

Shropshire Rural Housing Association



**SHROPSHIRE
RURAL HOUSING**
ASSOCIATION

Safeguarding Policy

1. INTRODUCTION

The Association seeks to ensure the safety and well-being of all children, young people and vulnerable adults who engage in activities with the Association. This policy explains the basic principles of safeguarding individuals who fall within these categories, and sets out our approach to minimising the risk of abuse and harm.

The Association will also ensure compliance with the current Independent Safeguarding Authority, as well as the Government scheme under the Protection of Freedoms Bill, which merged the responsibilities of the Criminal Records Bureau with the Independent Safeguarding Authority – Disclosure and Barring Service (DBS).

It is through the application of this policy that the Association will seek to develop a positive and proactive approach to enable all children, young people and vulnerable adults to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with these individuals.

2. DEFINITIONS

- **Child/Young Person**

For the purposes of this policy, a child or young person is someone under the age of eighteen (18) years as defined in the Children Act of 1989.

- **Vulnerable Adult**

For the purposes of this Policy, a “Vulnerable Adult” is a person aged eighteen (18) years or over who is, or may be, in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

This may also include someone who is homeless, or is in the criminal justice system, and may be receiving support from local statutory agencies. The term is further defined in law in the Safeguarding Vulnerable Groups Act 2006.

- **Abuse/Neglect**

With regard to safeguarding vulnerable adults, the national framework identifies a duty of care to all adults “whose independence and wellbeing is at risk due to risk or neglect”. In operating this Policy, SRHA will define abuse or neglect in any of the following categories:

- Physical abuse
- Domestic violence
- Sexual abuse
- Financial or material abuse
- Neglect including self-neglect – *(Defined as’ the deliberate withholding or unintentional failure to provide help or support when it is necessary for the adult to carry out activities of daily living. Neglect also includes failure to intervene in situations that are dangerous to the person,*

particularly when the person lacks the mental capacity to assess risk. Neglect can be both physical and emotional. Neglect is failure to keep a vulnerable person clean, warm and promote optimum health, or provide adequate nutrition or medication)

- Psychological or emotional abuse
- Modern slavery – (*encompassing slavery, human trafficking, forced labour and domestic servitude*)
- Organisational abuse
- Abuse of individual rights, including discriminatory and racial abuse

3. LEGISLATION

Safeguarding children and adults cuts through numerous pieces of legislation. For the purposes of this policy, the primary legislation is:

- Children Act 1989
- Children Act 2004
- Children (Leaving Care) Act 2000
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018
- General Data Protection Regulation (GDPR) 2018
- Human Rights Act 1988
- Care Standards Act 2014

4. POLICY

It is the duty of all persons employed or deployed by the Association, in a paid or voluntary capacity, to safeguard the welfare of children, young people and vulnerable adults by creating an environment that protects them from harm and they must make themselves aware of the Association's Safeguarding Policy. Where appropriate, their work will be supported by a safeguarding training programme.

The designated person with responsibility for safeguarding at the Association is the Chief Executive.

5. AIMS AND KEY PRINCIPLES

The aims and key principles of the Association's Safeguarding Policy are:

- To safeguard all children, young people and vulnerable adults who interact with the Association
- To demonstrate best practice in the area of safeguarding children, young people and vulnerable adults.
- To promote high ethical standards throughout. The key principles underpinning this policy are the child's, young person's or vulnerable adult's welfare is, and must always be the paramount consideration
- All children, young people and vulnerable adults have a right to be protected from abuse regardless of their age, gender, disability, culture, racial origin, religious beliefs or sexual identity.
- All allegations of abuse will be taken seriously and responded to efficiently and appropriately.

- To ensure that employees, volunteers, associates and all other persons who come in contact with children, young people and vulnerable adults provide exemplary behaviour.

6. TRAINING REQUIREMENTS

All employees or anyone working in direct contact with children, young people or vulnerable adults shall be required to complete all relevant training and will receive regular training appropriate to their position.

Board and Committee members will be kept up to date with changes in safeguarding policy and good practice through information briefings from the Chief Executive. **Such information briefings will also include updates on current trends relevant to Safeguarding such as exploitation and radicalisation.**

Contractors working in tenant's homes will be expected to demonstrate their understanding of safeguarding and how to report safeguarding concerns.

Failure to undertake or satisfactorily complete any required training, may result in the individual being unable to continue with their role, partially or in its entirety, which may affect your future employment with the Association.

7. POSITION OF TRUST AND DUTY OF CARE

It is essential that the behaviour by employees and others working on behalf of the Association demonstrates integrity, maturity and good judgement.

Any person responsible for a child, young person or vulnerable adult, whether solely or jointly, is in a position of trust which requires behaviour to be in accordance with this policy.

This could include when staff visit homes.

The Association will use its best endeavours to ensure that no person with any conviction for any aspect of abuse will be employed in a position which involves contact with children, young people or adults.

The Association will use its best endeavours to ensure that no contractor (or contractor's operative) with a conviction for any aspect of abuse will undertake work in any of the Association's properties, which may mean contact with children, young people or vulnerable adults.

8. SCOPE OF THE POLICY

8.1 General Situations

The following are situations where we need to consider the welfare of people we come into contact with:

- When visiting occupied homes
- When people visit the Association's office premises

The Association recognises that the term 'children' covers individuals from birth up to 18 years old and this policy covers this entire age range. As a general principle we will also be sensitive to the

developmental maturity of children in our care and ensure that this is taken into account when decisions are made that affect them.

'Children' are usually fairly easy to identify. Additional vulnerability is not as easy: disability, ethnicity, sexuality. Adults with additional vulnerability are often even more difficult to identify and plan for. It is a priority of this Association to safeguard the welfare of both children and adults with additional vulnerability when in our care.

Some people we come into contact with may not use English as their first language or may experience difficulty communicating with our employees in the usual ways. As a principle, we will always be patient and try to communicate in an individual's chosen way and if possible, use an interpreter (i.e. foreign language) or communicator (e.g. British Sign Language).

Occasionally, our employees or associates may come into contact with children who do not live in this country. This policy applies equally to them. We will also ensure that where this situation does arise, that international law and regulations are applied as well as the needs of the child being put first. Where we have a concern that a child may be being exploited or 'trafficked' the appropriate authorities will be informed.

Other specific situations relevant to our work where staff may come across safeguarding issues.

8.2 Domestic Abuse

As a housing provider, the Association's staff may come across domestic abuse situations in relation to our tenants and applicants for housing.

The Association has signed up to the Institute of Housing "Make a Stand" Campaign as our commitment to supporting victims of domestic abuse. In doing so, we have agreed to:

- 1. Make information about national and local domestic abuse support services available on your website and in other appropriate places so that they are easily accessible for staff, your members, customers or clients.*
- 2. Put in place an HR policy, or amend an existing policy, to support members of staff who may be experiencing domestic abuse*
- 3. Appoint a champion at a senior level in your organisation to own the activity you are doing to support people experiencing domestic abuse and promote the campaign with your members, customers or clients.*

8.3 Tenancy Breaches

Sometimes breaches to tenancy conditions such as anti-social behaviour or rent arrears can be the result of an underlying and undetected vulnerability on behalf of the tenant. The Association will therefore ensure that staff are aware of how to spot signs of vulnerability when dealing with tenancy breaches and other tenancy matters.

8.4 Applications for Housing with the Association

People sometimes need to move home due to a vulnerability. When assessing applications for our housing, the Association's staff have access to personal information about the applicant's circumstances that can serve to highlight issues of abuse or neglect. The Association will therefore ensure that staff are aware of how to spot signs of vulnerability when dealing with applications for housing.

8.5 Perpetrators of Abuse or Neglect

Occasionally, the perpetrator of abuse or neglect may be a tenant of the Association. Should this be the case, the Association will co-operate with other relevant agencies including the Police and Safeguarding Board.

9. REPORTING AND RESPONDING TO CONCERNS OF ABUSE/NEGLECT

In an emergency, employees should contact the Police on 999.

Where there is concern for the safety and wellbeing of a child or vulnerable adult but it is not considered to be an emergency, the employee should, where possible, inform their line manager and then report the concern to Shropshire Council's safeguarding service via the First Point Contact Team on 0345 678 9021. Outside of working hours reports should be made to Shropshire Council's Social Services Emergency Duty Team on 0345 678 9040.

At the earliest possible opportunity, the reporting/concerned employee should make a detailed, timed, dated and signed note of their concerns and the actions taken and should discuss this with their line manager. It may be that those responsible for safeguarding will wish to speak to the employee who has raised the concern. The Association will provide all reasonable support to employees in such circumstances.

9.1 Good Practice

All personnel should adhere to the following principles and action:

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- Treat all people equally and with respect and dignity
- Always put the welfare of the child, young person or vulnerable adult first
- Maintain a safe and appropriate distance and avoid unnecessary physical contact with children, young people or vulnerable adults
- Where any form of manual/physical support is required it should be provided openly and with the consent of the child, young person or vulnerable adult. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the person's consent has been given
- Request written parental consent if Association officials are required to transport children
- Gain written parental consent for any significant travel arrangements e.g. overnight stays
- Be a good role model. This includes not smoking or drinking alcohol in the Association of children
- Always give enthusiastic and constructive feedback rather than negative criticism
- Secure written parental consent for the Association to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises

- Keep a written record of any injury that occurs, along with details of any treatment given

9.2 Poor Practice/Potentially considered as Abuse

The following behaviours are regarded as poor practice and unacceptable and should be avoided by anyone covered within the scope of this Policy:

- Unnecessarily spending excessive amounts of time alone with children and/or away from others
- Being alone in changing rooms, toilet facilities or showers used by children, young people or vulnerable adults
- Taking children alone in a car on journeys, however short
- Taking children to your home where they will be alone with you
- Sharing a room with a child ☒ Engaging in rough, physical or sexually provocative games, including horseplay
- Allow or engage in inappropriate touching of any form
- Allowing children to use inappropriate language unchallenged
- Making sexually suggestive comments to a child, even in fun
- Reducing a child to tears as a form of control
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature that the child or vulnerable adult can do for themselves

Use of Photography & Film Images

You should not take photos or publish them without consent if the subject within the picture is recognisable.

Social Networking Guidance

When using Social Networking Sites for either personal use, or as authorised to do so by the Association, you must ensure that you adhere to the principles and guidelines outlined within this policy, as well as the Association's Confidentiality Policy and Communications and Technology Policy.

10. CONFIDENTIALITY

It may be necessary for some employees or other person associated with the Association to have access to confidential information about children, young people and vulnerable adults in order to undertake their responsibilities and in some circumstances, employees may be given highly sensitive or private information.

No person should ever use confidential or personal information about a child, young person or vulnerable adult or his/her family for their own or others' advantage.

Information must never be used to intimidate, humiliate or embarrass children or vulnerable adults.

Confidential information about a child, young person or vulnerable adult should never be used casually in conversation, or shared with any person other than on a need-to-know basis. In circumstances where the child's, young person's or vulnerable adult's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which an employee or worker may be expected to share information about a child, young person or vulnerable adult, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

If an employee or worker is in any doubt about whether to share information or keep it confidential, he should seek guidance from the designated person identified above. Any media or legal enquiries should also be referred to the designated person.

The storing and processing of personal information about children is governed by the GDPR. For further information on the Company's (and your) obligations under the GDPR, please see the Company's Personal Data Policy.

Date Considered by Committee	7/8/19
Date Approved by Board	
Scheduled date for Review	
Lead Officer	CE