

# Safeguarding Policy

<b>1.0</b>	<b>SCOPE</b>
	<b>Purpose</b>
1.1.	For the purpose of this policy, safeguarding is acknowledged as the action that is taken to promote the safety, dignity, welfare and wellbeing of children, young people, and vulnerable adults in order to keep them safe from harm.
1.2.	whg is committed to the safeguarding and protection of whg customers and colleagues by driving a culture where safeguarding is seen as everyone's business and everyone's concern.
1.3.	The purpose of this policy is to set out the responsibilities and the commitment within whg to safeguard customers and colleagues preventing and protecting them from incidents of abuse, neglect (including self-neglect) exploitation or harm.
1.4.	The policy provides a definition of vulnerability and vulnerable groups who may be at an increased risk of harm; it defines the different types of abuse, sets out varying roles and responsibilities, outlines our work with partners, the approach to mental capacity and consent and outlines how performance will be managed monitored and reported.
1.5.	The policy provides colleagues, board members and others connected with the delivery of whg services with the necessary guidance to effectively manage and respond to safeguarding concerns in line with the required regulations and legislation.
1.6.	For the purpose of this policy this includes the Human Rights Act (1998) the Childrens Act (2004), the Gender Recognition Act 2004, the Mental Capacity Act (2005), the Care Act (2014) the Data Protection Act (2018), The Domestic Abuse Act (2021), the Social Housing (Regulations) Act (2023), the Modern Slavery Act (2015) and the statutory Working Together guidance (2023).
1.7.	The policy is also designed in line with the Regulator of Social Housing's Consumer Standards with a focus upon the <i>Transparency, Influence and Accountability Standard</i> and <i>Neighbourhood and Communities Standard</i> in that colleagues will engage respectfully with customers, ensuring their dignity and taking (where appropriate) their wishes and views into account as part of any safeguarding referral or action.
1.8.	This policy has been written in line with the West Midlands Group Safeguarding Procedures. These are regional procedures which have been adopted as the operating framework for safeguarding within nine participating areas (Walsall, Telford and Wrekin, Wolverhampton, Sandwell, Dudley, Birmingham, Solihull, and Coventry).
1.9.	This ensures that whg's Safeguarding Policy and practice is universal across all geographical areas where we have homes therefore ensuring parity for whg customers.

1.10.	The policy is universal but has a focus upon vulnerable adults, children and young people who live in a whg home.
1.11.	<p>Within the scope of this policy and in line with the definition outlined within the Care Act 2014 we have identified the following people as potentially vulnerable, with the understanding that vulnerability is not a fixed position:</p> <ul style="list-style-type: none"> <li>• An older person with memory loss, dementia;</li> <li>• A person with a long-term mental health condition or a personality disorder;</li> <li>• A person dependent upon others to maintain their quality of life;</li> <li>• An individual with a physical disability;</li> <li>• An individual with a learning difficulty;</li> <li>• Someone who is dependent upon alcohol, drugs or medication and it impacts negatively on their day-to-day life;</li> <li>• An individual who is homeless or at risk of being homeless;</li> <li>• A person experiencing domestic abuse;</li> <li>• A person experiencing Anti-Social Behaviour</li> <li>• A carer with unmet care needs of their own;</li> <li>• A child or young person with a disability;</li> <li>• A child or young person at risk of or involved in crime.</li> </ul>
1.12.	However, the policy also acknowledges that this is not an exhaustive list and that other factors can contribute to a person feeling vulnerable.
1.13.	This policy should be read in conjunction with whg's Hoarding, Domestic Abuse, Anti-Social Behaviour, Recruitment, Conduct and Capability, Data Protection, Whistleblowing, Complaints, and Vulnerability Policies.
1.14.	The policy is also written in line with the Regulator of Social Housing's Tenant Satisfaction Measures 2023.
<b>2.0</b>	<b>POLICY STATEMENT</b>
2.1.	This Safeguarding Policy sets out whg's commitment to ensuring the safety, dignity, and well-being of whg customers and colleagues.
2.2.	It is designed to take a person-centred approach that recognises the strengths, capabilities, and lived experience of each person and ensures their right to live in safety, free from abuse, neglect (self-neglect), exploitation or harm with a balanced emphasis on both their safety and wellbeing.
2.3.	whg will do this by 'alerting' statutory agencies and sharing information with them where there are concerns about a customer's safety or wellbeing.
2.4.	The policy will enable us to empower people to take informed decisions about their own safety and well-being actively involving them in all safeguarding processes, ensuring their opinions, views, choices, and preferences are respected and considered as part of any decisions made.
2.5.	We will achieve this by working in an open and transparent way with customers colleagues their families, statutory services, and community organisations.

2.6.	whg will embed a culture of collective responsibility which ensures that safeguarding is seen as everyone's business and everyone's concern.
	<b>Six Principles of Safeguarding</b>
2.7.	<p>whg will deliver safeguarding in line with the six principles of safeguarding.</p> <ul style="list-style-type: none"> <li>• <b>Empowerment:</b> <i>whg customers are supported to make their own decisions with informed consent.</i></li> <li>• <b>Prevention:</b> <i>We take steps to prevent abuse or harm occurring.</i></li> <li>• <b>Proportionality:</b> <i>We take the least intrusive approach available based upon the perceived risk.</i></li> <li>• <b>Protection:</b> <i>We will ensure that support and representation is given to those in greatest need.</i></li> <li>• <b>Partnership:</b> <i>We will work in partnership with customers, communities, statutory and community and voluntary organisations to ensure neglect and abuse is reported.</i></li> <li>• <b>Accountability:</b> <i>We are accountable and transparent fully contributing to serious case reviews and using reflective practice to learn lessons or highlight good practice.</i></li> </ul>
	<b>Definitions</b>
2.8.	<p>Within the scope of this policy and in line with the Care Act 2014 whg will respond to concerns in respect of abuse, neglect, exploitation, and harm using the definitions outlined below.</p> <p><b>Abuse</b></p> <ul style="list-style-type: none"> <li>• physical, sexual, emotional, verbal, psychological or financial. (adults)</li> <li>• an act of neglect or failure to act. (self-neglect)</li> <li>• when a child, young person or adult at risk is persuaded to enter a financial or sexual transaction which is not consented to.</li> <li>• discriminatory motivated by prejudice.</li> <li>• institutional where organisations offer little or no choice from unfair practices.</li> <li>• linked to domestic abuse and modern slavery.</li> <li>• controlling or coercive behaviour.</li> <li>• forced marriage and honour-based abuse.</li> <li>• be linked to online activity.</li> </ul>
	<b>Perpetrators of Abuse</b>
2.9.	<ul style="list-style-type: none"> <li>• Abuse is a violation of an individual's human and civil rights by another person or persons.</li> <li>• Anyone; friends, strangers, family members or whg colleagues can be perpetrators of abuse.</li> <li>• Abuse is behaviour that either deliberately or unknowingly causes harm endangers life or infringes upon an individual's rights.</li> <li>• Abuse may consist of a single or a repeated act of abuse and could include two or more types of abuse which are occurring simultaneously.</li> </ul>
	<b>Neglect and Self- Neglect</b>

2.10.	<ul style="list-style-type: none"> <li>• Neglect is a failure to meet a person’s basic physical, emotional, social, or psychological needs which is likely to result in poor health and wellbeing outcomes.</li> <li>• Neglecting a child’s basic needs can lead to poor physical and mental health impacting on their ability to thrive and in extreme cases can lead to their death.</li> <li>• Self-neglect is a mental health condition in which an individual can fail to meet their basic needs such as personal hygiene, having appropriate clothing, feeding themselves appropriately, refusing to take prescribed medication or ignoring medical conditions such as diabetes.</li> <li>• Self-neglect is considered a safeguarding risk when it causes physical mental or emotional harm to themselves or others that they are responsible to care for.</li> </ul>
	<b>Concerns: whg colleagues</b>
2.11.	Where whg colleagues or customers have safeguarding concerns about a whg colleague’s behaviour (anyone that is delivering services on behalf of whg), they should report it to the Corporate Director of People and Culture who will then contact the Local Authority Designated Officer and alert whg’s Board of the concerns.
2.12.	If the colleague reporting their concerns does not feel that the concerns are being addressed in line with whg policies and procedures, they can report their concerns through whg’s Whistleblowing process. However, if they feel that an individual is in immediate danger, they should contact the Police.
<b>3.0</b>	<b>ROLES AND RESPONSIBILITIES</b>
3.1.	whg has a strong culture where safeguarding is seen as everyone’s business and everyone’s responsibility; all colleagues are expected to focus upon the prevention of harm and to reduce safeguarding risks by being professionally curious and reporting concerns in a timely way in order to safeguard customers and comply with whg’s Safeguarding Policy and practice.
3.2.	Alongside an all-colleague safeguarding culture whg also has a matrix safeguarding model which includes a number of roles throughout whg that have specific responsibilities in respect of safeguarding and supporting vulnerable customers.
3.3.	The Corporate Director of Strategy, Assets and Transformation is whg’s executive lead for safeguarding and undertakes this role at whg Board, Committee and Group Executive meetings.
3.4.	The Director of Stronger Communities is whg’s strategic lead for safeguarding and represents whg and whg customers upon Walsall Council’s Safeguarding Partnership Board.
3.5.	This role is also responsible for co-producing whg’s Safeguarding Policy, collaborating with Governance colleagues to monitor compliance and mitigate risk, providing an annual safeguarding report for the whg Board and leading upon Serious Case Reviews on behalf of whg.

3.6.	The Corporate Director of People and Culture has lead responsibility for ensuring that where people are applying for roles that involve regulated activities; working with vulnerable adults, young people, or children that they are vetted through the Disclosure and Barring Service (DBS) undertaking enhanced DBS checks as per the Safer Recruitment guidance 2018 and the Working Together to Safeguard Children and Young People 2023 statutory requirements.
3.7.	In addition, the Corporate Director of People and Culture also has responsibility to report safeguarding concerns or allegations involving whg colleagues to the Local Authority Designated Officer (LADO). The LADO will offer advice in relation to referrals and investigations and ensure that cases are managed in accordance with safeguarding regulations.
3.8.	The Wellbeing Services Manager is the operational lead for safeguarding customers, coordinating referrals and coordinating support to the team of Designated Safeguarding Officers (DSOs) and other colleagues who may require advice and guidance in respect of working in line with whg's Safeguarding Policy and practice.
3.9.	Regional Community Housing Managers are assigned to safeguarding subgroups (neglect, abuse, and exploitation) representing whg and whg customers who may be the subject of referrals. They are a key link between Walsall Safeguarding Business Unit and whg and are responsible for promoting referrals, disseminating information to the Community Housing and Neighbourhoods teams, and responding to safeguarding concerns in respect of whg customers.
3.10.	The Community Safety Manager is responsible for coordinating whg's response to domestic abuse cases, attending Safer Walsall Partnership meetings and overseeing MARAC (Multi Agency Risk Assessment Conference) referrals in relation to whg customers.
3.11.	Community Safety Advisors will attend MARAC meetings to refer whg customers who are impacted by serious domestic abuse (usually three reports in 12 months and a high-risk score on DASH). They are the operational link with other statutory agencies who deal with domestic abuse cases including the Police and Children's Services who are located within all of the local authorities where whg has homes.
3.12.	whg's Data Privacy Manager will advise and guide colleagues to ensure we are sharing information in line with Data Protection Act 2018 and whg's Safeguarding Policy. The Data Privacy Manager will provide advice and guidance where it is not clear if a safeguarding referral should be made without consent.
3.13.	The Learning and Development Manager is responsible to work with Walsall Council's Safeguarding Training Manager to ensure that whg colleagues have access to appropriate training relevant to their role. This will enable them to effectively recognise, respond, record, and refer all safeguarding concerns in line with whg's Safeguarding Policy and statutory and regulatory requirements.
3.14.	HR Business Partners are responsible for coordinating support for colleagues who are dealing with a serious issue such as the death of or serious injury to a vulnerable adult, child, or young person. Each case will be dealt with on an individual basis with colleagues offered individual support and reflective supervision as required.

3.15.	Designated Safeguarding Officers (DSOs) are a representative group of trained colleagues who have voluntarily offered to be a key point of contact for other colleagues advising, guiding and making safeguarding referrals on behalf of whg customers. DSOs are trained for these additional duties and are supported by the Wellbeing Services Manager.
3.16.	From April 2024 procurement and contract managers are working towards inserting a mandatory clause into all whg contracts and agreements which states that the supplier, contractor and others who are delivering services on whg's behalf will comply fully with whg's Safeguarding Policy.
3.17	In relation to 'Call Off' under 'Framework Agreements' and where whg are bound by individual suppliers' terms and conditions, whg will require the suppliers of these services to confirm that they will comply with whg' Safeguarding Policy and procedures.
	<b>Partnership Work</b>
3.18.	This policy recognises that in order to deliver effective safeguarding our most important partners are whg customers. We will work alongside whg customers in a strength-based way validating their lived experience to build confidence and capacity which enables them to make informed decisions about their personal circumstances.
3.19.	whg works in partnership with Walsall Council Safeguarding Business Unit and is an active member of Walsall Council Safeguarding Partnership Board. We are fully committed to meeting our organisational safeguarding duties and ensuring that decisions made do not cause a detriment to whg customers.
3.20.	Colleagues will attend and contribute to a number of safeguarding steering groups and subgroups ensuring that customers have equitable access to specialist and statutory services and that decisions made in these forums are not detrimental to whg customers.
3.21.	whg will work proactively with Walsall Council Safeguarding Business Unit to provide access to safeguarding training for whg colleagues which is on a role specific basis. This training will complement whg's internal mandatory safeguarding training.
3.22.	whg will work in partnership with the West Midlands Safeguarding group adopting the safeguarding principles and practice agreed within the nine West Midlands Combined Authority geographical areas where whg has homes.
3.23.	whg will also work with Local Authority Safeguarding Teams within geographical areas outside of Walsall, ensuring that colleagues and customers who work or live outside of Walsall have access to local safeguarding services and support.
3.24.	whg will develop strong partnerships with a range of statutory and community and voluntary sector partners establishing referral pathways to services which can provide specialist support to increase resilience, develop individual protective factors and reduce safeguarding risks.
	<b>Mental Capacity - Consent</b>

3.25.	The policy is designed in recognition that whilst the primary purpose is to keep people safe, we also acknowledge that some adults may have complex personal relationships which could place them at harm.
3.26.	Where there is mental capacity and there are no safeguarding risks to others, whg will respect a person's right to a private life and step back as appropriate.
3.27.	However, where we believe an adult lacks the mental capacity to act in theirs or others' best interests, whg can exercise its role as an 'official authority' to make safeguarding referrals without their consent.
3.28.	In these instances, the person making the referral will seek guidance from whg's Data Privacy Manager, recording the reasons for referring without consent and the outcome of the referral.
	<b>Children and Young People – Consent</b>
3.29.	The policy recognises that all children and young people aged 18 and under (including unborn children) have a right to be protected from all types of abuse, neglect, exploitation or harm.
3.30.	Where there are concerns about a child or young person's safety and a referral is going to be made, parents or carers should be informed at the earliest opportunity.
3.31.	However, where it is considered that informing the parents could be prejudicial to the safety or welfare of the child, referrals should be made without consent.
3.32.	In these instances, the Director of Stronger Communities and the Data Privacy Manager will assess the reasons to refer without consent, record the concerns and, in line with the Data Protection Act 2018, review the decision to ensure it would be considered lawful and proportionate to make the referral without consent
3.33.	Where colleagues are unsure, they should seek advice and guidance from whg's Data Privacy Manager who will use guidance from the Information Commissioner's Office that ' <i>it is often more detrimental not to refer than to refer without consent.</i> ' Colleagues will also be encouraged to call the duty safeguarding officer at the relevant local authority to gain advice over the telephone as appropriate.
3.34.	whg has Information Sharing Agreements with partner organisations which enable us to share accurate and timely information and sets out an expectation that information is shared on a lawful and proportionate basis.
<b>4.0</b>	<b>PERFORMANCE MEASURES</b>
4.1.	An annual safeguarding report is produced and presented to whg Board members, our Group Executive Team and other senior leaders and stakeholders. The report provides an overview of safeguarding activity relating to whg customers over a twelve-month period. It highlights any change in regulation or legislation and provides the outcome of audits or inspections which have taken place during a twelve-month period.

4.2.	The Director of Stronger Communities will collaborate with colleagues within whg's Governance team to complete internal audits and report on external audits to ensure we are compliant and are delivering safeguarding in line with legislative and regulatory requirements and within the scope of whg's Safeguarding Policy.
4.3.	Serious Case Reviews which involve whg customers will be scrutinised and reviewed highlighting areas where whg's response and actions are not in line with whg's policy and practice. We will record these instances within a lesson learnt log and coordinate responses as appropriate.
4.4.	The Wellbeing Services Manager will monitor referrals, spot check and sample a range of cases reporting on areas of good practice and near misses as appropriate. They will work closely with the Health and Safety team to monitor and respond to SHE safeguarding reports noting any areas of risk or non-compliance.
4.5.	We will work closely with Walsall Council's Safeguarding Partnership Board (WSPB) and the Safeguarding Business Unit, undertaking internal audits, peer reviews and contributing to Care Quality Commission (CQC) audits as a public agency and a member of the WSPB.
4.6.	We will monitor and respond to any complaints received in relation to safeguarding using them as insight and customer feedback. We will reflect and review our approach and ensure all complaints are dealt with in line with whg's complaints policy.
4.7.	We will record referrals and monitor the response from each local authority, highlighting any areas of concern and where required escalate our concerns where despite having unmet care and support needs referrals are not being allocated for adult social care support.
4.8.	We will monitor the completion of whg's mandatory online safeguarding course, to ensure colleagues are completing it and checking that it is equipping colleagues with the knowledge and skills they require to undertake effective safeguarding.
4.9.	whg will develop a digital pathway to record monitor and report near misses, safeguarding concerns, and outcomes. We will monitor trends and use data to develop preventative interventions.
<b>5.0</b>	<b>EQUALITY AND DIVERSITY</b>
5.1.	This policy has been written with input from whg customers, colleagues and with guidance from WSBP, therefore ensuring it is person centred and balanced in respect of safety and overall wellbeing.
5.2.	This policy is written in the belief that every person has the right to be their true self and live a life without prejudice fears or barriers.
5.3.	We will monitor and review safeguarding referrals to ensure that unconscious bias is not impacting on who we refer and why.



5.4.	We will monitor safeguarding reports providing information on protected characteristics to ensure we are not excluding customers from receiving equitable safeguarding support and that we make reasonable adjustments where required.
5.5.	We will provide information to customers and other key stakeholders in a variety of formats, languages and styles ensuring customers are not excluded and that access to support is equitable.
5.6.	We will provide customers and colleagues with a checklist and guide to safeguarding in a format that suits them (hard copy, online, pocketsize book or link to an electronic document). The checklist and guide have been co-produced with whg customers.
5.7.	We will take customers' lived experience into account ensuring it is considered as part of our response to meet their needs and wishes.
5.8.	Customers who are impacted by violence and domestic abuse, and need to be moved for their safety, will not be disadvantaged and will be offered alternative accommodation on the same tenancy agreement they currently have.
5.9.	Where customers disclose that they have been a victim of sexual abuse, we will ensure that they are supported to access specialist support from agencies or individuals with this specific knowledge and expertise.
5.10.	Customers who are in the process of changing their sex (they are proposing this, have started, or completed their transition) and require safeguarding, are not required to share this information and it is unlawful for whg to share this information on their behalf without explicit consent.
<b>6.0</b>	<b>TRAINING AND DISSEMINATION</b>
6.1.	Colleagues and customers will be provided with a co-produced guide to safeguarding within whg. The guide will include a flow chart to demonstrate reporting and referral pathways along with links to organisations who can support vulnerable customers
6.2.	On induction, all colleagues will complete a mandatory CORE training module on Adults and Children's safeguarding.
6.3.	whg's People and Learning Manager will ensure that colleagues receive safeguarding training at a specific level, pre-agreed for their role and responsibilities.
6.4.	We will offer all colleagues opportunities to take part in themed lunch and learn sessions in areas of safeguarding such as neglect, domestic abuse and exploitation.
6.5.	Colleagues who have a leadership role in respect of safeguarding will attend team meetings, trade colleague cascades and colleague inductions in order to deliver key messages around safeguarding.
6.6.	We will circulate seven-minute briefings provided by Walsall Council, opportunities to attend conferences and training sessions, and opportunities for colleagues to work shadow colleagues involved in safeguarding.

6.7.	whg will work in partnership with Walsall Council Safeguarding Business Unit to promote access to and use of the free training portal which offers training across a wide range of safeguarding areas.
<b>7.0</b>	<b>MONITOR AND REVIEW</b>
7.1.	<p>The policy will be monitored by the Corporate Director of Strategy, Assets and Transformation and reviewed every three years by the Policy Group, and approved by the whg Board, with the following exceptions where the review can be brought forward:</p> <ul style="list-style-type: none"> <li>• Any significant changes in legislation, policy, and best practice within the sector.</li> <li>• Any Serious Case Review findings for organisations outside of Walsall.</li> <li>• Any serious incidents or Case Reviews within Walsall and specifically relating to whg.</li> <li>• Any Whistleblowing reports where a colleague suspects that another colleague is perpetrating abuse against a colleague or a customer.</li> <li>• A pattern of complaints in respect of whg's response to safeguarding reports.</li> </ul>
7.2.	whg will encourage and respond to feedback about its safeguarding practice, ensuring we use this feedback to continuously improve the safeguarding support we offer, using customer complaints as feedback and an opportunity to improve services as appropriate.
<b>8.0</b>	<b>ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES</b>
8.1.	<p>Documents, policies, and procedures associated with this policy are:</p> <ul style="list-style-type: none"> <li>• Walsall Safeguarding Partnership Board terms of reference</li> <li>• West Midlands Safeguarding group procedures</li> <li>• Code of Conduct</li> <li>• Whistleblowing Policy</li> <li>• Disciplinary Policy</li> <li>• Data Protection Policy</li> <li>• Domestic Abuse Policy</li> <li>• Self-Neglect/Hoarding Policy</li> <li>• Vulnerability Policy</li> <li>• Modern Slavery Act 2015</li> <li>• Care Act 2014</li> <li>• Children Act 1989 and 2004</li> <li>• Human Rights Act 1998</li> <li>• Mental Capacity Act 2005</li> <li>• Statutory Working Together Guidance 2023</li> <li>• Social Housing (Regulation) Act 2023</li> <li>• Consumer Standards 2024</li> </ul>

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<b>Document owner</b>	Corporate Director of Strategy, Assets and Transformation
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<b>Approved by</b>	whg Board – May 2024
<b>Review date</b>	May 2027

<b>Key changes</b>	We have revised the policy changing some of the language based on feedback from customers and colleagues. The policy sets out specific roles and responsibilities and has been updated to encompass changes due to new regulations and legislation including the Social Housing (Regulation) Act 2023, Working Together to Safeguard Children 2023 and the Regulator of Social Housing's Consumer Standards 2024.
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