



# Safeguarding Policy

Date policy effective from	4 December 2025
Date of last revision	9 September 2025
Approved by	Board
Date approved	4 December 2025
Equality Impact Assessed	30 October 2024

## Contents

	Page(s)
Introduction	3
Purpose	3
Principles	4
Definitions	4
Scope	8
Contribution to Plan A	9
Legislative and regulatory framework	9
Policy statements	10
Roles and responsibilities	15
Related policies and procedures	16
Monitoring, assurance and review arrangements	17

## 1.0 Introduction

- 1.1 The Safeguarding Policy (the Policy) outlines the principles and approach taken to mitigate the risk of abuse and neglect posed to adults and children living in our communities.
- 1.2 Living a life that is free from harm and abuse is a fundamental right of every person. We recognise that effectively protecting those experiencing or at risk of abuse is everyone's responsibility, and we are committed to ensuring the health and wellbeing of our customers is successfully safeguarded.

## 2.0 Purpose

- 2.1 We are committed to safeguarding children, young people and adults experiencing or at risk of abuse, harm, and neglect.
- 2.2 The purpose of this policy is to:
  - Ensure that all board members, employees and our contractors understand with the principles underpinning safeguarding
  - Ensure children, young people, and adults at risk are protected from abuse, neglect, exploitation, and harm
  - Define our role in identifying, responding to, and referring safeguarding concerns, in line with statutory guidance and legal duties
  - Be vigilant and able to respond appropriately and effectively to safeguarding concerns
  - Support effective collaboration with local authorities, police, health services, and other safeguarding partners
  - Support an organisational culture that does not tolerate abuse and recognises safeguarding is everyone's responsibility where all concerns are taken seriously
  - Ensure our approach to safeguarding adheres to the relevant legislative and regulatory expectations

## 3.0 Principles

3.1 This policy is underpinned by the following principles:

- **Trust** – We build trust with our customers by listening, being consistent and advocating on their behalf in relation to safeguarding matters
- **Respect** – We listen to customers, treat tenants as individuals and respond to their needs in a fair, respectful, and caring way
- **Innovate** – We will use our data to adapt our services and do things differently when our customers need it to remove or reduce any disadvantage
- **Own it** – Our employees and contractors are empowered to make sure the right customer experience and standard of service is provided to customers
- **Working together** – We will collaborate with teams and our partners to understand customer needs and vulnerabilities, delivering services in a joined-up way to sustain tenancies

## 4.0 Definitions

4.1 The key terms used in this policy are defined below.

Safeguarding adults	The Care Act 2014 statutory guidance defines adult safeguarding as: “Protecting an adult’s right to live in safety, free from abuse and neglect”
---------------------	---

Safeguarding children	<p>The statutory definition of child safeguarding in the UK is primarily drawn from the Department for Education’s guidance “Working Together to Safeguard Children”, most recently updated in June 2025. It defines safeguarding and promoting the welfare of children as:</p> <ul style="list-style-type: none"> <li>• Providing help and support to meet the needs of children as soon as problems emerge</li> <li>• Protecting children from maltreatment, whether within or outside the home, including online</li> <li>• Preventing impairment of children’s mental and physical health or development</li> <li>• Ensuring children grow up in circumstances consistent with the provision of safe and effective care</li> <li>• Promoting the upbringing of children with their birth parents or family network through kinship care, where possible and in the child’s best interest</li> <li>• Taking action to enable all children to have the best outcomes</li> </ul>
Abuse	<p>Children: Working Together to Safeguard Children (DfE), defines “abuse” is: “A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.”</p> <p>Adults: The Care and Support Statutory Guidance under the Care Act 2014 defines abuse as: “A violation of an individual’s human and civil rights by any other person or persons.”</p>

## Abuse types

### Adults (Care Act 2014)

Physical abuse – hitting, slapping, misuse of medication, restraint

Domestic abuse – controlling, coercive, threatening behaviour between intimate partners or family members

Sexual abuse – rape, sexual assault, sexual acts without consent

Psychological/emotional abuse – threats, humiliation, intimidation, isolation

Financial/material abuse – theft, fraud, misuse of property or benefits

Modern slavery – human trafficking, forced labour

Discriminatory abuse – harassment based on race, gender, disability, etc.

Organisational abuse – poor care practices in institutions

Neglect and acts of omission – ignoring medical or physical care needs

Self-neglect – neglecting personal hygiene, health, or surroundings

Economic abuse – controlling access to money, property, or resources

Additionally, online/ digital abuse is recognised as “cyberbullying, image-based abuse, surveillance”

<p>Abuse types (continued)</p>	<p>Children (Children Act 1989 &amp; 2004)  Physical abuse – hitting, shaking, burning, poisoning  Emotional abuse – persistent emotional maltreatment, bullying, silencing  Sexual abuse – forcing or enticing a child into sexual activities  Neglect – failure to meet basic physical and emotional needs</p> <p>Domestic Abuse Act 2023:  ‘Honour’-based abuse – violence committed to protect perceived family or community honour  Coercive control – a pattern of behaviour that isolates, exploits, and regulates a person’s life</p>
<p>Child</p>	<p>The Children Act 1989, which remains the cornerstone of child welfare legislation in England and Wales, defines a child as: “A person under the age of 18.”  This definition was reinforced by the UN Convention on the Rights of the Child, which the UK ratified in 1991. This definition applies regardless of the child’s living arrangements, education status, employment, or whether they are in care, custody, or living independently</p>
<p>Children</p>	<p>Younger children who do not have the maturity and understanding to make important decisions for themselves</p>

Young people	Older or more experienced children who are more likely to be able to make important decisions for themselves. It is for statutory and specialist agencies to personalise their response based on the age and capacity of the individual to make decisions for themselves, our role is to ensure any concerns are reported and that child or young person is effectively safeguarded.
Multi Agency Risk Assessment Conference (MARAC)	Multi Agency Risk Assessment Conference (MARAC) is a statutory body which coordinates holistic support to those experiencing domestic abuse.
Multi Agency Public Protection Arrangements (MAPPA)	Multi Agency Public Protection Arrangements (MAPPA) is a statutory body which coordinates strategies to mitigate the risk of harm posed by violent or sexual offenders
Section 47 Enquiry	<p>A statutory child protection investigation carried out by a local authority when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. This duty is set out in Section 47 of the Children Act 1989, which applies across England and Wales.</p> <p>The enquiry is designed to:</p> <ul style="list-style-type: none"> <li>• Determine whether protective action is needed</li> <li>• Assess the child’s circumstances and safety</li> <li>• Decide what services or interventions are required to safeguard the child’s welfare</li> </ul>

## 5.0 Scope

5.1 This policy is an over-arching policy and is applicable across all departments. It is important that all employees, board members, contractors working on our behalf, and involved customers are aware that safeguarding is ‘everyone’s responsibility’ and that we

all have responsibility to act on concerns of abuse or neglect.

- 5.2 Where safeguarding concerns arise in relation to employees these will be managed via our People Services Team and relevant procedures.

## 6.0 Contribution to Plan A

- 6.1 The delivery of an agile, responsive, and effective safeguarding service which identifies and targets support to adults and children experiencing, or at risk of harm, enables tenancy sustainment, improves health and wellbeing, and supports vulnerable people in maintaining independence. This supports delivery of the Supporting Sustainable Tenancies and Supporting Balanced and Sustainable Communities Strategies of Plan A 2025/28.
- 6.2 The provision of personalised support for tenants to improve their health and wellbeing is a key delivery action of Plan A 2025-28 Objective 12 which sets out the necessity to “deliver effective support interventions that meet individual needs”

## 7.0 Legislative and regulatory framework

- 7.1 The Children Act 2004 placed a duty of Local Authorities to safeguard and promote the welfare of children. The Act introduced the requirement for Local Authorities to coordinate Section 47 enquiries for children at risk of significant harm and mandated inter-agency cooperation, relevant to Registered Providers. The Act also mandated all local authorities are to establish a Local Safeguarding Children Board (LSCB). The Children and Social Work Act 2017 amended this law replacing LSCB's with multi-agency safeguarding partnerships, which are designed to be more flexible and agile.
- 7.2 The Care Act 2014 placed adult safeguarding on a statutory footing, requiring local authorities to “make enquiries” if an adult is at reported as being at risk of abuse or neglect.
- 7.3 The Domestic Abuse Act 2021 defined domestic abuse in law placed a duty on local authorities to support victims and to ensure safe accommodation
- 7.4 The Equality Act 2010 defines nine protected characteristics which are aspects of identity that the law safeguards against

discrimination in employment, housing, education, and access to services.

7.5 The Safeguarding Vulnerable Groups Act 2006 established a legal framework to prevent unsuitable individuals from working with children and vulnerable adults.

7.6 Safeguarding requirements placed upon Registered Providers are embedded across three regulatory Consumer Standards through expectations around tenant and community safety, wellbeing, tenancy sustainment, and effective partnership working as follows:

Neighbourhood and Community Standard	
Local cooperation	Registered providers must co-operate with relevant partners to promote social, environmental and economic wellbeing in the areas where they provide social housing.
Domestic abuse	Registered providers must work co-operatively with other agencies tackling domestic abuse and enable tenants to access appropriate support and advice.

Tenancy Standard	
Tenancy sustainment and evictions	Registered providers must support tenants to maintain their tenancy.
Diverse needs	In relation to the housing and landlord services they provide, registered providers must take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants.

## 8.0 Policy statements

8.1 This Policy and supporting procedures are based on six key principles which underpin safeguarding as defined by the Care Act 2014:

- Prevention - it is always preferable to act before harm occurs

- Proportionality - the latest intrusive response appropriate to the risk presented
- Protection - support and representation for those in greatest need
- Empowerment - people being supported and encouraged to make their decisions through informed consent
- Partnership - local solutions through services working with communities who have a key part to play in preventing, detecting and reporting abuse and neglect
- Accountability - accountability and transparency in delivering safeguarding. We will take preventative, proportionate and appropriate proactive action to ensure all individuals experiencing harm, or at risk of harm, are safeguarded

## Corporate policy statements

- 8.2 All Board Members, employees, contractors, and engaged tenants/ volunteers will receive annual safeguarding training appropriate to their role enabling them to recognise signs of abuse and/ or neglect and the action subsequently required. We will ensure that safeguarding responsibilities are clearly understood and embedded across all service areas.
- 8.3 We recognise that abuse may be committed by an employee, contractor, agent or by others who are in a trusting relationship with a vulnerable person. Any such incident will be managed through relevant People Services procedures, via the Executive Director of Corporate Services.
- 8.4 We will follow safe recruitment practices, including Disclosure and Barring Service (DBS) checks for relevant roles. We will not knowingly employ or engage individuals who are barred from working with vulnerable groups.
- 8.5 Through our contractual arrangements we will ensure that contractors and sub-contractors working on our behalf have an effective safeguarding policy in place and where not, that they work in accordance with our policy and processes.
- 8.6 We recognise our responsibility to ensure, where a customer or potential customer is a known risk to others, that a risk assessment is undertaken regarding the appropriateness of any proposed letting and to agree how risks will be managed.

## Safeguarding policy statements

- 8.7 We will manage safeguarding via a case management approach, maintaining accurate, contemporaneous records that are clear, concise, factual, and timely to enable an appropriate response to concerns and effective governance and oversight.
- 8.8 We will uphold the right of every individual to live free from harm, regardless of age, sex, race, sexual orientation, gender reassignment, marital status or civil partnership, pregnancy or maternity, religion or belief, or disability.
- 8.9 We recognise that our employees and contractors are well placed to identify people at risk of abuse and neglect. We will work collaboratively with statutory and non-statutory partners, advocating for individuals recognising our remit as a registered provider, and will take a person-centred, and supportive approach.
- 8.10 We will be alert to signs of abuse, neglect, exploitation, and unsuitable living conditions and we will act immediately to prevent harm and minimise risk. To enable this, we will ensure our board members, employees, contractors and volunteers understand how to identify, report, and respond to safeguarding concerns.
- 8.11 Safeguarding often involves the most vulnerable members of society. Wherever possible we will empower the individual(s) to make their own decisions regarding their welfare. Where we cannot, we will engage relevant Local Authority Safeguarding and Adult Social Care Teams to advocate in relation to the individuals' immediate capacity to care for themselves appropriately.
- 8.12 We will adopt a victim centric approach, which treats individuals with dignity, respect, and without prejudice. We will recognise diverse needs of individuals and, where we are able, we will tailor our services, and support offers to meet those needs.
- 8.13 We will listen to anyone raising a safeguarding concern in good faith and provide assurance that we will act on their concern.
- 8.14 Safeguarding requires a multi-agency approach, we will engage with a range of statutory and non-statutory organisations to deliver effective, regular and sustained joint working, which is essential to protect people who may experience, or be at risk of, abuse or harm.
- 8.15 We recognise the lead responsibility of local authorities in coordinating safeguarding work and our own role in alerting the appropriate services and the police of any safety concerns. We will

refer any suspected or actual criminal offence to the police, and we will support statutory bodies in their investigations.

- 8.16 We will respect professional boundaries and not undertake any activity which is beyond the scope of our role as a Registered Provider recognising that to do so may cause harm. Referral and access to specialist support intervention underpins effective safeguarding; we will raise the alarm to relevant statutory services, advocating for our tenants in need, we will not attempt to directly deliver support which we are not qualified to deliver.
- 8.17 While we are not a statutory safeguarding partner, we will actively participate in multiagency safeguarding arrangements, including MAPPA, MARAC, strategy meetings and Section 47 enquiries, where appropriate.
- 8.18 Information sharing between organisations is essential to safeguard people at risk and we will act in accordance with agreed inter-agency information sharing protocols. We will share relevant information in line with legal and ethical standards to support the protection of individuals at risk.
- 8.19 Where possible, we will always seek a person's consent to share information placing the individual at the heart of safeguarding, however we cannot guarantee full confidentiality when our responsibility to safeguard adults or children at risk, or the public interest, is greater than our responsibility to an individual.
- 8.20 We will promote safeguarding awareness among tenants and residents, encouraging them to report concerns and access support. We will work with community partners to identify risks and respond to safeguarding issues within our communities.

### Customer data and voice

- 8.21 In accordance with our Complaints, Compliments and Feedback Policy, we will consistently analyse and utilise transactional service data and engage our customers in the ongoing development, implementation and monitoring of this Policy and its associated interventions.

### Diverse needs

- 8.22 Our Customer Vulnerability Policy sets out our commitment and approach to how we listen to, understand, and respond to customers' specific and diverse needs or circumstances in relation to any vulnerabilities they have. This policy aims to ensure all customers experience fair and equitable outcomes when receiving

our services by treating all customers as individuals, identifying and responding effectively to customers' vulnerabilities by making reasonable adjustments to how they access and receive our services to ensure services are delivered in a fair and equitable way.

- 8.23 We will use information about a customers' circumstances and vulnerabilities when addressing safeguarding issues to make sure we take action to mitigate the risk of harm they are experiencing.

## Communication

- 8.24 We are committed to the provision of seamless, responsive and convenient services and as such are a digital first organisation. We advocate, encourage, and support our tenants to engage with us via the most efficient and effective method, suitable to their needs, and will assist tenants or their advocates to engage with us digitally.
- 8.25 Digital copies of this policy and related guidance are available on our website and in an alternative format for tenants who may not be able to access services digitally or experience other communication barriers, on request.

## Feedback and complaints

- 8.26 In line with the Customer Complaints, Compliments and Feedback Policy, we will work with customers who have specific needs and vulnerabilities to make sure they can access the service, have their views listened to and receive their complaint response in a way that meets their needs. Customers satisfaction
- 8.27 Customers can provide feedback about the services they have received in respect of this policy. If a customer is dissatisfied with the service they have received from us, they can make a complaint to us in line with our Complaints, Compliments and Feedback Policy.
- 8.28 We define a complaint as: 'Any expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, our own employees, or those acting on our behalf, affecting a resident or group of residents.'

## 9.0 Roles and responsibilities

9.1 Roles and responsibilities under this policy are outlined below.

Board	Board will formally approve this policy and review it every three years (or sooner if there is a change in legislation or regulation).
All employees	Be vigilant to safeguarding issues within our tenant's homes and communities taking required action to report concerns immediately and, where necessary, take immediate action to stop harm.
Director of Housing and Communities	Designated Safeguarding Lead and responsible for the effective delivery of this policy
Head of Housing and Communities	Operational responsibility for the management safeguarding cases.
Repairs and Maintenance Manager	The Repairs and Maintenance Manager has operational responsibility for the delivery of the services covered by this policy.
Housing Managers	Responsible for overseeing the delivery of safeguarding actions and ensuring associated procedures are followed.
Housing Team	Will implement the policy and associated procedures.

9.2 This policy will be communicated to our customers and employees via our website and intranet. Those responsible for implementing the policy will, where required, receive appropriate training, advice, and/or guidance in collaboration with respective Local Authority partners.

## 10.0 Related policies and procedures

10.1 This policy should be read in conjunction with the following documents:

Plan A 2025-28 Supporting Sustainable Tenancies Strategy	Sets out the strategic interventions being undertaken to deliver the vision of empowered tenants living in comfortable and manageable homes in sustainable communities
Customer Vulnerability Policy	Sets out our commitment and approach to how we listen to, understand, and respond to customers' specific and diverse needs or circumstances in relation to any vulnerabilities they have
Domestic Abuse Policy	Sets out our approach to recognising and effectively responding to cases of domestic abuse
Equality, Diversity and Inclusion Policy	Sets out how we provide treat people with fairness and respect, ensuring we respond to diverse needs in line with the Equality Act 2010
Access to Services Policy	Sets out how we will enable convenient access to services including how we provide information on our services and how to access them
Condition of Property Policy	Sets out how we identify and manage instances where conditions within our homes fall below acceptable standards
Anti-social Behaviour Policy	Sets out how we will prevent, investigate, manage and resolve instances of anti-social behaviour and hate incidents contributing to improved community safety and tenancy sustainment

## 11.0 Monitoring and review arrangements

11.1 Monitoring and assurance of safeguarding is delivered via the following reporting mechanisms:

Type of assurance	Key source	Frequency
Management assurance	Safeguarding Panel Oversight	Monthly
	Quarterly Safeguarding Update to Director of Housing and Communities	Quarterly
Corporate Oversight	Annual Safeguarding Report received by Housing and Communities Committee	Annual
	Housing Services Update Report	Bi-annual
Independent assurance	Internal Audit	As required

11.2 This policy will be reviewed every 3 years, unless there is significant development that would require a more urgent review e.g. new legislation or regulation.