

## Safeguarding Policy

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Approved by	Directors Group Customer Services Committee of the Board
Approved date	October 2023
Date of next review	October 2024
Lines of Defence/how is the document audited?	1. KPI Reporting 2. Safeguarding Monitoring Meetings 3. Lessons Learned Review Meetings 4. This policy is reviewed annually

## **1. Scope and Aims**

- 1.1. Hexagon Housing Association (Hexagon) is committed to safeguarding and promoting the wellbeing of our customers who are experiencing, or at risk of, abuse and neglect.
- 1.2. The aim of this policy is to ensure that Hexagon promotes and enables the safeguarding of:
  - Children (defined as people under the age of eighteen); regardless of any support need/requirement and
  - Adults who have needs for care and support, and as a result of those care and support needs are unable to protect themselves against abuse, neglect or the risk of abuse, as defined by the Care Act 2014.
- 1.3. Hexagon does not provide care and support services directly therefore is not regulated under The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014. However, we will actively work to safeguard children, young people and vulnerable adults from harm and will respond appropriately if it occurs.
- 1.4. The policy relates to all accommodation and neighbourhoods visited by any member of staff, board member, volunteer or contractor. All staff, volunteers and external partners therefore have a duty to fulfil the professional responsibilities in keeping people safe and preventing abuse and neglect, as set out under the Care Act 2014.
- 1.5. Hexagon will work in partnership with other agencies to effectively fulfil our safeguarding responsibilities.
- 1.6. This Policy is designed to ensure appropriate interventions are taken and, where necessary, referrals made to local authorities and to Local Safeguarding Boards.

## **2. Equality and Diversity**

- 2.1. An equality and diversity impact assessment has been carried out and is attached as an appendix to this Policy.

## **3. Consultation**

- 3.1. The Customer Services Committee were consulted on this policy and their feedback has been incorporated into this policy.

## **4. Policy Statement**

- 4.1. As a “relevant partner” to the Local Authority under the Care Act 2014, Hexagon will co-operate with the Local Authorities Safeguarding arrangements. Hexagon staff have a duty to inform Social Services if there are any safeguarding concerns regarding any of our residents. Social Services and the police are responsible for leading all investigations of abuse.
- 4.2. A Local Safeguarding Children Board (LSCB) and a Local Adult Safeguarding Board (LASB) operates in each local authority area and these take the lead role in coordinating and ensuring the effectiveness of services to safeguard people in that area. As per our duties under the Care Act 2014, Hexagon is committed to working in partnership with all the local authorities and relevant agencies in our areas of operation, within the frameworks agreed by the LSCBs and LSABs, in order to protect children and adults.

## **5. Safeguarding children and young people.**

- 5.1. Safeguarding and promoting the welfare of children is defined by the Working Together to Safeguard Children 2018 Guidance as:
  - Protecting children from maltreatment;
  - Preventing impairment of children's mental and physical health or development;
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - Taking action to enable all children to have the best outcomes.
  - A ‘child’ is anyone who is aged up to 18 years.
- 5.2. All children and young people have the right to be safe from harm and need safe environments to grow with confidence. Everyone is responsible for helping to keep children safe. Safeguarding children and young people means protecting them from any potential source of harm.
- 5.3. Under the *Working Together to Safeguard Children 2018* guidance, Hexagon staff have a duty, where they have concerns about a child's welfare, to make a referral to local authority children's social care and should do so immediately if there is a concern that the child is suffering significant harm or is likely to do so. Staff who make a referral should always follow up their concerns if they are not satisfied with the response.
- 5.4. There are links between domestic abuse, substance misuse, mental health needs and poor outcomes for families and children. Families may demonstrate levels of resilience with appropriate support, and therefore it is

not inevitable that families who experience problems are at risk and in need of protection. We also need to consider circumstances where families may not reach the criteria for safeguarding, but where interventions such as offering financial support or signposting to appropriate services may act to prevent deterioration and the need for statutory intervention. Welfare concerns of this nature will be considered and personalised service including referrals to external agencies for support will be made when this is appropriate.

- 5.5. The organisational responsibilities set out in Section 11 of the Children Act 2004 do not apply to Hexagon, however Hexagon strives to fulfil these duties and the guidance set out in *Working Together to Safeguard Children 2018* where they are relevant, including:

- 5.5.1. A culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services.
- 5.5.2. Clear whistleblowing procedures that are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed.
- 5.5.3. Clear escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies.
- 5.5.4. Arrangements which set out clearly the processes for sharing information, with other practitioners and with safeguarding partners.
- 5.5.5. A designated Safeguarding Lead.
- 5.5.6. Safe recruitment practices and ongoing safe working practices.
- 5.5.7. Appropriate supervision and support for staff, including undertaking safeguarding training.
- 5.5.8. Creating a culture of safety, equality and protection within the services we provide.
- 5.5.9. Ensuring staff are competent to carry out their responsibilities for safeguarding and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
- 5.5.10. Providing relevant staff with a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures to be followed if anyone has any concerns about a child's safety or welfare.

## **6. Safeguarding Adults.**

- 6.1. Safeguarding Adults means protecting an adult'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 adult's 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.
- 6.2. As per the Care and Support Statutory Guidance, Hexagon's safeguarding duties apply equally to those adults with care and support needs regardless of whether those needs are being met, regardless of whether the adult lacks mental capacity or not, and regardless of setting.
- 6.3. Organisations should always promote the adult's wellbeing in their safeguarding arrangements. People have complex lives and being safe is only one of the things they want for themselves. Professionals should use professional curiosity in working with the adult to establish what being safe means to them and how that can be best achieved. Professionals and other staff should not be advocating "safety" measures that do not take account of individual well-being. (*Care and Support Statutory Guidance* Issued under the Care Act 2014).
- 6.4. In the safeguarding of adults, Hexagon is guided by the six key principles set out in The Care Act 2014. Hexagon aims to demonstrate and promote these six principles in our work:
  - 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 local neighbourhoods, where people have a part to play in preventing, detecting and reporting neglect and abuse.
  - Accountability - Accountability and transparency in delivering safeguarding.

## **7. Keys points of policy**

- 7.1. Hexagon takes the protection and safeguarding of our customers and their family members very seriously. Abuse is a violation of an individual's human and civil rights. We accept our role as part of the inter-agency framework for

safeguarding, Hexagon has a clear and consistent approach to safeguarding, with policies, with policies and procedures to underpin and inform this.

- 7.2. In line with the recruitment policy, Hexagon will ensure that the necessary DBS checks are undertaken when recruiting staff and that these are reviewed at the necessary intervals, annually for front line customer facing roles and 3 years for all other colleagues.
- 7.3. We ensure that our staff and customers understand what abuse is, what to do if they have a concern and to whom they can report concerns.
- 7.4. Hexagon will adopt the Child Protection Procedures linked to the London **Children's Safeguarding Board procedures**, since these may vary from region to region. We will also adopt the same principle for Safeguarding Adults from Abuse.
- 7.5. Some of the local authorities where we work have made minor adaptations to these policies and procedures to reflect their local arrangements and the most up to date versions of these may be found on the websites of the relevant Local Safeguarding Children's Board or Local Safeguarding Adults Board. Hexagon will follow the applicable local protocol for both adults and children.
- 7.6. Hexagon will follow the recommendations from the Protecting Children from radicalisation as well as vulnerable adults as defined in the **Prevent Duty Guidance** as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'. It is recognised that children and vulnerable adults may be more likely to be drawn into radicalisation. In the event that Hexagon has been informed that abuse of a child or a vulnerable adult is taking place or that they are at risk of radicalisation, this will be reported to the Safeguarding Lead (and also the Director of Operations), who will refer to the local protocol in order to report the case to the local authority without delay, and/or the police where appropriate. Any discussions and actions carried out should be recorded accurately and promptly and stored securely.
- 7.7. Hexagon will log all safeguarding cases to ensure effective recording, progress monitoring and reporting.
- 7.8. A safeguarding concern raised with the Local Authority may progress to a safeguarding enquiry. The level of enquiry will be proportionate to the risk taking into account both vital interest of the adult and public interest. The enquiry may start and finish with a conversation with the adult. If the enquiry progresses further, it can either be a multi-agency enquiry or a single agency

enquiry. The Local Authority have a statutory duty to conduct enquiries or make sure others do. With this in mind, Hexagon may be asked to contribute to a multi-agency enquiry or alternatively conduct an internal enquiry.

- 7.9. If a customer suspects that harm is taking place they should report it to their local Social Services, the police or a member of staff.
- 7.10. **Safeguarding children categories of abuse and neglect include:** physical abuse. Sexual abuse. Emotional abuse.
- 7.11. **Safeguarding adults categories of abuse include;** sexual, modern slavery, psychological, discrimination, domestic abuse, self neglect, neglect or acts of omission, financial abuse or exploitation, physical or organisational.
- 7.12. A person can become at risk at any time and all staff and contractors have a responsibility to be aware of actual and potential risk to adults and children and to ensure that the correct process is followed.
- 7.13. The purpose of identifying potential risk is to ensure that the service provided is, where possible, tailored to meet the needs of the individual. We recognise that individuals need different levels of support from a variety of agencies. We provide support with housing and tenancy management issues and we can assist other agencies in providing a “wrap-around” service for vulnerable customers and their families.
- 7.14. There are circumstances where the person alleged to have caused harm may also be an adult at risk of abuse or neglect, and in these circumstances, they must receive protection and support using a multi-agency approach.

## 8. Early help

- 8.1. Children and families will always benefit from having emerging problems responded to at the earliest opportunity. As a provider of social housing, Hexagon and its staff have a key role in identifying emerging problems and potential unmet needs for individual children and families and sharing information with other professionals to assist with early identification and assessment.
- 8.2. All staff should be alert to the potential need for early help for a child who:
  - Is disabled and has specific additional needs
  - Has special educational needs
  - Is a young carer
  - Is showing signs of engaging in antisocial or criminal behaviour

- Is in family circumstances presenting challenges for the child such as substance misuse, adult mental health problems or domestic violence and abuse
  - Is showing early signs of abuse or neglect
  - Is showing signs of radicalisation
- 8.3. Adults who may be at risk of abuse and neglect, may be increasingly vulnerable as a result of their care and support needs.
- 8.4. Staff have a responsibility to recognise the signs and symptoms of abuse or neglect and share the information with their manager and/or the Safeguarding Lead (Head of Housing Services) and/or Director of Operations.
- 8.5. The Safeguarding Lead will work in partnership with other agencies to support the adult or child.

## **9. Confidentiality and information sharing**

- 9.1. Hexagon understands the importance of ensuring that personal data is always treated fairly, lawfully and appropriately and that the rights of individuals are upheld. However, we are clear that where an individual's safety is at risk, we are required to report our concerns to the responsible authorities and share information with them.
- 9.2. Information that may be shared includes names, contact details, a person's physical or mental health, or relations with others. The sharing of this information will be restricted to those who have a demonstrable need to know and robust protections, such as encryption, will be used to share this information.

## **10. Sexual exploitation**

- 10.1. Whilst much abuse of children and young people takes place within the home and family, sexual exploitation has emerged as a form of abuse which can be more visible to a wider range of people.
- 10.2. Sexual exploitation is where a young person receives 'something', (e.g. food, accommodation, drugs, gifts, money) as a result of performing, and/or others performing on them, sexual activities.
- 10.3. Child sexual exploitation can occur through use of technology, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain.



- 10.4. In all cases the person exploiting the young person has power over them by virtue of age, gender, intellect, physical strength and/or economic or other resources.
- 10.5. Violence, coercion and intimidation are common, with involvement in exploitative relationship being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.
- 10.6. Whilst definitions and guidance in relation to sexual exploitation focus on children under 18 as victims, it can also happen to young adults.

## **11. Keeping safe online**

- 11.1. Many people, particularly children, young people and young adults, use technologies (such as mobile phones, email, social networking sites, Instant Messenger) as a positive and creative part of their activities. Children and young people often use these methods to make plans with friends or organise events so if you are working with young people it might be necessary to communicate with them in this way.
- 11.2. Staff will not give out their personal contact details, including home address, personal e-mail address, mobile numbers, personal accounts in social networking sites or communicate with children/young people/ young adults that staff have met in the course of their work.

## **12. Use of photographs and videos**

- 12.1. Before an image of a child is used, written consent must be obtained from parents, guardians or carers. Verbal consent should be obtained from the child. Before an image of an adult is used, verbal and written consent must be obtained from the adult. If the adult lacks capacity to consent to the use of an image, written consent must be obtained from the adults representative who may be a family member, social worker, friend or advocate.
- 12.2. Any publications or communications we produce that contain photographs or videos of children or adults at risk, will not contain personal information about them that could identify their whereabouts. Children and adults at risk will not be portrayed in a demeaning or tasteless way.
- 12.3. Only staff or approved professional photographers and film makers will be used to take photographs and video footage of events and other community activities. Videos and photographs will be stored securely in accordance with Hexagon's Data Protection policy.

## **13. Training**

- 13.1. As part of their induction training, all Hexagon relevant staff, contractors and volunteers are required to read and understand this policy to ensure that they are able to identify children, young people and adults at risk who may be at risk and act appropriately.
- 13.2. Hexagon will provide a basic level of training to all new staff during induction. Refresher training will be provided periodically to existing staff no more than 3 years apart.
- 13.3. Hexagon will provide enhanced training to the Service Lead and Team Leaders in Customer Facing roles.

## **14. Lessons Learned**

- 14.1. Hexagon recognises that in order to reduce or mitigate future risk and recurrence of harm, that a review should be undertaken of all safeguarding cases throughout the year. These reviews will include:
  - Anonymised synopsis of the case
  - Review all contact and involvement with the customer(s) leading up to the incident from colleagues across the organisation (and contractors)
  - What have we learned and what could we do better
  - Have we identified a pattern or other customers that may also be at risk
  - What do we need to change to prevent this happening again
  - How do we embed that learning and identified changes across the wider organisations
- 14.2. Hexagon will consider in these reviews, how reducing the areas of safeguarding risk can reduce the negative impact on both tenants and the organisation. These reviews will highlight the importance of seamless safeguarding governance between front line practitioners to senior leaders; and including customer, and how this can improve safeguarding delivery in their workplace
- 14.3. Ensure that Hexagons culture reflects and encourages robust systems that can further enable effective safeguarding implementation.
- 14.4. Ensure that all key functions across the organisation understand how their role can impact upon safeguarding systems, and 'the golden thread of safeguarding' can be supported via effective communication throughout the organisation

## **15. Monitoring and reporting**

- 15.1. The Reviews and monitoring of all Safeguarding cases will be reported to the Directors Group by the Safeguarding Lead via the Director of Operations on a six monthly basis. Accountability for safeguarding from Directors will in turn be reported to the Board via the Chair of the Audit and Risk Committee.
- 15.2. Each case of concern should be reported to the appropriate manager who will provide guidance and supervision to make sure it is handled properly. The Safeguarding Lead should be advised of all safeguarding matters, and will keep a record of all such cases.
- 15.3. The Safeguarding Lead is the Head of Housing Services.
- 15.4. The Director of Operations will provide a Safeguarding annual review to the Audit and Risk Committee.
- 15.5. Hexagon is committed to continually developing good practice and monitoring standards, in conjunction with our partner agencies. The service is subject to internal audit and recommendations from internal audit will be adopted.

## **16. Legal Framework**

- Social Housing (Regulations) Act 2023
- Care Act 2014 and the Care and Support Statutory Guidance (issued under the Care Act 2014)
- Children Act 2004 and “Working Together to Safeguard Children” (Department for Education Guidance 2018)
- Mental Capacity Act 2005 - Deprivation of Liberty Safeguards \*Currently out for consultation
- Mental Health Act 2007
- Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedom Act 2012
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, March 2015 and amended 2018)
- Data Protection Act 2018
- Public Interest Disclosure Act 1998
- The Modern Slavery Act 2015.
- Prevent Duty Guidance: England and Wales (2023).

## **17. Related Hexagon policies, strategies and procedures**

- Anti-Social Behaviour

- Complaints
- Data Protection
- Domestic Abuse (and Violence Against Women and Girls)
- Employee Code of Conduct
- Equality and Diversity
- Hate Crime & Harassment
- Hoarding
- Lone Working
- Professional Boundaries

## Appendix 1: Equality Impact Assessment

### Part one: Initial Screening

Name of policy, service or function	Safeguarding Policy
Current or Proposed	Proposed
Persons completing Initial screening (It is best to include multiple colleagues with specialist knowledge)	Steve Hickman-Brown Niamh Mannion Carly Foley

### Screening

Protected Characteristic	Is impact positive, negative, or none			Reason:
	Positive	Negative	No Impact	
Age	X			Older and younger tenants or household members are particularly vulnerable. This Policy aims to protect them and link into specialist services
Disability	X			Tenants or household members with a disability are particularly vulnerable. This Policy aims to protect them and link into specialist services
Sex	X			Tenants and household members of any sex may be subject to abuse. This Policy aims to protect them and link into specialist services.
Gender reassignment	x			Transgender and non-binary tenants or household members may be subject to abuse. This Policy aims to protect them and link into specialist services.
Race	X			Tenants or household members may experience abuse because of their race. This Policy aims to protect them and link into specialist services.
Religion or belief	x			Tenants or household members may experience abuse because of their religion or belief. This Policy aims to protect them and link into specialist services.

<b>Sexual orientation</b>	<b>x</b>			<b>Tenants or household members may experience abuse because of their sexual orientation. This Policy aims to protect them and link into specialist services.</b>
<b>Socio-economic status</b>	<b>x</b>			<b>Tenants or household members with fewer socio-economic resources may be more vulnerable to abuse, with fewer options to escape abuse. This Policy aims to protect them and link into specialist services.</b>
<b>Literacy</b>			<b>X</b>	<b>The details of this policy can be explained verbally to tenants on request. The implementation of this policy will take due regard to tenant's preferred contact methods.</b>

**What are the arrangements for monitoring the policy and its impact on customers?**

**Housing services facilitate a fortnightly Safeguarding Meeting to review actions and progress on individual cases including Domestic Abuse cases. These are also monitored in 121 with the relevant staff. A Lessons Learned Review meeting has been initiated and is to be carried out after every major incident. This policy has been reviewed following one such recent meeting.**

**As no negative impact has been identified for any group, we will not complete section two of the Equality Impact Assessment.**