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Safeguarding Policy

May 2024

A Sovereign Network Homes Policy

Important

Policies and procedures must be coordinated through the Business Development Team for compliance, auditing and control purposes. A Policy Registration Form must be completed before

any revisions are made by contacting the Business Development Team at

NH.Policy@networkhomes.org.uk

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Safeguarding Policy

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Policy author	Director of Housing	
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Accountable officer	Executive Director of Customer Services	
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Sovereign Network Group (SNG) is the trading name of Sovereign Housing Association Limited, which is charitable. Sovereign Network Homes is part of SNG.

Version Control – Change Record

Date	Author	version	Reason for change
23/12/2016	Transformation Director	1.1	Amalgamation of the Adults Safeguarding & Child Protection Policy
Mary Larbie	Transformation Director	v.2.0 – 23/02/17	Changes throughout document
July 2021	Service Quality Manager & Heads of	Version 3	Changes from Int. Audit and 3 yearly review
December 2023	Customer Service Graduate	V 3.1	Amended to take account of SNG rebrand
May 2024	Service Quality Manager	V4.1	2 year review

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Appendices

None

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Sovereign Network Group (SNG) is the trading name of Sovereign Housing Association Limited, which is charitable. Sovereign Network Homes is part of SNG.

1. Introduction and Scope

- 1.1 This policy outlines our approach to preventing and reducing the risk of harm to our customers and their households, including children, who are experiencing, or are at risk from abuse or neglect.
- 1.2 Sovereign Network Homes recognises we have a responsibility to keep our customers safe from harm.
- 1.3 The Safeguarding policy is an overarching policy applied across all of our tenures at Sovereign Network Homes. It is the responsibility of each person working on behalf of Sovereign Network Homes to consider the safety and welfare of the adults and children that we come into contact with.
- 1.4 This policy sets out how Sovereign Network Homes will use the department of Health's six principles which underpin safeguarding work. The Department of Health's six key principles are contained in the definitions table.
- 1.5 All Safeguarding case management will be overseen by local Safeguarding Champions and via local Safeguarding Panels.
- 1.6 This policy complies with the Social Housing Regulator's Tenancy and Neighbourhood and Community Standards.

2. Purpose and Objectives

2.1 The purpose & objectives of this policy are to:

- Outline Sovereign Network Homes' approach to dealing with Safeguarding adults and children at risk of harm, abuse or neglect who use or are connected to our services.
- Always act in the customer's best interests by making safeguarding personal for the customer
- Raise awareness of the abuse and neglect of children, young people and adults at risk.
- Develop a culture that does not tolerate such abuse, and which encourages people to raise concerns of what they see, hear, are told or have a gut feeling about.
- Outline how we will work with our service partners to develop partnership working with other agencies to support safeguarding.
- Ensure that staff are fully knowledgeable and trained on Sovereign Network Homes' procedures to respond promptly and proportionately to any safeguarding concern.
- Ensure, the Safeguarding Champions report, monitor and review safeguarding concerns.

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- Expect Sovereign Network Homes partners who are in contract with us and are working on our behalf to have appropriate safeguarding procedures in place and to raise safeguarding concerns with us.
- Comply with legal and regulatory requirements.

2.2 If there is a concern regarding about the wellbeing of an employee, please contact HR. In addition, the help and support of our Mental Health Liaison Team and Mental Health First Aiders can be sought.

2.3 If a Safeguarding concern relates to an allegation against a member of staff, it will be dealt with in line with the disciplinary procedure.

3. Policy Statement

3.1 Sovereign Network Homes will apply the Department of Health’s six key principles which underpin safeguarding work, these principles are contained in our definitions table.

3.2 Everyone has a responsibility to safeguard our customers.

3.3 Where a safeguarding allegation or suspicion is raised then this policy as well as our Safeguarding Procedure will be followed.

3.4 Where a significant risk is identified, these concerns will be forwarded to the relevant Local Authorities for further investigation.

4. Definitions

4.1 Definitions mentioned in this Policy are explained in the table below. It includes examples of the different types of safeguarding we may manage as part of this policy. This is not an exhaustive list.

<p>Department of Health’s Six Key Principles</p>	<p>These 6 key principles underpin safeguarding work and are:</p> <p>1 - Protection Support and protection are key to safeguarding customers from harm, abuse and to protect those who are unable to make decisions about their own safety.</p> <p>2 - Prevention Raising awareness and supporting people to protect themselves. It is preferable to take action before harm occurs. Organisations have processes in place to protect and minimise the risk of abuse.</p> <p>3 - Proportionality The least intrusive response appropriate to the risk presented.</p>
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	<p>4 - Partnership Working Local solutions through services with their communities. Communities have a vital role to play in preventing, detecting and reporting neglect and abuse.</p> <p>5 - People are supported to take control of their own lives and their consent is needed for decisions and actions designed to protect them.</p> <p>6 - Accountability To demonstrate accountability and transparency in delivering safeguarding.</p>
Safeguarding	Protecting a person’s right to live in safety, free from abuse and neglect.
Partnership	People and organisations working together to prevent and stop both the risks and experience of abuse and neglect.
Safeguarding or Management Transfer Panels	Our Safeguarding Panel or Management Transfer Panels meet monthly to review new safeguarding cases and agree actions. They also review progress against existing safeguarding cases
Wellbeing	Is promoted having regard to their views, wishes, feels and beliefs in deciding any actions
Who does it apply to	Adults, young people and children. Under the Children Act 1989 a child is someone under 19 and this can include them living independently or being a member of the armed forces
Mental Capacity	<p>The Mental Capacity Act applies to everybody who has dealings with people who may lack capacity, and particularly if they have a professional relationship with the person. We will comply with the requirements set out in the Mental Capacity Act 2005 and will consider the Act’s five key principles during interactions with customers:</p> <p>A link to the legislation is included here: Mental Capacity Act 2005 (legislation.gov.uk).</p>
Abuse	<p>Abuse is the violation of an individual’s human and civil rights by any other person or persons.</p> <p>Abuse can occur in any relationship and may result in significant harm to the person subjected to it. Abuse may consist of a single act or repeated acts, and it can be intentional or unintentional.</p>
Examples of abuse	There are many types of abuse – the categories generally recognised in Adult Safeguarding and in the Safeguarding of Children & Young People are listed below. This list is not exhaustive. Our Safeguarding Procedure details how we manage our safeguarding cases:

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	<p><u>Psychological/Emotion Abuse</u> Threats of harm or abandonment • deprivation of contact • humiliation • blaming • controlling • intimidation • coercion • harassment • verbal abuse • cyber bullying • isolation • unreasonable and unjustified withdrawal of services or supportive networks.</p> <p><u>Physical Abuse</u> Assault • hitting • slapping • pushing • misuse of medication • restraint.</p> <p><u>Sexual Abuse</u> Rape • indecent exposure • sexual harassment • inappropriate looking or touching • sexual teasing or innuendo • sexual photography • subjection to pornography or witnessing sexual acts • sexual assault • sexual exploitation and/or acts to which the adult has not consented or was pressured into consenting.</p> <p><u>Financial or Material Abuse</u> Where someone else controls your spending, access to cash, assets or finances.</p> <p><u>Domestic Abuse</u> Controlling, coercive, threatening behaviour • violence or abuse between those aged 16 or over who are, or have been intimate partners or family members, regardless of gender or sexuality • so called ‘honour’ based violence • female genital mutilation (FGM) • forced marriage. Please see Domestic Abuse Policy and Domestic Abuse Support Directory.</p> <p><u>Discriminatory Abuse</u> Harassment • slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, religion.</p> <p><u>Institutional or Organisational Abuse</u> Neglect and poor care practice within an institution or specific care setting such as a hospital or care home • neglect and poor care practice in relation to care provided in one’s own home •neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.</p>
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	<p><u>Modern Slavery</u> Trafficking in persons’ and ‘human trafficking’ for the act of • recruiting • harbouring • transporting • providing • obtaining a person for compelled labour or commercial sex acts through use of • force • fraud • coercion.</p> <p><u>Exploitation or Grooming</u> The act of using an adult / child for • profit • labour • sexual gratification • or some other personal or financial advantage.</p> <p><u>Prevent Duty – radicalisation or extremism</u> The act or process of causing someone to adopt radical positions on political or social issues. • The aim of early identification and early intervention is to divert people away from being drawn into terrorist activity.</p> <p><u>Neglect and acts of omission</u> The act includes not being provided with enough food or with the right kind of food, or not being taken proper care of. Leaving you without help to wash or change dirty or wet clothes, not getting you to a doctor when you need one or not making sure you have the right medicines all count as neglect.</p> <p><u>Self Neglect</u> When a person is unable, or unwilling, to care for their own essential needs. It can cover a wide range of behaviour including neglecting personal hygiene, health or surroundings, refusal of necessary support.</p>
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5. The Policy

5.1 Managing a Safeguarding Concern

We can accept a safeguarding concern from anyone and will arrange a joint visit/meeting (e.g., over the phone or at Sovereign Network Homes offices) within 48 working hours.

5.1.1 We will

- Complete a Safeguarding Form, update Customer Hub and our Safeguarding SharePoint site.
- The new safeguarding case, including the form will be reviewed by our Safeguarding Panels.
- The Panels will ensure referrals are made to other agencies as required and agree internal actions.
- The Panels will review progress of cases as part of their meetings.

5.2 Partnership Working

Sovereign Network Homes will work closely with a number of partners and agencies responsible for Safeguarding those at risk. This will include but are not limited to:

- **MARAC- Multi-Agency Risk Assessment Conference** which aim to protect those affected by domestic violence.
- **Local Safeguarding Children Boards** - which aim to protect children at risk.
- **Multi- Agency Public Protection Arrangements-** The mechanism through which statutory agencies aim to manage risk posed by sexual and violent offenders, in a coordinated way in order to protect the public.
- **Safeguarding Adult Review (SAR)** Safeguarding Adult Boards must arrange a (SAR) when an adult dies as a result of, or has experienced serious abuse or neglect, whether known or suspected and there is concern that partner agencies could have worked more effectively together. The aim of SAR is to identify learning and improvement action.
- **Multi-agency Safeguarding Hub (MASH)** – single point of contact for all professionals to report safeguarding concerns.
- **Serious Case Review (SCR)** – A SCR takes place after a child dies or is seriously injured and abuse or neglect is thought to be involved. It looks at lessons that can help prevent similar incidence from happening in the future.
- **Local Joint Action Groups-** Which are used to work in partnership with the police and other agencies to share information on and manage crime.

5.3 Mental Capacity

The Mental Capacity Act applies to everybody who has dealings with people who may lack capacity, and particularly if they have a professional relationship with the person. We will comply with the requirements set out in the Mental Capacity Act 2005 and will consider the Act's five key principles during interactions with customers:

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We will take the opportunity to confirm capacity when appropriate (eg.at tenancy sign up, review and termination; during arrears discussions, anti-social behaviour incidents and complaints).

We will engage our partners to carry out an assessment when a person's capacity is in doubt, either because their behaviour causes concern or about lack of capacity.

5.4 Record Keeping

We will treat all information relevant to each customer in the strictest confidence and whilst our Housing Management System will flag there is a safeguarding, no further details is visible.

The detail of the case is managed on a confidential Safeguarding SharePoint site with only Neighbourhood, Mental Health Liaison and the safeguarding champions having access .

The Safeguarding SharePoint should be kept updated with progress on each case and reviewed with relevant staff members, team leads or by the Safeguarding and/or Management Transfer Panel.

6. Compliance

6.1 Quarterly reports will be submitted to the Director of Housing and include information on the number of cases.

6.2 Sovereign Network Homes will record all cases of safeguarding concerns by using our Safeguarding procedure. Complex cases will be reviewed and monitored at monthly Safeguarding meetings. The meetings are used to close cases where Sovereign Network Homes have sign posted cases to external agencies or cases where it is felt that Sovereign Network Homes are not required to carry out any further actions.

6.3 In addition, regular case reviews are completed by line managers as part of our individual 6 weekly conversations with their direct reports.

7. Responsibilities

Role	Responsibility
Local Authority	The Local Authority has a duty to receive the alert and decide whether a safeguarding enquiry is necessary or not. Housing providers have a duty to cooperate with Local Authorities implementing their statutory duties around safeguarding. This

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Role	Responsibility
	may include: carrying out 'enquiries' into incidents; information sharing; and participating in statutory local Safeguarding Boards.
Executive Director of Operations (London and Hertford)	Approving the Policy
Director of Housing Director of Leasehold Service Charges and Rent Accounting. Director of Customer Contact Centre Heads of: Leasehold Compliance Neighbourhood Intermediate Rents and Agency Services Older Persons Income Services Customer Experience Managers	For the implementation and compliance with this policy and our safeguarding procedure. Cascading the Policy
Team Leads	Communicating and implementing the Policy Team Leads are responsible for the implementation and compliance of this policy. They are to monitor all cases and discuss cases prior to closure
Scheme Managers, the Mental Health Liaison Team and Property and Neighbourhood Managers	They are responsible for completing referrals and referring them to their local panels. They are responsible for investigating and monitoring cases, reviewing actions and reporting critical incidents or immediate concerns to the Line Manager and making referrals to appropriate external services.
Safeguarding Champions	Providing advice and support to staff with safeguarding concerns and members of our safeguarding panels Updating the Safeguarding Sharepoint Site.
All Staff and those working in contract with us	Responsible for raising suspicion of or allegations of abuse with either our safeguarding champions or their managers and for updating the records on Customer Hub

8. Equality and Diversity

8.1 We will apply this policy consistently and fairly and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equality Act 2010.

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9. Training

9.1 All staff at Sovereign Network Homes will receive basic, online safeguarding training because Sovereign Network Homes recognises that Safeguarding is everyone’s responsibility.

9.2 Frontline staff (e.g. Neighbourhood Officers/Property Managers/Scheme Managers) will receive specialist Safeguarding training.

9.3 Sovereign Network Homes colleagues will provide “tool-box talks” for contractors which cover safeguarding, including domestic abuse. The toolbox talks will ensure the contractors feel confident to raise any concerns they may have visiting Sovereign Network Homes properties.

10. Related documents

10.1 This policy should be read in conjunction with the following Sovereign Network Homes policies

- Data Protection Policy
- ASB Policy and Procedure
- Equality and Diversity Policy
- Grievance and Whistleblowing Policy
- Code of Conduct for Employees
- Disciplinary and Dismissal Policy
- Recruitment and Selection Policy
- Health and Safety Policy
- Lone Working Policy
- Allocations and Lettings Policy
- Mental Health First Aider Procedure
- Mental Health Liaison Policy
- Domestic Abuse Policy

This is not an exhaustive list, other relevant policies and procedures will also apply, depending on the relevant occupancy or tenure of individuals concerned

11. Legislation and regulation

11.1 Department of Health’s Care and Support Statutory Guidance 2017

- Care Act 2014
- Mental Capacity Act 2005 • Mental Health Act 2007
- Children Act 1989 & 2004

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- Sexual Offences Act 2003
- Human Rights Act (1998)
- Protection of Freedoms Act 2012
- Data Protection Act (2018)
- Modern Slavery Act 2015
- Equality Act 2010
- Safeguarding Vulnerable Adults Act 2006
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Housing Act 1985 & 1996
- Deprivation of Liberties Safeguards 2007
- Disability Discrimination Act 2003
- Safeguarding Adults – National Framework of Standards 2005
- Every Child Matters: Change for Children 2004
- Children and Families Act 2014
- Social Regulator of Housing Regulatory Framework

12. Complaints

12.1 Any customer or other stakeholder who is dissatisfied with how we have managed their safeguarding is able to submit a complaint using our Complaints process. Once our Complaints process has been exhausted, and if they remain dissatisfied, then they can contact the Housing Ombudsman Service, who can consider if we have acted appropriately.

13. Review

13.1 This Policy will be reviewed on every 2 years from July 2021, or sooner if there is a specific legislative, regulatory or service requirement or change in guidance, law or practice.

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