

Safeguarding from Abuse Policy

Introduction

Grand Union Housing Group (GUHG) provides housing and services to customers, some of whom may require additional support to manage their home and live as independently as possible. This in accordance with our customer service values.

GUHG is required, through its regulatory and funding frameworks, to ensure that a comprehensive policy and procedure is implemented for the safeguarding of children, young people and adults from abuse.

This policy sets out the relevant framework to ensure that all relevant personnel are able to implement this policy effectively, to promote wellbeing, prevent harm and respond effectively if concerns are raised.

This policy should be used in conjunction with the Safeguarding from Abuse procedure guide.

Policy statement

GUHG takes the detection, prevention and cessation of abuse of children, young people and adults very seriously and believes that every person has the right to live free from abuse. All staff have a responsibility for safeguarding and protecting individuals from abuse and GUHG incorporates the awareness of abuse through all aspects, roles and responsibilities of its operations.

For the purposes of this policy, The Care Act 2014 is the relevant act of parliament. The local authority is obliged to comply with the Care Act 2014 which also places a requirement on housing associations to assist local authorities in their safeguarding obligations. The local authority has a duty to liaise with housing associations in this respect. GUHG will work in partnership with social services, the police and other agencies to achieve the best outcome for those affected.

Our safeguarding duties under this policy apply to all customers and visitors to any of our premises. Any contractor, organisation or individual employed by, or using, GUHG premises or working directly with GUHG customers will be required to have their own safeguarding policies and procedures or be willing to adhere to those used by GUHG.

All staff that come in to contact with children, young people and adults have a duty to safeguard and promote their welfare and should be adequately trained to identify indicators of abuse and raise concerns.

This policy focuses on what staff should do if they suspect abuse and also how GUHG can enable and empower their customers to better protect them.

Policy objectives

- Define the different types of abuse.
- To have clear and robust procedures in place for dealing with incidents.
- To promote a multi-agency approach in the identification, investigation and longer term impact of suspected abuse for an individual, to help promote the protection of children, young people and adults. This will include contributing to the appropriate safeguarding board and forums. Also to maintain a register and report on all safeguarding incidents to Homes and Services Committee members on a quarterly basis.
- To monitor and maintain employee's training and compliance to ensure quality of safeguarding is maintained.

Regulatory and legal compliance

There is no one specific piece of legislation that provides a framework for action to protect an individual from abuse. Legal powers to assess and intervene are contained in a wide range of legislation. Some of it is contained in criminal law, civil law which imposes on a local authority's statutory duties and/or legal frameworks for assessment and provision of services.

Protection is available through criminal and civil courts, both to prevent a person being abused and to take action against an abuser.

Key legislation is listed below:

- Children Act 1989 and 2004
- Children and Families Act 2014
- Care Act 2014
- Sexual Offences Act 2003
- General Data Protection Regulation 2016
- NHS and Community Care Act 1990
- Mental Health Act 1983 (England and Wales)

- Deprivation of Liberty Safeguards (DOLS) 2014
- Mental Capacity Act 2005
- Offences against the Person Act 1861
- Family Law Act 1996
- Equalities Act 2010
- Public Interest Disclosure Act 1998
- Human Rights Act 1998

Key principles of safeguarding

Adults

The following six principles will underpin GUHG's adult safeguarding work:

- **Empowerment** : being supported and encouraged to make their own decisions
- **Prevention**: take action before harm is done
- **Proportionality**: to take the least intrusive response appropriate to the risk
- **Protection**: support and representation to those in greatest need
- **Partnership**: working with other professionals and the customer
- **Accountability**: transparent in delivering safeguarding.

Children

The following four principles will underpin GUHG's children and young people safeguarding work as per Every Child Matters.

(Every Child Matters (ECM) is a UK government initiative for England and Wales, that was launched in 2003, at least partly in response to the death of Victoria Climbié.):

- protecting children from abuse and maltreatment
- preventing impairment 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 outcome.

What is abuse?

Abuse is a single or repeated act, or lack of appropriate action occurring within a relationship where there is an expectation of trust, which causes significant harm or distress.

There are many varied types of abuse, including:

- physical
- psychological
- financial

- sexual
- domestic abuse
- neglect including self neglect
- discriminatory
- institutional or organisational abuse
- modern slavery
- hate crime
- honour based violence
- female genital mutilation
- forced marriage
- exploitation by radicalisers promoting violence.

GUHG aims to ensure that staff providing services to children, young people and adults receive regular training in how to identify and report suspected cases of abuse. Robust procedures are in place to follow when abuse is suspected. GUHG staff will work with the emergency services, local authority adult or children services and other agencies as appropriate to deal with instances of abuse. This policy will link in to the relevant local authority safeguarding policy and procedure within the locality in which the person resides.

Definition of adult at risk

An adult at risk is anyone aged 18 years and over who is, or may be, in need of community care services by reason of mental or other disability, age or illness, and who is, or maybe, unable to take care of himself or herself, or unable to protect himself or herself against significant harm of exploitation. Law commission (1995)

Definition of child or young person

As stated in the Children's Act 1989 and 2004, a child is anyone who has not yet reached their 18th birthday. Children, therefore, means children and young people throughout. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate for children, does not change their status or entitlement to services or protection under the Children Act 1989

Confidentiality

GUHG staff will always respect a person's confidentiality, however, they must not promise to keep a secret which could relate to either an incident of abuse and/or a criminal offence which may have been committed against a person.

Empowering people with support and care needs

Further to some extensive consultation, GUHG has identified ways it can deliver an empowering and informative programme around the area of abuse:

- Informal training being delivered to customer groups within their services.
- Structured discussion sessions about what process we will work to if someone reports abuse.
- Information made available about how a person can report abuse to an outside agency i.e. the Safeguarding from Abuse team.
- Abuse concerns and issues raised as part of support planning.
- Regular discussion about abuse via customer meetings/coffee mornings.
- Role play, open consultation and discussion used to help people understand issues around abuse in learning disability services.
- Publish clear information about staff's conduct and professional boundaries to be maintained.
- Publish clear information around expected service standards to be delivered.
- Use other formats for information delivery around abuse, such as picture cards, leaflets, open days and training information.
- Link with other agencies to utilise training/information offered to vulnerable groups.
- Information sharing protocols developed to enhance co-ordination with other agencies.

Roles and responsibilities

The Director of Independent Living and Better Lives is the designated safeguarding lead for GUHG.

The Homes and Services Committee will appoint a member as the safeguarding champion for GUHG.

Ensuring employee competence and compliance

GUHG will undertake regular training of staff and Board members and is included as part of a new employee's induction programme, along with regular monitoring of competence and compliance to maintain a high standard of professional practice and knowledge.

Developing an understanding of safeguarding practices outside of the immediate service delivery aimed at customers with support and care needs, (for example safer recruitment practices) and raising staff awareness amongst all teams who may come into contact with any customer within GUHG, would also be good practice measures. GUHG has developed the

following training programme to ensure that all staff have an awareness of safeguarding:

- All staff and Board members will complete online training to cover safeguarding children and adults from abuse via Skillsgate.
- Members of staff who have telephone contact with customers or who deal with contractors who attend customers' homes will complete the next level of training. The training will provide a 30 minute overview of safeguarding usually at a team meeting and will be completed in addition to the online training.
- The third level of training is provided to all staff that will be entering a customer's home. This training will be a 1 hour training session and will be completed in addition to the online training.

The full training will be scheduled to take place every quarter and will capture new staff as they join the organisation.

The staff member must still report their concerns where there is a risk of harm, even if they are unable to gain the consent of the victim first, the staff member should refer to multi-agency, procedures for guidance. Staff must also be aware of, and take account of, people's ethnic origins, gender, sexuality, religion and cultural background - although this should not influence safeguarding decisions, particularly when relating to children.

All safeguarding alerts will be raised with the local authority as soon as possible.

However, there may be occasions where the child, young person or adult is not willing to report the suspected abuse, and where the level of risk does not necessitate overriding the individuals' decision not to report. If there is any level of risk or concern then you should encourage the person to report it. In such circumstances, and where staff have thoroughly explored the reasons why the person is not willing to report a concern, there may still be safeguards which can be implemented, to minimise the occurrence of such things happening in the future, as guided by the local safeguarding team who will be happy to provide advice even without disclosure. It is an important principle of this policy to work with the individual to find out what being safe means to them and how best to achieve it.

Any such safeguards discussed and implemented, should be done in partnership with the person with care and support needs and any other involved agencies where possible. GUHG will avoid safeguards which do not take into account the person's wellbeing as defined in the Care Act.

All safeguarding incidents relating to children must be reported regardless of the parent/guardians or child's wishes. Staff should, however, wherever possible, advise parents/guardians that they will be making a safeguarding

referral as this is often the expectation of social services. If it is deemed by the staff member that by making the parent/guardians aware of the referral will place the child at a greater risk, they should not be informed.

GUHG staff will ensure that all existing and potential customers, and where possible, other family members, are aware of our approach towards safeguarding.

GUHG works in partnership with the local authorities and other agencies to safeguard those who are vulnerable to radicalisation or grooming into extremism.

Staff are expected to adhere to a comprehensive protocol with regards to professional boundaries, and the code of conduct, as part of their terms and conditions of employment. This is designed to both safeguard the customer and the members of staff who could themselves otherwise be subject to false allegations of abuse.

Other related policies/documents

Safeguarding from Abuse Procedure Guide
Domestic Abuse Policy
Data Protection and Confidentiality Policy
Tenancy Support Procedure
Equality, Diversity and Customer Care Policy
Multi-Agency Safeguarding Protocols and guidance
Professional boundaries guidance
Social Media Protocol

Monitoring, review and risk management

A safeguarding log will be used to monitor the reporting and outcome of any suspected and reported cases of abuse. This monitoring will be fed back to the Homes and Services Committee.

Monitoring of individual safeguarding cases will be managed through staff 1-1's where a staff member has reported suspected abuse or been involved in a multi-agency safeguarding investigation. This will ensure the staff member can be supported appropriately also.

Regular safeguarding training will be delivered to all staff at corporate induction and mandatory refresher sessions.

Day to day risk management for safeguarding will be managed by the Director of Independent Living and Better Lives supported by the Independent Living Managers. Where a customer is deemed to lack capacity

under the Mental Capacity Act, guidance will be sought from the LA safeguarding team. Safeguarding will form part of GUHG's risk management monitoring, with appropriate assurances in place. The Homes and Services Committee will monitor the number of safeguards reported quarterly and monitor trends and any potential learning.

Responsibility for implementation

The Director of Independent Living will assume overall responsibility for the implementation of this policy as GUHG's designated person.

CONSULTATION

Staff from across GUHG

Customer Consultation: May 2018

Equality Impact Assessment carried out: initial screen

Person responsible for review: Director of Independent Living and Better Lives

Supported in the review by: Independent Living Managers

Ratified by: Leadership team 29.5.19

Date of review: April 2019

Date of next review: May 2022