

Safeguarding Policy

Linked strategies	All
Version	3
Date approved by	Board – 27 May 2021
Policy level	1
Date effective (Subject to staff consultation)	May 2021
Date of next review	May 2024
Policy Owner	Head of Housing and Support Services.

1 Policy Statement

1.1 Greatwell Homes is committed to preventing harm to children and adults at risk. This policy and the associated procedures set out a consistent response to suspicions or allegations of abuse and or neglect.

1.2 This policy is informed by the following legislation.

- The Children Act (1989)
- Data Protection Act (2018)
- Freedom of Information Act (2004)
- The Mental Capacity Act (2005)
- Safeguarding Vulnerable Groups Act (2006)
- Protection of Freedoms Act (2012)
- The Care Act (2014)
- The Children and Social Work Act (2017)

2 Scope

2.1 This policy applies to all Greatwell Homes staff, customers, stakeholders, contractors, and volunteers.

3 Definitions

3.1 For the purposes of this policy the relevant definitions are set out below –

3.2 **Safeguarding** is defined as protecting a person's right to live in safety, free from abuse or neglect.

3.3 **A Child** is defined as anyone under the age of 18

3.4 **An adult at risk** is defined as any person who is aged 18 years or over and at risk of abuse or neglect. because of their needs for care and/ or support. This definition is set out in the Care Act (2014).

3.5 The Care Act (2014) defines **neglect** as

'Deliberately withholding, or failing to provide, suitable and adequate care and support needed. It may be through a lack of knowledge or awareness, or through a decision not to act.'

3.6 The Care Act (2014) sets out eight types of abuse –

- Physical
- domestic abuse
- sexual abuse
- emotional abuse
- financial abuse
- modern slavery
- discriminatory abuse
- institutional abuse

4 Policy Principles

- 4.1 Safeguarding children and adults at risk is the responsibility of every Greatwell Homes staff member and contractor, and staff must follow safeguarding procedures.
- 4.2 Greatwell Homes will always seek to work in partnerships with other agencies both proactively and reactively to reduce the risk of harm to children and adults at risk.
- 4.3 Greatwell Homes will monitor all reported safeguarding cases, keep up to date records and use these to establish patterns, perpetrators, and emerging trends.
- 4.4 Greatwell Homes will work with contractors operating on their behalf to ensure they carry out Disclosure and barring service (DBS) checks on employees working in or around customers' homes Greatwell Homes will carry out DBS checks on all customer facing employees at three-year intervals.
- 4.5 Greatwell Homes will seek to work collaboratively with statutory agencies to ensure all concerns raised are discussed and referred to the relevant agencies promptly.

5 Safeguarding for Customers

- 5.1 Greatwell Homes will adopt both pre-emptive and reactive measures to prevent and stop abuse or neglect. There are many points in the customer journey, outlined

below, where staff have contact with customers. We will adopt the following pre-emptive steps to identify any safeguarding concerns.

5.2 Pre-Tenancy

- Pre tenancy interview
- Financial assessment
- Referral form for Independent Living customers
- Needs assessment for Independent Living customers

5.3 During the Tenancy

- Sign up of the tenancy.
- 1st year of tenancy visits
- Tenancy and arrears visits
- Management of ASB which includes hate crime and domestic abuse.
- ASB, Domestic Abuse and Hate Crime case reviews.
- Risk assessments and support plans for those customers in Independent Living
- Estate inspections
- Repairs visits
- Staff attendance at specialist forums
- Gas and electric testing checks

5.4 Ending a Tenancy

- Pre-Termination Visits
- When carrying out an eviction

6 Partnership Working

6.1 Greatwell Homes will always seek to work in partnerships with other agencies both proactively and reactively to reduce the risk of harm to children and adults at risk. Staff will attend relevant forums and work collaboratively to resolve complex issues affecting communities and individuals that will prevent harm.

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6.3 MAPPA

6.3.1 Greatwell Homes will be an activate representative in Multi-Agency Public Protection Arrangements (MAPPAs) for high risk violent and sexual offenders. MAPPAs work in partnerships to ensure high risk offenders are housed appropriately. We will ensure that all MAPPAs referrals to Greatwell Homes stock will have a full risk assessment undertaken prior to acceptance.

6.4 MARAC & Domestic Abuse

6.4.1 Greatwell Homes will be represented at the Northamptonshire Multi Agency Risk Assessment Conference (MARAC) to support survivors of high-risk domestic abuse.

6.4.2 Greatwell Homes will complete a referral to the multi-agency safeguarding hub in all cases where domestic abuse is suspected, and children are present in the home.

6.4.3 Greatwell Homes has signed up to the Chartered Institute of Housing's (CIH) 'Take a Stand' Pledge. This commits the organisation to do four things to support people suffering domestic abuse by -

- Put in place and embed a policy to support residents who are affected by domestic abuse.
- Make information about national and local domestic abuse support services available on our website and in other appropriate places so that they are easily accessible for residents and staff.
- Have an HR policy to support members of staff who may be experiencing domestic abuse.
- Have a champion at a senior level in your organisation to own the activity you are doing to support people experiencing domestic abuse.

6.5 Safeguarding & Homelessness

6.5.1 Greatwell Homes has signed up to the National Housing Federation's 'Commitment to Refer' and will complete a referral to the local authority housing options teams for any customer threatened with homelessness. Where a child is present in the property a safeguarding referral to children's social care will be completed also.

6.5.2 Where a staff member has serious concerns for the welfare of a customer or is unable to establish the welfare of a child or adult at risk, they will contact the police to request a safe and well check be undertaken.

7 Safeguarding for Staff

7.1 New Starters

- 7.1.1 Interview questions for every role are varied from recruitment to recruitment to prevent them becoming known and applicants preparing for these.
- 7.1.2 Two satisfactory references from previous employers must be received prior to any new starter being confirmed in post.
- 7.1.3 Every new starter will be subject to a basic DBS check
- 7.1.4 No customer facing new starter will be permitted to lone work until their DBS has been returned. DBS disclosures will be subject to a criminal risk assessment. with the head of service making final decision which could lead to a rescinding of an offer of employment.
- 7.1.5 In order to successfully complete their probation all new starters must complete a safeguarding e-learning course and attend a one-to-one session on the Greatwell Homes policy and procedure with the company's designated lead or deputy lead.

7.2 Ongoing Training for Existing Staff

- 7.2.1 Greatwell Homes staff will carry out online safeguarding training every two years and face to face safeguarding training annually. Human resources will hold a training data base and undertake an annual check to ensure compliance with this.
- 7.2.2 Greatwell Homes will maintain the roles of designated safeguarding lead and deputy safeguarding lead. The purpose of these roles will be to coordinate and oversee safeguarding procedures, as well as act as a first point of contact. Designated lead training will be completed annually by the designated lead and deputies.
- 7.2.3 The Support Services Manager will be Greatwell Homes' designated safeguarding lead, supported by the Housing Services Manager who will be our deputy safeguarding lead.

8 Monitoring and Performance Management

- 8.1 A log will be maintained to record all safeguarding cases and a folder for evidence of what has been done to keep customer safe alongside any outcomes.

- 8.2 On a quarterly basis the Head of Housing and Support Services will be required to report the Board on the number of safeguarding cases arising in the quarter and the outcomes.
- 8.3 Safeguarding will appear as a regular feature of internal audit to ensure compliance with policy and procedure.

9 Feedback

- 9.1 Where a customer wishes to provide feedback concerning our response to a safeguarding case, customer services should put the customer in touch with the designated lead or deputy designated lead to act as the single point of contact for this.
- 9.2 Allegations of abuse or neglect made against Greatwell Homes staff will be managed by the disciplinary procedure.

The Local Authority Designated Officer will be informed within one working day of any cases in which it is alleged that a person who works with children or adults at risk has: behaved in a way that has harmed, or may have harmed, a child or adult at risk.

10 Privacy Impact Assessment

- 10.1 A privacy impact assessment for this policy has been completed and is available upon request
- 10.2 The PIA does note implications for customers who are elderly, disabled and from BAME backgrounds. Proportionate actions have been included with the PIA to minimise their impact upon delivery of this policy.

11 Implications for customers

- 11.1 This policy will affect a small number of our customers. Where it doesn't put anyone at risk, a customer will be informed when a safeguarding alert is raised with the local authority about them. A safeguarding alert will be raised without seeking the consent from the customer (or parent in the case of a child) when there is a belief that do so would put someone at risk or make detection more difficult.

11.2 Ensuring that the policy is implemented effectively will have a significant impact on the experience of these customers. Failure to follow this policy and associated procedures correctly could lead to significant harm.

12 Responsibility and Decision Making

The table below illustrates the structure for responsibility and decision making in relation to this policy.

Person Responsible	Scope
Head of Housing and Support Services	<ul style="list-style-type: none"> • Overall responsibility for ensuring that all activities are undertaken, and all performance measurements are met. • Reporting data quarterly to board
Heads of Service	<ul style="list-style-type: none"> • Reviewing any criminal risk assessments in their area and deciding if candidates are to be offered a role.
Safeguarding Lead / Deputy Safeguarding Lead.	<ul style="list-style-type: none"> • Responsible for the day-today application and adherence to this policy • Responsible for logging and monitoring all safeguarding cases. • Responsible for providing quarterly data to HHSS. • Responsible for review of safeguarding log annually and identify any key points for action. • Responsible for providing information, advice, and guidance to other staff members

	<p>on matter related to safeguarding.</p> <ul style="list-style-type: none"> Responsible for escalating with social care management any responses to safeguarding alerts that are unsatisfactory or don't meet with expectations
HR Manager	<ul style="list-style-type: none"> Responsible for checking DBS checks are carried out on all relevant staff. Responsible for requesting previous employment references. Responsible for annual check of training data base Responsible for checking full completion of all corporate inductions
All Managers	<ul style="list-style-type: none"> Booking safeguarding induction with designated lead for all new starters Not signing off probation without completion of safeguarding e-learning or 1 to 1 induction
All staff	<ul style="list-style-type: none"> Raising safeguarding concerns when identified Keep detailed records on Orchard of work with customers

13 Review

13.1 This Policy will be reviewed every three years or in line with changes in legislation, whichever is the sooner, updates or recommendations for changes will be presented to the Greatwell Homes Board.

Associated Policies	Associated Procedures
	Safeguarding Procedure

Recruitment and Selection Policy	
Disciplinary Policy	Disciplinary Procedure
Tenancy Sustainment Policy	
Domestic Abuse policy for customers	Domestic Abuse support for Employees