

Policy Title	Safeguarding Children and Vulnerable Adults Policy and Procedure
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This Policy relates to safeguarding issues in respect of children and adults at risk.

1. Policy Statement

- 1.1. Nehemiah’s mission statement is to build successful, sustainable and diverse communities by providing housing and well-being services in a culturally sensitive way to our current and future customers
- 1.2. We ensure this commitment is understood, and embedded into our operational practices to help protect children, young people, adults and volunteers from abuse/harm. We will fulfil our responsibilities as a key partner, given the crucial importance of multi-agency working, by working with our communities, stakeholders and customers to prevent those at risk from being harmed.
- 1.3. Nehemiah expect all staff, those in direct support roles as well as housing staff and contractors to understand their individual and collective responsibilities. This requires us to:
 - Listen to, value, encourage and support those we work with.
 - Provide clear internal procedures for identifying and dealing with concerns about possible abuse and ensure their implementation.
 - Provide effective management for staff through supervision, support and training.

- Include continuous risk assessment within our work with young people, families and adults at risk.
- Develop and maintain effective information sharing with statutory services and other agencies, involve children, parents and adults at risk as appropriate.
- Work collaboratively with local safeguarding children and adults board.
- Recruit safely, ensuring all necessary checks are made.

2. Policy Purpose and Aims

- 2.1 This policy aims to deliver a customer focused approach that incorporates the ethos of our values, by listening to our customers both internal and external. Our approach is to be honest and open with customer relationships based on mutual trust, which ensures children, young people, adults and volunteers live and work in a safe and secure environment.
- 2.2 As a Registered Provider, we are expected to have our own Safeguarding Policy and associated procedures.
- 2.3 Nehemiah's procedure aim to provide straightforward guidance for staff, managers and contractors about what to do, how and when, if any concerns are identified about harm/abuse, including where a member of staff may be implicated.
- 2.4 This policy ensures we respond promptly and effectively when there are concerns of abuse/harm. Our focus is on the outcomes, the person at risk wants and not driven by the process.
- 2.5 The approach of this policy is based on and reflects the principals of both UK legislation and guidance. Nehemiah will abide by existing regulatory requirements and legislation.

Nehemiah will act in accordance with the policies and procedures of the relevant Local Safeguarding Boards

3. Our Policy

- 3.1 All children, young people and adults, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have a right to protection from significant harm or abuse.
- 3.2 Children, young people and adults have a right to information which could make life better and/or safer for them and we therefore will provide our service users with information about how and with whom they can share their concerns and

complaints. We also, where possible, offer a choice in working together including signposting to other agencies.

4. Designated Safeguarding Leads

4.1 It is the responsibility of the Board to ensure that this policy is successfully implemented and the procedures followed. The Housing Service Manager will act as the Safeguard Lead. Managers with staff responsibility, will be responsible for ensuring that all staff and contractors understands the importance of this policy and the related procedures and comply with them.

It is essential to the implementation of this policy that staff know how to deal with emergencies and to express concerns to the appropriate person in the organisation. During Safeguard lead's absence, Property Service Manager will lead with support from Operations Director and Senior Housing and Support Officers.

5. Definitions

5.1 Abuse has been defined as:

“the violation of an individual's human and civil rights by another person or persons” (No Secrets DH 2000)

Abuse may consist of a single act or repeated acts. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. The abuse can encompass, but is not limited to:

- Psychological abuse
- Physical abuse
- Sexual abuse
- Financial abuse
- Emotional abuse
- Self-neglect: A wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- Neglect, wilful neglect and acts of omission - ignoring or withholding physical or medical care needs.
- Social media
- Female Genital Mutilation (FGM)
- Forced marriages
- Modern day slavery
- Human trafficking

- Discriminatory abuse - values, beliefs or culture result in a misuse of power that denies mainstream opportunities. It includes discrimination on the basis of race.

5.2 Definition of Children

Children are taken to be up to 16 years old and young people between 16-18 years old. Because of the nature of our work, it is possible that such young people may be either young tenants of our accommodation or the children of customers or service users.

Every Child Matters: In response to the death of Victoria Climbié, whose death was seen as a serious set of failings by many authorities who didn't work together, the Every Child Matters scheme was launched. The main aims of this act is that every child has the support they need to stay safe, be healthy, enjoy and achieve, make a positive contribution and achieve economic well-being. Nehemiah will ensure we follow the key aims of this act by working in partnerships with external agencies and local authorities across our services to help support our tenants and their children.

5.3 Work Experience

Nehemiah is aware of its responsibilities in relation to under 16s, who are offered periods of work experience. We ensure that the proper protocols are observed and risk assessments are carried out. For example, individuals are in plain sight of their supervisor, site visits are supervised and all staff are DBS checked on a 3 yearly cycle.

5.4 Definition of Adult

“Adult” is used to refer to anyone aged 18 or over and an “adult at risk” is one who is or may be in need of community care services because of the frailty, learning or physical or sensory disability or mental health issues and who is or may be unable to take care of his or herself or to take steps to protect him or herself from significant harm or exploitation.

6 Legislative and Policy Framework

The publication in 2000 of national guidance, No Secrets, by the Department of Health and the Home Office raised the profile of abuse of vulnerable people. Since its publication, safeguarding services have developed and public

awareness and sensitivity has continued to grow. This has been against the background of other key developments including:

Adult Social Care most recent guidance (April 2013) The Care Act (2014)

Local Authorities, together with key partners (particularly in the NHS and the Police), developing policies, procedures, commissioning frameworks and contract monitoring arrangements to prevent abuse
Development of specialist teams and Safeguarding Adults Boards
Mental Capacity and Human Rights Legislation

The emphasis has increasingly been placed on organisations working effectively together to prevent people from being abused and empowerment to ensure people remain at the heart of the process.

This policy has increasingly been developed with reference to the following organisational policies and guidance:

- Anti-social Behaviour
- Hate Crime and Harassment
- Equality and Diversity
- Whistleblowing
- Lone Working
- Disciplinary
- Recruitment and Selection
- Health and Safety
- Confidentiality and Data Protection

7 Roles and Responsibilities

Safeguarding is everyone's responsibility, whether it is preventative action or taking action to protect someone, we all have a part to play.

All managers are expected to take responsibility for any alerts that come to their attention in their service area. They must never ignore, underplay or pass on responsibility to another member of staff or peer.

Managers should ensure the Safeguarding Lead is made aware of any safeguarding issues and Senior Management in Leads absence.

8 Equality and Diversity

We will ensure that the ethnic, cultural or religious needs of those at risk are understood and met when dealing with cases of safeguarding, domestic abuse or neglect; but we will not accept ethnicity, culture or religion as a reason for a perpetrator committing abuse.

9 Monitoring, Evaluation and Review

There are a number of arrangements in place to ensure incidences of abuse are effectively managed and that Nehemiah is fulfilling its corporate/strategic duties. It also ensures that key learning points/areas for improvement are identified and shared across the organisation, including near misses as well as actual incidents.

A review of all abuse cases across the organisation is undertaken, coordinated by all managers and the Safeguarding lead. Safeguarding cases are also discussed in supervision sessions with staff and will now be an agenda item at all team and departmental meetings, which includes the organisational Risk Management Meeting.

All serious incidents including any that involve staff are always reported to the Local Authority. The Corporate Services Manager is always notified of any incident (either alleged, suspected or actual) that involves a member of staff and the Accident and Incident reporting process is followed.

We will monitor and report on the following to the Operations Committee and Executive Board at agreed frequency, including the production of an Annual Safeguarding Report:

- The number and type of Safeguarding referrals made to Local Authorities and the number and type accepted as Safeguarding by the Local Authority;
- The number of Safeguarding by types of abuse and outcomes from interventions and actions taken.
- Any Serious Case Reviews or Domestic Homicide Reviews we've been involved in and the learning and improvements we've made as a result.
- Safeguarding concerns relating to our contractors or partners which involve our customers including outcomes.

10 Training

All relevant staff will receive mandatory training on using our policy and procedures and will also be made aware and receive training on the procedures of their local safeguarding boards. The level of training they receive will be considered in proportion to the role within the organisation, clients they work with and risk they are potentially dealing with.

Everyone working on behalf of the organisation is expected to behave towards customers and staff in a way that demonstrates their commitment to this policy. Failure to do so could result in disciplinary action or termination of contracts.

All staff training will be monitored via our HR training records

All contractors, agencies and individuals working within our services will confirm they have carried out safeguarding awareness training with their staff. Confirmation should be obtained by Managers and Supported Housing Officer (in relation to supported housing) and forwarded to HR.

11 Equality Impact Assessment

Nehemiah carries our Equality Impact Assessments to understand the impact that our policies may have on groups of people or individuals. These impacts may be positive or negative.

This policy will be reviewed every 3 years or sooner if legislation or good practice dictates.

National Legislation and Policy Framework for Adults and Children

National Legislation and Policy Framework for Children

Children Act (1989)	<p>Key aspects:</p> <ul style="list-style-type: none"> • Welfare of the child is paramount • Delay is not in the child's best interests and to be avoided • Children's wishes to be taken seriously
United Nations Convention on the Rights of Child 1989 (ratified by the UK 1991)	<p>In 1989, governments worldwide promised all children the same rights by adopting the UN Convention on the Rights of the Child (CRC). These rights are based on what a child needs to survive, grow, participate and fulfill their potential. They apply equally to every child, regardless of who they are, or where they are born.</p>

White Paper Modernising Social Services (1998)	Stresses the importance of protection for adults needing care and support.
Human Rights Act (1998)	Placed a positive duty on public bodies to intervene proportionately to protect the rights of citizens.
Protection of Children Act (1999)	Changed the route by which employers can check whether an actual or potential employee has criminal offences against children and whether they are suitable to work with children.
Education Act (2002)	Emphasises duty to make arrangements for the safeguarding and promoting of the welfare of children
Homelessness Act (2002)	Housing Authorities are required to refer to adult social services any homeless person with dependent children who are eligible for homelessness assistance.
Sexual Offences Act (2003)	Sets out a new legal framework to protect children from sexual abuse, covers the internet pornography, grooming and exploitation. Puts restrictions on convicted sex offenders
Children Act (2004)	<p>Keys aspects:</p> <ul style="list-style-type: none"> • New role of children commissioner for England • Duty of local authorities to promote co-operation between agencies • Establish Local Safeguarding Children's Board • Develop local arrangements to safeguard and promote the welfare of children • Develop index/data base to hold basic information on children and families • Establishment of new post of Director of Children's Services

Every Child Matters Change for Children (2004)	Focuses on a shared programme of national change to provide services around the needs of children and young people. Achieving better outcomes: <ol style="list-style-type: none"> 1. Be Healthy 2. Stay Safe 3. Enjoy and Achieve 4. Make positive contribution 5. Achieve economic wellbeing
Safeguarding Children and Safer Recruitment (2006)	Combine three documentations: <ul style="list-style-type: none"> • Safeguarding children in education 2004 • Safer recruitment 2005 • Dealing with allegations 2005
No Secrets (2000)	Guidance to local agencies that have responsibility to take action when a vulnerable adult is believed to be suffering abuse.
Sexual Offences Act (2003)	Outlines a range of offences against children and adults with a mental disorder.
Disability Discrimination Act (2003)	Significantly extends to the rights of disabled people.
Domestic Violence Crime and Victims Act (2004)	Strengthens the protection available to victims of domestic violence by: <ul style="list-style-type: none"> • Criminalizing any breach of a non-molestation order • Extending the availability of restraining orders • Making common assault a criminal offence of causing or allowing the death of vulnerable adults
Mental Capacity Act (2005)	It aims to protect people who cannot make decisions for themselves due to a learning disability or mental health condition. It sets out a single clear test for assessing whether a person lacks capacity to make a decision at a particular time.
Safeguarding Adults National Framework of Standards (2005)	The document collects best safeguarding practice and sets it within 11 good practice standards. These are to be used as an audit tool and guide for those implementing adult protection work.
Safeguard Vulnerable Organisations	Strengthens the local governance arrangements for safeguarding by putting Safeguard Adult Boards on a Statutory footing.

Safeguarding Vulnerable Groups Act 2006.	The Act established the legal basis for the Independent Safeguarding Authority who managed the two lists of people barred from working with children and/or vulnerable adults replacing the former barred lists, the Protection of Children Act 1999 (PoCA), the scheme relating to the Protection of Vulnerable Adults (PoVA) and Disqualification Orders).
Mental Health Act (2007)	This makes changes to the procedures for authorizing the deprivation of liberty of a person in a hospital or care home who lacks capacity to consent to being there.
Protection of Freedoms Act (2012)	Scaling back the criminal records and barring systems to more proportionate levels whilst ensuring that they continue to provide effective protection for those who need it. This came into effect 10 th September 2012.
Equality Act 2010	<p>Equality Act came into force in October 2010 and aims to streamline and combine previous legislation such as Race Relations Act 1976 and the Disability Discrimination Act 1995 and ensures consistency in what employers need to do in order to make the workplace a fair environment and compliance with the law.</p> <p>The Act offers protection for: age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnerships and pregnancy and maternity which are called Protected Characteristics.</p>

<p>Sarah's Law 2011</p>	<p>What is Sarah's Law? The child sex offender disclosure scheme, more commonly known as Sarah's Law, allows anyone to formally ask the police if someone who has access to a child has a child sexual offences record. The option to make an online referral has been available since June 2019.</p> <p>Why was Sarah's law developed? Following Sarah's abduction and death in 2000, her parents launched a campaign calling for a UK version of what is known as Megan's Law in the United States. A Home Office review had previously decided against a Megan's Law for the UK. After piloting Sarah's Law in 4 police areas in 2008, it was rolled out across England and Wales in April 2011.</p>
<p>Clare's Law 2014 (The Domestic Violence Disclosure Scheme DVDS).</p>	<p>Clare's Law gives any member of the public the right to ask the police if their partner may pose a risk to them. Under Clare's Law a member of the public can also make enquiries into the partner of a close friend or family member.</p>
<p>The Care Act (2014)</p>	<p>Came into force in England on the 1st April 2015. The Act introduces new duties and responsibilities on local authority adult social services in protecting adults at risk. This gives public services and government clear responsibility to make sure that people in the most vulnerable situations are safe from abuse or neglect.</p>
<p>Anti-Social Behaviour, Criminal and Policing Act (2014)</p>	<p>Part 10 of the Act outlines powers available on forced marriages</p>
<p>Modern Slavery Act (2015)</p>	<p>The Act gives law enforcement the tools to fight modern slavery, ensure perpetrators can receive severe punishment and enhance support and protection for victims.</p>

The Homelessness Reduction Act 2017	Reformed England's Homelessness Legislation by placing duties on local authorities to intervene at earlier stages to prevent homelessness in their areas.
General Regulations (GDPR) and the Data Protection Act 2018	Data amendment of Data Protection Act
Homes (Fitness for Human Habitation) Act 2018.	The Act came into force on 20 March 2019. The aim of the Act is to help drive up standards in rented homes in both the social and private sectors.
Working Together to Safeguard Children 2018.	The new guidance is in response to government consultation, launched in October 2017, which set out the changes needed to support the new system of multi-agency safeguarding arrangements established by the Children and Social Work Act 2017. https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Safeguarding resource/notes

General safeguarding info

<https://www.scie.org.uk/safeguarding/adults/practice/housing>

<https://www.bsab.org/downloads/download/48/safeguarding-adults-basic-awareness-workbook>

<https://www.bsab.org/downloads/file/63/what-do-i-do-if-i-have-a-safeguarding-concernWe>

<https://www.wolverhamptonsafeguarding.org.uk/publications-and-resources>

Useful links for children safeguarding

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

<https://www.west-midlands.police.uk/your-options/sarahs-law/CSODS-form>

Birmingham

<https://www.bsab.org/how-to-report-abuse/>

<http://www.lscbbirmingham.org.uk/>

Coventry

http://www.coventry.gov.uk/info/233/coventry_safeguarding_adults_board/2414/coventry_safeguarding_adults_board/2

<http://www.coventry.gov.uk/csab>

Dudley

<http://safeguarding.dudley.gov.uk/adult/for-adults/how-to-report-abuse/>

<http://safeguarding.dudley.gov.uk/child/safeguarding-children-board/>

Sandwell

http://www.sandwell.gov.uk/info/200216/adults_and_older_people/2215/sandwell_safeguarding_adults_board_ssab

http://www.sandwell.gov.uk/info/200219/children/2180/about_reporting_a_child_at_risk

Walsall

<http://wsab.co.uk/>

http://cms.walsall.gov.uk/index/health_and_social_care/social_care-2/adult_safeguarding.htm

Wolverhampton

<https://www.wolverhamptonsafeguarding.org.uk/safeguarding-children-and-young-people/safeguarding-children-board>

<http://www.wolverhampton.gov.uk/article/2959/Safeguarding-Adults-Board-SAB>

Nehemiah's Safeguarding Children and Adults at Risk Procedure

The Safeguarding Procedure should be used in conjunction with Nehemiah's Safeguarding Adults and Children Policy and Local Authorities Safeguarding processes. This procedure is to ensure staff understand the processes involved in safeguarding our tenants and their family.

Each Local Authority has a safeguarding bodies who are responsible for vulnerable adults and children, (see links in policy). The referral paperwork may vary depending on if you are referring a child or adult. Each Local Authority provides training on safeguarding which should ensure staff are familiar with their processes. All frontline staff supporting tenants and customers will receive regular training from Nehemiah Housing and should attend any safeguarding training organised by Local Authorities.

The following section outlines provides a brief outline of the safeguarding process:

- 1. What is a safeguarding concern;**
- 2. Who to seek further clarification from to confirm safeguarding concern;**
- 3. Who to report safeguarding concern at Nehemiah**
- 4. Where and how to report and record safeguarding concern;**
- 5. How the organisation will monitor and review safeguarding.**

1. What is a safeguarding Concern?

A safeguarding concern is when you are worried about the safety or well-being of a child or adult because of something seen or heard, or information which has been given to you, (See policy for further clarification)

2. Who to seek further clarification from to confirm safeguarding concern,

When you have concerns about a possible safeguarding incident you should refer to our policy and discuss with your line manager immediately.

If you believe that there is an immediate risk to our tenant or a member of their family i.e. child/children you should report concern immediately to the safeguarding board (Local Authority – Safeguarding department).

3. Who to report safeguarding concern at Nehemiah

If safeguarding concerns raised relate to a contractor this should be immediately reported to your line manager. You should also report concerns to the contract

manager i.e. repairs contractors would be Property Service Manager, the Safeguarding Lead and Corporate Service Manager.

4. Where and how to report and record safeguarding concern

You should inform your line manager (via telephone call and email) of any safeguarding concerns and also report it to the local Safeguarding Board. The concern should also be logged on Sassha and updated as and when you receive any further information relating to concern raised. When the safeguarding concern has been addressed staff should close case on Sassha and inform their line manager.

5. How the organisation will monitor and review safeguarding

- All cases reported and logged on Sassha will be reviewed in your 1-2-1 monthly
- Quarterly figures and outcomes will be shared with board and operations committee
- Key case will be used to share good practice and learn at team meetings
- Risk Management Meetings will review cases

If staff require any further information they should discuss initially with their line manager followed by the Safeguarding Lead.