

Safeguarding Policy	
Document Owner: Supported Living Manager	Document No: ILS-PL-003
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1.0 Introduction

- 1.1 Beyond Housing recognises that, in the course of the delivery of its services, it has a key role in safeguarding adults and children. Beyond Housing has developed this overarching safeguarding policy, with an underpinning procedure, which applies to customers, their families, people with whom we come into contact through a wide range of activities, within the wider community, including Beyond Housing employees, volunteers, board members and agents acting on behalf of Beyond Housing. This policy supports the relevant local authorities' multi-agency policy and procedures pertaining to both Adults and Children (details noted in Beyond Housing's Safeguarding procedure ILS-PR-056).
- 1.2 The safety and wellbeing of our customers and colleagues is our first priority and it is vital that everyone that uses our services feels safe and knows who to contact in an emergency.
- 1.3 We are committed to providing a caring, friendly and safe environment for all our customers and colleagues. This policy will be applied by all Beyond Housing employees through the course of their work.
- 1.4 Contractors who are engaged by Beyond Housing, are required to abide by Beyond Housing's Safeguarding Policy & Procedures. This includes, but is not limited to, having relevant procedures in place to report safeguarding concerns, carry out relevant DBS checks on employees and provide relevant training to their employees. As part of the procurement procedures, where relevant, safeguarding will form part of the quality assessment questions.

2.0 Policy objectives, key performance indicators (KPI) and reporting

- 2.1 This policy provides Beyond Housing's approach to safeguarding both Adults and Children, as well information in relation to the process for colleagues to raise concerns where they think someone is being, or is at risk of being, abused, neglected, exploited or radicalised.

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Information is provided to support colleagues in recognising what abuse, neglect, exploitation and radicalisation is, what their responsibilities are, and how to raise a concern and work in partnership to address safeguarding concerns. The safeguarding procedure (ILS-PR-056) details how these concerns, alerts and referrals are submitted and managed throughout the Something's Not Right and Safeguarding referral routes.

- 2.2 This policy reflects the external multi-agency policy and procedures operational across all geographical locations in which Beyond Housing operates.
- 2.3 Beyond Housing will provide Governance over the application of the safeguarding policy and procedure through regular monitoring of reports provided to the Customer Health & Safety Forum, (or other relevant forums as requested), the content of the reports will focus on the number of alerts and referrals, how they are managed, resolved, or escalated, any patterns or emerging themes and any identified concerns over the application of the policy and procedure.

Key Performance Indicator	Owner (job role)	Policy objective alignment
100% investigation and progression of all Something's Not Right alerts	Safeguarding Coordinator	
Escalation of valid safeguarding alerts into statutory safeguarding referrals within 48 hours of receipt of alert	Safeguarding Coordinator	

3.0 Definitions

- 3.1 **Child** is defined as anyone under the age of 18 (Children's Act 1989, Education Act 2002) and up to 24 years of age for care leavers and those with learning difficulties and disabilities.
- 3.2 **Adult at risk** is defined as someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs is unable to protect themselves from that abuse happening.

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- 3.3 **Abuse** is a form of maltreatment of an individual against their wishes. Somebody may abuse or neglect another by inflicting harm, or by failing to act to prevent harm. Anyone can be abused in a family, or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the internet, or a care provider).
- 3.4 Within the context of this policy, abuse and harmful behaviours are defined in the following categories:

Physical abuse <p>The use of physical force that may result in bodily injury, physical pain or impairment. This may involve, but is not limited to, acts of violence such as, assault, hitting, slapping, pushing. Misuse of medication, restraint or inappropriate physical sanctions.</p> <p>Further examples of physical abuse would be Fabricated or Induced Illness, where a carer would deliberately try to cause the symptoms of illness.</p>	Financial or material abuse <p>Including theft, fraud, internet scamming, coercion in relation to an adult'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. An example of this would be “cuckooing”, whereby the perpetrator would coerce the victim out of their own home.</p>
Sexual abuse <p>This includes acts such as rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assaults.</p>	Psychological abuse <p>Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or support networks.</p>
Modern slavery <p>Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slaver/gang masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.</p>	Discriminatory abuse <p>Including forms of harassment, slurs or similar unfair treatment; because of race, gender reassignment, marriage and civil partnership, pregnancy and maternity, age, disability, sex, sexual orientation or religion or belief.</p>
Organisational abuse <p>Including neglect and poor care practice within an institution or care setting such</p>	Neglect and acts of omission <p>Including ignoring medical, emotional or physical care needs, failure to provide access to</p>

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as a hospital or care home; or in relation to care provided in one's own home. This may range from a one-off incident to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structures, policies, processes and practices within an organisation/institution	appropriate health care and support or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating. Other examples of neglect in children would be providing inadequate supervision (i.e. leaving children home alone) or inappropriate clothing, such as t-shirts and shorts in cold weather.
Self-neglect	Domestic abuse
This covers a wide range of behaviour, neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding and substance misuse.	Any incident or pattern of incidents of physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional or other abuse between those aged 16 and over and personally connected to each other. The act also recognises: <ul style="list-style-type: none"> - Post-separation abuse through coercive and controlling behaviour - Children as victims of domestic abuse (a child who sees or hears, or experiences domestic abuse, and is related to the person being abused or the perpetrator)". This policy will also cover Children and Adolescent to Parent Violence and Abuse (CAPVA)".

- 3.5 **Section 42 enquiry** - Local authorities have a statutory obligation (under the Care Act 2014) to make enquiries, or cause others to do so, if it is believed an adult or child is experiencing, or is at risk of, abuse, neglect or abuse.
- 3.6 **Section 47 Enquiry** - is initiated through an appropriate referral to the local authority to decide whether and what type of action is required to safeguard and promote the welfare of a child who is suspected of, or likely to be, suffering significant harm.
- 3.7 **Prevent** - is a Governmental driven strategy to "prevent", or identify and address, the radicalisation of individuals. Prevent will build on "Channel", the existing multi-agency programme, to identify and provide support to people at risk of radicalisation. Identification of signs of radicalisation is key to referral of the individual for support and intervention measures before they become radicalised, and take part in, or assist with, extremist or terrorist activity. Referrals of individuals displaying signs of radicalisation are made through

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the normal safeguarding route, where the referral will be identified and put through the Channel process.

- 3.8 **Extremism** refers to the process by which a person (as defined in the Prevent strategy) is “vocal or actively opposes fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.” Also included in the definition of extremism are calls for “the death of members of our (United Kingdom) armed forces, whether in this country or overseas, extreme Right-Wing or Left-Wing activities, and extremist activities pertaining to Animal Liberation”.
- 3.9 **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups usually by the influence of others, coercing them into activities and beliefs they normally would not participate in. Radicalisation is usually a process not an event. During the process it is possible to intervene to prevent vulnerable people being drawn into extremist or terrorist related activity.
- 3.10 **Terrorism** as defined by the Terrorism Act 2000, is an action that endangers or causes serious violence to a person/people, causes serious damage to property; or seriously interferes or disrupts an electronic system. The use, or threat of use, must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 3.11 **Terrorist-related offences** are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.
- 3.12 **Something’s Not Right (SNR)** is the name given to the internal reporting procedure for safeguarding (and other relevant person or property related) concerns in Beyond Housing. SNR is available to all colleagues to raise concerns via telephone, email, or via PDA, to raise alerts directly with the Safeguarding Coordinator. Colleagues have a duty to act on and raise alerts where they feel that “Something’s Not Right” and the Safeguarding Coordinator can advise them of a course of action accordingly or follow up on reported concerns. All alerts are recorded and tracked through to completion.
- 3.13 **Mental Capacity Act (2005)** makes clear who can make decisions, in what situations, and how they should go about this. It enables people to plan ahead for a time when they may lose capacity. It applies to anyone aged 16 or over in England and Wales and defines a statutory framework for assessing whether a person has or lacks capacity to make decisions for themselves in all aspects of their lives. These rules apply whether the decision is a significant event, like moving accommodation or everyday decisions, like what to wear. All colleagues will ensure that when dealing with customers that the Mental Capacity Act principles are followed.

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4.0 Legislative, regulatory and strategic alignment

- 4.1 Beyond Housing have a statutory responsibility (under the Care Act 2014) to protect vulnerable adults (alongside our existing responsibility for safeguarding children). The Care Act sets out a legal framework for how local authorities and other parts of the health and care system (including housing providers) should protect adults at risk of abuse or neglect.
- 4.2 Beyond Housing recognises that it has both a moral and legal obligation under the Children Act 1989 & 2004 to ensure that children are safeguarded from harm. To this end, Beyond Housing will report concerns accordingly and work in partnership abiding by the principles of the Working Together to Safeguard Children statutory framework (2018).
- 4.3 Section 26 of the Counter Terrorism and Security Act 2015 places a duty on organisations, in the exercise of its function, to have “due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent Duty.

5.0 Responsibilities

- 5.1 The Chief Operations Officer, through the Supported Living Manager is responsible for ensuring that there is adequate resource to deliver that this policy, and that it is applied across the organisation.
- 5.2 The Safeguarding Manager is responsible for ensuring that that safeguarding features as a key element of service delivery, and that beyond Housing meets its responsibilities under safeguarding under the Care Act 2014.
- 5.3 Beyond Housing recognise the importance and the need for the correct application of Safeguarding under The Care Act 2014, therefore the post of Safeguarding Co-ordinator has previously been created to ensure a dedicated resource to safeguarding and protecting our customers, colleagues, and their families.
- 5.4 The Safeguarding Coordinator will act as the first point of contact for all colleagues as a resource to support, assist and lead on safeguarding concerns.
- 5.5 All Beyond Housing colleagues have both a duty of care and a legislative obligation to report any concerns of safeguarding through the agreed process.
- 5.6 The Chief Operations Officer, Safeguarding Coordinator and the Supported Living Manager, as Designated Persons, will be responsible for the effective implementation of the policy and procedure, and for ensuring that colleagues have access to appropriate training and information.
- 5.7 Beyond Housing will ensure that it discharges its duties in respect of Prevent when dealing with concerns raised over potential radicalisation or extremism.

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- 5.8 Beyond Housing will, when escalating alerts raised, into local authority safeguarding referrals, follow the respective areas multi-agency policy and procedures, when submitting referrals to request a section 42 enquiry, or submitting concerns pertaining to safeguarding children to initiate a section 47 enquiry.
- 5.9 Beyond Housing will raise public awareness so that professionals, other colleagues and communities as a whole play their part in preventing, identifying and responding to abuse and neglect.
- 5.10 Beyond Housing is committed to working in close partnership with all relevant statutory and non-statutory organisations to ensure that (as an organisation) we are at the forefront of both local and national best practice. Beyond Housing will (as far as is practicable) ensure attendance at all relevant partnership meetings and forums (such as Local Safeguarding Partnership meetings (LSP), Children’s Safeguarding Partnership (CSP) meetings, Prevent partnerships (Bronze & Silver, where possible), Multi-Agency Risk Assessment Conferences (MARAC), Multi-Agency Tasking and Coordination meetings (MATAC), Domestic Abuse partnership meetings, Missing and Child Exploitation meetings (MACE) and other recognised meetings formed as part of wider partnership working pertaining to safeguarding).
- 5.11 All relevant colleagues will have Disclosure and Barring Scheme (DBS) checks carried out. Evidence of this is to be recorded by Human Resources. Further information regarding DBS checks is covered in Beyond Housing’s Recruitment & Selection Policy.
- 5.12 Beyond Housing has a Code of Conduct which details the expectations of the behaviour and conduct of colleagues, employed by Beyond Housing, when acting on behalf of the organisation, and can extend in certain circumstances to the behaviour and conduct of colleagues when not at work (for example carrying out certain criminal acts). Allegations of abuse made against employees of Beyond Housing will be managed through the relevant HR procedures to minimise risk to others, offer relevant support to colleagues, and to reflect the requirement for robust procedures to manage allegations against Persons In a Position of Trust (PIPoT).
- 5.13 Employees who fail to meet agreed standards and implement the values of the organisation may be subject to disciplinary action, which can include dismissal from employment.
- 5.14 Beyond Housing recognises that it is critical that all colleagues have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern, so all colleagues will undertake mandatory training for Safeguarding and Prevent.
- 5.15 All new “front line” colleagues to the business (in customer facing roles) will undertake a mandatory Safeguarding/Prevent induction with the Safeguarding Coordinator within their introductory 6-month period.

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5.16 All colleagues have a responsibility to provide a safe environment for customers and colleagues, by being aware of, and applying Beyond Housing’s safeguarding policy and procedure, and by raising concerns of suspected abuse or radicalisation.

6.0 Policy delivery

6.1 Beyond Housing is committed to the protection of others from abuse and exploitation by ensuring that we support the 6 Key principles as identified in “Safeguarding under the Care Act 2014”:

- Empowerment – supporting adults to make decisions and informed consent.
- Prevention – taking action before harm occurs.
- Proportionality – taking the least intrusive appropriate response.
- Protection – support and representation
- Partnership – services working with communities.
- Accountability – along with transparency

6.2 Beyond Housing is also committed to:

- Prevent harm and reduce the risk of abuse and neglect to children, and adults with care and support needs.
- Safeguard individuals in a way that supports them in making choices and having control in how they choose to live their lives.
- Promote an outcomes approach in safeguarding that works for people resulting in the best experience possible.

6.3 Beyond Housing will ensure that it will carry out its obligations as stipulated in “Safeguarding under the Care Act 2014”.

6.4 Beyond Housing will ensure that when dealing with alerts over concerns raised that due regard will be given to the Mental Capacity Act 2005 and 2019 (amended), with regards to determining the capacity of an individual and applying the underpinning principles.

6.5 Disclosure of suspected abuse or radicalisation can be direct, indirect, or via a third – party. Anyone who suspects, observes, hears, or receives a disclosure must record and report this to the designated person(s). Any colleague making or reporting a disclosure will be supported with advice and guidance from the designated safeguarding lead(s). Reporting of concerns is via the Something’s Not Right process (described in the ILS-PR-056 Safeguarding procedure)

6.6 All colleagues are required to:

- Always act where there are concerns,
- Not promise complete confidentiality,

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- Not investigate, however, do listen and reassure and write down any disclosures wherever possible,
 - Follow the policy and procedure for safeguarding.
- 6.7 If a disclosure is made, colleagues are to assess the risk for the individual and themselves, based on the information available and follow the safeguarding procedure accordingly.
- 6.8 In all incidents involving adults, colleagues should obtain consent to share information unless the following applies:
- The adult does not have the capacity to consent (NB Capacity must be assumed unless there is significant and tangible evidence to support that the individual does not have capacity).
 - It puts them or others at risk.
 - A child may be involved.
 - If it would interfere with the detection or prevention of crime
- 6.9 When sharing information regarding a child, consent is **not** required. It is, however, best practice to inform the parent(s) / guardian(s) unless:
- Discussion would put the child at risk of harm.
 - Discussion would impede police investigation or a social work enquiry.
 - Sexual abuse is suspected.
 - Organised or multiple abuse is suspected.
 - Fabricated or induced illness is suspected.
 - Honour Based Violence or Forced Marriage is suspected.
 - It puts you at risk.
- 6.10 Beyond Housing has signed up to the Chartered Institute of Housing's "Make a Stand" pledge to tackle domestic abuse, which has been developed with the Domestic Abuse Housing Alliance and Women's Aid. While we recognise that domestic abuse falls under safeguarding, in making a commitment to the "Make a Stand" pledge, Beyond Housing will put into place further provisions to aid and support customers and colleagues who are, or have been, subjected to domestic abuse.
- 6.11 Beyond Housing believe that every colleague who is experiencing or has experienced domestic abuse has the right to raise the issue with their employer in the knowledge that we will treat the matter effectively, sympathetically, and confidentially. Beyond Housing are committed to developing a workplace culture that recognises that some employees will be experiencing domestic abuse and that the workplace should be a place of safety, and one that recognises that perpetrators of domestic abuse are responsible for their behaviour and for addressing this. Beyond Housing aims to create a safer workplace and send out a strong message that domestic abuse is wholly unacceptable.

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- 6.12 Colleagues experiencing domestic abuse may choose to disclose, or seek support from a line manager, or colleague. Colleagues taking the disclosure will not counsel survivors, but will offer information, workplace support, and signpost to other organisations.
- 6.13 The Safeguarding Coordinator will be nominated as an additional confidential contact for colleagues. They will also provide guidance for line managers and colleagues who are approached by staff who are being abused.
- 6.14 Beyond Housing respects colleagues' right to privacy and although strongly encourage survivors of domestic abuse to make a disclosure, for the safety of themselves and all colleagues in the workplace, we respect a colleague's wishes not to disclose if they do not want to.
- 6.15 Beyond Housing recognise that domestic abuse can impact adversely on a colleague's performance at work, and line managers should address the issue positively and sympathetically ensuring that the colleague is aware that support and assistance can be provided.
- 6.16 Beyond Housing makes provision for line managers, supporting colleagues who have disclosed they are experiencing domestic abuse, to treat unplanned absences and temporary poor timekeeping sympathetically; as well as the flexibility to allow special paid leave for relevant appointments or support, or changes to working patterns or duties to reduce risk or exposure to the perpetrator.
- 6.17 Domestic abuse perpetrated by colleagues will not be condoned under any circumstances, nor will it be treated as a private matter. Beyond Housing recognises that it has a role in encouraging and supporting colleagues to address abusive behaviour of all kinds. If a colleague discloses their abusive behaviour, Beyond Housing will provide information about the services and support available to them and will encourage the perpetrator to seek support and help from an appropriate source.
- 6.18 Beyond Housing will treat any allegation, disclosure, or conviction of a domestic abuse related offence on a case-by-case basis with the aim of reducing risk and supporting change.
- 6.19 A colleague cautioned or convicted of a criminal offence may be subject to Beyond Housing's Performance management policy and specifically the disciplinary procedure. Beyond Housing reserves the right to consider the use of these policies and procedures should a colleague's activities outside of work (whether it leads to a criminal conviction or not) have an impact on their ability to perform the role for which they are employed and/or be considered to bring Beyond Housing into disrepute.

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- 6.20 Beyond Housing view the use of violence and abusive behaviour by a colleague, wherever this occurs, as a breach of the organisation's Code of Conduct for disciplinary purposes.
- 6.21 Beyond Housing will work in partnership with the relevant local authorities, and local police services, to try to provide safe and secure homes for our customers. We will, through local arrangements, and where practicable and reasonable, provide "target hardening" measures to add additional security for customers subject to domestic abuse, under guidance and support from local police and respective local authorities.

7.0 Consultation

- 7.1 Open email consultation has taken place on the review of the safeguarding policy and procedures with all team leaders and managers in Beyond Housing, with the inclusion of the Safeguarding Coordinator, Chief Operations Officer, Director of Human Resources and Director of Customer & Communities.
- 7.2 External consultation has taken place with North Yorkshire Council and Redcar and Cleveland Borough Council Health & Adult Services and Children's Service leads, safeguarding leads in adult and children's safeguarding, local safeguarding partnerships forum members, Prevent silver & bronze chair and partnership members, police and local authority community impact teams and domestic abuse partnerships.

8.0 Approval

This policy will be reviewed after three years or in response to a change to legislation or best practice, whichever is the sooner.

Approval and revision Criteria	Information
Document written by:	Supported Living Manager
Document approved by:	Governance & Review Committee
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3	July 2023	3-year review period