

Paragon Asra Housing Limited

Safeguarding Policy

May 2018

Owning manager

Sharon Butler and Angela Wade
Tenancy Solutions Team Manager

Department

Housing Services

Approved by EMT

30 May 2018

Next review date

May 2021

Contents

	Page	
1	Introduction	3
2	Objectives	3
3	Definitions	3
4	Safeguarding adults	4
5	Key points of policy	4
6	Identifying vulnerability	6
7	Early help	6
8	Confidentiality and information sharing	7
9	Sexual exploitation	7
10	Keeping safe online	8
11	Use of photographs and videos	8
12	Training	8
13	Monitoring and reporting	9
14	Equality analysis	9
15	Consultation	9
16	Legislation	9
17	Linked policies	10

Paragon Asra Housing Limited (PA Housing) is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all of our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats we will provide them.

AUDIT LOG

Date of change	Who updated	Details of the change

1. Introduction

- 1.1 Paragon Asra Housing Limited (PA Housing) provides housing and support services to a wide range of people, and some of these are vulnerable or may be at risk of being harmed. We actively work to safeguard children, young people and vulnerable adults from harm and we will respond appropriately if it occurs. We have a duty to tell Social Services if there are any protection concerns about any of our customers, 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.
- 1.2 A Local Safeguarding Children Board (LSCB) and a Local Adult Safeguarding Board (LASB) operate in each local authority area and these take the lead role in co-ordinating and ensuring the effectiveness of services to safeguard children and young people/adults in that area. PA Housing is committed to working in partnership with all of the local authorities and relevant agencies in its areas of operation, within the frameworks agreed by the LSCBs and LSABs in the areas in which we work, in order to protect vulnerable children and adults.

2. Objectives

- 2.1 This policy sets out PA Housing's approach to safeguarding children, young people and vulnerable adults from significant harm, abuse or neglect, and promoting their welfare and wellbeing.
- 2.2 Effective safeguarding is a shared responsibility. The policy applies to all staff and volunteers, who individually and collectively have a responsibility to play a part in safeguarding the children, young people and adults who are at risk of abuse or neglect in our communities, and those vulnerable customers who give rise to concerns due to issues of self-harm or self-neglect which are not as a result of third party abuse.
- 2.3 No single person can have a full picture of the needs and circumstances of a child or adult at risk, and if children, families and adults at risk are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- 2.4 The policy relates to all accommodation and neighbourhoods visited by any member of staff, board member, volunteer or contractor. All staff, volunteers and external partners therefore have a duty to safeguard and promote the welfare of customers as far as possible, to minimise the opportunities for abuse and or neglect.
- 2.5 All staff should be aware of their responsibilities and how to act in ways that protect themselves from wrongful allegations of abuse.

3. Definition - What is Safeguarding?

3.1 Safeguarding children and young people

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best

outcomes. (*Working Together to Safeguard Children*, DfE, 2015)

- 3.2 A 'child' is anyone who is aged up to 18 years.
- 3.3 All children and young people have the right to be safe from harm and need safe environments to grow with confidence. Everyone is responsible for helping to keep children safe. Safeguarding children and young people means protecting them from any potential source of harm.
- 3.4 There are links between domestic abuse, substance misuse, mental health needs and poor outcomes for families and children. Families may demonstrate levels of resilience with appropriate support, and therefore it is not inevitable that families who experience problems are at risk and in need of protection. We also need to consider circumstances where families may not reach the criteria for safeguarding, but where interventions such as offering financial support or signposting to appropriate services may act to prevent deterioration and the need for statutory intervention.

4. Safeguarding adults

- 4.1 Safeguarding means protecting an adult'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 or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.
- 4.2 Organisations should always promote the adult's wellbeing in their safeguarding arrangements. People have complex lives and being safe is only one of the things they want for themselves. Professionals should work with the adult to establish what being safe means to them and how that can be best achieved. Professionals and other staff should not be advocating "safety" measures that do not take account of individual well-being.
(*Care and Support Statutory Guidance* Issued under the Care Act 2014, DoH)
- 4.3 Six key principles underpin all adult safeguarding work:
 - Empowerment – People being supported and encouraged to make their own decisions and informed consent
 - Prevention – It is better to take action before harm occurs
 - Proportionality – The least intrusive response appropriate to the risk presented
 - Protection – Support and representation for those in greatest need
 - Partnership – Local solutions through services working with their local neighbourhoods, where people have a part to play in preventing, detecting and reporting neglect and abuse
 - Accountability – Accountability and transparency in delivering safeguarding

5. Keys points of policy

- 5.1 We take the protection and safeguarding of our customers and their family members very seriously. Abuse is a violation of an individual's human and civil rights. We accept our role as part of the inter-agency framework for safeguarding, and also accept the need for a clear and consistent approach to safeguarding, with policies and procedures to underpin and inform this.

- 5.2 We ensure that our staff and customers understand what abuse is, what to do if they have a concern and to whom they can report concerns.
- 5.3 PA Housing will adopt the Child Protection Procedures linked to LCSB procedures, since these may vary from region to region. We will also adopt the same principle for Safeguarding Adults from Abuse.
- 5.4 Some of the local authorities where we work have made minor adaptations to these policies and procedures to reflect their local arrangements and the most up to date versions of these may be found on the websites of the relevant LSCB or LASB. PA Housing will follow the applicable local protocol for both adults and children.
- 5.5 PA Housing will follow the recommendations from the Protecting Children from Radicalisation as well as vulnerable adults as defined in the Prevent Duty Guidance as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'. It is recognised that children and vulnerable adults may be more likely to be drawn into radicalisation. In the event that PA Housing has been informed that abuse of a child or a vulnerable adult is taking place or that they are at risk of radicalisation, this will be reported to the Head of Housing Services.
- 5.6 Child protection is covered by legislation that does not assume capacity. Similarly, the policy refers to the use of the Mental Capacity Act in supporting those adults who lack capacity in decision-making about their protection. Equally, this policy supports staff to work with adult customers who have capacity in order to negotiate a desirable outcome, ensuring choice, dignity and rights.
- 5.7 PA Housing has issued a Modern Slavery Act Statement on its website and takes care to ensure that slavery and human trafficking do not exist in our supply chains. New suppliers are required to declare that they are not involved in slavery or human trafficking and, where relevant, share their own Modern Slavery Statement with PA Housing. Contracts with suppliers require them to take appropriate steps to ensure that there is no slavery or human trafficking in their own supply chains. Staff are required to be vigilant about this requirement.
- 5.8 PA Housing has detailed procedures that cover the management and reporting of abuse and neglect. These include referral/ alert work flows taken from the local authority protocols which show the different local arrangements. Any member of staff who suspects or receives an allegation has a duty of care to report it to their line manager immediately. The manager will consult the safeguarding lead (Head of Housing Services) and refer to the local protocol in order to report the case to the local authority without delay, and/or the police where appropriate. Any discussions and actions carried out should be recorded accurately and promptly and stored securely.
- 5.9 All safeguarding cases will be logged on the housing management IT system or a safeguarding data base to ensure effective recording, progress monitoring and reporting.
- 5.10 Managers will fully co-operate with the specialist agencies and work with them to investigate any alleged breach of tenancy agreement and take action where appropriate.
- 5.11 If a customer suspects that harm is taking place they should report it to their local

Social Services, the police or a member of staff.

6. Identifying vulnerability

- 6.1 We aim to ensure that customers who are presenting as at risk or giving rise to a cause for concern, are identified at an early stage and receive appropriate advice and support as required to help them stay safe in the community of their choice and maintain their tenancy.
- 6.2 In carrying out their work, which can include entering customers' homes on a regular basis, at a customer's request or to carry out maintenance inspections, staff might see evidence of harm. They may become concerned about the safety or welfare of a child, young person or vulnerable adult in a number of ways:
- The person may tell you
 - The person may say something that worries you
 - A third party may voice concerns
 - You may see something – an incident or an injury or other sign
- 6.3 Concerns can take many forms; evidence of an impoverished environment, lack of food, heat, access to medical treatment needed, unkempt and poor hygiene, repairs not reported, evidence of rent arrears, lack of children's bedding, toys and facilities, poor school attendance. Relationship issues such as the way that people communicate with children, spouse and or parents may alert staff.
- 6.4 A person can become at risk at any time and all staff and contractors have a responsibility to be aware of actual and potential risk to adults and children and to ensure that the correct process is followed.
- 6.5 The purpose of identifying potential risk is to ensure that the service provided is, where possible, tailored to meet the needs of the individual. We recognise that individuals need different levels of support from a variety of agencies. We provide support with housing and tenancy management issues and we can assist other agencies in providing a "wrap-around" service for vulnerable customers and their families.
- 6.5 There are circumstances where the person alleged to have caused harm may also be an adult at risk of abuse or neglect, and in these circumstances they must receive protection and support using a multi-agency approach.

7. Early help

- 7.1 Children and families will always benefit from having emerging problems responded to at the earliest opportunity. As a provider of social housing, PA Housing and its staff have a key role in identifying emerging problems and potential unmet needs for individual children and families and sharing information with other professionals to assist with early identification and assessment.
- 7.2 All staff should be alert to the potential need for early help for a child who:
- Is disabled and has specific additional needs
 - Has special educational needs
 - Is a young carer
 - Is showing signs of engaging in anti-social or criminal behaviour
 - Is in family circumstances presenting challenges for the child such as substance misuse, adult mental health problems or domestic violence

and abuse

- Is showing early signs of abuse or neglect
- Is showing signs of radicalisation

7.3 Equally, there will be adults who are also vulnerable for a range of reasons, including poor childhood experiences, and who are less resilient in coping with difficulties.

7.4 Staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share that information with their manager and/or the safeguarding lead (Head of Housing Services), and work together to provide children with the support they need.

8. Confidentiality and information sharing

8.1 We understand the importance of ensuring that personal data is always treated fairly, lawfully and appropriately and that the rights of individuals are upheld. However, we are clear that where an individual's safety is at risk, we are required to report our concerns to the responsible authorities and share information with them.

8.2 Information that may be shared includes names, contact details, a person's physical or mental health, or relations with others. The sharing of this information will be restricted to those who have a demonstrable need to know and robust protections, such as encryption, should be used to share this information.

8.3 If a member of staff or one of our contractors becomes concerned about the safety or welfare of a child, young person or vulnerable adult, it is imperative that advice is sought from the safeguarding lead (Head of Housing Services).

9. Sexual exploitation

9.1 Whilst much abuse of children and young people takes place within the home and family, sexual exploitation has emerged as a form of abuse which can be more visible to a wider range of people.

9.2 Sexual exploitation is where a young person receives 'something', (e.g. food, accommodation, drugs, gifts, money) as a result of performing, and/or others performing on them, sexual activities.

9.3 Child sexual exploitation can occur through use of technology, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain.

9.4 In all cases the person exploiting the young person has power over them by virtue of age, gender, intellect, physical strength and/or economic or other resources.

9.5 Violence, coercion and intimidation are common, with involvement in exploitative relationship being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

9.6 Whilst definitions and guidance in relation to sexual exploitation focus on children under 18 as victims, it can also happen to young adults.

10. Keeping safe online

- 10.1 Many people, particularly children, young people and young adults, use technologies (such as mobile phones, email, social networking sites, Instant Messenger) as a positive and creative part of their activities. Children and young people often use these methods to make plans with friends or organise events so if you are working with young people it might be necessary to communicate with them in this way.
- 10.2 Staff should not give out their personal contact details, including home address, personal e-mail address or mobile numbers. Under no circumstances should personal accounts in social networking sites be used to communicate with children/young people/ young adults that staff have met in the course of their work. The use of a professional networking site may only be used in line with the Social Media policy.
- 10.3 Adults, where possible, should only use equipment provided through work to communicate with children and young people. In all circumstances, adults should be cautious in their communications so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.

11. Use of photographs and videos

- 11.1 Any publications or communications we produce that contain photographs or videos of children or adults at risk, will not contain personal information about them that could identify their whereabouts. Children and adults at risk will not be portrayed in a demeaning or tasteless way.
- 11.2 Only staff or approved professional photographers and film makers will be used to take photographs and video footage of events and other community activities. Videos and photographs will be stored securely in accordance with the Data Protection policy.
- 11.3 Before an image of a child or adult at risk is used, written consent is obtained from parents, guardians or carers. Verbal consent is also obtained from the child or adult if they can communicate verbally.
- 11.4 Photographs or record footage from schools are subject to written permission from the head teacher on behalf of the pupils. Large group shots do not require consent, but any parent, guardian or carer will be given the opportunity to withdraw their child from being photographed or recorded at any time.

12. Training

- 12.1 As part of their induction training, all relevant staff and volunteers are required to read and understand this policy to ensure that they are able to identify children, young people and vulnerable adults who may be at risk and act appropriately.
- 12.2 A clear safeguarding training pathway for staff and volunteers according to the level of need is in place. Where staff have specific roles with children and families, enhanced training will be considered.
- 12.3 All training will be recorded on individual training logs.

13. Monitoring and reporting

- 13.1 There is a clear line of accountability for work on safeguarding; from the Board and the Executive Directors of Operations and throughout the organisation.
- 13.2 This policy spells out what these lines of accountability are and is designed to ensure appropriate interventions are taken and, where necessary, referrals made to local authorities and to Local Safeguarding Boards.
- 13.3 Each case of concern should be reported to the appropriate manager who will provide guidance and supervision to make sure it is handled properly. The safeguarding lead should be advised of all safeguarding matters, and will keep a record of all such cases.
- 13.4 The safeguarding leads are the Head of Housing Services, Rachael Smart 01932 235795 rachael.smart@pahousing.co.uk for London and the South East and Sally-Anne Underhill 0116 2576819 sally-anne.underhill@pahousing.co.uk for the Midlands and London.
- 13.5 The Executive Directors of Operations will provide a Safeguarding annual review to the Audit and Risk Committee.
- 13.6 PA Housing is committed to continually developing good practice and monitoring standards, in conjunction with our partner agencies. The service is subject to internal audit and recommendations from internal audit will be adopted.

14. Equality analysis

- 14.1 This policy has undergone an equality analysis to make sure that we do not illegally discriminate against anyone and that it is accessible to everyone.

15. Consultation

- 15.1 Customers were consulted on whether this policy is clear, reasonable and easy to understand. Where customers didn't find the policy clear, we changed parts of it to meet their suggestions.

16. Legislation

The following legislation has been considered:

- Care Act 2014 and the Care and Support Statutory Guidance (issued under the Care Act 2014)
- Children Act 2004 and "Working Together to Safeguard Children" (Department for Education Guidance 2015)
- Mental Capacity Act 2005 - Deprivation of Liberty Safeguards
- Mental Health Act 2007
- Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedom Act 2012
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, March 2015)
- Data Protection Act 1998
- Public Interest Disclosure Act 1998
- The Modern Slavery Act 2015.

17. Linked policies

Anti-social Behaviour
Complaints
Data Protection
Disclosure and Barring
Domestic Abuse
Employee Code of Conduct
Equality & Diversity
Hate Crime
Hoarding
Lone Working
Neighbour Dispute
Social Media
Whistleblowing