



# **Safeguarding Policy**

## **July 2024**

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

Safeguarding Policy	Approved: July 2024	Approver: Services Committee
Version 1.0	Review Date: July 2026	Page 1 of 10

## 1 Introduction

- 1.1 This policy outlines our approach to preventing and reducing the risk of harm to our customers and their households, including children, who are experiencing, or are at risk from abuse or neglect.
- 1.2 SW9 recognises we have a responsibility to keep our customers safe from harm.
- 1.3 The Safeguarding policy is an overarching policy applied across all of our tenures at SW9. It is the responsibility of each person working on behalf of SW9 to consider the safety and welfare of the adults and children that we come into contact with.

This policy sets out how SW9 will use the Department of Health and Social Care's six principles which underpin safeguarding work.

- 1.4 All Safeguarding case management will be overseen by local Safeguarding Champions and via local Safeguarding Panels. The current Safeguarding Champions are:
  - Supported Housing Scheme Manager
  - Tenancy Support Officer
- 1.5 This policy complies with the Regulator of Social Housing's Tenancy Involvement and Empowerment Standard.

## 2 Aims and Objectives

- 2.1 The aims & objectives of this policy are to:
  - Outline SW9's 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 SW9's procedures to respond promptly and proportionately to any safeguarding concern.
- 2.2 This Policy applies to all SW9 partners to which we commission external services. We expect them to have appropriate safeguarding procedures in place.
- 2.3 The Safeguarding Policy extends to members of staff at SW9 or those working on behalf of SW9; should there be concerns about the wellbeing of an employee, please contact HR. In addition the help and support of our Mental Health First Aiders can be sought.
- 2.4 If a Safeguarding concern relates to an allegation against a member of staff, it will be dealt with in line with the disciplinary procedure.

Safeguarding Policy	Approved: July 2024	Approver: Services Committee
Version 1.0	Review Date: July 2026	Page 2 of 10

### 3 Policy Statement

3.1 SW9 will apply the six key principles of the Department of Health and Social Care which underpin safeguarding work:

Protection	Support and protection are key to safeguarding customers 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.

3.2 With all safeguarding suspicions or allegations including neglect and abuse, SW9 will complete a Safeguarding Concerns Report. If a significant risk is identified the concerns will be forwarded to the 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 cooperate 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.

## 4 Definitions

- 4.1 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.
- 4.2 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.

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 • coercion
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	Being 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.  Self-neglect includes cases of hoarding where the OCD Foundation's Clutter Rating scale rating exceeds '4' (in accordance with SW9's Hoarding Procedure).

## 5 Partnership Working

5.1 SW9 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.
- **Lambeth 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 coordinated 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.
- **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.

## 5.2 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

Safeguarding Policy	Approved: July 2024	Approver: Services Committee
Version 1.0	Review Date: July 2026	Page 6 of 10

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.

## **6 Monitoring and responsibilities**

6.1 All staff are required to be familiar with this policy. In particular:

- The Head of Customer Service is responsible for the implementation and compliance of this policy and ensuring that staff training is provided. They will provide an annual report to the Senior Leadership Team, the Services Committee and the SW9 Board on the effectiveness of this policy.
- The Safeguarding Champions are responsible for the implementation and compliance of this policy. They will monitor all cases and discuss cases prior to closure.
- The Scheme Manager, Property Services Manager and Housing Services Manager are responsible for completing referrals and referring them to the Safeguarding Champions. 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.

6.2 The following are responsible for the implementation of this Policy and the supporting procedure:

- Head of Customer Services
- Supported Housing Manager
- Neighbourhood Services Manager

6.3 SW9 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 SW9 have sign posted cases to external agencies or cases where it is felt that SW9 are not required to carry out any further actions.

## **7 Training**

7.1 All staff at SW9 will receive basic, online safeguarding training because SW9 recognises that Safeguarding is everyone's responsibility.

7.2 All staff will undertake training on the SW9 Safeguarding Policy and Procedure.

7.3 Frontline staff (e.g. Neighbourhood Officers/Property Managers/Scheme Managers) will receive specialist Safeguarding training.

Safeguarding Policy	Approved: July 2024	Approver: Services Committee
Version 1.0	Review Date: July 2026	Page 7 of 10



## 8 Related documents

8.1 This policy should be read in conjunction with the following SW9 policies:

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

## 9 Legislation and regulation

The legislation listed below is not intended to cover all legislation applicable to this policy. To meet the required standard of the Regulator of Social Housing, namely the Governance & Financial Viability Standard on adherence with all relevant law, SW9 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.

- Support Statutory Guidance 2017 of the Department of Health and Social Care
- Care Act 2014
- Mental Capacity Act 2005
- Mental Health Act 2007
- Children Act 2014
- Sexual Offences Act 2003
- Human Rights Act 1998
- Protection of Freedoms Act 2012
- Data Protection Act 2018
- Modern Slavery Act 2015
- Equality Act 2010
- Safeguarding Vulnerable Adults Act 2006
- Housing Act 1985 & 1996
- Counter Terrorism and Security Act 2015 (Prevent Duty)
- Deprivation of Liberties Safeguards 2007
- Disability Discrimination Act 2003
- Safeguarding Adults – National Framework of Standards 2005

Safeguarding Policy	Approved: July 2024	Approver: Services Committee
Version 1.0	Review Date: July 2026	Page 8 of 10

- Every Child Matters: Change for Children 2004
- Children and Families Act 2014

## 11 **Complaints**

Any customer 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.

## 12. **Performance Monitoring**

Each individual case is reviewed by the safeguarding champions and the Head of Customer Services. More high-level performance information regarding the number of cases, the case type and the length of time the case was open will be compiled by the Head of Customer Services and will be submitted to the Senior Leadership Team on a quarterly basis. An Annual performance report is submitted to the Services Committee and the Board.

## 13. **Equality and diversity**

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**

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

Safeguarding Policy	Approved: July 2024	Approver: Services Committee
Version 1.0	Review Date: July 2026	Page 9 of 10