

**Policy Title:** Safeguarding Children Policy

**Department:** Corporate

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## **Contents**

1	Policy Statement
2	Objectives
3	Related Documents and Policies
4	Definitions
5	Principles
6	Policy
7	Accountability & Responsibility
8	Monitoring, Auditing and Controls
9	Version Control

1.	<p><b>Policy statement</b></p> <p>All One Housing staff have a duty to ensure that action is taken if they have any concerns that a customer is at risk of abuse or neglect. This document sets out One Housing’s approach to Child Safeguarding and the procedure for reporting and investigating allegations of abuse.</p> <p>This policy must be read in conjunction with:</p> <ul style="list-style-type: none"><li>• The Care and Support (“CS”) Safeguarding Children Procedure – for all Housing, Care and Support staff, working across both Season and One Support services</li><li>• The Group Safeguarding Procedure – for all other One Housing staff</li></ul> <p>The government document ‘<i>Working Together to Safeguard Children</i>’ (2017) states: “a child is anyone who has not yet reached their 18th birthday. ‘Children’ therefore means ‘children and young people”</p> <p>In accordance with the above guidance it is possible that such children and young people may be:</p> <ul style="list-style-type: none"><li>• customer’s in their own right (e.g. supported housing services for 16 and 17 year olds)</li><li>• the children of customers (e.g. children staying with their mother at a teenage parent supported housing service, children living in general needs accommodation owned by OH, or children of customers living in their own homes who receive a floating support service)</li><li>• visitors to customers residing in a OH property or service.</li><li>• known to customers but not a visitor to OH premises.</li></ul>
2.	<p><b>Objective(s)</b></p> <p>Our services will provide a safe and secure setting for all children.</p> <p>We may have concerns about a child’s safety and report these to Social Services and/or the police.</p> <p>Social services may ask us to provide them with information about a child in relation to an assessment or investigation.</p> <p>We may be asked to provide specific support to the child or family as part of an agreed plan and contribute to the ongoing reviewing of the child’s needs.</p> <p>All OH staff will be trained to:</p> <ul style="list-style-type: none"><li>• recognise the signs of abuse and behaviours which should give cause for concern</li><li>• assess the risk of abuse to customers and ensure measures are in place to minimise this as part of assessment and support planning</li><li>• respond to abuse in accordance with this policy</li><li>• refer cases of suspected child abuse to Social Services.</li></ul>

3.	<p><b>Related Documents and Policies</b></p>
	<p>This policy should be considered in conjunction with the following documents;</p> <ul style="list-style-type: none"> <li>• Community Safety Policy</li> <li>• Safeguarding Procedure</li> <li>• Safeguarding Strategy</li> <li>• Equality &amp; Diversity Policy</li> <li>• Domestic Abuse Policy</li> <li>• Domestic Abuse Procedure</li> <li>• Code of Conduct</li> <li>• Complaints Policy</li> <li>• Data Protection Policy</li> <li>• Disciplinary Policy</li> <li>• Employee Screening Policy &amp; Procedure</li> <li>• IT and Email Policy</li> <li>• Recruitment and Selection Policy</li> <li>• Whistleblowing Policy</li> <li>• Assessment and Support Planning Policy – CS</li> <li>• Confidentiality and Access to Records Policy – CS</li> <li>• Customer Money and valuables Policy – CS</li> <li>• Delivery of Personal Care Policy – CS</li> <li>• Lone Working Policy – CS</li> <li>• Management on Call Policy – CS</li> <li>• Incident Management Policy – CS</li> <li>• Service Risk Assessment Policy – CS</li> <li>• Supervision Policy – CS</li> </ul>
3.1	<p>Government legislation has an impact on how One Housing can implement its Safeguarding policy. Listed below are the key Acts which may form part of One Housing’s approach to Safeguarding;</p> <ul style="list-style-type: none"> <li>• The Care Act 2014</li> <li>• Health and Social Care Act 2008</li> <li>• Housing Act 1985</li> <li>• Housing Act 1988</li> <li>• Housing Act 2004</li> <li>• Equality &amp; Diversity Act 2010</li> <li>• Localism Act 2011</li> <li>• The Domestic Violence, Crime and Victims Act 2004</li> <li>• The Protection from Harassment Act 1997</li> <li>• The Family Law Act 1996</li> <li>• The Crime and Disorder Act 1998</li> <li>• Human Rights Act 1998.</li> </ul>
3.2	<p>In meeting the standards that our regulators, commissioners and customers expect, this policy is developed in line with:</p> <ul style="list-style-type: none"> <li>• National Minimum Standards</li> </ul>

	<ul style="list-style-type: none"> <li>• NSPCC’s Safeguarding toolkit (2016).</li> <li>• Common inspection framework: education, skills and early years (CIF)</li> <li>• Safeguarding: Statutory Requirements and Ofsted Expectations (2016)</li> <li>• Working together to safeguard children (DfE 2017)</li> </ul> <p>The government guidance document ‘Working Together to Safeguard Children’ (2017) defines safeguarding children as:</p> <ul style="list-style-type: none"> <li>• protecting children from maltreatment;</li> <li>• preventing impairment of children's health or development;</li> <li>• ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and</li> <li>• taking action to enable all children to have the best outcomes</li> </ul>
4.	<p><b>Definitions</b></p>
	<p>The Human Rights Act (1998) imposes a positive duty on the state to protect individuals, including children and young people, from serious breaches of their personal integrity such as violence and abuse. It is therefore necessary that all agencies working with children and young people have mechanisms in place to minimise the risks of harm and abuse occurring and, where concerns exist, to ensure appropriate action is taken to address them. Working in partnership with other agencies is also integral to safeguarding, and a multi-agency approach must be adopted in response to all instances of abuse or suspected abuse. Our services provide a safe and secure setting for all children.</p> <p>We will also empower our customers to have the self-confidence and strategies to resist abuse and inappropriate approaches by:</p> <ul style="list-style-type: none"> <li>• Encouraging our customers to develop independence</li> <li>• Working with them to build positively on their esteem</li> <li>• Assisting them in building and maintaining satisfying relationships with peers and adults</li> <li>• Empowering them with information on what constitutes abuse and how to report it</li> <li>• Involving them in decisions made in response to allegations of abuse</li> <li>• Working with families to promote an understanding of, and commitment to, the welfare of children</li> </ul>
5	<p><b>Abuse and Neglect</b></p> <p>Children can suffer abuse by a range of possible perpetrators including parents, siblings, friends, acquaintances, ‘trusted adults’ (for example a professional who works with them), neighbours, other customers and strangers.</p> <p>The abuse may be the result of a direct act, or omission of an act, or both. Abuse can take a number of forms, and it may be the case that two or more types of abuse are occurring simultaneously. Furthermore, staff should not be constrained in their view of what constitutes abuse or neglect, and should always consider the circumstances of the individual case.</p> <p>5.1 <b>Types of abuse</b></p> <ul style="list-style-type: none"> <li>• <b>Bullying and cyberbullying</b> is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at</li> </ul>

school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

- **Child sexual exploitation (CSE)** is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.
- **Child trafficking** Child trafficking and modern slavery are child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold. Children are trafficked for child sexual exploitation; benefit fraud; forced marriage; forced labour in factories or agriculture; domestic servitude such as cleaning, childcare, cooking; criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft. Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another.
- **Discriminatory abuse** including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Domestic abuse** is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes emotional, physical, sexual, financial or psychological abuse. Abusive behaviour can occur in any relationship. It can continue even after the relationship has ended. Both men and women can be abused or abusers. Domestic abuse can seriously harm children and young people. Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.
- **Emotional abuse** is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It is sometimes called 'psychological abuse'. It may involve conveying to children that they are worthless or unloved, inadequate or only valued insofar as they meet the needs of another person. It may also involve developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened or the exploitation or corruption of children.
- **Female genital mutilation (FGM)** – involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act 2003 makes it illegal to practice FGM in the UK or to take girls who are British Nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country. In addition, staff have a mandatory duty under the Serious Crime Act 2015, to make a personal report to the police if they hear a disclosure that a girl under 18yrs appears to have undergone FGM.
- **Financial or Material Abuse** including theft, fraud, internet scamming, coercion in relation to a child's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- **Grooming** is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female. They could be any age. Many children and young people don't understand that they have been groomed or that what has happened is abuse.
- **Harmful sexual behaviour** Harmful sexual behaviour includes: using sexually explicit words and phrases; inappropriate touching; using sexual violence or threats; full penetrative sex with other children or adults. Children and young people who develop harmful sexual behaviour harm themselves and others. Age differences and harmful sexual behaviour: Sexual behaviour between children is also considered harmful if one of the children is much older – particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other isn't (Davies, 2012). However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled (Rich, 2011).
- **Neglect** including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. It may also take the form of neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Online abuse** is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online). Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.
- **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- **Physical Abuse** is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts. It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell – this is known as fabricated or induced illness (FII).
- **Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include involving children in looking at, or in the production of pornographic material, or encouraging children to behave in sexually inappropriate ways.

Patterns of abuse vary and include:

- **Serial abusing** in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse
- **Long-term abuse** in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse
- **Opportunistic abuse** such as theft occurring because money or jewellery has been left lying around

## Prevent

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works with individuals and communities by using voluntary early intervention to encourage them to challenge extremist and terrorist ideology and behaviour.

At One Housing we recognise that Prevent is safeguarding our residents, service users and staff in the same way that support is provided to people at risk of involvement with drugs, gangs, or other forms of harm, and we acknowledge that individuals vulnerable to being groomed into radicalisation can also be helped. We believe that community engagement is essential, and we will work closely with local voluntary and community groups to co-deliver support with the local authorities and the police.

Radicalisation is the process by which a person comes to adopt increasingly extreme political, social, or religious ideals. This can in extreme cases, result in condonation or support of terrorism. Extremism covers vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

In the UK, we define terrorism as an action used to further an ideological aim that:

- Endangers a person's life, other than that of the person committing the action
- Involves serious violence against a person
- Causes serious damage to property
- Creates a serious risk to the public's health and safety
- Interferes with or seriously disrupts an electronic system

Radicalisers prey on the need for self-esteem, achievement, meaning or identity, competence and control. Every case is different, but the following are possible indicators that someone might be at risk:

- Desire for status
- Victim of or experience of discrimination or racism
- Going through a transitional time of life
- Being influenced or controlled
- Feelings of grievance or injustice
- Experiencing a traumatic event
- A desire for political or moral change
- Struggling with a sense of identity, meaning and belonging or questioning their place in society

6

## Principles

One Housing will not tolerate or collude with any form of neglect or abuse. We aim to promote and safeguard the welfare of all our customers and will be proactive in responding to any allegation or

suspicion of abuse. We also empower our customers by ensuring they are fully aware of what constitutes abuse and how to report it.

The government has identified six key principles and their individual outcomes, underpinning all safeguarding work:

- **Empowerment:** Personalisation and the presumption of person-led decisions and informed consent. *Outcome: I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.*
- **Prevention:** It is better to take action before harm occurs. *Outcome: I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.*
- **Proportionality:** Proportionate and least intrusive response appropriate to the risk presented. *Outcome: I am sure that the professionals will work for my best interests, as I see them and will only get involved as much as needed.*
- **Protection:** Support and representation for those in greatest need. *Outcome: I get help and support to report abuse. I get help to take part in the safeguarding process to the extent to which I want and to which I am able.*
- **Partnership:** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. *Outcome: I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together to get the best result for me.*
- **Accountability:** Accountability and transparency in delivering safeguarding. *Outcome: I understand the role of everyone involved in my life.*

Furthermore, One Housing’s Safeguarding Children Policy is based on the following principles:

- ensuring suitable and appropriate staff are recruited
- ensuring effective management of staff through regular supervision, support and training
- sharing information about concerns with agencies who need to know, including care-coordinators and the safeguarding authority
- involving and supporting victims appropriately and, wherever possible, respecting their choice in the range of agencies they may wish to work with
- where the perpetrator, or alleged perpetrator, is another customer of One Housing, we will provide them with appropriate support to enable them to engage with the investigation and to understand and comply with the outcome and any subsequent action plan
- sharing information about adult safeguarding and good practice with customers, staff, partner organisations and carers
- ensuring that partner organisations (e.g. suppliers of agency staff, voluntary organisations) apply adult safeguarding practice when operating from One Housing’s premises
- ensuring action is sensitive to and takes account of the victim’s gender, age, disability, stage of development, religion, culture and race
- we aim to identify customers at risk from abuse and take a proactive approach to reducing risk.

7

## Policy

This policy applies to One Housing’s customers, and also to members of the public who staff suspect may be being abused.

The Care Act refers to 'people with care and support needs' in relation to safeguarding. One Housing provides services to adults with a wide range of care and support needs including those arising from

mental health problems, drug and alcohol use, learning disabilities, poverty and marginalisation, offending, old age, disabilities and ill health. For the purposes of this policy all instances of adult abuse or suspected abuse towards customers will be managed in accordance with this policy's framework.

## 7.1 **Recognising Abuse**

Whilst allegations of abuse may be raised directly by the victim through them disclosing abuse to a staff member, there may be occasions where the victim is unwilling or unable to disclose. All staff must be aware and mindful of possible indicators of abuse, such as:

- unexplained changes in mood or behaviour
- nervousness or watchfulness
- inappropriate relationships with peers and/or adults
- inappropriate sexual language
- attention-seeking behaviour
- changes in appearance or hygiene
- scavenging or compulsive stealing
- persistent fatigue
- running away
- injuries inconsistent with an explanation given

## 7.2 **Code of Conduct**

One Housing expects all its staff to abide by the Code of Conduct in order to avoid situations where their actions could be mistakenly interpreted and perhaps lead to allegations of abuse. Good practice will reduce the possibility of anyone using their position to gain access to children in order to abuse them. Staff must also ensure their actions are sensitive to customer needs.

One Housing staff will always:

- listen to children
- value and respect children as individuals, regardless of their gender, ethnicity, disability or sexual identity
- as appropriate, involve children in decision-making processes
- empower customers with the necessary information to make informed decisions

## 7.3 **Safe Working**

Staff working with vulnerable families and children must avoid placing themselves in positions that may cause children or parents to feel uncomfortable and which could lead to questions and/or false accusations of abuse.

In particular, One Housing staff must not:

- meet with customers outside of work/organised activities
- smack or discipline children
- restrain children
- make unnecessary physical contact with children. In cases where physical contact is unavoidable (for instance providing comfort/reassurance for a distressed child, physical support or contact in sports) this should only take place with the consent of the child

- engage in sexually provocative or rough physical games
- do things of a personal nature for children that they can do themselves, and if the child does require help (for instance because of disability) then only with the consent of the child and his or her understanding of what is happening
- engage in or tolerate any bullying either by adults, young people or children
- allow children to use inappropriate language unchallenged
- engage in favouritism or in singling out of "trouble-makers"
- make sexually suggestive remarks or discriminatory comments about or to children, even in jest
- trivialise child abuse
- let allegations made by a child go unrecorded or unaddressed, including any made against themselves.

Staff and volunteers must comply with the OH Email and IT Policy which states that they must not access inappropriate material. Equally, they must not use email to distribute pornographic material or use the internet to access it.

#### 7.4 **Children as Visitors to CS services**

In order to ensure that children are protected, any child or young person visiting a customer at one of our Housing, Care and Support services must be accompanied at all times by the customer who they are visiting, their parent or by an adult approved by their parent or guardian.

#### 7.5 **Whistle Blowing**

If a member of staff suspects that a customer is being abused by another member of One Housing staff, there is a failure to respond appropriately to allegations of abuse, or where staff have concerns that a colleague or superior is responsible for the abuse, staff must follow the One Housing Whistleblowing Policy.

Staff should report any concerns directly to their line manager. It is hoped that in many cases a concerned individual will be able to raise any concerns with their line manager. This can be face to face, or by putting the matter in writing if preferred. A line-manager may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious, or it is felt the line manager has not addressed the concern, or it does not feel possible to raise it with them for any reason, you should contact one of the following:

- The Whistleblowing Officer, (Group Director, Governance and Compliance);
- Your HR Business Partner

#### 7.6 **Regulatory Framework**

When an allegation of abuse is made, the Team Manager or Head of Service must notify the appropriate commissioning body as contractually obliged. This will usually be either the local authority or the local NHS Foundation Trust and CQC for registered services.

In services where care is provided, staff must work in compliance with the CQC Fundamental Standards as outlined in the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, in particular; Regulation 13 Safeguarding service users from abuse and improper treatment and Regulation 18 of the Care Quality Commission (Registration) Regulations 2009 (part 4).

Regulation 13 states that providers must ensure that care and treatment is not provided in a way that:

- Discriminates against a customer on the grounds of any protected characteristic (as defined in the Equality Act 2010)
- Includes acts of control or restraint that are not necessary or proportionate to the risk of harm posed to the customer or another individual if the customer was not subject to control or restraint
- Is degrading to the customer
- Significantly disregards the needs of the customer
- Deprives a customer of their liberty for the purpose of care and treatment.

Regulation 18 requires that CQC are notified without delay:

- If any serious injury occurs to a customer
- The death of a customer
- Any applications made to deprive a person of their liberty
- Abuse or allegations of abuse
- Events that stop or threaten to stop the service from carrying out a regulated activity safely and to the appropriate standard
- Incidents reported to or investigated by the police.

All staff must ensure that they respond in accordance with the relevant regulations of the commissioning and governing bodies in all cases of abuse. Details of who to contact must be readily available in all services.

### **Confidentiality and the Mental Capacity Act**

Due attention must always be paid to confidentiality when working with customers. All staff must be familiar with the OH Data Protection Policy. Staff working in HCS services must also ensure familiarity with the HCS Confidentiality and Access to Records Policy including the limits to confidentiality and the circumstances under which confidentiality may be breached.

In accordance with the Children Act, staff should always try to discuss the raising of a Safeguarding Alert with the child or young person, and their parent(s)/ guardian(s) as long as doing so will not place the child or young person in further danger. The reasons for their concerns should be discussed, and agreement sought from the parties involved for raising the alert.

However, there may be instances where the child or young person, their parent(s) or guardian(s) do not want an alert to be raised. In these circumstances staff must be mindful of the capacity of the child or young person to make decisions on their own behalf.

- Where a child is less than 16 years of age, if staff become aware of abuse, or the possibility that abuse may be occurring, an alert must be raised regardless of the child's wishes.
- For young people aged 16 or 17, if it is believed that they are suffering, or at risk of suffering, significant harm an alert should be raised whether they consent to it or not and whether or not they have the capacity to make informed decisions. This should be explained to them and the local authority must be informed of the child's wishes when the safeguarding alert is raised with them.

### **Mental Capacity**

7.7

7.8 The Mental Capacity Act (2005) was created to enable people receiving support to make their own decisions, and to offer protection for those individuals charged with making decisions on the behalf of those lacking capacity. It applies to all individuals aged 16 and over, although some sections do not apply to 16 and 17 year olds.

The act has 5 main principles:

- Every individual has the right to make their own decisions unless it can be shown they are incapable of doing so.
- Individuals should be supported to make their own decisions where possible.
- A person has the right to make decisions even if others regard the decisions made as being inappropriate. A decision deemed as inappropriate does not in itself mean the client should be deemed incapable.
- A person making decisions on the behalf of someone lacking capacity must do so in their best interests.
- Decisions made by a third party on behalf of someone lacking capacity should always be the option which is least restrictive on their basic rights and freedoms.

Where staff have concerns about a customer or young person's ability to make an informed decision that relates to an abuse allegation or concerns around abuse, they must request that social services, the local CAMHS or NHS Trust arrange for an assessment to take place. Where the customer has an allocated social worker or care coordinator they should be contacted in the first instance.

This assessment will consider:

- The individual's views
- Their past and present wishes, feelings, beliefs and values
- Any written statement they've produced
- Anyone they have requested be consulted
- The views of family, friends or support staff who have an interest in their welfare

All staff must ensure that they provide appropriate support to the customer during this process contributing to the assessment as required.

More information on the Mental Capacity Act is available in: '*Making Decisions. A Guide For Advice Workers. The Mental Capacity Act*' which can be found in the Associated Documents.

### **Partnership Working and Information Sharing**

7.9 Working in partnership with statutory and other relevant agencies is a key element of investigations into suspected abuse. The wishes of the child or family in relation to what information should be shared, and with whom, should be respected where possible. However, where there is a concern that the child may be suffering or is at risk of abuse or neglect, their safety must be the over-riding priority. Information must be shared with statutory authorities where there is any indication of abuse. The following points must be considered as part of this process:

- It should be explained openly and honestly to the child and/or parent what information will have to be divulged to statutory authorities and any other third parties, how it will be divulged and to whom.
- Information should not be shared with other non-statutory third parties where it would increase the risk to the victim or undermine the prevention, detection or prosecution of a crime.

- Information shared must be accurate and up-to-date, necessary for the purpose for which it is being shared, and shared only with those who need to know.

## **Duty of Candour**

7.10 In line with Regulation 20: Duty of Candour of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, OH will provide all relevant information to persons who have or may have been harmed in the provision of our services. The Duty of Candour will apply to safeguarding incidents that have resulted in significant avoidable harm or death to a customer. It will not apply to other incidents, but these incidents will still be reported to the customer if appropriate as set out above.

## **Recording and Reporting**

7.11 Full details on recording and reporting allegations of abuse are provided in the following Safeguarding Procedures:

- CS Safeguarding Children Procedure – for CS staff
- Safeguarding Procedure – for all other Housing staff

When managing any allegation of abuse it is essential that information is recorded accurately and in a timely manner. In addition staff may also be called upon to complete relevant forms for the local authority, the local Safeguarding Team the police or NHS Trust.

## **Disincentives to Reporting**

7.12 One Housing Group recognises that it is often difficult for victims of abuse to disclose or report instances of abuse. This may be for a number of possible reasons, such as:

- fear
- stigma
- not realising it is abuse
- not knowing how to report it
- thinking they won't be taken seriously
- learned Helplessness
- not being able to see any solutions
- feeling ashamed
- not wanting to get someone else into trouble
- lacking capacity or experiencing poor mental health

Overcoming these barriers is key to ensuring that no abuse goes unnoticed or unaddressed, and One Housing aims to achieve this by:

- regularly exploring barriers to reporting abuse with customers during House Meetings, and Key-working sessions. This includes discussing example cases.
- using Team Meetings, training and supervision to ensure staff are aware of how to recognise and respond to abuse, and how to empower and encourage customers to report it.
- encouraging services to learn from each Safeguarding Alert by including the need for service improvements, including overcoming barriers, to be recorded as part of every safeguarding investigation.

7.13	<p><b>Raising Awareness</b></p> <p>One Housing have developed a Safeguarding Strategy for customers and staff. Our strategy sets our commitment to preventing abuse and safeguarding our residents and staff through developing clear policies, robust leadership and empowering our staff to deliver services that minimise the risk of abuse to our residents and staff; or intervene swiftly to prevent abuse continuing.</p> <p>The strategy consists of the following key subject areas;</p> <ul style="list-style-type: none"> <li>• <i>Policies and Procedures</i></li> <li>• <i>Reporting and Auditing</i></li> <li>• <i>Managing and Identifying Risk</i></li> <li>• <i>Raising Awareness</i></li> <li>• <i>Compliance</i></li> <li>• <i>Partnership and Engagement</i></li> <li>• <i>Aims and Objectives</i></li> </ul> <p>The purpose of the strategy is to ensure that all aspects of Safeguarding are fully integrated into the management of One Housing Group across the business, aligning itself to the vision and values of the business.</p> <p>To raise awareness across the business, One Housing have a dedicated Safeguarding Campaign. The campaign focuses on staff reporting safeguarding concerns, and encourages staff to “<b>Feel, Think, Act</b>”! If they see a safeguarding concern.</p> <ul style="list-style-type: none"> <li>• <b>Feel</b> – Does something not quite feel right?</li> <li>• <b>Think</b> – Does the resident require support, what are their circumstances?</li> <li>• <b>Act</b> – Reporting and recording information to the safeguarding team.</li> </ul> <p>In alignment with the campaign and strategy as part of One Housing’s mandatory induction for all staff, One Housing have developed an online eLearning training video which is suitable for all staff across the business. The training provides a basic overview of the types of abuse, signs of abuse and how to report Safeguarding concerns.</p>
8	<p><b>Accountability and responsibility</b></p>
	<p>This policy will be reviewed annually, in accordance with broader guidance and legislation, and taking into account feedback from staff and customers.</p> <p>The Group Director of Governance and Compliance will ultimately be responsible for ensuring that the policy is reviewed.</p> <p>The Group Director and internal Safeguarding Panel will be responsible for monitoring developments in relation to legislation, regulation, or good practice with regards to data protection. They will further, be responsible for ensuring that these developments are incorporated into this policy and are communicated with all staff.</p>
9	<p><b>Monitoring / Auditing and Controls</b></p>

9.1	<p>One Housing takes our responsibilities in relation to safeguarding very seriously by prioritising safeguarding, ensuring the opportunities for abuse are minimised, and that it is safe for those affected to report safeguarding concerns with the assurance they will be managed sensitively and properly.</p> <p>To ensure that all safeguarding concerns are managed effectively and transparently, One Housing has a robust reporting and monitoring process in place which provides oversight at all levels of the organisation such as regular reporting to the Audit and Risk Committee, Care and Support Committee, Customer Service Committee, The Group Board and Executive Team.</p> <p><b>Safeguarding Panel</b></p> <p>A Safeguarding Panel has been created internally to oversee our overall approach. It identifies areas of potential risk and provides recommendations on best practice that can be rolled out across all departments within One Housing.</p> <p>The Safeguarding Panel supports the Group Board in its responsibilities for overseeing and scrutinising the Safeguarding services across One Housing, performance and operational delivery of Safeguarding services.</p> <p>It's key areas of responsibility are to:</p> <ul style="list-style-type: none"> <li>• Regularly report to the Group Board, relevant Board sub-committees and Executive Team</li> <li>• Review best practice and implement actions to manage risk</li> <li>• Engage and liaise with Local Safeguarding Boards</li> <li>• Review training and knowledge across the business</li> <li>• Continuously review policy and procedure ensuring it is up to date with legislation changes</li> <li>• Review the efficiency and effectiveness of the delivery of all Safeguarding services including relevant benchmarking and board-level KPIs</li> <li>• Review serious case reviews and recommend learning across the business</li> <li>• Manage and identify critical incidents, ensuring mitigating factors are implemented.</li> <li>• Review Safeguarding performance indicators and targets on an annual basis with residents and partners to ensure they are fit for purpose and challenge improvement.</li> <li>• Carry out regular internal case audits ensuring that we are learning from best practice and reviewing inconsistencies.</li> <li>• Scrutinise reporting systems ensuring that they are updated, accurate and enable information-sharing between internal and external partners.</li> <li>• Carry out regular audits to ensure that we are up to date with improvements in legislation and include additional acts that aim to prevent abuse and support community safety and safeguarding activities.</li> </ul>			
9	<b>Version Control</b>			
9.1	<b>No</b>	<b>Author</b>	<b>Date</b>	<b>Summary of Changes</b>
	<b>9</b>	<b>Charlotte Smith</b>	<b>June 2020</b>	<b>Safeguarding Strategy, Safeguarding Panel and PREVENT updates.</b>