to significant harm to/exploitation of the victim. It can take any one of the following forms, or a combination of them:

##### **Types of Abuse (with non-exhaustive examples)**

**Physical abuse:** includes hitting, slapping, shaking, throwing, kicking, poisoning, burning, drowning/suffocation, rough or inappropriate handling, medical mistreatment and physical confinement. It also includes Female Genital Mutilation and “Honour- Based” Violence.

**Domestic abuse:** includes any incident/pattern of incidents of controlling, coercive, threatening behaviour or violence or other form of abuse between people aged 16/above who are//have been intimate partners or are family members.

A new criminal offence of coercive and controlling behaviour in intimate and familial relationships was introduced under the Serious Crime Act 2015. “Honour-Based” Violence can also manifest itself as domestic abuse.

Our Domestic Abuse Policy & Procedure should be referred to in any case of domestic abuse coming to our attention.

**Sexual abuse:** includes inappropriate touching (including over clothing) or sexual acts to which the person has not consented or could not understand; rape and sexual assault; indecent exposure, voyeurism and exposure to pornography.

**Psychological/emotional abuse:** includes threats of harm, intimidation, harassment, verbal abuse, cyber abuse, enforced isolation/deprivation of contact, control/coercion and denial of basic human rights such as the right to privacy and dignity. Psychological/emotional abuse can accompany Forced Marriage and “Honour-Based” Violence.

In the case of a child, psychological/emotional abuse can manifest in making a child feel worthless, inadequate or unloved, threatening their abandonment, setting unreasonable standards/demands, deliberating silencing and ridiculing them. It can cause severe and enduring negative effects on their emotional development.

**Discriminatory abuse/hate crime:** verbal harassment, prejudice towards a person’s age, gender, gender identity, disability, race/ethnicity, colour, sexual or religious orientation. Discrimination can also be behind other forms of abuse.

**Financial or material abuse:** includes theft, fraud, internet scamming, coercion over a person’s property, inheritance, financial transactions, possessions & benefits. Can occur in isolation but often combines with other forms of abuse. This may include an individual who has been ‘cuckooed’. Cuckooing involves gangs which use violence and abuse to target the homes of vulnerable people and use them as bases for drug dealing.

**Neglect:** includes ignoring medical, emotional or physical care needs; denying access to health, care, support or educational services; withholding key necessities such as medication, heating and nutrition.

**Self-neglect:** covers a wide range of behaviour including neglect for one’s personal hygiene, health or surroundings. Hoarding is a specific example (and dealt with under our Hoarding Policy available on Grapevine). Self-neglect will become a safeguarding issue when the person is unable to protect themselves by controlling their behaviour, necessitating additional support.

**Modern Slavery:** includes slavery, human trafficking, forced labour and domestic servitude.

**Child Sexual Exploitation (CSE):** involves exploitative situations, contexts & relationships where a child (or possibly other person) receives “something” (e.g. food, accommodation, drugs/alcohol, cigarettes, affection, money or gifts) for performing (or others performing on them) sexual activity.

CSE can occur through the use of technology without the child’s immediate awareness. The exploiter has power over the child by virtue of their age, gender, intellect, mental capacity, physical strength, economic or other resources.

## 7. Safeguarding Principles

We recognise that, in providing our services, those working for or on our behalf may come into contact with children or adults at risk of abuse or neglect. An increasing number of customers in general needs housing are, for instance, older, disabled, with long-term limiting health conditions or dependencies that increase their vulnerability. People can however become vulnerable at any point in their life for any reason.

The responsibility to be aware of and vigilant about the risk of harm to children and adults at risk lies with everyone (including our contractors) coming into contact with children or adults at risk through their work for us. This is a statutory duty upon us as a housing provider under the Care Act 2014.

Swift and appropriate action must be taken to act on concerns in all cases where abuse or neglect is known or suspected, irrespective of who the perpetrator(s) may be in order to protect the individual concerned from harm or further harm. See the Safeguarding Procedure at Appendix 1.

We will ensure that publications or communications containing photos or videos of children or adults at risk will only be produced with the express written consent of the child’s responsible adult or, in the case of an adult at risk, them or their advocate. Children and adults at risk will never be portrayed in an inappropriate way. Personal information will not be displayed which identifies their whereabouts.

## 8. Customer Profiling

We will update ‘person details’ on our Housing management system recording vulnerability data for example mental and/or physical health where this is identified.

Where a customer is identified as having a vulnerability and requires a reasonable the case handler should request this. This will be recorded as a ‘VULNBL’ UDC marker on the Housing Management system.

Information should be recorded at sign up and at any other contact point with the customer for example at a customer review. UDC markers should be applied as soon as the officer is aware that a reasonable adjustment is required to be put in place.

The use of UDC markers such as this is governed by the Person UDC Policy and Procedure, which should be followed whenever Person UDCs are used. See Appendix 2 of our Data Protection Policy for further guidance.

## 9. GDPR

Effective information sharing underpins integrated working and is a vital element of both early intervention and safeguarding. This means that our associated Safeguarding and Concern Procedures often involves the processing of special category personal data.

Due to the sensitivity of the personal data being shared within safeguarding cases, it is imperative that all staff, volunteers, and contractors confidently adhere to our relevant Data Protection Policy and Data Sharing Policy and Procedures. Please remember to:

- Share information securely through secure means (Mimecast, a secure link or a password protected document)
- Comply with the principle of data minimisation by only sharing data that is relevant and necessary
- Ensure any documents relating to safeguarding are saved in a secure location and in accordance with its set retention period (refer to the Personal Data Retention Policy for more information)
- Before sharing any personal data externally with partner agencies, contractors or suppliers, ensure a data protection sharing agreement is in place and they have undergone our due diligence process
- Contact your Data Champions or our Data Protection Officer where you have any data protection queries

## 10. Recruitment

All members of staff and volunteers having regular contact with children or adults at risk will undergo an enhanced Disclosure & Barring Service check on their recruitment and every 3 years thereafter. The Human Resources team retains a list of affected roles which should be consulted where necessary.

## 11. Staff Training

We will provide all staff with mandatory role-appropriate training in good safeguarding practice and prevention including the six principles of: empowerment, prevention, proportionality, protection, partnership and accountability. Training will take place every two years as a minimum. This will be documented in the organisation's Training Plan overseen by the HR team.

Managers will be alerted as to when their staff need to attend introductory or refresher training for their role.

On occasions E-learning topics around safeguarding will be compulsory for all staff e.g. Modern Slavery e-learning.

## **12. Wider Partnerships with Agencies**

Alongside our duty to refer safeguarding concerns, we also have a duty to share information and generally co-operate with the Local Authority in assisting the Local Authority to meet its own safeguarding duties. This may involve sharing information about a child or adult at risk with the Local Authority.

In all cases, an applicable information sharing protocol will be followed and where possible the consent of the individual (or their responsible adult/advocate) will be obtained in accordance with the UK General Data Protection Regulation and Data Protection Act 2018. Information may need to be shared without consent where it is necessary to protect a person's vital interests or those of a third party or where it is necessary for the prevention or detection of a crime. Our Data Protection Policy found on Grapevine gives further information and guidance in this area.

## **13. Supporting Staff**

We offer access to an Employee Assistance Programme (EAP) for staff members affected by a safeguarding (or any other) issue to receive confidential, specialist (telephone or face to face) counselling as a means of support. The service is available 24 hours a day all year-round. Individuals can access this directly themselves or through their line manager.

## **14. Reviewing Cases**

Where additional training is required, this will be arranged in early course and outcomes monitored by the Director of Housing as part of the Operations risk map to ensure all relevant objectives are met.

## **15. Equality & Diversity Considerations**

We are committed to fairness and equality for all and will not discriminate against any person in its application of this Policy and Procedure by reason of their age, gender/gender identity, racial/ethnic origin, language, sexual orientation, religion or health status.

## **16. Policy Monitoring**

Concerns recorded under the Safeguarding Policy and Procedure and their progress/outcome, will be reported on quarterly to the Director of Housing. The Director of Housing will consider any necessary changes or improvements to this Procedure or the Safeguarding Policy accordingly.

## 17. Appendices

- Appendix 1 - Local Authority Designated Officer (LADO) Form
- Appendix 2 – Concerns Procedure
- Appendix 3 - Logging a Concern Case on CAS User Guide
- Appendix 4 – Managing a Concern Case on CAS User Guide
- Appendix 5 – Closing a Safeguarding Case Guidance Notes
- Appendix 6 – Mental Health Referral Form

## 18. Related Documents

- Chime Housing Safeguarding Register
- Person UDC Policy & Procedure
- Anti-Social Behaviour Policy & Procedure
- Harassment & Hate Crime Policy & Procedure
- Domestic Abuse Policy & Procedure
- Whistleblowing Policy
- Recruitment Policy
- Hoarding Policy & Procedure
- Subject Access Request Policy & Procedure
- Data Protection Policy & Person
- Talent Development Policy
- Conduct Policy & Procedure
- Personal Data Retention Policy