



## Safeguarding Policy

<b>Date of approval</b>	<b>24th July 2023</b>
<b>Responsible director</b>	<b>Executive Director – Customers &amp; Communities</b>
<b>Policy monitoring body</b>	<b>WCHG Board</b>
<b>Resident input into policy date</b>	
<b>Date for policy review</b>	<b>July 2025</b>
<b>Linked strategies/policies</b>	<b>See Section 10</b>
<b>Version/date</b>	<b>July 2023</b>
<b>Owner</b>	<b>Amanda Seals, Head of Living Well</b>
<b>Policy Author</b>	<b>Vicki Broadbent, Safeguarding Specialist</b>

## **1. Purpose of the Policy**

- 1.1 To establish a policy for safeguarding children and adults at risk and to deliver a service in line with legislation and regulatory compliance. The policy together with its appendices confirms the Group's position on safeguarding and the approach to be taken by colleagues, contractors and volunteers who, whilst carrying out their duties, have concerns, allegations or actual evidence concerning abuse or neglect to children or adults at risk.
- 1.2 Our policy confirms we will;
- Comply with legal and regulatory requirements
  - Have a robust safeguarding procedure in place
  - Work in partnership with other agencies to reduce the risk of harm and abuse for our customers.
  - Raise awareness that safeguarding is the responsibility of all WCHG colleagues.
  - Always act in the customers best interest by making safeguarding personal for that customer.
- 1.3 The objectives of this policy are set in line with Manchester City Council's [Safeguarding Standard](#) and the [Self Neglect Strategy and Toolkit](#) and aim to provide effective guidance for all our WCHG colleagues to be able to identify potential safeguarding issues, and for WCHG to investigate and refer cases where necessary to the relevant Local Authority safeguarding team. ( Should be read in conjunction with the Safeguarding procedure, Confidential Reporting and Whistleblowing policy (found on the WCHG intranet), Domestic Abuse policy, and Antisocial Behaviour & Hate crime policy).

## **2. Relevant Legislation, Scope and Definitions**

- 2.1 This policy should be used by all colleagues, contractors, managing agents (where they don't have their own safeguarding approach) and volunteers within WCHG to understand the obligations and responsibilities placed upon the organisation to maintain a safe environment for our colleagues and customers within our properties and communities.
- 2.2 The Group has responsibilities under the Children Acts 1989 and 2004 to safeguard children at risk of abuse and neglect and under the Care Act 2014 and the Mental Capacity Act 2005 to safeguard adults with care and support needs.

- 
- 2.3 Wythenshawe Community Housing Group (WCHG), as part of Manchester Safeguarding Partnership (MSP) defines safeguarding as protecting a child or adults right to live in safety, free from abuse and/or neglect. Organisations and communities should work together to support children, young people to make decisions about the risks they face and to protect those who lack capacity to make these decisions.
- 2.4 The Care Act 2014 states that safeguarding decisions apply to an adult (defined as those over 18 years old) who:
- Has care and support needs
  - Is experiencing or at risk of abuse and neglect or,
  - Is unable to protect themselves because of their care and support needs.
- 2.5 The Care Act introduced 6 principles for working with adults with care and support needs:
- Empowerment
  - Prevention
  - Proportionality
  - Protection
  - Partnership
  - Accountability
- 2.6 Safeguarding children is defined in Working Together to Safeguard Children 2018 as:
- Protecting children from maltreatment
  - Preventing impairment of children's health and development
  - Ensuring that children grow in circumstances consistent with the provision of safe and effective care.
  - Acting to enable all children to have the best outcomes.
- 2.7 The Mental Capacity Act (MCA) 2005 provides the legal framework for establishing if people can make a specific decision themselves and the Act's 5 principles are to be considered during interactions with our customers:
- A presumption of capacity
  - Supporting individuals to make their own decisions
  - Unwise decisions
  - Best interests
  - Least restrictive option
- 

### **3 WCHG's objectives are:**

- 3.1 To comply with all relevant legislation and best practice and ensure that this policy and procedure are published and promoted within the organisation via the intranet & WCHG website so that all colleagues 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.
- 3.2 To ensure a prompt and proportionate response when it appears that a child, young person or adult at risk may be at risk of abuse or neglect. By prompt and proportionate, we mean a response will be generated the same working day if received by 6pm.
- 3.3 To work with partner agencies and the local authorities (Manchester & Cheshire East) to minimise risk and to ensure that where concerns are identified, they are swiftly and appropriately raised, and information is effectively shared.
- 3.4 To ensure that the policy is accessible to all so that children, young people and vulnerable adults are aware of the Group's approach and responsibilities.
- 3.5 Each colleague at WCHG has a 'duty of care' to act in the best interest of its customers and therefore everyone is responsible for safeguarding the people we work with, taking actions to avoid abuse occurring and reporting incidents when they occur. We will raise awareness about the abuse and/or neglect of children, young people and adults at risk. We will develop a culture that does not tolerate such abuse and encourages colleagues to raise concerns.
- 3.6 WCHG colleagues, volunteers and contractors visiting our homes and delivering services within our neighbourhoods and communities will understand their role in reporting safeguarding concerns. We will make checking safeguarding policies part of our procurement approach for the appointment or renewal of contractors and suppliers.

### **4. Policy**

- 4.1 The Group will comply with MSP Safeguarding Standards (and relevant Cheshire East standards) and we aim to ensure that our colleagues are equipped to identify and investigate cases as appropriate, making further referrals as needed.
- 4.2 The Group will have a named Safeguarding Specialist, Safeguarding Lead, Executive Lead and a member of our Board who champions safeguarding for the Group.

- 4.3 The Group will respond to allegations against colleagues using the Manchester Safeguarding Partnership guidelines (and relevant Cheshire East guidelines). Where relevant, we will use the Groups own disciplinary procedures and where appropriate, referral to external organisations.
- 4.4 The Group will ensure operating systems of management, supervision, internal inspections and quality control have the potential to reveal abuse where it exists.
- 4.5 The Group will support the delivery of the Groups 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
- 4.6 Reporting
- **Statutory agencies** - WCHG will record and refer concerns, suspicions and allegations of abuse, harm or neglect to the relevant statutory agency responsible for carrying out our safeguarding assessments and enquiries. In most cases, this will be the local authority. We will record all decisions not to refer a concern, the reasons why and any other action taken.
  - **Non-statutory arrangements** – WCHG will take appropriate action to support customers where we have identified a broader welfare concern. This includes customers with welfare concerns where the referral is deemed not acceptable to the local authority. For instance, signposting to local charities, for wellbeing concerns such as drug and alcohol issues, counselling and health services. We will also refer to our own inhouse support services such as The Living Well Team, Financial Inclusion or Tenancy Audit Team.

## 5 Training

- 5.1 WCHG will support colleagues, volunteers, contractors and board members across the organisation to understand how to recognise the signs of abuse and what to do if they have a safeguarding concern.
- 5.2 An annual safeguarding campaign will be carried out across the whole business by the way of 'Safeguarding September' and regular information briefing will be delivered throughout the year.

5.3 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 vulnerable adults who may be part of the organisation as volunteers, work placements, apprenticeships or any such work training programme

## **6. Responsibility and Reporting**

6.1 The Executive Director of Customers & Communities shall act as WCHG's Executive Safeguarding Lead and shall be responsible for the implementation and review of this policy.

6.2 Safeguarding data will be provided to the Leadership Team on a monthly basis. The data will include all referrals recorded including actual or any potential safeguarding concerns received. Data will also include referrals made to partner agencies such as Adults and Children's Services. WCHG will report annually to the board to provide assurance through the governance process of the safeguarding activity of the organisation.

6.3 The Safeguarding Steering Group will meet every 6 weeks. The Group provides strategic direction and support for all aspects of the Group's approach to safeguarding vulnerable children and adults.

6.4 Safeguarding 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 performance measures and outcomes and lessons learnt from safeguarding cases etc...

6.5 All WCHG safeguarding referrals from colleagues will be assessed by the duty officer and urgent contact will be made in order to fully understand the concerns. The duty officer will complete an assessment and offer signposting or support if appropriate.

6.6 When disclosures of actual, or suspected abuse are received outside of normal working hours, the Out of Hours Duty Manager will take responsibility for any referrals made and follow the procedure.

6.7 The Safeguarding Policy is reviewed every two years, and an annual update to Board will be provided to ensure that all operational, strategic and regulatory changes are compliant and that the procedure are reflective of the Landlord and community based services on offer. We will provide an assurance of our compliance.

## **7. Crisis Situation**

7.1 In the event of a national or local crisis, such as the COVID-19 pandemic, which increases risk of harm, the Group may use its customer data to identify vulnerable people and children at increased risk of abuse. We will work with local agencies and partners to support any identified individuals with the following: -

- contact individuals to check on their welfare
- co-ordinate necessary support such as food bank parcels
- liaise with internal and external agencies on an individual's behalf

## **8 Equality & Diversity**

8.1 The Group ensures that the Safeguarding Policy and procedure is accessible to its customers and will consider the different needs of our customers when considering action.

8.2 WCHG recognises that customers of all races, ages, religions, gender, sexual orientation, literacy levels and disability should be treated equally and fairly.

8.3 WCHG will provide information in languages other than English, in Braille, Large Print, audio and in easy read formats. Our receptions and interview rooms are fitted with a hearing loop system.

8.4 If you require assistance with translation of this policy, large print, easy read, braille, or an audio copy, contact us by phone on: 0300 111 0000 or: 0800 633 5500 or by email: [communications@wchg.org.uk](mailto:communications@wchg.org.uk)

## **9 Safe Requirement Including Whistleblowing**

- 9.1 There are certain posts which by virtue of their job, come into contact on a regular one to one basis with vulnerable adults and/or children, and therefore require a Disclosure and Barring Service (DBS) check. Some roles may require checking against the children and/or vulnerable adults barring lists. In order to ensure WCHG complies with its statutory obligations and is able to discharge its full duty of care towards its tenants and customers, DBS checks will be undertaken as part of the recruitment process as appropriate and monitored by the safeguarding steering group.
- 9.2 WCHG whistleblowing policy encourages and supports colleagues to report concerns about the conduct of colleagues across the business.

## **10 Associated Strategies, Policies and Documents**

- Hoarding Policy
- Domestic Abuse Policy
- Anti-Social Behaviour & Hate Crime Policy (under review)
- Ageing Well & Living Well strategy (in development)
- Inclusion Strategy
- Health and Wellbeing Strategy
- Community Safety Strategy (under review)
- Whistleblowing Policy
- Critical Incident Policy
- Disciplinary Policy
- Code of conduct
- Talent Acquisition Policy & Procedure
- Data Protection Policy
- Managing Probation Policy & Procedure.

### **Key Legal and regulatory references**

- Children Act 1989 & 2004
- Human Rights Act 1998
- Mental Capacity Act 2005
- Children and Young Persons Act 2008
- Equality Act 2010
- Working Together to Safeguard Children 2022
- Care Act 2014
- Modern Slavery Act 2018
- Data Protection Act 2018
- General Data Protection Regulations 2018

## Appendix 1: Definitions

Term	Description
Abuse or neglect	There is no statutory definition of abuse or neglect. It can be described as a violation of individuals human and/or civil rights by any other person or persons who cause harm to a person in need of care and support. It may be a single or repeated acts or omissions occurring within a personal or close relationship where there is an expectation of trust.
Adult at risk	<p>‘An adult who:</p> <ul style="list-style-type: none"> <li>a) Has needs for care and support (whether or not the local authority is meeting any of those needs)</li> <li>b) Is experiencing, or is at risk of abuse and neglect, and</li> <li>c) As a result of those needs is unable to protect themselves against abuse or neglect or the risk of it’</li> </ul> <p>Care Act 2014</p>
Child	A person up to the age of 18 years old
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 the 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	The Care and Support statutory guidance 2014 issued under the Care Act 2014 defines safeguarding as ‘Protecting an adult right to live in safety, free from abuse and neglect’.
Section 11 Audit	Section 11 of the Children Act 1004 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 required that each local authority must make enquires, or causes others to do so, if it believes ab= n adult has care and support needs, and

	believes the adult 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.
Serious case review or serious 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.
Adults with care and support needs	<p>These are people at risk of safeguarding concerns. They included but not limited to a person who:</p> <ul style="list-style-type: none"> <li>• Is elderly, with poor health, a physical disability or cognitive impairment</li> <li>• Has a learning disability</li> <li>• Has a physical disability and/or sensory impairment</li> <li>• Has mental health needs including dementia or a personality disorder</li> <li>• Misuses substances or alcohol: and</li> </ul> <p>Is unable to demonstrate the capacity to make an informed decision as defined by the Mental Capacity Act 2005 and needs care and support.</p>
Young Person	<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"> <li>• Up to 21 years old (25 years old if in formal education): and</li> <li>• Disabled children up to 18 years old (25 years old if in formal education)</li> </ul>

## Appendix 2: The 6 principles of adult safeguarding

This information is taken from the Care and Support statutory guidance 2014 issued under the Care Act 2014. It sets out the 6 principles which underpin all adult safeguarding work. The principles apply to all sectors including Registered Social Housing. The principles should inform the ways in which professionals and other colleagues work with adults.

<b>Principle</b>	<b>Outcome</b>
Empowerment	People being supported and encouraged to make their own decisions and informed consent
Prevention	It is better to act before harm occurs.
Proportionality	The least intrusive response appropriate to the risk presented.
Protection	Support and representation for those in greatest need.
Partnership	Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
Accountability	Accountability and transparency in safeguarding practice.

### Appendix 3: 10 Types of abuse and indicators

The Care and Support guidance 2014 identifies 10 types of abuse. It is not an exhaustive list but an illustration guide as to the sort of behaviour which could contribute towards a safeguarding concern.

Types of abuse	Signs & indicators
<b>Physical abuse</b> – assault, hitting, lapping, punching, pushing, biting, rough handling, physical punishment, misuse of medication withholding food	No explanation for injuries, bruising, cuts and/or loss of hair, frequent injuries, subdued or change of behaviour, failure to seek medical attention.
<b>Domestic abuse</b> – psychological, physical, sexual, financial, emotional	Low self-esteem, physical evidence such as bruising, fear of outside intervention, damage to home, isolation, limited access to money, verbal abuse or intimidation in front of others.
<b>Sexual abuse</b> - Rape, attempted rape or sexual assault, inappropriate touch, non-consensual masturbation or either or both persons. Inappropriate looking, teasing or sexual innuendos.	Bruising particularly to the thighs, buttocks and upper arms, bleeding or pain to the genital area. Infections or sexually transmitted diseases. Self-harming, Poor concentration, withdrawal, sleep disturbance
<b>Psychological abuse</b> – Cyber bullying, preventing choices, failure to respect privacy, addressing a person in a patronising way, intimidation, coercion, harassment or threats of abuse, humiliation	insomnia, low self-esteem, change of appetite weight loss/gain, withdrawal or change in the psychological state of the person
<b>Financial or material abuse</b> – theft of money or possessions, fraud, scamming, denying assistance to benefits, exploitation of a person’s money or assets.	Missing personal possessions, unexplained lack of money, unexplained withdrawals from a bank account, family or others shows unusual interest in the assets of a person, rent arrears and eviction notices.
<b>Modern Slavery</b> – human trafficking, forced labour, domestic servitude, sexual exploitation, debt bondage	Signs of physical or emotional abuse, appears to be unkempt, malnourished, living in dirty conditions, always wearing the same clothes, fear of law enforcements.
<b>Discriminatory abuse</b> – harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual and religion	Appears withdrawn and isolated, Expressions of anger, frustration, fear or anxiety
<b>Organisational abuse</b> – Neglect and poor care practice within an institution or specific	Lack of flexibility and choice for people using the service, lack of adequate procedures,

care setting such as hospital, care home. Failure to respond to complaints	poor record keeping and missing documents, lack of management and oversight.
<b>Neglect and acts of omission</b> – Ignoring medical, emotional and physical care needs.	Poor personal hygiene, unexplained weight loss, inappropriate or inadequate clothing, pressure sores/ulcers, poor environment.
<b>Self-neglect</b> – Lack of self-care to an extent it threatens personal health and safety. Inability to avoid self-harm, neglecting to care for personal hygiene.	Poor personal hygiene, unkempt appearance, hoarding, neglecting household maintenance, collecting a large number of animals, lack of essentials – food, clothing or shelter.