



Safeguarding Policy

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1. Purpose

- 1.1. The purpose of this policy is to set out how Hull Churches Housing Association Limited (the Association/HCHA) will prevent, identify, report and respond to safeguarding concerns. It provides a clear framework for staff, Board members, contractors and volunteers so that concerns are handled consistently, recorded appropriately and referred to the right agencies without unnecessary delay.
- 1.2. This policy aims to ensure that we comply with relevant legislation, meet regulatory expectations, promote a safeguarding culture, support residents to make informed choices where possible, and protect people who may be unable to protect themselves from harm.

2. Scope

- 2.1. This policy applies to all areas of HCHA's work, including housing management, repairs, income collection, tenancy sustainment, anti-social behaviour, complaints, resident involvement, estate services and any direct contact with residents or household members.
- 2.2. It applies to employees, Board members, involved residents acting on our behalf, agency workers, volunteers, consultants, contractors and subcontractors. Contractors are expected to have suitable safeguarding arrangements and to report any concerns they observe while delivering services on our behalf.

3. Policy Statement

- 3.1. HCHA is committed to safeguarding adults at risk, children and young people who live in, visit, or come into contact with our homes and services. We believe that everyone has the right to live safely, free from abuse, neglect, exploitation and harm.
- 3.2. As a small social landlord, we recognise that our staff, Board members, contractors and volunteers may be well placed to notice signs of harm or changing circumstances. Safeguarding is therefore everyone's responsibility. We will act promptly, proportionately and professionally when concerns are identified, working in partnership with statutory agencies and other organisations to prevent and respond to abuse or neglect.

4. Legal and Regulatory Framework

- 4.1. This policy is informed by relevant legislation and statutory guidance, including the Care Act 2014, Children Act 1989 and Children Act 2004, Mental Capacity Act 2005, Equality Act 2010, Human Rights Act 1998, Domestic Abuse Act 2021, Modern Slavery Act 2015, Counter-Terrorism and Security Act 2015, Data Protection Act 2018 and UK GDPR, and Working Together to Safeguard Children.

4.2. Registered providers are also expected to co-operate with local authorities and relevant partnership arrangements where they are able to assist with local safeguarding objectives. This policy should be read alongside related policies and procedures, including domestic abuse, anti-social behaviour, tenancy management, data protection, complaints, equality, diversity and inclusion, health and safety, lone working, whistleblowing, recruitment, code of conduct and contractor management.

5. Definitions

- Safeguarding adults means protecting an adult's right to live in safety, free from abuse and neglect. An adult safeguarding concern may arise where a person aged 18 or over has needs for care and support, is experiencing or is at risk of abuse or neglect, and because of those needs is unable to protect themselves from that abuse or neglect.
- Safeguarding children means protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children grow up with safe and effective care, and taking action to enable all children to have the best outcomes. A child is anyone under the age of 18.
- Adult at risk means an adult who may need care and support because of age, illness, disability, mental health need, substance misuse or other circumstances, and who may be unable to protect themselves from harm. A person's circumstances may change over time, and vulnerability may be temporary, situational or fluctuating.

6. Types and indicators of abuse or neglect

6.1. Abuse or neglect can take many forms. It may be a single incident or repeated pattern of behaviour, deliberate or unintentional, and may be carried out by a family member, friend, neighbour, professional, carer, landlord, contractor, stranger or organised criminal group.

Examples include but are not limited to:

- Physical abuse, including assault, rough handling or inappropriate restraint.
- Domestic abuse, including controlling or coercive behaviour, economic abuse, honour-based abuse and stalking.
- Sexual abuse or exploitation.
- Psychological or emotional abuse, including intimidation, threats, humiliation or isolation.
- Financial or material abuse, including theft, fraud, coercion or misuse of money, property or benefits.
- Neglect or acts of omission, including failure to provide essential care, food, medication, heating or support.
- Self-neglect, including extreme hoarding, poor personal care, unsafe living conditions or refusal of essential support where significant risk is present.
- Modern slavery, trafficking, forced labour or criminal exploitation.
- Discriminatory abuse linked to protected characteristics or hate crime.
- Organisational abuse, including poor professional practice or unsafe systems.
- Cuckooing, county lines activity or exploitation of a resident's home by others.
- Online abuse, scams, harassment or exploitation using digital technology.

- 6.2. Possible indicators include unexplained injuries, sudden changes in behaviour, fearfulness around particular people, withdrawal, rent arrears linked to financial pressure, poor property condition, repeated missed appointments, signs of neglect, unusual visitors, concerns raised by neighbours, or children appearing hungry, distressed, unsupervised or unsafe. Indicators should be considered in context and should not be ignored simply because an explanation is offered.

7. Safeguarding principles

- 7.1. HCHA's approach adult safeguarding is guided by the six principles of empowerment, prevention, proportionality, protection, partnership and accountability. We will seek to involve the person wherever safe and appropriate, understand what outcome they want, and balance their wishes with our duty to act where others may be at risk or where a person cannot protect themselves.
- 7.2. For children and young people, the welfare of the child is paramount. Concerns about a child must always be taken seriously and referred in line with local safeguarding children procedures. Staff must not investigate concerns themselves or delay action while trying to gather proof.

8. Roles and responsibilities

8.1. There are the following defined roles and responsibilities

- The Board is responsible for ensuring that suitable safeguarding governance arrangements are in place, that the policy is reviewed and approved, and that safeguarding risks are considered as part of overall organisational risk management.
- The Chief Executive is responsible for ensuring that this policy is implemented, that staff receive appropriate training, and that serious or repeated safeguarding themes are escalated to the Board where appropriate.
- The Safeguarding Leads are responsible for providing advice to staff, overseeing safeguarding records, supporting referrals to statutory agencies, maintaining links with local safeguarding arrangements, identifying learning, and reporting safeguarding activity through the agreed governance route.
- Managers are responsible for ensuring that staff understand this policy, follow procedures, attend training, seek advice promptly, and receive support following difficult or distressing safeguarding situations.
- All staff, contractors, volunteers and Board members must be alert to safeguarding concerns, report concerns promptly, record factual information accurately and maintain confidentiality. No one should assume that someone else will act.

9. Responding to a safeguarding concern

- 9.1. If there is an immediate risk to life or serious harm, staff must call 999. If a crime may have been committed but there is no immediate emergency, staff should contact the police using 101 or follow local police reporting arrangements.
- 9.2. Where a safeguarding concern is identified, staff must listen carefully, stay calm, avoid making promises of secrecy, reassure the person that the concern will be taken seriously, and explain that information may need to be shared to keep them or others safe. Staff must not investigate, confront the alleged perpetrator, or ask leading questions.
- 9.3. Concerns must be reported to the appropriate Safeguarding Lead, who's details can be found in appendix 1, or a manager as soon as possible and normally on the same working day. Where the concern relates to a child, an adult at risk, domestic abuse, exploitation, modern slavery or serious neglect, the Safeguarding Lead or manager will decide whether to make an external referral to the relevant local authority safeguarding team, police or other specialist agency. If the Safeguarding Lead or manager is unavailable and delay would place someone at risk, the staff member must make the referral directly and inform the Safeguarding Lead afterwards.

10. Record keeping and information sharing

- 10.1. All safeguarding concerns must be recorded promptly, accurately and securely. Records should include what was seen, heard or disclosed; dates and times; the people involved; immediate actions taken; advice received; referrals made; consent decisions; and any follow-up actions. Records should be factual and distinguish clearly between observation, allegation and professional judgement.
- 10.2. Information will be handled in line with data protection legislation. However, confidentiality must never prevent appropriate action to protect a child, adult at risk or other person from serious harm. Relevant information may be shared without consent where there is a lawful basis to do so, including where there is a risk of harm, a crime may have been committed, statutory agencies require information, or others may be at risk.

11. Mental capacity and consent

- 11.1. Adults should be involved in decisions about safeguarding wherever possible. Mental capacity is decision-specific and should not be assumed on the basis of age, disability, illness or appearance. Where an adult has capacity, their views and desired outcomes should be considered. However, concerns may still need to be shared where there is coercion, undue influence, public interest, a serious risk of harm, or risk to others.
- 11.2. Where there are concerns that an adult may lack capacity to make a specific decision, staff must seek advice from the Safeguarding Lead, manager or relevant statutory agency. Best interests decisions must be made in line with the Mental Capacity Act 2005.

12. Safer recruitment, training and contractors

- 12.1. HCHA will use safer recruitment practices proportionate to each role, including appropriate pre-employment checks, references and Disclosure and Barring Service checks where required. Staff and Board members will receive safeguarding awareness appropriate to their role, with enhanced training for managers and the Safeguarding Leads.
- 12.2. Contractors and suppliers who work in residents' homes must be made aware of our safeguarding expectations and must have clear routes for reporting concerns. Contract managers should ensure that safeguarding requirements are included in relevant procurement, contract management and mobilisation arrangements.

13. Allegations involving staff, Board members or contractors

- 13.1. Any allegation or concern that a member of staff, Board member, volunteer, contractor or person acting on our behalf may have harmed, abused or exploited a resident, child or adult at risk will be treated seriously. The concern must be reported immediately to the Chief Executive, Safeguarding Lead or Chair, depending on who is implicated.
- 13.2. We will take appropriate action in line with employment, disciplinary, whistleblowing, safeguarding and regulatory requirements. This may include referral to the local authority, police, Disclosure and Barring Service, professional regulator, funder or other relevant body.

14. Partnership working

- 14.1. We will work constructively with local safeguarding adults boards, safeguarding children partnerships, local authority housing and social care teams, police, health services, domestic abuse services, mental health services, fire and rescue services and voluntary sector partners. Partnership working will be proportionate to our role as a landlord and will focus on prevention, early identification, referral, information sharing and support for residents.

15. Monitoring, assurance and review

- 15.1. The Safeguarding Leads will maintain oversight of safeguarding activity and ensure that concerns are recorded, followed up and reviewed. Safeguarding themes, learning, training completion and serious incidents will be reported through the agreed management and governance arrangements.
- 15.2. This policy will be reviewed at least every three years, or sooner if there are changes in legislation, statutory guidance, regulatory

expectations, local safeguarding arrangements, organisational structure or learning from a serious incident.