



Safeguarding Policy

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Linked strategies/policies	See Section 11 – Associated Documents
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1.0 Scope of the Policy

- 1.1 Our Safeguarding Policy is designed to raise awareness about the abuse and neglect of children, young people, and adults at risk. This policy is an overarching policy, applying across our business to both customers and colleagues. All colleagues, managers, directors, board & Committee members and involved customers must be aware that safeguarding is 'everyone's responsibility' and that we all have a responsibility to act on concerns of abuse or neglect. We will deliver our services in line with legislation and regulatory compliance. We are committed to making safeguarding personal. This means being personally led and outcomes-focused.
- 1.2 This Policy applies to:
- the protection of children, young people, and adults at risk of abuse who live in or visit our properties and who use our services.
 - WCHG Colleagues, volunteers, subcontractors, and agents working for WCHG.
- 1.3 Our policy confirms we will.
- (i) Comply with legal and regulatory requirements
 - (ii) Develop a culture that does not tolerate abuse and encourages people to raise concerns.
 - (iii) Prevent abuse from happening wherever possible.
 - (iv) Have robust safeguarding procedures for children and adults in place
 - (v) Work in partnership with other agencies to reduce the risk of harm and abuse for our customers.
 - (vi) Raise awareness that safeguarding is the responsibility of all WCHG colleagues.
 - (vii) Always act in the customer's best interest by making safeguarding personal for that customer.
- 1.4 WCHG is committed to using a Think Family approach when delivering our services to ensure we recognise children and adults living in our properties. A Think Family approach emphasises considering the needs of the entire family when addressing concerns about a child or adult, recognising that individuals are part of a larger network of relationships. This means that services for children and adults should work together to understand the family's context and support their plans. It encourages professionals to be aware of potential safeguarding needs for all family members and to take appropriate action.
- 1.5 For further information relating to Think Family, please see [Think Family - NHS Safeguarding](#).

2.0 Statutory and regulatory context

2.1 We have legal and regulatory duties and responsibilities to safeguard children. The key guidance for child protection is Working Together to Safeguard Children (2018).

2.2 Working Together states that everyone who works with children has a responsibility to keep them safe. Everyone who comes into contact with children and families has a role to play in identifying concerns and sharing information.

2.3 The Children Act 2004 (Section 11)

- (i) Section 11 places duties on a range of organisations and individuals to make arrangements for ensuring that their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.
- (ii) We conduct a Section 11 self-assessment to demonstrate our compliance with Section 11 when performing our day-to-day activities. Our self-assessment is submitted to the relevant local authority. We complete this self-assessment every two years.

2.4 Children's Safeguarding Legislation

- The Children's Act 1989
- The Children's Act 2004 (Section 11)
- Children & Social Work Act 2017
- Working Together to Safeguard Children 2018
- The Care Act 2014 (where a child is transitioning from children's services to adult services)

2.5 Adult Safeguarding Legislation

- The Care Act 2014
- The Mental Capacity Act 2005
- The Mental Health Act 2007

2.6 We have legal and regulatory duties and responsibilities to safeguard both children and adults with care or support needs or who are deemed at risk of abuse or harm under the following legislation:

- The Domestic Abuse Act 2021
- The Housing Act 2004

- The Safeguarding Vulnerable Groups Act 2006
- Awaab's Law 2025 (To be enacted October 2025)
- The Mental Capacity Act 2005 (includes children aged 16 and upwards)
- The Anti-Social Behaviour, Crime and Policing Act 2014
- The Harassment Act 1997
- The Homelessness Reduction Act 2017
- The Modern Slavery Act 2015
- The Counter Terrorism and Security Act 2015
- The Human Rights Act 1998
- The Equality Act 2010
- The Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- The Social Housing (Regulation) Act 2023

2.7 We sometimes receive requests from statutory agencies to share information about children, young people and adults, where safeguarding and child protection concerns exist. We must cooperate and share information with statutory agencies in these situations. This is referred to as a duty to cooperate. The Care Act 2014 and the Children's Act 2004 outline our duty to cooperate. We will always share information in a sensitive, safe and secure way.

3.0 Definitions


3.1 We use The Care Act 2014 statutory guidance, which defines adult safeguarding as:

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.

3.2 We use the National Society for the Prevention of Cruelty to Children (NSPCC) definition for safeguarding children as "the action that is taken to promote the welfare of children and protect them from harm."

Safeguarding children means:

- Protecting children from abuse and maltreatment.
- Preventing harm to children's health or development.
- Ensuring children grow up with the provision of safe and effective care.
- Taking action to enable all children and young people to have the best outcomes.

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- 3.2 Abuse is any behaviour that deliberately or unknowingly causes a person harm or endangers their life and is a violation of a person's human and civil rights by another person or persons. It may consist of a single act or repeated acts.
- 3.3 The six fundamental principles of safeguarding are vital for ensuring the safety and well-being of individuals who may be at risk. They are:
- (i) Empowerment - People are supported and encouraged to make their own decisions and give informed consent. This means respecting the wishes of individuals and enabling them to take control of their own lives.
 - (ii) Prevention - It is essential to take action before harm occurs. This involves identifying and mitigating potential risks early on to prevent abuse or neglect from happening in the first place.
 - (iii) Proportionality - The least intrusive response appropriate to the level of risk presented. This principle ensures that interventions are balanced and proportionate to the level of risk faced by the individual.
 - (iv) Protection - Support and representation for those in greatest need. This principle highlights the importance of safeguarding those who are most at risk and ensuring they have access to the necessary resources and support.
 - (v) Partnership - Local solutions through services working with their communities. Communities play a crucial role in preventing, detecting, and reporting neglect and abuse. Collaboration between different organisations and stakeholders is key to effective safeguarding.
 - (vi) Accountability - Accountability and transparency in delivering safeguarding. This principle emphasises the need for clear roles and responsibilities, as well as openness in safeguarding practices to ensure trust and confidence.
- 3.4 Our Adult Safeguarding Procedure lists the ten types of abuse and indicators for adults in the UK.
- 3.5 The four types of child abuse in the UK are listed in our Children's Safeguarding Procedure, together with two further contextual safeguarding (outside the family home – Child Criminal Exploitation and Child Sexual Exploitation).

4.0 Duty of Care, Conduct and Professionalism

- 4.1 All colleagues at WCHG have a 'duty of care' to act in the best interest of our customers. All colleagues are made aware of their responsibility to be vigilant about recognising signs of abuse and harm, and how to report these in a safe and timely manner.
- 4.2 All colleagues (including volunteers, students on placement and contractors) are made aware of their responsibility to be vigilant about safeguarding issues, their own conduct, and how to respond to any concerns or suspicions they may have.
- 4.3 All WCHG colleagues are required to undergo mandatory safeguarding e-learning training. This is completed by every colleague at their corporate induction and then on an annual basis.
- 4.4 All colleagues are expected to uphold our values and work with integrity and honesty in a safe and trusting way. All colleagues understand how they are expected to conduct themselves when working for WCHG.
- 4.5 All colleagues understand the importance of professional boundaries. These act as a clear set of professional, trustworthy, and honest behaviours. Breaches of professional boundaries undermine a safe and effective safeguarding culture, causing confusion and doubt about possible intentions and motivations.

5.0 Our response to Safeguarding Concerns

5.1 Reporting (If In Doubt Shout)

- All safeguarding concerns are reported via our internal safeguarding system 'If In Doubt, Shout'. We encourage all colleagues to report safeguarding concerns, including instances where something doesn't feel right, to our dedicated reporting system.
- All concerns reported via If In Doubt Shout are assessed and triaged by our duty manager (Living Well Coordinators), who will take appropriate and timely action.

5.2 Referrals to Emergency Services

- Where someone is in immediate danger or discloses abuse that is a criminal offence, we will report this to the Police using 999.

5.3 Referrals to Statutory Agencies *(Children's Social Care, Adult Social Care, Health Care Services, Fire and Rescue Teams)*

- We will report concerns of abuse and neglect to partners that have statutory responsibility to investigate safeguarding referrals. These include the Police, Fire & Rescue Services, NHS and the Local Authority (WCHG currently work with Manchester City Council, Cheshire East, and Stockport local authorities). We will always ensure we make safeguarding personal by capturing the customer's voice. We will always, where appropriate, seek consent from the person to whom the referral relates.
- In most cases, this will be done with the consent of the adult or family, unless they lack capacity or there is an overriding risk to a child or an adult with care and support needs.
- We will focus on outcomes that promote health and wellbeing while ensuring that we take a risk-based approach to abuse and harm and that the appropriate level of intervention is used. This may include a combination of support and enforcement, as well as legal interventions.

5.4 Referrals to other support services

- We will focus on helping customers find the right support at the right time.
- We will take appropriate action to support customers where we have identified a preventative support need. For instance, we may signpost to our Living Well Team (including Staying Close Support), Financial Inclusion Team, or Youth Team. We may also signpost or refer customers to local charities for well-being concerns such as substance misuse and alcohol issues, counselling, and therapeutic health services.
- **The Wythenshawe Community Housing Group (WCHG) Youth Team** is committed to the personal and social development of children and young people. The team provides early intervention support, using a person-centred approach that empowers children and young people to overcome challenges and make positive choices. The team works in partnership with families by creating safe environments, encouraging positive activities, and collaborating with professionals to ensure that children and young people thrive.
- **Staying Close (Living Well)** is a dedicated service supporting care-experienced young people aged 18–25 as they move into independent living. Delivered in partnership with Manchester City Council, Moss Care St Vincent, Manchester Mind, and One Manchester, we offer tailored, wraparound support to young people in Manchester. This includes developing practical life skills, finding a stable home, sustaining their tenancy, managing money effectively, and integrating into their local community.

6.0 Training

6.1 We will provide colleagues, volunteers, contractors and board & committee members across the organisation with training in how to recognise the signs of abuse and harm and how to report these in a safe and timely manner.

6.2 All colleagues, volunteers and contractors will be provided with role-appropriate training.

- We will support colleagues, board and committee members and volunteers across our business in understanding how to recognise the signs of abuse and what to do if they have a concern via annual safeguarding briefings.
- A training matrix will be used to ensure that colleagues who have safeguarding responsibilities receive adequate training and that this is refreshed at least every three years.
- We will monitor training records so that we are able to offer training opportunities where there are gaps.
- Training and support are available for colleagues managing working relationships with young people and adults at risk, who may be part of the organisation as volunteers, work placements, apprenticeships or any such work training program.

6.3 Trauma Informed – Being professionally curious

- (i) A trauma-informed approach is essential in creating a supportive and collaborative working environment. We will aim to build trusting professional relationships with our customers. We will be empathetic and offer choices to customers to empower them to make the decisions for themselves.
- (ii) We will be professionally curious in a respectful but interested manner. We want to better understand both the person and the situation. To do that, we may ask some further questions so that we can help by discussing options and offering choices. We care about our customers and communities and are interested in getting to know people better. We are interested in collaborating to find solutions to problems.

7.0 Compliance Monitoring & Reporting

7.1 We will ensure that the operating systems of management, supervision, and internal inspections, reviews, and quality control highlight our strengths and areas of good practice, along with identifying areas we need to strengthen or change.

- 7.2 We have a named WCHG Safeguarding Specialist role, WCHG Safeguarding Lead, Executive Lead and a member of our Board who champions safeguarding for customers, colleagues and the wider public.
- 7.3 Our Health and Safety Committee meets every quarter. The Committee will provide strategic direction for safeguarding and support for all aspects of our approach to safeguarding children and adults at risk.
- 7.4 Safeguarding data will be reported to the Health & Safety Committee every quarter to promote a positive health & safety and safeguarding culture across WCHG. The report will focus on outcomes and lessons learnt from safeguarding cases both locally and nationally.
- 7.5 The Safeguarding Working Group will meet every eight weeks. The Working Group will provide operational services for safeguarding and supporting all aspects of our approach to the development of a safe, robust safeguarding culture.
- 7.6 We will respond to all safeguarding allegations made against colleagues using the Manchester, Stockport, or Cheshire East Allegations (Persons in Positions of Trust) procedures. Where relevant, we will use our own disciplinary procedures and, where appropriate, refer to external organisations.
- 7.7 We will support the delivery of our Slavery and Human Trafficking Statement by referring any cause of concern in line with the Safeguarding Policy. Taking advice from the Modern Slavery Helpline 0800 555 111.
- 7.8 An annual report will be provided to our Board to ensure that all operational, strategic, and regulatory changes are compliant and that the procedures reflect our landlord and community-based services on offer. We will provide an assurance of our compliance.

8.0 Data Protection

- 8.1 We will comply with our obligations under the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 18) when dealing with safeguarding referrals.
- 8.2 We will share information with appropriate agencies where the circumstances require the sharing of information for the purposes of safeguarding individuals. All information sharing decision will be recorded, including the reasons for the decision.
- 8.3 We will provide fair processing information and respect the wishes of the person at risk in relation to what information should be shared, and with whom, where possible.

8.4 Our colleagues will always respect confidentiality and not share any information given in confidence unless justified by the assessed risk to the person or required by law.

8.5 We will report potentially criminal acts to the Police.

9.0 Equality, diversity and inclusion

9.1 WCHG are committed to providing excellent customer service, which is fair, equitable and inclusive. We will make every reasonable effort to ensure that no one is discriminated against directly or indirectly because of any protected characteristic as defined by the Equality Act 2010 and in line with our reasonable adjustments statement.

9.2 We recognise that some protected groups may be disproportionately impacted and will take additional steps in the application of this policy and make reasonable adjustments to ensure compliance with the Act. If you require this policy in a different format, translated, large print, easy read, braille, or an audio copy, contact us by phone on 0300 111 0000 or by email: inclusionanddiversity@wchg.org.uk

10.0 Review and revision

10.1 The next policy review is scheduled for July 2028 and every two years thereafter.

11.0 Associated Documents

- WCHG Adult Safeguarding Procedure
- WCHG Children Safeguarding Procedure
- Hoarding Policy
- Domestic Abuse Policy
- Anti-Social Behaviour Policy
- Hate Crime Policy
- Complaint Policy
- Whistleblowing Policy
- Critical Incident Policy
- Disciplinary Policy
- Boundary Policy
- Talent Acquisition Policy
- Data Protection Policy
- Allocations Policy
- Tenancy Fraud Policy
- Slavery and Human Trafficking Statement

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- Whistleblowing Policy
 - ICT Security Policy
 - Health & Safety Policy

12.0 Glossary of Terms

Term	Description
Abuse or neglect	There is no statutory definition of abuse or neglect. It can be described as a violation of an individual's human and/or civil rights by any other person or person who causes harm to a person in need of care and support. It may be single or repeated acts or omissions occurring within a personal or close relationship where there is an expectation of trust.
Adult at risk	<p>WCHG recognises 'Adults at Risk.' This is the term now used instead of 'vulnerable adult' which is still widely used. The two phrases mean the same thing. e.g. whilst an individual with a disability may not be specifically experiencing abuse or harm, they are at higher risk of being abused or harmed, due to their vulnerabilities.</p> <p>An '<u>Adult at Risk</u>' is defined as any person aged 18 years with care and support needs (whether these are met, or unmet) such as older people, or people with disabilities (including mental health issues, learning or physical disability, sensory impairment, age or illness), who may be targeted, exploitation or experience abuse or neglect.</p> <p>They may be less likely to identify abuse themselves or to report it. People with communication difficulties can be particularly at risk because they may not be able to alert others. Sometimes people may not even be aware that they are being abused, and this is especially likely if they have a cognitive impairment. Abusers may try to prevent access to the person they abuse. The term has been widened to include people encountering domestic violence, substance misusers and asylum seekers.</p>
Modern slavery and human trafficking	A term used to encompass the offences of slavery, servitude and forced or compulsory labour and human trafficking. The term extends to slavery-like practices such as/and not limited to sale of exploitation of children or adults, forced marriage.
Perpetrator	The person(s) committing abuse or causing neglect
Person-centred approach	Keeping the person in focus when making decisions about their lives and working in partnership with them and taking their views and wishes into account.

Safeguarding	<p>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.</p> <p>The <u>NSPCC</u> defines safeguarding as "the action that is taken to promote the welfare of children and protect them from harm."</p> <p>Safeguarding means:</p> <ul style="list-style-type: none"> • Protecting children from abuse and maltreatment. • Preventing harm to children's health or development. • Ensuring children grow up with the provision of safe and effective care. • Taking action to enable all children and young people to have the best outcomes.
Section 11 Audit	Section 11 of the Children Act 2004 places a range of duties on organisations and individuals to ensure their functions and any services that they contract out to others are discharged having regard to the need to safeguard and promote the welfare of children.
Section 42 enquiry	Section 42 of the Care Act 2014 requires that each local authority must make enquiries, or causes others to do so, if it believes an adult has care and support needs, and believes the adult is experiencing or is at risk of abuse or neglect and, as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.
Practice Review or Safeguarding Adult Review	A serious care review or serious adult review in England is held after a child or vulnerable adult dies or is seriously injured under circumstances where abuse or neglect are thought to be involved.
Child In Need	This refers to Section 17 of the <u>Children Act 1989</u> . This section places a duty on <u>children's services</u> to provide help and support to a <u>child in need</u> to safeguard the child and promote their welfare. This duty extends to providing help to their family

	<p>where needed. A range of appropriate services may be provided, including financial assistance or housing.</p> <p><u>Social workers</u> may sometimes use the term ‘section 17’ as a shorthand way of referring to an <u>assessment</u> or the provision of services in relation to this duty.</p>
Child Protection	<p>Section 47 of the <i>Children Act 1989</i> places a legal duty on local authorities in England to investigate if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. This is known as a Section 47 enquiry.</p> <p>If a child is thought to be at serious risk, the local authority must look into the situation and decide what action is needed to protect the child.</p> <p>What this means for housing providers:</p> <p>While housing providers are not responsible for carrying out the investigation, they must cooperate with local authorities during a Section 47 enquiry. This includes:</p> <ul style="list-style-type: none"> • Sharing relevant information about the child or family (e.g. tenancy issues, living conditions, reports of antisocial behaviour). • Allowing access to properties if needed for welfare checks. • Working jointly with social workers and other professionals to support the child’s safety and wellbeing.
Child	A person up to the age of 18 years old.
Young Person	<p>A child’s maturity cannot be solely determined by age; therefore, categorising a child as a ‘young person’ due to their age alone could place them at risk by portraying them to be more advanced and mature than they are.</p> <p>In the UK the term ‘young person’ is defined by the Child and Young Persons Act 1933, a “young person” means a person who has attained the age of fourteen and is under the age of eighteen years”, and the Children Act 1989 and 2004 define a child as: ‘as anyone who has not yet reached their 18th birthday’.</p>

Care Leavers & Care Experienced Young People	<p>The Care Leavers (England) Regulations 2010 outline the responsibilities of local authorities in supporting young people who have left care.</p> <p>The regulations also highlight the role of personal advisers in assisting care leavers with their transition to independent living.</p> <p>Under the Children and Young Persons Act 2008, are formally 'looked after' children, i.e., children under the parental care of the local authority.</p> <ul style="list-style-type: none"> Up to 21 years old (25 years old if in formal education): and <p>Disabled children up to 18 years old (25 years old if in formal education)</p> <p>These regulations emphasise the importance of assessing the needs of care leavers and providing them with appropriate support, including housing.</p> <p>Local authorities are required to ensure that care leavers have access to safe and suitable accommodation and to work collaboratively with housing providers to meet their needs.</p>
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