

## STATEMENT OF INTENT

The Saffron Group (referred to hereafter as 'Saffron') is committed to working with statutory agencies to ensure the safety and wellbeing of all residents, employees, contractors, and board members. We recognise the important role colleagues can play in identifying and raising safeguarding concerns. Safeguarding is an important part of this commitment with accountability for safeguarding held by the Board and the responsibility that Saffron meets obligations to tenants is delegated to the Chief Tenant Officer.

Saffron Housing Trust is a leading housing provider in Norfolk and Suffolk creating and supporting thriving communities by:

- Inspiring Trust as we focus on improving homes & services.
- Inspiring community as we focus on creating capacity to improve Safe, quality, affordable homes in Norfolk and Suffolk.
- Inspiring Organisation as we focus on creating the culture to improve. A place where people want to work and can flourish.

## 1. Definitions

Everyone has the right to live safely, free from abuse and neglect. Abuse and neglect can occur anywhere: in a home or a public place, or for example in a hospital, day centre, or in a college or care home. The person causing the harm may be a stranger but, often they can be known by an individual and they feel safe with them. They're usually in a position of trust and power, such as a health or care professional, relative or neighbour

For the purpose of this policy, the definition of a vulnerable adult is: someone aged 18 or above who may need community care services for reasons like mental health issues, disability, age or illness. They are considered more 'vulnerable' because they may not be able to protect themselves from harm or exploitation. The definition of a child is a child or young person under the age of 18.

### **Safeguarding duties apply to any adult regardless of mental capacity who:**

- has needs for Care and Support (whether these have been assessed or are being met by the Local Authority or not),
- is experiencing, or at risk of experiencing abuse or neglect; and
- as a result of Care and Support needs is unable to protect themselves against the abuse or neglect

### **The definition of safeguarding children, as per the Working Together to Safeguard Children (2018) Legislation is:**

- 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

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## 2. Policy Statement

All those who come into contact with vulnerable adults, children and families in their work (including those who do not have a specific vulnerable adults or child protection role) have a duty to safeguard the welfare of vulnerable adults and children (the Safeguarding Vulnerable Groups Act 2006, The Children's Act 2004).

It is the responsibility of statutory agencies to investigate vulnerable adult and child abuse. It is not our role to undertake investigation itself or to decide if abuse or neglect is occurring, although all colleagues have a responsibility to ensure that concerns or allegations are acted on and responded to as set out in our safeguarding procedures.

This policy is to ensure that our colleagues effectively identify and raise concerns by following our Safeguarding Procedures.

We will:

- Demonstrate leadership, accountability, and commitment in working with statutory partners to safeguard our residents, and those we engage with in the communities we work.
- Ensure colleagues are well-trained, have the knowledge and confidence to identify and make safeguarding referrals.
- Ask for consent to make referrals where it is appropriate. Where it is not, we will communicate this to the Local Authority or police to ensure that they are fully aware of risk attached to the referral, and the reason why consent has not been obtained.
- Work proactively within our services to identify abuse and report this, for example our income teams (financial abuse) and domestic abuse through our visiting services.
- Develop robust local partnerships and multi-agency working to develop a proactive approach to safeguarding and learn from best practice.
- Participate in multi-agency risk assessment conferences and any other multi-agency meeting that require involvement to safeguarding our residents.
- Work with Safeguarding & Community Safety Boards in the regions we work – using these links to improve our management of safeguarding and in partnership on serious case and domestic homicide reviews as well as monitor the impact of Right Care Right Person and sharing experiences.

## 3. Principles and Duty

Included in The Care Act 2014 are six Principles of Safeguarding. These principles are intended to form a core set of standards for anyone who has a responsibility for safeguarding adults at risk. The principles aim to highlight every individual's wants and

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needs as a human being and should underpin all work with adults at risk. The six principles of Safeguarding as defined by The Care Act 2014 are:

- Accountability – accountability and transparency in safeguarding practice
- Empowerment – people being supported and encouraged to make their own decisions and give informed consent.
- Partnership – local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- Prevention – it is better to act before harm occurs.
- Proportionality- the least intrusive response appropriate to the risk presented.
- Protection – support and representation for those in greatest need

## 4. Forms of Abuse

There are many forms of abuse and neglect including, but not limited to:

- Physical Abuse
- Sexual Abuse
- Psychological Abuse
- Financial Abuse
- Neglect and Acts of omission
- Discriminatory Abuse
- Domestic Abuse
- Organisational Abuse
- Self-Neglect
- Modern Slavery
- Coercive Control
- Cuckooing
- County Lines
- Emotional Abuse
- Bullying or cyberbullying
- Female genital mutilation
- Child trafficking
- Grooming

Full definitions of the forms of abuse can be found within our safeguarding procedures.

## 5. Abuse involving colleagues:

- a. There may be exceptional instances when a colleague is involved in the abuse of an adult at risk or a child. All colleagues must take responsibility to report any concerns immediately via our Whistleblowing Policy. Normal disciplinary procedures would apply to investigate any allegation.
- b. The HR team should be notified of any abuse linked to colleagues and will offer relevant advice and guidance. The Chief People and Change Officer must also be informed if a financial abuse allegation has been made towards a colleague.

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- c. In addition, if any individual has a concern regarding another colleague or their wellbeing they should report this immediately to their manager, or another available manager. The manager should contact the HR team without delay.
- d. If there is a reason why the manager cannot be the first contact for the colleague, they should go to their manager's manager, the HR team, or a member of the Executive team.
- e. A critical factor in all cases is the accurate keeping of records, these could be required by the Local Authority Safeguarding Team, Police and/or the HR team. Any notes relating to formal colleague action will be held centrally by the HR team.

## 6. Consent to Make a Referral

- a. Adults – Consent is not always need to report a safeguarding concern. Sharing information for the purpose of safeguarding adults is different to seeking consent when a service will be provided. Sometimes a safeguarding concern must be raised without consent, for example if someone else may be at risk, a crime may have been committed, to prevent harm, or the person does not have capacity to make that decision.  
The Data Protection Act 2018 must be applied which includes 'Safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent. Where possible, and if it will not cause further harm, keep the adult informed of your actions.  
Decisions about sharing or not sharing information must always be recorded along with the reasons for the decisions.
- b. Children - When making a safeguarding referral it would be appropriate to inform a parent of a referral being made. However, there are some occasions when consent is not required, including: if it places the child/young person at significant harm, or could delay support.  
In these situations, it is important to record the reasons for not seeking consent on the referral form. As above, you must apply the Data Protection Act 2018 which includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent.  
The decisions about sharing or not sharing information and the reasons for your decisions should always be recorded.

## 7. Contractors

- a. Within our procurement process we will ensure that contractors are asked for their safeguarding procedures, so we are satisfied they have arrangements for their workers who may visit our properties/residents. Where we have 3rd party partnership arrangements, we will ask the organisation we have engaged/or are working with for their safeguarding procedures, to ensure they have a robust approach

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## 8. Disclosure and Barring Service (DBS)

- a. Our HR team will, in conjunction with managers, ensure that all relevant colleagues have the required checks by the Disclosure and Barring Service (DBS) and/or as outlined in our DBS Policy.
- b. Within our procurement process we require all contractors that visit our properties to be DBS checked at the appropriate level.

## 9. Training

- a. It is mandatory that all colleagues complete online safeguarding training via our Learning Management System (LMS). For tenant-facing roles, we will provide additional Adults and Children safeguarding training delivered by a qualified trainer.
- b. Contractors for Saffron must also confirm that their workers have received safeguarding training.
- c. Colleagues who work more closely with residents, and Safeguarding leads will receive additional safeguarding training to ensure they have advanced knowledge and skills to deliver their role with our vulnerable customers.
- d. We will provide any required refresher training as relevant at the appropriate level.

## 10. Key Legislation

- a. There is a range of relevant legislation that addresses different aspects of safeguarding and work with adults at risk and children. Much of the legislation gives statutory authorities powers, but as a key partner we work with them to assist and immediately raise concerns where we have them, ensuring individuals and families are made safe and assisted when needed:
  - Care Act 2014
  - Data Protection Act 2018
  - Crime and Disorder Act 1998
  - Domestic Violence, Crime and Victims Act 2004
  - Children Act 1989
  - The Children Act 2004
  - Education Act 2011
  - Children (Leaving Care) Act 2000
  - Criminal Justice Act 2003
  - Mental Capacity Act 2005
  - Safeguarding Vulnerable Groups Act 2006
  - Freedom of Information Act 2000 o Children and Families Act 2014

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- Digital Economy Act 2017
- Adoption and Children Act 2002
- Female Genital Mutilation Act 2003
- Serious Crime Act 2015
- Children and Young Persons Act 2008
- Borders, Citizen, and Immigration Act 2009
- Working together to Safeguarding Children 2023
- Human Rights Act 1998
- Care Standards Act 2000
- Immigration and Asylum Act 1999
- Protection of Freedom 2012
- Sexual Offences Act 2003
- Public Interest and Disclosure Act 1998

## 11. Procedure and Referrals

- a. The Safeguarding procedures (Adults and Children) should be followed in all cases of abuse or suspected abuse. All other associated Policies and Procedures should be referred to in relation to this Policy including, but not limited to ASB, Domestic Abuse, Data Protection Policy, Data retention Storage and Disposal, Data of information Strategy and Whistleblowing-Speaking up.

## 12. Record Keeping and Monitoring

- a. The Safeguarding Leads (as identified in the safeguarding procedures) will ensure that confidential and secure records are kept of all alleged cases of abuse or neglect.
- b. This record will be reviewed regularly, examining how cases were managed, and actions followed up. These actions may include changes that need to be made to policy, training, supervision, case work conduct and responses to allegations.
- c. Cases studies will be looked at through our Service Improvement Group process, and we will review lessons learnt to improve services to our tenants.
- d. The data will be kept until there is no legal requirement to retain the record beyond the closure of the case.

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