

### Safeguarding Policy

#### 1.0 Introduction

1.1 The Wrekin Housing Group (the 'Group') is committed to ensuring that adults and children are safeguarded from abuse or neglect. This Safeguarding Policy sets out how we will meet our statutory obligations and manage safeguarding appropriately, ensuring that staff can raise concerns about any adult or child who they think is at risk of harm, abuse or neglect.

1.2 This policy adopts the six safeguarding principles: Empowerment, Protection, Prevention, Proportionality, Partnership and Accountability. The policy should be read in conjunction with the Safeguarding procedures.

#### 2.0 Policy Statement

2.1 The Safeguarding Policy sets out the standards that the Group will adhere to and the approach we will take to ensure that all residents and customers are safeguarded from abuse or neglect.

2.2 This policy and associated procedure aim to safeguard all adults and children who live in our properties, receive a service from the Group or who are employed by the Group.

#### 3.0 Policy aims

3.1 This policy and the associated procedure aims to:

- provide guidance for staff to be able to recognise and identify the types and signs of abuse or neglect;
- provide guidance for staff to enable them to feel confident to act on and report suspected or actual incidents of abuse or neglect, including responding to any immediate safety needs;
- identify the reporting pathway for raising an alert and making a safeguarding referral;
- ensure that staff are able to record any concerns and the action taken;
- clarify the support and advice available to staff who are involved in a safeguarding situation;
- clarify the organisational structure and governance arrangements in relation to adult safeguarding.

#### 4.0 The Principles of Safeguarding

4.1 The six safeguarding principles are:

- Empowerment – presumption of person led decisions and informed consent.
- Prevention – it is better to act before harm occurs.

- Proportionality – proportionate and least intrusive response appropriate to the risk presented.
- Protection – support and representation for those in greatest need
- Partnerships – local solutions through services working with their communities.
- Accountability – accountability and transparency in delivering safeguarding.

4.2 Further detail about making safeguarding personal statements can be found in the Safeguarding Procedure.

## 5.0 Policy Scope

5.1 This policy applies to all staff including volunteers and agency staff, apprentices, Board members, work placements, contractors, subcontractors and anybody working on behalf of the Group.

## 6.0 Definitions

6.1 Safeguarding – protecting a person’s rights to live in safety, free from abuse and neglect.

6.2 Child – an individual up to the age of 18.

6.3 Vulnerable adult – someone who may need care because of a physical, learning or other disability or because of their age or illness. This also applies to an adult who is unable to take care of themselves properly, or who is unable to protect themselves from significant harm or exploitation.

## 7.0 Roles and Responsibilities

7.1 The Wrekin Housing Group Board are responsible for scrutiny, oversight and adherence to this policy.

7.2 The Head of Care Operations is the Safeguarding Lead for the Group ([Claire.Skelton@wrekin.com](mailto:Claire.Skelton@wrekin.com) / 07484 001063).

7.3 All staff, volunteers, work placements, agency staff, Board members, contractors and subcontractors are responsible for understanding the different types of abuse. Everyone has a responsibility to report concerns of abuse or neglect.

## 8.0 Categories of abuse

8.1 Abuse is a violation of an individual's human and civil rights by another person/s and may result in harm to, or exploitation of, the person subjected to it. It may consist of a single act or repeated acts, be deliberate or unintentional or result from a lack of knowledge. There are different types of abuse:

8.2 Financial abuse – a type of abuse which includes having money or other property stolen, being defrauded, put under pressure in relation to money / property and

having money or property misused. Financial abuse commonly means controlling a persons ability to acquire, use and maintain their own money and financial resources.

8.3 Physical abuse – includes assault, hitting, slapping, pushing, restraint, inappropriate physical sanctions or misuse of medication.

8.4 Psychological and emotional abuse – abuse which has a harmful effect on the person's emotional health and development. This includes but is not limited to:

- Mental distress;
- The denial of basic human and civil rights such as self-expression, privacy and dignity;
- Neglecting the right of the adult to make choices and undermining their self-esteem;
- Isolation that has a harmful effect on the persons emotional health, development or wellbeing.

8.5 Sexual abuse – includes rape, sexual assault or sexual acts that a person has not consented to or was pressured into consenting.

8.6 Neglect – includes ignoring medical and physical care needs, failing to provide appropriate health, care, support or educational service and withholding necessities such as medication and nutrition.

8.7 Domestic abuse – defined as 'any incident of threatening behaviours, violence, coercive control or abuse between adults who are or have been in a relationship together, or between family members, regardless of gender or sexuality'. Domestic abuse can also include emotional abuse or coercive control.

8.8 Self-neglect – this covers a wide range of behaviour neglecting to care for an individual's personal hygiene, health or surroundings and includes behaviour such as hoarding.

8.9 Organisational or institutional abuse – this includes neglect and poor care practice within an institution or specific care setting like a care home. This can range from isolated incidents to continuing ill-treatment.

8.10 Modern Slavery – is the illegal exploitation of other people for personal or commercial gain. Modern Slavery includes:

- Criminal Exploitation, for example pickpocketing, shoplifting and drug trafficking such as use by county lines gangs;
- Domestic Servitude, whereby victims are forced to work in private houses with restricted freedoms, long hours, or no pay;
- Forced Labour involving long hours, no pay, poor conditions, and/or verbal and physical threats;
- Sexual Exploitation such as prostitution and child abuse;
- Organ removal, forced begging, forced marriage and illegal adoption.

8.11 Discriminatory abuse – includes discrimination on grounds of race, age, gender and gender identity, disability, sexual orientation or religion and other forms of harassment including hate crimes.

8.12 Other forms of abuse may include, but are not limited to:

- Domestic abuse including controlling or coercive behaviour;
- Mate Crime;
- Cuckooing
- Peer-on-peer abuse;
- Bullying and cyber-bullying;
- Substance misuse;
- Teenage relationship abuse;
- Sexting;
- Radicalisation and/or extremist behaviour;
- Racist, disability and homophobic or transphobic abuse;
- Gang activity or youth violence;
- Female Genital Mutilation (FGM);
- Forced Marriage;
- Fabricated or induced illness;
- Poor parenting;
- Any other issues that pose a risk to children and vulnerable adults.

8.13 Definitions for all of the above can be found at **Appendix 1**.

## 9.0 Reporting a Safeguarding Concern

9.1 The Group has a statutory obligation to report safeguarding issues to relevant local authorities. All staff must report safeguarding concerns so that appropriate action can be taken. Where the service is CQC registered, a CQC notification must also be submitted, detailing the allegations and immediate actions taken to remove further risk of harm or abuse.

9.2 The full details of how staff can report a safeguarding concern can be found in the [safeguarding procedure](#).

9.3 All staff also have a duty to report concerns about colleagues who do not adhere to this policy and they should follow the Whistleblowing Policy to raise their concerns.

9.4 If staff are concerned about an individual's capacity, they should refer to the Mental Capacity Act Policy.

## 10.0 Managing Safeguarding Concerns

10.1 The Group's approach to managing safeguarding concerns is set out in the [safeguarding procedure](#).

## 11.0 Lessons Learned

- 11.1 Lessons learned will be shared quarterly as part of the Safeguard Leads Forum. The minutes of these forums will be documented and stored within the Safeguard Knowledge Library on Workplace.
- 11.2 A Safeguarding Toolkit will be completed by the Head of Care Operations on a three yearly basis in line with the policy review, to consider any actions that may need to be implemented.

## **12.0 Governance**

- 12.1 The Group Board hold ultimate responsibility for safeguarding across the organisation, receiving quarterly updates in relation to any key safeguarding risks for the Group. The Board are required to ensure the effective management of safeguarding and provide the appropriate challenge in respect of any safeguarding matters.
- 12.2 The Audit & Assurance Committee monitor the compliance of safeguarding and actions taken, receiving a quarterly update on any key safeguarding cases, bringing to the attention of the Group Board any matters of concern.
- 12.3 The Customer Committee hold responsibility for ensuring our customers are supported effectively with safeguarding, supporting a positive customer experience and monitoring any social impacts that may need to be considered through the review of safeguarding information provided to the committee.
- 12.4 The Executive Management Group will receive updates in relation to safeguarding across the organisation and are responsible for providing strategic oversight and monitoring.
- 12.5 The Locality Boards will monitor safeguarding reporting, training compliance and any trends in information identifying any key areas of concern and sharing learning across the organisation.
- 12.6 The Head of Care Operations, as the safeguarding lead for the organisation, will provide advice to the Executive Management Group on the strategic direction the Group should take in relation to safeguarding, as well as ensuring the operational oversight of training compliance, reporting and monitoring.

## **13.0 Training**

- 13.1 All staff will receive safeguard awareness annually.
- 13.2 Front-line staff with direct contact with customers, tenants and volunteers will receive Adult and / or Children Safeguard training tailored to their role. Refresher training will be provided every three years. All mandatory training can be accessed via the individual's profile on the LMS portal.
- 13.3 For those within regulated care services (regulated by CQC), as a minimum, all staff will be required to complete Adult Safeguarding Training on a 2 yearly basis and Children's Safeguarding Training on a 3 yearly basis.

- 13.4 All managers overseeing regulated activity will receive Safeguarding Lead training on a three yearly basis.
- 13.5 The Head of Care Operations, as the safeguarding lead for the organisation, completes a Level 5 in Safeguarding Training on a three yearly basis.
- 13.6 Training will be reviewed on an annual basis for staff across the organisation by the Head of Care Operations in connection with the Learning and Organisational Development Team.

## **14.0 Legal Framework**

14.1 The following legislation has been considered in relation to this policy:

- Care Act 2014;
- Children's Act 1989 and 2004;
- Data Protection Act 2028;
- Equality Act 2010;
- Human Rights Act 1998;
- Mental Capacity Act 2005; (Amendment) Act 2019
- Mental Health Act 1983 amended 2007;
- Modern Slavery Act 2015;
- Protection of Freedoms Act 2012 (DBS);
- Public Interest Disclosure Act 1998;
- Safeguarding Vulnerable Groups Act 2006;
- Sexual Offences Act 2003.

14.2 The Group will ensure compliance with the Data Protection Act 2018, the GDPR Regulations and will process personal information in accordance with the relevant legislation, together with the Confidentiality and Data Protection Policy and the provisions of any Data Sharing Agreement.

14.3 The Group will ensure that all staff understand that data protection is not a barrier and does not prevent the sharing of personal information, including special category data where it would protect the health, safety and welfare of an individual.

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| <b>The Wrekin</b><br><u>Housing Group</u>     | <b>Policy Control Sheet</b><br><b>Safeguarding Policy</b><br><b>Policy Reference Number – 2024/021</b>  |
| <b>Policy Author</b>                          | Vicky Andrews - Services Manager<br>(Supported)   |
| <b>Direct Lead</b>                            | Claire Skelton – Head of Care Operations  |
| <b>Version</b>                                | 2.0 September 2024  |
| <b>Target audience</b>                        | All employees of the Wrekin Housing Group including volunteers, agency workers, placements, contractors and sub-contractors.  |
| <b>Consultation</b>                           | Wrekin Voices<br>Senior Managers<br>Safeguarding Leads<br>Housing, Care, HR and Trade Teams<br>Executive Management Group   |
| <b>Date of Equality Impact Assessment</b>     | 24 <sup>th</sup> May 2024   |
| <b>Date of Data Privacy Impact Assessment</b> | Not required  |
| <b>Approving Body</b>                         | The Wrekin Housing Group Board  |
| <b>Date of final approval</b>                 | 25 <sup>th</sup> September 2024   |
| <b>Implementation date</b>                    | September 2024  |
| <b>Monitoring arrangements</b>                | Audit & Assurance Committee<br>The Wrekin Housing Group Board   |
| <b>Reporting</b>                              | Executive Management Group<br>Audit & Assurance Committee<br>The Wrekin Housing Group Board   |
| <b>Review date</b>                            | March 2027  |
| <b>Expiry date</b>                            | September 2027  |
| <b>Review cycle</b>                           | Three year review cycle   |
| <b>Policy category</b>                        | Corporate and Governance  |
| <b>Associated policies and procedures</b>     | Safeguarding Procedure<br>Anti-Social Behaviour Policy<br>Code of Conduct<br>Confidentiality and Data Protection Policy<br>Confidentiality and Data Protection Procedure<br>Consent to Care and Treatment Policy<br>Disciplinary Policy<br>Domestic Abuse Policy<br>Duty of Candour Policy<br>Modern Slavery Statement<br>Mental Capacity Act Policy<br>Whistleblowing Policy<br>Whistleblowing Procedure |
| <b>Policy location</b>                        | Sharepoint<br>Wrekin Housing Group website  |



## Summary of changes table

| Revision history                  |   |                      |  |
|-----------------------------------|---|----------------------|--|
| Author                            | Summary of changes                            | Version              | Authorised by & date   |
| Rebekah Newton                    | Policy shortened and separated from procedure | 1. June 2021         | The Wrekin Housing Group Board – 20 <sup>th</sup> September 2021 |
| Vicky Andrews /<br>Claire Skelton | Policy reviewed in line with review date      | 2.0 – September 2024 | The Wrekin Housing Group Board – 25 <sup>th</sup> September 2024 |