



Safeguarding Policy

Approval date	August 2024
Approval Level	Customer Experience Committee
Review Period	3 Years
Next Review Date	August 2027
Policy Owner Role Title	Head of Customer Services Delivery
Responsible Director	Customer and Operational Services
Is Customer engagement required?	No
Is an Equality Impact Assessment (EIA) required?	Yes
Is a Data Protection Impact Assessment (DPIA) Required?	No
Has the Policy Development Guide been followed?	Yes



Contents

1.0 Introduction and scope	3
2.0 Policy Statement	4
2.1 Introduction	4
2.2 What is Safeguarding?	4
2.3 What are Safeguarding Issues?	5
2.4 Principles of safeguarding	5
2.5 Performance monitoring and reporting.	5
2.6 Training	6
2.7 Freedom to speak & Duty to Act.	6
2.8 Whistleblowing	6
2.9 Confidentiality and Sharing Information	6
2.10 Referring and Recording cases	7
2.11 Safe Recruitment	8
2.12 Support for staff.	8
2.13 Systems.	8
3.0 Roles and Responsibilities	8
4.0 Related Documents and Guidance	10
5.0 Internal Documents	10
6.0 Regulatory Standards	11
6.1 Safety and Quality Standard.	11
7.0 Legal Framework	11
8.0 Definitions	12
9.0 Abbreviations	14
10.0 Equality Diversity & Inclusion	15

1.0 Introduction and scope

This Safeguarding Policy has been developed in line with Wandle's values, which are:

- Think customer
- Build relationships
- Work together
- Aim high
- Own it

It will ensure that actions we undertake will be underpinned by our vision of:

"Homes to be proud of and services you can trust"

We will 'think customer' by keeping the experience of our residents at the forefront of our minds and 'build relationships' by recognising that each person we interact with is unique when handling safeguarding situations and concerns.

Scope

This policy applies to all staff (including temporary staff), apprentices, volunteers, contractors and agents who work for Wandle. It is of particular relevance to our customer facing staff, who communicate with residents daily, may visit their homes or repair their properties. This policy applies to the safeguarding of Adults and Children (which may include an unborn child, as well as young people leaving care).

This policy does not specifically cover domestic abuse or hoarding. Staff should also refer to the domestic abuse policy and hoarding policy for further guidance in these areas.

Our Commitments

We will:

- Empower our residents with information on what constitutes abuse and how to report it.
- Comply with relevant legal and regulatory needs regarding our safeguarding duties.
- Promote the dignity, safety and well-being of those at risk.
- Keep the interests of residents at the centre of any safeguarding activity where we can.
- Work in partnership with relevant agencies to reduce risk of harm/abuse for our residents.
- Respect the rights of the person alleged to be causing harm, as far as is possible.
- Promote an organisational culture of fairness and openness to allow any concerned person to raise concerns without fear.
- Ensure that all staff and volunteers understand their role in relation to safeguarding and understand that safeguarding is the responsibility of everyone

- in the business. It will be mandatory for all relevant staff to undertake training to ensure that they are competent in preventing, recognising and acting on abuse and neglect.
- Recognise the lead responsibilities of local authorities in coordinating safeguarding work. We will work in partnership with authorities and in line with locally defined procedures when implementing this policy.
- Refer suspected or actual crime to the police.

2.0 Policy Statement

2.1 Introduction

Every person has the right to be safe from abuse and fear. We all have a responsibility to prevent, recognise and act on abuse and neglect quickly to keep adults, children and young people safe from harm in the in the areas that Wandle operates. We are committed to a zero-tolerance policy against any kind of abuse towards anyone.

Anyone raising a safeguarding alert or concern will always be listened to, taken seriously and assured that we will act on their concern.

Wandle staff share a responsibility to ensure the safeguarding of children and adults at risk as part of our daily duties. Our aim is to promote an environment where abuse towards any person will not be tolerated in any capacity.

We observe each Local Safeguarding Children's Board's (LSCB) Child Protection Procedures and the requirements of any relevant authority. We will report instances of suspected or known abuse or neglect to them in accordance with their procedures and timescales.

It is our responsibility to:

- respond promptly and appropriately to concerns;
- pass information to Children's Social Care and the Police;
- Co-operate with statutory child protection procedures and criminal enquiries.

2.2 What is Safeguarding?

Adult Safeguarding

The Care Act statutory guidance defines adult safeguarding as:

Protecting an individual's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adults wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

Child Safeguarding

Safeguarding children is defined in [Working together to safeguard children](#) as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Safeguarding should not be confused with other additional support needs, such as mental health or general vulnerability; Safeguarding is where there is a risk or potential risk of actual mental or physical harm.

2.3 What are Safeguarding Issues?

Examples of safeguarding issues include:

- bullying,
- intimidation and coercion,
- radicalisation, sexual exploitation,
- grooming, violence or threat of violence,
- incidents of self-harm,
- forced marriage, and
- FGM (refer to section 8 for definition)

This list should not be considered exhaustive, and staff should use their best judgement when identifying potential safeguarding concerns.

2.4 Principles of safeguarding

Wandle's approach to safeguarding is based on around the 6 **main principles of safeguarding** that is important to be aware-

- Empowerment - People being supported and encouraged to make their own decisions and informed consent
- Prevention - It is better to take action before harm occurs.
- Proportionality - The least intrusive response appropriate to the risk presented.
- Protection - Support and representation for those in greatest need.
- Partnership - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability - Accountability and transparency in safeguarding practice.

2.5 Performance monitoring and reporting.

We strive for continuous improvement in all safeguarding practices and learning from case reviews. We will hold regular safeguarding review boards to ensure legislative/policy changes are adhered to and that staff are comfortable with all measures/practices in place.

Reports of recording safeguarding incidents will be made to the Executive team on quarterly basis.

2.6 Training

Wandle delivers online safeguarding training to all staff that come into contact with residents, including managers and front-line staff. This is a mandatory e-learning objective monitored by the HR department. It is imperative that all staff, including senior management and the executive team complete this training and where relevant complete any refresher training when requested. We will require our staff to complete refresher training every two years.

For non-office-based staff, who come into more regular contact with our customers, we will deliver additional guidance and training on identifying and reporting safeguarding issues they may encounter. These will usually be delivered through 'tool-box talks' with operatives.

2.7 Freedom to speak & Duty to Act

We will support any member of staff or volunteer who reports their concerns in good faith. It is better to report a suspicion and be wrong than not to report it at all. The procedures set out clearly and comprehensively how staff can report concerns.

Any concern relating to the abuse of residents may be raised in confidence, but it will be investigated. Therefore, we will need to share details of the concern on a 'need to know' basis.

2.8 Whistleblowing

When raising a concern staff are encouraged to speak in the first instance with their line manager. If they feel this is inappropriate, or if the allegations regard their line manager, they should contact another senior member of staff, or report to Wandle's designated person for whistleblowing.

Our [Whistleblowing Policy](#) provides a confidential route for staff to raise serious concerns related to suspected wrongdoing or dangers within the organisation. If a staff member or volunteer asks for their identity to be protected, anonymity will be maintained wherever possible.

We are committed to listening to any suspicion and acting. However, if a member of staff or volunteer feels that Wandle is not taking their safeguarding concerns seriously, they have the right to explain their concerns to the Police or Social Services/Local Authorities.

2.9 Confidentiality and Sharing Information

We commit to multi-agency working in relation to all safeguarding concerns. This includes responding to requests for information from the local authority, Safeguarding Adult Boards, Safeguarding Children Boards, Child Protection Conferences and Serious Case Reviews, Domestic Homicide Reviews and any other relevant organisation.

We strongly believe that a right to independence, choice and self-determination is integral to people's life chances. This right extends to their having control over information about themselves and how that information is shared.

We also recognise that information sharing between organisations is essential to safeguard those at risk. Therefore, decisions about what information is shared and with who will be taken on a case-by-case basis.

We will comply with the principles of the Data Protection Act and our Data Protection policy to maintain confidentiality. However, the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information is shared in a lawful way. We cannot guarantee full confidentiality when the duty to safeguard adults, children at risk, vital interests or the public interest is greater than our responsibility to an individual.

Where possible, professionals working directly with children and their families should seek to discuss their concerns with the child and/or their parents and seek their agreement to making a referral to Children's Social Care. However, if such a discussion would place the child at an increased risk of significant harm (for example, the parent is the alleged perpetrator) then this discussion should not take place.

We reserve the right to make the referral to Children's Social Care or the Police without the permission of the child or parent where the situation and the provisions of the Data Protection Act (and any other relevant legislation) justify it. This includes where there is reason to believe that a child is suffering, or at risk of suffering, significant harm, or to prevent or detect a criminal offence. The needs of the child at risk must come first and any actions we take will reflect this.

2.10 Referring and Recording cases

Any safeguarding issues should be referred to the resident engagement and partnership team by following the clear [guidance](#) published on the intranet and with relevant notes recorded in dynamics or raised as a general enquiry.

The resident engagement and partnership team will then refer to the relevant local authority or agency as required and log each case on the safeguarding register to for monitoring and review. The safeguarding lead will provide support and oversight where needed.

For any suicide related calls i.e. when a customer calls stating they will commit suicide/contemplating suicide staff must notify their line manager and emergency services in the first instance. – Staff should not just email the resident engagement and partnership team, resident support safeguarding inbox, or just raise a general enquiry on dynamics.

The police will respond to a request for a welfare check, if it is established that there is a real and immediate risk to life, or when the information available suggests there is a real and immediate risk to the life of the person. Unless this threshold is reached, police have no duty, and therefore no power, to take any action once outside those premises. As such if the concern is that a welfare check is still required then often an ambulance will be allocated for paramedics to attend and check on the residents.

After which staff must follow up with an email for audit purposes with their statement to their line manager, health & safety, neighbourhood team and resident engagement and partnership team so they're able to follow up long term support plans for the individual.

2.11 Safe Recruitment

We will follow relevant procedures for the recruitment and selection of staff and volunteers. DBS checks will be completed in line with relevant HR policies and procedures where required.

We will meet our responsibilities towards the Independent Safeguarding Authority and any applicable vetting and barring schemes.

2.12 Support for staff

Being a witness to, hearing about, or supporting a child or young person through abuse can be very distressing. We will support all staff involved in a safeguarding children or safeguarding adults case at every stage of the process through regular supervision meetings and any other relevant support mechanisms.

2.13 Systems

The referrals for safeguarding are made to the safeguarding mailbox and will be looked after by the resident engagement and partnership team.

3.0 Roles and Responsibilities

Partnership Working

We are committed to meeting the multi-agency working requirements set out in statutory guidance and local authorities' policies and procedures. This policy should be read alongside those of the relevant local authority.

We realise that good information keeping and sharing with partners is key. We will engage with local Multi-Agency Public Protection Arrangements (MAPPA) and (Community) Multi-Agency Risk Assessment Conference (CMARAC /MARAC) work, as well as Multi-Agency Safeguarding Hub (MASH) for child safeguarding concerns and contribute to Serious Case Reviews when required by the lead authority or agency.

We are committed to working swiftly and productively with all relevant agencies to take action to protect individuals who may be experiencing or are likely to experience significant harm.

Staff Responsibilities

All staff, especially those who communicate with residents, visit their homes or work in our communities must:

- Be aware they have a duty to act promptly on any concern or suspicion that an individual who is vulnerable and/or at risk is being or is at risk of being abused.
- Be aware of the different types and signs of abuse that can occur.

- They should be vigilant for any signs or signals of abuse or harm and report any concerns they have that an individual is suffering, or is likely to suffer, abuse or significant harm.
- Inform their line manager, and if necessary, the appropriate authorities, of abuse concerns.
- Make clear factual records of their concerns and actions taken.
- Understand this policy and complete mandatory Safeguarding awareness training for Adults, Children and Young people.

Executive Director of Customer and Operational Services

The Executive Director of Customer and Operational Services will serve as the executive director safeguarding lead for the organisation and is responsible for ensuring that the executive team is kept up to date on relevant safeguarding matters and performance.

Managers

Managers have an important role to:

- Be 'safe managers' for staff to bring their concerns to
- Take responsibility for the quality of safeguarding in their teams and encourage staff to raise alerts appropriately.
- Act immediately when an alert is raised, take the concern seriously and support staff to take the appropriate steps.
- Make referrals to the local authority when required.
- Foster a fair and open culture of safeguarding awareness.

Contractors

Contractors who visit our resident's homes are expected to comply with our Safeguarding policy by ensuring that their employees are able to report risk concerns. Contractors must inform us when such concerns involve our residents.

Contractor Managers

To make sure their staff are regularly trained on safeguarding procedures and know how to refer, where to refer, and when to call the police and or Ambulance Services. The contractor manager should ensure all staff who come into contact with our residents are trained on safeguarding procedures. Contract managers will be responsible for assuring the relevant contractors are aware of the safeguarding principles and that they know how to raise any concerns regarding our residents.

Safeguarding Lead

The Safeguarding Lead is the Head of Customer Service Delivery. The lead will have oversight of the safeguarding process and ensure that all reported cases are logged appropriately in an appropriate case log, which are protected where necessary. They will also ensure that all safeguarding procedures and trainings are up-to-date and fit for purpose. The safeguarding lead is responsible for reporting the volume of safeguarding

cases to the executive. The Neighbourhood Customer Service Manager will act as stand in Safeguarding Lead in the absence of the Head of Customer Service Delivery.

Resident engagement and partnership team

The resident engagement and partnership team should be notified of safeguarding cases. RST can help progress or advise on cases as necessary as well as make referrals to external agencies where appropriate. The resident engagement and partnership team can also advise if a case is deemed as safeguarding in the first instance to expedite the necessary actions for that case.

4.0 Related Documents and Guidance

[No Secrets: guidance on protecting vulnerable adults in care](#)

[London Multi-Agency Adult Safeguarding Policy & Procedures](#)

[Safeguarding Adults – A National Framework of Standards](#)

[MARAC referral form](#)

CMARAC referral form (different Boroughs)

[HCA Regulatory Framework](#)

[Working together to safeguard children](#): A guide to inter-agency working to safeguard and promote the welfare of children

[Child sexual exploitation](#): Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation

[What to do if you're worried a child is being abused](#): Advice for practitioners

5.0 Internal Documents

Key Strategy	Customer Experience Strategy
Policies:	Anti-Social Behaviour Data Protection Domestic Abuse Whistleblowing Recruitment and Selection
Procedures	Lone Working Vulnerability Safeguarding Referral and Reporting Procedure

Other documents	Modern Slavery Statement ASB Permission to Disclose Form
-----------------	---

6.0 Regulatory Standards

6.1 Safety and Quality Standard

2.2.2 Registered providers must ensure that all required actions arising from legally required health and safety assessments are carried out within appropriate timescales.

2.2.3 Registered providers must ensure that the safety of tenants is considered in the design and delivery of landlord services and take reasonable steps to mitigate any identified risks to tenants.

The safeguarding policy helps us to fulfil the above requirements through setting out our approach to how we will safeguard our residents and work with partnership organisations where a safeguarding issue has been identified. The policy sets out clear guidelines and expectations for staff to ensure we are able to act swiftly to mitigate any potential harm to our residents.

7.0 Legal Framework

Legislation	Main powers and relevance to <i>policy subject</i>
Safeguarding Vulnerable Groups Act (2006)	Prevents people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work. Under the Act, organisations with responsibility for providing services or personnel to vulnerable groups have a legal obligation to refer relevant information to the Disclosure and Barring Service.
Counter-Terrorism and Security Act (2015)	Contains powers to help the UK respond to the threat of terrorism. It put Channel, a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism, on a statutory basis.
Modern Slavery Act (2015)	Requires businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains. Wandle achieve this through our Modern Slavery Statement.

Legislation	Main powers and relevance to <i>policy subject</i>
The Care Act (2014)	Under this Act we can obtain help from local authorities by referring cases to them, using their Safeguarding Adults Board (SAB). They can set up a Safe Guarding Review (SAR). The Act sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. Any relevant person or organisation must provide information to Safeguarding Adults Boards as requested.
The Children Act 1989	Provides a comprehensive framework for the care and protection of children. It centers on the welfare of children up to their 18th birthday. It defines parental responsibility and encourages partnership working with parents. Interagency co-operation is encouraged. It reinforces the message that all organisations working with children have a duty in helping safeguard and promote the welfare of children.
Sexual Offences Act 2003	Specifically, the following sections: • S.5-8 Rape and other sexual offences against children under 13 • S.14 Arranging or facilitating commission of a child sex offence • S.15 Meeting a child following sexual grooming • S.47 Paying for sexual services of a child • S.48 Causing or inciting sexual exploitation of a child S.49 Controlling a child in relation to sexual exploitation
Other relevant legislation:	• Data Protection Act 2018 and GDPR • Children Act 2004 • Safeguarding Vulnerable Groups Act 2006 • Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)

8.0 Definitions

What does 'Safeguarding' mean?

All work to help adults at risk stay safe from significant harm.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing the impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable children in need to have optimum life chances.

Who is an 'adult at risk'?

An adult at risk is a person aged 18 or over who is in need of care and support (whether those needs are being met), who is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves against the abuse or neglect or the risk of it.

What does 'significant harm' mean?

Ill treatment (including sexual abuse and forms of ill treatment which are not physical) and the impairment of, or an avoidable deterioration in, physical or mental health, and the impairment of physical, intellectual, emotional, social or behavioural development.

Common categories of abuse:

- **Financial** – including misuse of the person's money and possessions, blackmail, undue pressure in connection with wills, property or inheritance
- **Physical** – such as hitting, pushing, pinching, scalding, illegal restraint or misusing medication
- **Emotional** – such as threatening to harm or abandon, intimidating, shouting and swearing
- **Domestic** – abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender or sexuality
- **Sexual** – such as inappropriate touching, indecent exposure, sexual assault, rape
- **Neglect** – such as ignoring medical or physical care needs, preventing a person getting the care they need
- **Organisational** – This includes neglect and poor care practice within an institution or specific care setting. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation
- **Self-neglect** – This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

What is child abuse?

'Forms of maltreatment of a child.' (*Safeguarding Children Board*)

There are many different types of abuse. Child abuse can happen in any family or caring relationship, regardless of class or cultural background. It includes familial

violence, 'honour' based violence and harmful cultural practices, such as forced marriage or female genital mutilation. We will be sensitive and informed when assessing a child's needs but will never accept abuse for religious or cultural reasons: all children have an absolute right to be protected from harm.

Not all abusive behaviours are violent and include neglect and emotional abuse, which can both cause severe and persistent effects on the child's emotional and physical development.

What is 'child sexual exploitation'?

A form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur by technology (Department for Education, 2017).

What is Female Genital Mutilation?

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting.

Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM.

9.0 Abbreviations

MARAC	Multi Agency Risk Assessment Conference
CMARAC	Community Multi Agency Risk Assessment Conference
DH	Department of Health
ADASS	Association of Directors of social Services
SCIE	Social Care Institute for Excellence
MAPPa	Multi Agency Public Protection Arrangements
SAB	Safeguarding Adults Board
SAR	Safeguarding Adults Review
LSCB	Local Safeguarding Children's Board's
DBS	Disclosure and Barring Service
EIA	Equality Impact Assessment

FGM	Female Genital Mutilation
-----	---------------------------

10.0 Equality Diversity & Inclusion

Equality Diversity & Inclusion is central to our business; promoting fairness and opportunity for customers and staff; helping provide the best services shaped by and for customers; and right for recruiting and developing our staff.

We are committed to celebrating diversity. To ensure equal access to our services is available, we will comply with the Equality Act 2010 and all other legislative requirements relating to equality. We will work to avoid exclusions or restrictions that are not appropriate to the housing and support needs of our tenants and that may lead to discrimination. We will endeavour to ensure that all tenants receive a consistent level of quality service.

Equality Consideration

Under the *Equality Act 2010* Wandle must consider whether our policies adversely affect our customers and/or staff.

The following table identifies whether this policy disproportionately impacts upon any individuals in regard to the key protected characteristics, as identified in the Act:

Special Characteristic	Disproportionate impact? (Yes or No)
age	No
disability	No
gender reassignment	No
marriage and civil partnership	No
pregnancy and maternity	No
race	No
religion or belief	No
sex	No
sexual orientation	No

We do not consider this policy to disproportionately impact any individuals in regard to these characteristics. However due to the nature of the policy it was agreed that a full Equality Impact Assessment (EIA) should still be completed. These can be found linked here:

- [Adult safeguarding](#)

- [Children and Young People](#)