

Purpose and Scope

Adullam Homes Housing Association is committed to the protection of both adults and children. The aim of this policy is to set out the values, principles and approach to safeguarding children, young people and adults. This policy sets out a framework for the conduct of all staff within the Association.

All employees, volunteers, agency staff, students and Board members must be aware of the contents of this policy and the Safeguarding Procedures to understand their individual responsibilities and help promote best practice. The policy demands the highest standards of professional practice which all staff are required to follow.

The policy applies to all residents, tenants, and service users (TRS) accessing any offer of Adullam Homes Housing Association regardless of gender, age, ethnicity, disability, sexuality or religion.

1. Introduction

Every TRS accessing our organisation has the right to live their life with privacy, dignity, independence and choice and be free from abuse.

Safeguarding is everyone's responsibility and all staff have a duty, during the course of their work to protect and promote the welfare of children and adults in need of safeguarding. The Association has a duty to make sure appropriate arrangements are in place to enable staff to do this.

During the course of their work, staff may have concerns that TRS are being abused or at risk of abuse. This may be by other people, including members of staff either within Adullam or other agencies. TRS may disclose concerns and ask for help. In all cases staff have a duty to act in accordance with the Safeguarding Policy and Procedures.

Adullam has a duty to reduce risks to staff and avoid putting them in positions where abuse might be alleged.

2. Definitions

A child is legally defined as anyone under the age of 18.

An adult in need of safeguarding is defined as a person over 18 who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse or neglect; and
- 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.

3. Abuse

Abuse is the violation of an individual's human and civil rights by any other person or persons. It can be a single act or repeated acts. Abuse takes many forms, including, but not limited to, physical, sexual, emotional, financial, controlling behaviour, exploitation and cuckooing. It can take place in person, online, or via technology. It also includes acts of neglect or an omission to act. In all forms of abuse there are elements of emotional abuse, and some people may be subjected to more than one form of abuse at any one time.

4. Key Principles (Safeguarding)

The following key principles underpin all our work in relation to safeguarding and promoting the welfare of children and adults:

- Empowerment - Adullam staff will enable individuals to take their own decisions and give informed consent.
- Prevention - Adullam believe that it is better to take action before harm occurs and will work towards

preventing abuse occurring through working in a holistic and person-centred way that promotes resilience and wellbeing.

- Proportionality - Staff will always adopt the least intrusive response to managing risk.
- Protection - We will provide support and representation for those in greatest need and provide people with the resources to protect themselves.
- Partnership - Adullam will work in partnership to safeguard children and adults, creating local solutions working together with local services as part of communities. This is key to understanding the challenges around transitional safeguarding across children and adults accessing our services.
- Accountability - We will ensure that our safeguarding practices are accountable and transparent.

5. Roles and Responsibilities

All staff have responsibility to identify and report safeguarding concerns. The Assistant Director of Quality & Support has the overall responsibility for the implementation of this policy.

Each locality will appoint a safeguarding representative for adults and or a safeguarding representative for children. Responsible for providing advice and guidance to staff dealing with concerns.

Each locality will have a safeguarding coordinator who is responsible for ensuring cases are recorded appropriately and staff have received relevant training.

Heads of service will provide a quarterly report to the safeguarding lead identifying key trends and analysis of reporting data. This is a dual role in children's services for the registered manager under Ofsted.

Please refer to the Safeguarding Structure

6. Creating a Safe Environment

Adullam recognises the complexity of safeguarding issues. This may include service users being reluctant to disclose issues around safeguarding because of possible consequences. We approach this by keeping TRS informed through briefings and leaflets and offering them the opportunity to speak to peer mentors about concerns they have, who can then inform a member of staff on their behalf. Service users will be encouraged, and supported, where appropriate, to be part of an annual event where they will be part of the improvement process to ensure barriers to reporting concerns are overcome

Staff receive mandatory training on safeguarding and specialist training to identify trends in localities and geographical areas.

7. Perpetrators

Where a person is identified as a perpetrator of abuse, their individual support needs and risk should be assessed and managed in the same way as all other people using or accessing our services. If a person's actions/behaviours raise a concern, then staff must discuss this with their line manager and safeguarding co-ordinator for appropriate advice and record the decisions that are made

Some TRS of Adullam may be perpetrators of abuse. Their individual support needs and risk should be assessed and managed in the same way as all other service users. If a service user's actions/behaviours raise a concern, then staff must discuss this with their line manager and safeguarding co-ordinator for appropriate advice.

If information from or involving the service user highlights the risk or potential risk of harm to another person,

then the divulgence of this override's confidentiality.

Adullam will keep a record of people we work with who may pose a risk to others. It is the responsibility of the safeguarding coordinators to keep this record for each region.

8. Recognising Signs of Abuse and Neglect

Indicators for different types of abuse include

Physical Abuse: inflicting any form of physical harm, pain or restriction e.g. hitting or misuse of medication.

Sexual Abuse: any sexual act which is unwanted or to which the person cannot consent. Examples include unwanted touching or kissing, being made to listen to sexual comments or being forced to look at sexual acts or materials. It can involve forcing or enticing someone to take part in sexual activities. It may also include grooming for abuse through exposing a child or adult in need of safeguarding to increasingly explicit materials or acts. Children, and adults with limited capacity to consent (e.g. due to learning disabilities or poor mental health) may also be at risk of **sexual exploitation**.

Exploitation: where an adult or child receives something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, or money) in exchange for sexual activities. **Sexual exploitation** and **criminal exploitation** can occur through the use of the internet or on mobile phones. In all cases, those exploiting the adult or child have power over them because of their age, gender, intellect, physical strength and/or resources.

Cuckooing: When an individual's home or accommodation is 'taken over' in order to facilitate some form of illegal activity, for example sexual and criminal exploitation, drug dealing, or storing illegal items such as firearms, knives or stolen goods.

Emotional Abuse: any act intended to inflict emotional harm or distress. This may include threats, humiliation, bullying (including cyber-bullying), harassment, intimidation, or isolation.

Neglect and acts of omission: this will include intentional or unintentional failure to meet the needs of a person who is dependent on others for those needs to be met. For example, withholding of necessities of life such as food or heating.

[Working Together to Safeguard Children](#) includes description of some specific types of abuse experienced by children including child sexual exploitation, extremism and county lines

Organisational Abuse: This is where the custom and practice within an organisation is a contributory factor to facilitate, or not prevent, abuse that is taking place. It includes isolated incidents of poor professional practice or neglect to pervasive ill treatment or gross misconduct within an organisation. It also includes organisational practices which consistently disadvantage service users.

Financial / Economic Abuse: this includes theft, fraud or exploitation for material gain. It can involve someone using or putting pressure on a person to use their money in a way that they do not want or is not in their best interests. Economic abuse involves behaviours that interfere with an individual's ability to acquire, use and maintain economic resources such as money, transportation and utilities. Frequently involving an element of coercion and control, it is often linked to domestic abuse.

Discriminatory Abuse: includes behaviour intended humiliate or degrade a person or result in less favourable treatment, based on their actual or perceived membership in a certain group or social category (e.g. race, age, gender, disability, religion etc.) Discriminatory abuse may include hate crime

[Stop Homophobic, Transphobic, Racial, Religious and Disability Hate Crime - True Vision](#)

Domestic abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of gender or sexuality. The Domestic Abuse Act 2021 recognises children as victims of domestic abuse if they witness, hear, or experience the effects of abuse between adults they are related to. (See Domestic Abuse (TRS) Policy)

Modern slavery a relationship in which one person is controlled through violence, the threat of violence, or psychological coercion, has lost free will and free movement, is exploited economically, and paid nothing beyond subsistence.

Radicalisation is the process by which an individual may be coerced or otherwise persuaded to adopt extreme ideology, including the justification of violence towards others. Where services users are thought to be at risk of or displaying such harmful beliefs this must be addressed as a safeguarding concern. **Adullam's guidance on working with young people vulnerable to violent extremism provides further information on actions staff should take.**

Self-harm: Deliberate Self- Harm is a term used when someone intentionally injures or harms themselves. This can take a number of forms including cutting or burning, taking overdoses of tablets or medicines, punching themselves, throwing their bodies against something, pulling out hair or eyelashes, scratching, picking or tearing at skin, causing sores and scarring.

Self-neglect: A broad range of behaviours where an individual neglects to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have to an extent that it threatens their health and safety

Where an adult has care and support needs and may be unable to protect themselves from this behaviour, this may trigger the duty for an adult safeguarding enquiry to take place, and a concern should be raised to allow appropriate action to be considered. Irrespective of whether the adult safeguarding criteria have been met, consideration should be given as to whether action is required under the appropriate multi-agency self-neglect procedures for the area in question

[Self-Neglect: advice for all](#)

NSPCC [Spotting the signs of child abuse](#)
SCIE [types-and-indicators-of-abuse](#)

9. Information Sharing, Confidentiality and Data Protection

The welfare of the child or adult in need of safeguarding overrides the Association's commitment to confidentiality to an individual service user.

All referrals outside the organisation should be made in consultation with the Regional Safeguarding Co-ordinator or the appropriate safeguarding lead.

The welfare or safety of a child overrides any commitment to involve the parent or carer in the decision to make a referral to Children's Social Care and there should be no such discussion if this may place the child or adult at further risk of harm. Once a referral has been made a breach of confidentiality could be damaging to the child or young person and could compromise any subsequent child protection investigation.

For adults in need of safeguarding, concerns should be discussed with them before making a referral, unless so

doing would increase the risk to them or others. Consent may also be disregarded where others may potentially be at risk from the same perpetrator, where there is a public protection issue or for the purposes of the prevention or detection of crime.

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only. Recorded information should be stored in a secure place with limited access in line with data protection laws and Adullam data protection policies.

Children's and Adult's Social Care has a duty to provide advice and it may be that advice is sought from them initially. All concerns regarding safeguarding should be discussed with the person in the project designated as responsible for Safeguarding.

10. Working with other agencies

Adullam recognises the importance of working with other agencies both formally and informally and this multi-agency approach is reflected in an individual's support plan. We participate when invited in formal multi-agency approaches including, for example, Early Help Assessments (EHA) CAF (Common Assessment Framework), CPA (Care Programme Approach), MARAC (Multi Agency Risk Assessment Conference) and MAPPA (Multi Agency Public Protection Arrangements). Where such formal arrangements are in place, we would be expected to share any concerns/information around safeguarding issues within these forums.

Adullam complies with legislation requiring that there are Information Sharing Protocols in place and recognises that joint working is essential in order to help ensure the welfare and safety of an individual is not missed.

The Local Authority Children's and Adult's Social Care has the statutory duty to respond if urgent safeguarding action is required and to provide advice and support to staff from different agencies.

11. Recording safeguarding concerns

Cases will be recorded and monitored using the process outlined in the safeguarding reporting process. See Safeguarding Flowchart Process and Guidance for recording and monitoring safeguarding cases on Pyramid/Lief procedure for further guidance.

Each project should keep a safeguarding shared e-folder which contains information, advice and guidance on local authority safeguarding policy, procedures and documentation. Local procedures will contain essential contact details and all Projects working with children and young people must identify their Local Safeguarding Children Board/Local Safeguarding Partners and secure a copy of their procedures.

12. Staff support and training

Training will take place to ensure all staff are able to implement the Safeguarding Policy and Procedures. This will include information on all Adullam's policies and procedures, and training on child and adult safeguarding awareness for all staff and volunteers.

All Adullam employees will receive Safeguarding level 1 training.

Safeguarding coordinators and safeguarding leads will receive additional designated officer training. (Minimum level 3)

Staff receive regular support and supervision and safeguarding is an agenda item in weekly/monthly/quarterly team meetings.

13. Allegations about members of staff, contractors or volunteers

Where a member of staff has concerns that relate to an employee, volunteer or agency worker they should speak to their line manager. However, depending upon the nature of the concern, this can be reported directly to a Locality Manager, a Head of Department or Director, or the Human Resources (HR) department. All concerns will be dealt with in conjunction with the HR department.

Consideration will be given as to whether information should be shared with the LADO (children) or whether the Position of Trust framework applies (adults). Decisions made in relation to this will be recorded and will include the rationale.

As well as following our procedures relating to managing allegations, the local procedures in place for the relevant areas will be used to support decision-making.

Adullam's Whistleblowing Policy is in place to support staff reporting concerns about colleagues.

14. Disclosure and barring service

If Adullam removes an employee or volunteer from working with children or adults in need of safeguarding, or if they leave while under investigation for allegedly causing harm or posing a risk of harm, Adullam is required by law to refer this information to the Disclosure and Barring Service.

Any referrals to the Disclosure and Barring service will be made in conjunction with a member of the HR department. Prior to final submission, approval will be required from a director.

The decision on who should be placed on the barred lists will lie with the Disclosure and Barring Service

15. Recruitment, Induction and Training

Staff recruitment and induction will take place in line with the safer recruitment procedures

Training will take place to ensure all staff are able to implement the Safeguarding Policy and Procedures. This will include information on all Adullam's policies and procedures, and training on child and adult safeguarding awareness for all staff and volunteers.

All Adullam employees will receive Safeguarding level 1 training as mandatory.

Safeguarding coordinators and safeguarding leads will receive additional designated officer training. (Minimum level 3)

Staff will receive support through regular supervision and weekly/monthly/quarterly team meetings.

16. Partnership working

Adullam are committed to working in partnership with other organisations to support an effective safeguarding response.

We recognise the importance of working with other agencies both formally and informally and this multi-agency approach is reflected in an individual's support plan. We participate when invited in formal multi-agency approaches including, for example, Early Help Assessments (EHA), CPA (Care Programme Approach), MARAC (Multi Agency Risk Assessment Conference) and MAPPA (Multi Agency Public Protection Arrangements). Where such formal arrangements are in place, we would be expected to share any concerns/information around safeguarding issues within these forums.

Adullam complies with legislation requiring that there are Information Sharing Protocols in place and recognises that joint working is essential in order to help ensure the welfare and safety of an individual is not missed.

The Local Authority Children's and Adult's Social Care has the statutory duty to respond if urgent safeguarding action is required and to provide advice and support to staff from different agencies.

17. Monitoring, review and continuous improvement

Each Safeguarding Co-ordinators and Safeguarding Representatives will hold a quarterly safeguarding meeting which will review all safeguarding incidents logged. The composition of these meetings will be determined by the incidents that have been reported that quarter and will include those with a designated responsibility for safeguarding. The meetings will follow a standard format and will feed into the Associations bi-annual safeguarding and incident meeting.

The Heads of Service will meet with the Safeguarding Lead every six months as designated representatives from each service. The bi-annual safeguarding and incident meeting will be responsible for identifying trends, consider issues arising from reported incidents and reviewing policies and procedures. Regular reporting is provided to Board

We seek staff feedback annual via a safeguarding survey, which provides assurances around awareness, levels of knowledge and understanding of policies and procedures.

18. Review

This policy will be reviewed where:

- There are significant changes to legislation or regulation;
- There are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations.
- At which point the lead officer will initiate an immediate review.

In any event this policy will be reviewed no later than three years from the effective date of this version.

15.0 Appendices

None

16.0 Reference Documents

Alongside this safeguarding policy there are a set of procedures which must be followed. The procedures describe what action must be taken when a member of staff becomes aware that an adult or child may be experiencing abuse or their welfare is of concern. These are all available on Policy Hub

- Safeguarding Policy Statement
- E-Safety Procedure and Acceptable Internet Use Statement and Agreement TRS
- Role of Safeguarding Rep (Child or Adult)
- Role of Safeguarding Co-ordinator
- Managing Allegations Against Staff Adults Process
- Managing Allegations Against Staff Children's Process
- Out of Hours OOH Procedure
- Out of Hours OOH Incident Safeguarding Guidance Flowchart
- Procedure for reporting a young person missing from home

- Procedure for reporting an adult missing from home
- Guide to Multi Agency Meetings - A Briefing Note
- Safeguarding Poster Staff
- Safeguarding Poster TRS Areas
- Safeguarding Flowchart Process
- Guidance for managing supervision where staff are working with safeguarding cases
- Guidance for recording and monitoring safeguarding cases on Pyramid
- Guidance on Administering First Aid
- Guidance on Capacity and Consent
- Guidance on dealing with a disclosure about a safeguarding concern
- Guidance on Female Genital Mutilation
- Guidance on preventing bullying and harassment
- Guidance on working with people vulnerable to violent extremism
- Guidance on working with people who self-harm
- Guidance on working with young people vulnerable to child criminal exploitation
- Guidance on working with young people vulnerable to child sexual exploitation

In addition to these procedures, Adullam has a framework of policies and procedures designed to ensure the emotional and physical safety of all residents, service users, staff and volunteers. These are all available on Policy Hub

- Whistleblowing Policy
- Integrity at Work – A Code of Conduct
- Complaints Policy
- Equality and Diversity Policy (staff)
- Tenant, Resident and Service User (TRS) Equality, Diversity and Inclusion Policy (includes Children and Young People)
- Recruitment and Selection Policy and Procedure (Inc. Safer Recruitment)
- Confidentiality Policy
- Disciplinary Policy and Procedure
- Professional Boundaries Policy and Guidance
- Lone Working policy and procedures
- Incident Management Procedure
- Domestic Abuse Policy and Procedure STAFF
- Domestic Abuse Policy TRS
- DBS Procedure
- High Risk Offenders Policy
- Risk Management Policy
- Data Protection Policy incl. GDPR
- ASB Policy
- Contractors Code of Conduct Policy

Legal and regulatory framework for safeguarding (external documents and guidance)

Children (ENGLAND)

Primary Legislation

Children Act 1989

- Duty to safeguard and promote the welfare of children
- Section 17 (Child in Need) and Section 47 (Child Protection)

Children Act 2004

- Establishes key safeguarding duties on agencies
- Duty to cooperate (Section 10)
- Local Safeguarding Partnership arrangements (replacing LSCBs)

Statutory Guidance

- Working Together to Safeguard Children (latest version)
 - National multi-agency safeguarding guidance
 - Thresholds for intervention
 - Information sharing expectations

Relevant Additional Legislation / Frameworks

- Domestic Abuse Act 2021 (definition of domestic abuse; impact on children)
- Modern Slavery Act 2015
- Serious Crime Act 2015 (includes offences of coercive control)
- Children and Social Work Act 2017 (safeguarding partners & practice reviews)
- Female Genital Mutilation Act 2003 & mandatory reporting duty
- Counter-Terrorism and Security Act 2015 – Prevent Duty
- Data Protection Act 2018 / UK GDPR (information sharing, lawful bases)
- Human Rights Act 1998
- Equality Act 2010
- Housing Act 1996 & Homelessness Reduction Act 2017

Regulatory / Sector Requirements

- Regulator of Social Housing – Consumer Standards

Children (ENGLAND)

- Ofsted framework (supported accommodation for under-18s)
- Local Safeguarding Partnership Procedures (mandatory to follow)

Adults (ENGLAND)

Primary Legislation

- Care Act 2014
- Mental Capacity Act 2005

Statutory Guidance

- Care and Support Statutory Guidance (Chapter 14—Safeguarding)
- Mental Capacity Act Code of Practice

Relevant Additional Legislation

- Domestic Abuse Act 2021
- Modern Slavery Act 2015
- Human Rights Act 1998
- Equality Act 2010
- Data Protection Act 2018 / UK GDPR
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Criminal Justice and Courts Act 2015 (ill-treatment or wilful neglect)

Regulatory / Sector Requirements

- Local **Safeguarding Adults Board (SAB)** procedures
- **Regulator of Social Housing** consumer standards

External Documents

- [Working together to safeguard children guidance](#)