

Paragon Asra Housing Limited

Safeguarding Policy

September 2022

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Department Housing Services

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Paragon Asra Housing Limited (PA Housing) is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all of our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats we will provide them.

AUDIT LOG

Date of change	Who updated	Details of the change
02/08/2019	Isabella Kwiatkiewicz, Housing Operations	Noted spelling errors - amended
13/04/2022	Luke Walton Sally-Anne Underhill	Review and recommendations implement after consultation with Belinda Oates of Huntersjoy Consultancy & Training in Adult Social Care Change to responsible and reporting Officers
23/8/22	Deanna von Anrep, Housing Operations Manager	<p>Amended approved by EMT date to correct date</p> <p>2.2 changed to include contractors and authorized third parties</p> <p>2.3 added commitment to work in partnership with relevant agencies to reduce risk of harm to adults and children who may be at risk</p> <p>3.4 amended to include personalised assessment and incorporate welfare concerns as a consideration.</p> <p>5.2 new bullet point added to link to DBS policy</p> <p>5.11 & 5.12 added clause committing to carrying out instructions of specialist agencies</p> <p>Minor grammatical errors rectified. Jargon spelled out. Titles of director corrected.</p>
22/06/22	Poonam Veja, Improvement Services	<p>5.9 'The Executive Director of Customer Services' updated to The Director of Specialist Housing and Support.</p> <p>8.3 'The Executive Director of Customer Services' Rachel Smart – updated to The Director of Specialist Housing and Support. Emma Solomons</p> <p>10.3 'All customers' added before children and young people</p> <p>13.4 The Executive Director of Customer Services Rachel Smart – updated to The Director of Specialist Housing and Support. Emma Solomons</p> <p>17 Replaced '@whistleblowing Policy' with 'Probity Policy' (covers Anti-Fraud, Integrity & Bribery, and Whistleblowing)</p> <p>All references to vulnerable adults replaced with adults at risk.</p>
10.01.2024	Sharon Butler	Amendments to policy owner and safeguarding lead

1. Introduction

- 1.1 Paragon Asra Housing Limited (PA Housing) provides housing and support services to a wide range of people, some of whom are vulnerable or may be at risk of being harmed. We actively work to safeguard children, young people, and adults at risk from harm, and we will respond appropriately if it occurs. We have a duty to tell Social Services if there are any protection concerns about any of our customers, whether the concerns are identified by staff or directly reported to them. Social Services and the police are responsible for leading all investigations of abuse.
- 1.2 A Local Safeguarding Children Board (LSCB) and a Local Adult Safeguarding Board (LASB) operate in each local authority area, and these take the lead role in co-ordinating and ensuring the effectiveness of services to safeguard children and young people/adults in that area. PA Housing is committed to working in partnership with all the local authorities and relevant agencies in its areas of operation, within the frameworks agreed by the LSCBs and LSABs in the areas in which we work, to protect vulnerable children and adults.

2. Objectives

- 2.1 This policy sets out PA Housing's approach to safeguarding children, young people, and adults at risks of abuse and or neglect from significant harm, abuse or neglect, and promoting their welfare and wellbeing.
- 2.2 Effective safeguarding is a shared responsibility. The policy applies to all staff, contractors, volunteers and authorised third parties who individually and collectively have a responsibility to play a part in safeguarding the children, young people and adults who are at risk of abuse or neglect in our communities, and those vulnerable customers who give rise to concerns due to issues of self-harm or self-neglect which are not as a result of third party abuse.
- 2.3 No single person can have a full picture of the needs and circumstances of a child or adult at risk, and if children, families and adults at risk are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. PA Housing will work in partnership with other agencies to reduce the risk of harm and abuse for young people and adults who may be at risk.
- 2.4 The policy relates to all accommodation and neighbourhoods visited by any member of staff, board member, volunteer, or contractor. All staff, volunteers and external partners therefore have a duty to safeguard and promote the welfare of customers as far as possible, to minimise the opportunities for abuse and or neglect.
- 2.5 All parties to whom this policy applies should be aware of their responsibilities and how to act in ways that protect themselves from wrongful allegations of abuse.

3. Definition - What is Safeguarding?

3.1 Safeguarding children and young people

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment.
- preventing impairment of children's health or development.
- ensuring that children grow up in circumstances consistent with

the provision of safe and effective care; and

- taking action to enable all children to have the best outcomes. (*Working Together to Safeguard Children*, DfE, 2015)

3.2 A 'child' is anyone who is aged up to 18 years.

3.3 All children and young people have the right to be safe from harm and need safe environments to grow with confidence. Everyone is responsible for helping to keep children safe. Safeguarding children and young people means protecting them from any potential source of harm.

3.4 There are links between domestic abuse, substance misuse, mental health needs and poor outcomes for families and children. Families may demonstrate levels of resilience with appropriate support, and therefore it is not inevitable that families who experience problems are at risk and in need of protection. We also need to consider circumstances where families may not reach the criteria for safeguarding, but where interventions such as offering financial support or signposting to appropriate services may act to prevent deterioration and the need for statutory intervention. Welfare concerns of this nature will be considered and personalised service including referrals to external agencies for support will be made when this is appropriate.

4. Safeguarding adults

4.1 Safeguarding means 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.

4.2 Organisations should always promote the adult's wellbeing in their safeguarding arrangements. People have complex lives and being safe is only one of the things they want for themselves. Professionals should use professional curiosity in working with adults to establish what being safe means to them and how that can be best achieved. Professionals and other staff should not be advocating "safety" measures that do not take account of individual well-being. (*Care and Support Statutory Guidance* Issued under the Care Act 2014, DoH).

Any application of professional curiosity will recognise the concern following the correct procedure so that risks to the adult are not increased.

4.3 Six key principles underpin all adult safeguarding work:

- 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 collaborating with their local neighbourhoods, where people have a part to play in preventing, detecting and reporting neglect and abuse.

- Accountability – Accountability and transparency in delivering safeguarding.

5. Keys points of policy

- 5.1 We take the protection and safeguarding of our customers and their family members very seriously. Abuse is a violation of an individual's human and civil rights. We accept our role as part of the inter-agency framework for safeguarding, and accept the need for a clear and consistent approach to safeguarding, with policies and procedures to underpin and inform this.
- 5.2 In line with recruitment policy, PA Housing will ensure that the necessary DBS checks are undertaken when recruiting staff and that these are reviewed at the necessary intervals.
- 5.3 We ensure that our staff and customers understand what abuse is, what to do if they have a concern and to whom they can report this to.
- 5.4 PA Housing will adopt the Child Protection Procedures linked to the London Children's Safeguarding Board procedures, since these may vary from region to region. We will also adopt the same principle for Safeguarding Adults from Abuse.
- 5.5 Some of the local authorities where we work have made minor adaptations to these policies and procedures to reflect their local arrangements and the most up to date versions of these may be found on the websites of the relevant Local Safeguarding Children's Board or Local Safeguarding Adults Board. PA Housing will follow the applicable local protocol for both adults and children.
- 5.6 PA Housing will follow the recommendations from the Protecting Children from Radicalisation as well as families & adults at risk, as defined in the [Prevent Duty Guidance](#) as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. It is recognised that children, families and adults at risk may be more likely to be drawn into radicalisation. If PA Housing has been informed that abuse of a child or a vulnerable adult is taking place or that they are at risk of radicalisation, this will be reported to the Safeguarding Lead (Executive Director, Resources, Executive Services) and Director of Income and Home Moves.
- 5.7 Child protection is covered by legislation that does not assume capacity. This policy supports staff to work with adults who have capacity. When an adult lacks capacity to make decisions about their safety, staff will apply the principles of the [Mental Capacity Act 2005](#), assuming capacity unless there is a reason to doubt capacity at which point a mental capacity assessment should be undertaken.
- 5.8 PA Housing has issued a [Modern Slavery Act Statement](#) on its website and takes care to ensure that slavery and human trafficking do not exist in our supply chains. New suppliers are required to declare that they are not involved in slavery or human trafficking and, where relevant, share their own Modern Slavery Statement with PA Housing. Contracts with suppliers require them to take appropriate steps to ensure that there is no slavery or human trafficking in their own supply chains. Staff are required to be vigilant about this requirement.
- 5.9 PA Housing has detailed procedures that cover the management and reporting of

abuse and neglect. Any member of staff who suspects or receives an allegation has a duty of care to report it to their line manager immediately. The manager will consult the safeguarding lead (Executive Director, Resources, Executive Services) and refer to the local protocol to report the case to the local authority without delay, and/or the police where appropriate. Any discussions and actions conducted should be recorded accurately and promptly and stored securely.

- 5.10 All safeguarding cases will be logged on the housing management IT system or a safeguarding data base to ensure effective recording, progress monitoring and reporting.
- 5.11 A safeguarding concern raised with the Local Authority may progress to a safeguarding enquiry. The level of enquiry will be proportionate to the risk considering both vital interest of the adult and public interest. The enquiry may start and finish with a conversation with the adult. If the enquiry progresses further, it can either be a multi-agency enquiry or a single agency enquiry. The Local Authority has a statutory duty to conduct enquiries or make sure others do. PA Housing may be asked to contribute to a multi- agency enquiry or alternatively conduct an internal enquiry.
- 5.12 The nominated PA enquiry officer must report their findings on a standardized enquiry report. The outcome of the enquiry must focus on management of identified risks.
- 5.13 Managers will fully co-operate with the specialist agencies and work with them to investigate any alleged breach of tenancy agreement and take action where appropriate. PA Housing will ensure that any interviews or investigations are conducted at the instruction of the specialist agencies and at the appropriate time so as not to contaminate the investigation.
- 5.14 If a customer suspects that harm is taking place they should report it to their local Social Services, the police, or a member of staff.

6. Identifying vulnerability

- 6.1 We aim to ensure that customers who are presenting as at risk or giving rise to a cause for concern, are identified at an early stage and receive appropriate advice and support as required to help them stay safe in the community of their choice and maintain their tenancy.
- 6.2 In carrying out their work, which can include entering customers' homes on a regular basis, at a customer's request or carrying out maintenance inspections, staff might see evidence of harm. They may become concerned about the safety or welfare of a child, young person, or adult at risk in several ways:
 - The person may tell you.
 - The person may say something that worries you.
 - A third party may voice concerns.
 - You may see something – an incident or an injury or other sign.
- 6.3 Safeguarding children categories of abuse include: physical abuse. sexual abuse. emotional abuse. Safeguarding adults' categories of abuse include sexual, modern slavery, psychological, discrimination, domestic abuse, self- neglect, neglect or acts of omission, financial abuse, or exploitation, physical or organisational.

- 6.4 A person can become at risk at any time and all staff and contractors have a responsibility to be aware of actual and potential risk to adults and children and to ensure that the correct process is followed.
- 6.5 The purpose of identifying potential risk is to ensure that the service provided is, where possible, tailored to meet the needs of the individual. We recognise that individuals need different levels of support from a variety of agencies. We provide support with housing and tenancy management issues, and we can assist other agencies in providing a “wrap-around” service for vulnerable customers and their families.
- 6.5 There are circumstances where the person alleged to have caused harm may also be an adult at risk of abuse or neglect, and in these circumstances, they must receive protection and support using a multi-agency approach.

7. Early help

- 7.1 Children and families will always benefit from having emerging problems responded to at the earliest opportunity. As a provider of social housing, PA Housing and its staff have a key role in identifying emerging problems and potential unmet needs for individual children and families and sharing information with other professionals to assist with early identification and assessment.
- 7.2 All staff should be alert to the potential need for early help for a child who:
- Is disabled and has specific additional needs.
 - Has special educational needs.
 - Is a young carer.
 - Is showing signs of engaging in anti-social or criminal behaviour.
 - Is in family circumstances presenting challenges for the child such as substance misuse, adult mental health problems or domestic violence and abuse.
 - Is showing early signs of abuse or neglect.
 - Is showing signs of radicalization.
- 7.3 Adults who may be at risk of abuse and neglect may be increasingly vulnerable because of their care and support needs.
- 7.4 Staff have a responsibility to recognise the signs and symptoms of abuse or neglect and share the information with their manager and or the safeguarding lead (Executive Director, Resources, Executive Services). The lead will work in partnership with other agencies to support the adult or child.

8. Confidentiality and information sharing

- 8.1 We understand the importance of ensuring that personal data is managed fairly, lawfully, and appropriately, and that the rights of individuals are upheld. However, we are clear that where an individual’s safety is at risk, we are required to report our concerns to the responsible authorities and share information with them.
- 8.2 Information that may be shared includes names, contact details, a person’s physical or mental health, or relations with others. The sharing of this information will be restricted to those who have a demonstrable need to know and robust protections, such as encryption, should be used to share this information.

- 8.3 If a member of staff or one of our contractors becomes concerned about the safety or welfare of a child, young person or adult at risk, it is imperative that advice is sought from the safeguarding lead (Executive Director, Resources, Executive Services)

9. Sexual exploitation

- 9.1 Whilst much abuse of children and young people takes place within the home and family, sexual exploitation has emerged as a form of abuse which can be more visible to a wider range of people.
- 9.2 Sexual exploitation is where a young person receives 'something', (e.g., food, accommodation, drugs, gifts, money) as a result of performing, and/or others performing on them, sexual activities.
- 9.3 Child sexual exploitation can occur through use of technology, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain.
- 9.4 In all cases the person exploiting the young person has power over them by virtue of age, gender, intellect, physical strength and/or economic or other resources.
- 9.5 Violence, coercion, and intimidation are common, with involvement in exploitative relationship being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.
- 9.6 Whilst definitions and guidance in relation to sexual exploitation focus on children under 18 as victims, it can also happen to young adults.

10. Keeping safe online

- 10.1 Many people, particularly children, young people and young adults, use technologies (such as mobile phones, email, social networking sites, Instant Messenger) as a positive and creative part of their activities. Children and young people often use these methods to make plans with friends or organise events so if you are working with young people, it might be necessary to communicate with them in this way.
- 10.2 Staff should not give out their personal contact details, including home address, personal e-mail address or mobile numbers. Under no circumstances should personal accounts in social networking sites be used to communicate with children/young people/ young adults that staff have met in the course of their work. The use of a professional networking site may only be used in line with the Social Media policy.
- 10.3 PA Colleagues, where possible, should only use equipment provided through work to communicate with all customers including children and young people. In all circumstances, PA Colleagues should be cautious in their communications so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.

11. Use of photographs and videos

- 11.1 Any publications or communications we produce that contain photographs or videos of children, families, or adults at risk, will not contain personal information about them that could identify their whereabouts. Children and adults at risk will not be portrayed in a demeaning or tasteless way.
- 11.2 Only staff or approved professional photographers and film makers will be used to take photographs and video footage of events and other community activities. Videos and photographs will be stored securely in accordance with the Data Protection policy.
- 11.3 Before an image of a child is used, written consent must be obtained from parents, guardians or carers. Verbal consent should be obtained from the child. Before an image of an adult is used, verbal and written consent must be obtained from the adult. If the adult lacks capacity to consent to the use of an image, consent must be obtained from the adults representative who may be a family member, social worker, friend or advocate.
- 11.4 Photographs or record footage from schools are subject to written permission from the head teacher on behalf of the pupils. Large group shots do not require consent, but any parent, guardian or carer will be given the opportunity to withdraw their child from being photographed or recorded at any time.

12. Training

- 12.1 As part of their induction training, all relevant staff and volunteers are required to read and understand this policy to ensure that they are able to identify children, young people, families and adults at risk who may be at risk and act appropriately.
- 12.2 A clear safeguarding training pathway for staff and volunteers (where staff have specific roles with children, families, and adults at risk) according to the level of need is in place. Where staff have specific roles with children and families, enhanced training will be considered.
- 12.3 All training will be recorded on individual training logs.

13. Monitoring and reporting

- 13.1 There is a clear line of accountability for work on safeguarding; from the Board and the Executive Directors of Operations and throughout the organization.
- 13.2 This policy spells out what these lines of accountability are and is designed to ensure appropriate interventions are taken and, where necessary, referrals made to local authorities and to Local Safeguarding Boards.
- 13.3 Each case of concern should be reported to the appropriate manager who will provide guidance and supervision to make sure it is handled properly. The safeguarding lead should be advised of all safeguarding matters, and will keep a record of all such cases.
- 13.4 The safeguarding lead is the Executive Director, Resources, Executive Services, Simon Hatchman, 07720087108 Simon.hatchman@pahousing.co.uk
- 13.5 The Executive Director will provide a Safeguarding annual review to the Audit and Risk Committee.
- 13.6 PA Housing is committed to continually developing good practice and

monitoring standards, in conjunction with our partner agencies. The service is subject to internal audit and recommendations from internal audit will be adopted.

14. Equality analysis

- 14.1 This policy has undergone an equality analysis to make sure that we do not illegally discriminate against anyone and that it is accessible to everyone.

15. Consultation

- 15.1 Customers were consulted on whether this policy is clear, reasonable and easy to understand. Where customers didn't find the policy clear, we changed parts of it to meet their suggestions.

16. Legislation

The following legislation has been considered:

- [Care Act 2014](#) and the [Care and Support Statutory Guidance](#) (issued under the Care Act 2014)
- [Children Act 2004](#) and "[Working Together to Safeguard Children](#)" (Department for Education Guidance 2015)
- [Mental Capacity Act 2005](#) - Deprivation of Liberty Safeguards *Currently out for consultation and will be changing so the policy will need to be updated next year when this change is passed.
- [Mental Health Act 2007](#)
- [Safeguarding Vulnerable Groups Act 2006](#) as [amended by the Protection of Freedom Act 2012](#)
- [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (HM Government, March 2015 and amended 2018)
- [Data Protection Act 2018](#)
- [Public Interest Disclosure Act 1998](#)
- [The Modern Slavery Act 2015.](#)

17. [Linked policies](#)

Anti-Social Behaviour
Complaints
Data Protection
Disclosure and Barring
Domestic Abuse
Employee Code of Conduct
Equality and Diversity
Hate Crime
Hoarding
Lone Working
Neighbour Dispute
Social Media
Probity Policies
Professional Boundaries
Professional Curiosities