

**Safeguarding Children and Adults
Policy and Procedure
December 2021**

Statement of intent

Safeguarding means protecting the health, wellbeing and human rights of adults and children at risk, enabling them to live safely, free from abuse and neglect. It is about people and organisations working together to prevent and reduce both the risks and experience of abuse or neglect. It is also making sure that adults and children's wellbeing is supported and, their views, wishes, feelings and beliefs are respected when agreeing on any action. RHP group (including Co-op Homes) takes the prevention and reporting of suspected children and adult abuse very seriously.

Safeguarding is everyone's responsibility and RHP Group ensure that all employees, board members, volunteers, contractors and partners are aware of safeguarding concern and our duty to report and protect children and adults from suspected harm and abuse.

- Employees, contractors and volunteers in contact with customers understand how to recognise and respond to suspected child or adult abuse and are supported in raising a concern.
- Employees and volunteers receive training appropriate to their role and management support to reflect on their practice and the impact of their handling of a concern.
- We make an appropriate, timely, professional and ethical response to any suspected abuse.
- When raising a safeguarding concern we assume that the adult has capacity to decide whether they wish a safeguarding alert to be raised on their behalf, and their informed consent is always sought unless there is evidence to suggest this would put the adult or child at further risk then consent is not necessary required however this must be documented on the referral.

Safeguarding Children and Young People is a term which is broader than 'child protection' and relates to the action taken to promote the welfare of children and protect them from harm. Examples of this include (but is not limited to):

- Protecting children from maltreatment.
- Preventing impairment of children's health and development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes. Employees, contractors and volunteer in contact with customers understand how to recognize and respond to suspected child or adult abuse and are supported in raising a concern.

The Safeguarding Adults duty applies to an adult who is 18 or over and who:

- Has a care and support need, whether or not this is being met by the local authority.
- Is experiencing or at risk of abuse or neglect.
- As a result of those care and support needs is unable to protect themselves from either the risk of or the experience of abuse or neglect.

The six principles for Safeguarding Adults are to:

1. Empower – to support and encourage people to make their own decisions.
2. Prevent – to support people to take action before harm occurs.
3. Respect – we will not intrude any more than is essential to keep people safe.
4. Protect – when people need help, we'll do our best to support them.
5. Work together – we work with our local communities to find the best ways to keep people safe.
6. Explain – we will be clear and straightforward about what we do and why.

The Care and support statutory guidance identifies ten types of abuse, these are:

1. Domestic violence – including all types of abuse between family members or partners.
2. Discriminatory abuse – harassment or slurs due to someone's race, gender, age, disability sexual orientation, religion or gender identity.
3. Financial abuse – including theft, fraud or coercion with regards to financial affairs.
4. Organisational abuse – including neglect and poor care practice within a care setting or in relation to care provided at home.
5. Physical abuse – including hitting, slapping, pushing, unnecessary restraint or misusing medications.
6. Psychological abuse – including emotional abuse, threats to harm, attempts to control, coercion, verbal abuse and bullying.
7. Modern slavery – including forced labour and people trafficking.
8. Neglect – failure to act or ignoring medical, emotional or physical care needs.
9. Self-neglect – neglecting to care for your own health, hygiene or surroundings, this can include hoarding.
10. Sexual abuse – including inappropriate touching, indecent exposure, rape, harassment, or any sexual acts the adult has not consented to.

There are four types of child abuse:

1. Physical Abuse.
2. Sexual Abuse.
3. Emotional Abuse.
4. Neglect.

Harm is the detrimental impact on the child caused by the abuse. There are three types of harm:

1. Physical.
2. Emotional.
3. Psychological.

Safeguarding Indicators (warning signs for neglect)

Examples of the possible indicators for the various types of abuse are set out in Appendix 1.

Relevance

Safeguarding is everyone's responsibility and RHP Group ensures that all employees, board members, volunteers, contactors and partners are aware of safeguarding concerns and our duty to report and protect children and adults from suspected harm and abuse.

Connected Documents

- Working Together to Protect Children.
- Children Act 1989 and 2004.
- Care Act 2014.
- RHP's Whistleblowing Policy.

Explicit exclusions

None.

Definitions

None.

Responsibilities

Employees and contractors have a responsibility to:

1. Know our policies and procedures, and those working with children and adults at risk should be aware of issues of abuse and neglect, or exploitation.
2. Act in a timely manner where they suspect abuse and ensure their concern is raised with or referred to the appropriate person or agency as quickly as possible.
3. Where they suspect that a crime has been committed, or that there is immediate risk of harm or the need for medical treatment, they should make an immediate report to the police or emergency services by calling 999.
4. Know how to report abuse, including how and when to make a direct referral where speaking to a manager would cause delay.
5. Make a clear and factual record of their concern and the action taken and ensure that record is then properly stored on RHP systems.

Managing Director (CHS) and Senior Management Team

Have a responsibility to:

1. Ensure that all employees have completed the appropriate safeguarding e-learning associated with their job role for children and adults.
2. Ensure that the child or adult at risk is made safe if appropriate and possible.
3. Ensure any employee, contractor or volunteer who may have caused harm is not in contact with the child or adult who may be at risk.
4. Ensure information is provided to the safeguarding authority in a timely way and where possible within four hours.

Managers are not responsible for carrying out a safeguarding investigation into alleged abuse. This duty lies with the local authority although employees may be required to be involved.

Safeguarding Lead

The person in the organisation with responsibility as the Safeguarding Lead on all concerns of safeguarding children and vulnerable adults at RHP is the Director of Housing Services, and at Co-op Homes, the Head of Client Services and the Business Services Manager, whose responsibilities include:

- Making employees aware of their duty to report allegations and suspected abuse to a manager, or the local authority, and ensure they have regular supervision and support to identify and respond to possible abuse and neglect.
- Ensuring we have safe recruitment practices and routinely take up and check references and DBS for all employees who are in direct contact with children or adults.
- Ensuring that all employees have the relevant training according to their role and responsibilities.
- Ensuring that all employees and volunteers adhere to our whistleblowing policy and support employees who raise concerns.

Reporting to Board

Any safeguarding referrals or alerts that are considered high risk, for example death or serious injury or harm, or involving a CHS employee, contractor or partner will be reported to the Senior Management Team who will decide if this needs to be reported to the Board.

Training and Development

Ensuring all customer facing employees are regularly trained and updated on development and best practice in Safeguarding is a key objective of our overall approach. The L&D team will set up all employees in direct contact with customers through their role, whether on the phone or in person on Safeguarding Adults e-learning and ensure that 3-yearly refreshers are also organised.

Communication and Information to tenants

Information on Safeguarding and how to report concerns is provided in periodic newsletters and in addition, there is information on the company's website about how to report safeguarding issues or concerns.

Case Monitoring and Reviews

All Safeguarding cases including new and ongoing are reviewed quarterly by CHS' Senior Management Team. The Group includes the Managing Director, Head of Client Services, Finance Manager, Repairs & Maintenance Manager and Business Services Manager. The Group will review the progress and outcomes of all safeguarding alerts made.

Allegations against RHP Group employees

Safeguarding allegations or concerns made against RHP Group employees will be managed in line with our disciplinary policy. All employees are made aware of the whistle blowing policy and their right and duty to report issues of concern to CHS/RHP, the police or other relevant agencies. RHP will take all allegations made against employees seriously and act on them quickly to protect the person at risk, the employee and RHP Group.

Partnership Working

CHS works across many London Boroughs and other unitary authorities and will forge links with the relevant local safeguarding teams and Social Services departments. We will also support Safeguarding Boards in other areas of our operation as required.

Recruitment and DBS checks

HR are arranging DBS checks for new customer facing employees, however, as the DBS service regularly reviews the eligibility criteria for checks, the HR team is currently reviewing its DBS policy and eligible roles in line with these. Teams will be updated if there are any changes.

Information Sharing

A good balance between respecting privacy and sharing information where there is a public interest concern, is essential to safeguarding adults at risk.

Written consent from an individual to share information is not always a legislative requirement but is good practice to ensure their informal consent and choice is a central consideration in responding to safeguarding concerns.

The PAN London framework

https://www.sabrichmondandwandsworth.org.uk/media/1351/safeguarding_london_multi_agency_policy_and_procedures.pdf

advises that there is a general principle with safeguarding adults and children that an incident of suspected or actual abuse can be reported more widely and may need to be shared amongst those involved. Our principles include:

- Information given to an employee (in their professional capacity) belongs to CHS/RHP and not the individual employee. The employee cannot give individual assurance of confidentiality to the adult or child at risk.
- We must gain written consent about sharing information and routinely explain to our customers what information may be shared with other organisations.
- Maintaining confidentiality should not lead to a failure to act to protect an adult or child from abuse or harm.
- Management interests or secrecy will never override the need to protect the adult or child.

- Any whistle-blower who are employees or volunteers are protected according to their entitlement under the Public Disclosure Act (1998).

Information sharing must be considered on a case by case basis, be necessary for the purpose, shared only with those who need to know, be accurate and up to date, and provided in a timely and secure way.

Procedures for implementation

Reporting Suspected Abuse

It is everyone's responsibility to safeguard and report their concerns about abuse or neglect immediately or wherever possible within four hours to the local authority.

1. Ask for Consent

You must assume that the adult at risk has the capacity and you must inform them that you are raising an alert on their behalf. You can raise an alert without their consent if you have reason to think they do not have capacity to make the decision, if there are others at risk, or if a crime has been committed. For concerns for children, notify the parents or carer of the child unless it is not appropriate to do so.

2. Make a Factual Report and Record

Record the nature of your concerns and relevant factual details as soon as possible after you have observed them. Send these details to the borough's safeguarding team via their online referral.

3. Ask Advice

Discuss your concerns with your line manager or another manager, head of service or the Managing Director on how to proceed. If this isn't possible or where delay may cause harm, report directly to the single point of access team using the online form.

4. Report within four hours

Report any suspected abuse within four hours. You can discuss your safeguarding concern via the single point of access team directly by phone, and then follow up using their online reporting form including important information. You should give the following details:

- Name, address and date of birth of the child or adult at risk.
- Details of the person alleged to have caused the harm (unless its self-neglect).
- The nature of your concerns, and factual detail about what you have observed.
- Your contact details (the safeguarding team will want to follow up with you within four hours and need to be able to ask you or your manager for more information about the alert).

Where possible also provide information on:

- Any statements provided by the adult or child at risk or another person who has reported their concerns to you.
- Contact details of any witnesses.
- Clarify whether the adult or child has given you consent to pass on the information.
- Any immediate action you have taken to protect the adult or child at risk from harm.
- Any preventative measures you have put in place.

After discussing your concerns with a manager, you can report suspected abuse to the Adult or Children's Social Services in the tenant's local authority. Details and online referral forms can be found on the relevant websites.

Suspected Crime

The Police must also be informed if a criminal activity is suspected. The Police must be involved if:

- There is an allegation from an adult or child to another person of sexual abuse.
- There is a suspicion that sexual abuse has occurred.
- There has been an alleged or suspected case of physical injury that has caused harm to an adult or child constituting an assault, actual or grievous bodily harm.
- An alleged or suspected case of cruelty, including where an adult is ill-treated or neglected.
- There are allegations or suspicions that involve unusual circumstances e.g., organised or institutional abuse.
- There is an alleged or suspected case of financial abuse.

If the crime is happening right now employees should call 999 otherwise the local station should be contacted using 101. The Line Manager should be contacted immediately following this action.

Reducing the risk of harm and preventing abuse

After the alert has been raised with Social Services discuss with your manager what (if any) other measures or risk assessments can be undertaken. This could include a temporary move, lock change, visiting in pairs, raising an alert on Omni/Fixflo or a referral to the Vulnerable Adults Multi agency for consideration. If an employee is personally involved then they may be instructed not to have any further contact until the case has been fully investigated.

Recording and monitoring our safeguarding alerts

Following an alert to the relevant local authority where a safeguarding incident has been identified, employees must also complete our internal reporting form via this link – <W:\Safeguarding\Safeguarding report forms\CHS Safeguarding report form.docx>.

The completed form should be emailed to the Senior Management Team for review and saved as the customers name in the same folder.

Appendix 1: Indicators of Abuse

Possible Indicators of Physical Abuse

- Multiple bruising
- Fractures
- Burns
- Bed sores
- Fear
- Depression
- Unexplained weight loss
- Assault (can be intentional or reckless)

Possible Indicators of Neglect inside a residential home and Acts of Omission

- Malnutrition
- Untreated medical problems
- Bed sores
- Confusion
- Over-sedation
- Deprivation of meals may constitute “wilful neglect”

Possible Indicators of Psychological and Emotional Abuse

- Fear
 - Depression
 - Confusion
 - Loss of sleep
 - Unexpected or unexplained change in behaviour
 - Deprivation of liberty could be false imprisonment.
- Aggressive shouting causing fear of violence in a public place may be an offence against Public Order Act 1986, or harassment under the Protection from Harassment Act 1997

Possible Indicators of Sexual Abuse

- Loss of sleep
- Unexpected or unexplained change in behaviour
- Bruising
- Soreness around the genitals
- Torn, stained or bloody underwear
- A preoccupation with anything sexual
- Sexually transmitted diseases
- Pregnancy
- Rape – e.g., a male member of staff having sex with a Mental Health client (see Mental Health Act 1983)
- Indecent Assault

Possible Indicators of Financial and Material Abuse

- Unexplained withdrawals from the bank
- Unusual activity in the bank accounts
- Unpaid bills
- Unexplained shortage of money

- Reluctance on the part of the person with responsibility for the funds to provide basic food and clothes etc.
- Fraud
- Theft

Possible Indicators of Organisational Abuse

- Inflexible and non-negotiable systems and routines
- Lack of consideration of dietary requirements
- Name calling; inappropriate ways of addressing people
- Lack of adequate physical care – an unkempt appearance

Possible Indicators of Self-Neglect

- This includes various behaviours; disregarding one's personal hygiene, health or surroundings resulting in a risk that impact on the adult's wellbeing, this could consist of behaviours such as hoarding.

Possible indicators of Modern Slavery

Modern Slavery is an international crime, it can include victims that have been brought from overseas, and vulnerable people in the UK. Slave Masters and Traffickers will deceive, coerce and force adults into a life of abuse, callous treatment and slavery.

Possible indicators of Domestic Abuse

Definition of Domestic Abuse;

- Incident of controlling, coercive, or threatening behaviour, violence, or abuse, by someone who is or has been an intimate partner or family member regardless of gender or sexuality. Includes: psychological, physical, sexual, financial, emotional abuse;
- So called 'honour' based violence;
- Female Genital Mutilation
- Forced marriage.

Age range extended down to 16 (for the purpose of the safeguarding adult arrangements, safeguarding children arrangements would be applied to a person under 18)

Possible indicators of Discriminatory Abuse

Abuse can be experienced as harassment, insults or similar actions due to race, religion, gender, gender identity, age, disability, sexual orientation.

Possible indicators of Sexual Exploitation

Sexual exploitation is a subset of sexual abuse. It involves exploitative situations and relationships where people receive 'something' (e.g., accommodation, alcohol, affection, money) as a result of them performing, or others performing on them, sexual activities.