

# Safeguarding policy

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## **Why we have this policy**

Safeguarding people is everyone's responsibility. Some of our customers are at risk of abuse, harm or neglect. We all have a responsibility to protect them. This policy explains what safeguarding is, the types of harm, abuse or neglect and outlines the steps we'll take to identify and respond to safeguarding concerns. We'll always report concerns to the local authority and/or police.

# What is safeguarding?

## **Safeguarding is:**

- protecting a person's right to live in safety, free from abuse or neglect
- the work we do to help protect those who may be at risk from abuse or neglect
- where a child or adult needs care and support
- where a child or adult is experiencing, or is at risk of abuse or neglect, and can't protect themselves

We'll think about the needs of each customer when deciding what action we'll take.

Child Safeguarding Policy should be read in conjunction with this document in under 16's are involved in any case – [click here to view](#)

# Forms of abuse, harm or neglect

Somebody may abuse or neglect a person by causing harm or by failing to act to prevent serious risk of harm from happening.

There are many ways in which harm, abuse or neglect can occur. These include:

- neglect, such as lack of food
- self-neglect, such as poor hygiene or hoarding
- emotional or psychological abuse, such as bullying
- controlling behaviour, such as restricting what someone else does
- coercive behaviour, such as threats to harm or frighten someone
- physical abuse, such as hitting or slapping someone
- financial abuse, such as theft or pressuring someone into giving them or withholding money
- sexual abuse, such as making someone do things they don't want to do
- discriminatory abuse, such as treating somebody differently due to their beliefs
- domestic abuse, such as hitting, or abusive coercive control of a partner or family member
- modern day slavery, human trafficking such as forced labour, withholding documents
- exploitation – including cuckooing or coercive access to accommodation
- radicalisation and extremism, such as people influencing others to develop extremist views
- organisational abuse, such as neglect or poor practice
- online abuse, such as cyber-bullying, including social media
- child sexual exploitation, such as grooming and giving 'gifts' in return for sex
- forced marriage
- female genital mutilation.

# Our approach to safeguarding

When we identify concerns we will always report them to the local authority or the police, who have a statutory duty to investigate any concern.

Because safeguarding is so important to us our Chief Customer Officer, is responsible for leading our approach to safeguarding.

Our organisational position is:

- Safeguarding is everyone's responsibility and everyone needs to be aware of how to identify vulnerability and how to raise concerns they may have
- we'll work with the relevant authorities in address these concerns
- effective safeguarding needs to be embedded in all our ways of working
- it is a complex and sensitive issue, so we'll make sure there are clear ways for staff to raise their concerns with processes for recording, follow-up and support.

We're committed to working in line with the 'Making Safeguarding Personal' initiative which has formed part of the Department of Health's statutory guidance since 2017.

It means our approach, particularly with adults should:

- be person-led
- outcome focused
- engage the person and enhancing involvement, choice and control
- improve quality of life, well-being and safety.

# Prevention

To prevent abuse, harm or neglect, we'll:

- provide information and advice to our customers
- encourage everyone to report concerns to us or local authority safeguarding teams
- promote ways for all our people to report concerns, including through our tradespeople and our visiting employees
- provide training and support to frontline teams, including trade and contact centre employees
- work with local statutory safeguarding teams and adults' and children's safeguarding boards/groups – focusing our efforts in areas of higher risk.
- use the data we collect to understand patterns and themes to bolster preventative measures and improve the service we offer
- learn from serious incidents so we improve preventative measures

# What we'll do when we suspect abuse

If we suspect or identify possible harm to, abuse of or neglect of a child or adult at risk, we'll report it to the local authority team with responsibility for Safeguarding Adults/Children. If there's an immediate risk to safety or a crime has been committed, we'll call the police or an ambulance.

We'll:

- listen to customers concerns and try to understand what the issue is
- provide clear, accurate and straightforward advice
- give customers time to explain their situation and the impact on them – particularly where the resident has difficulty communicating
- treat the report seriously and respond quickly
- work with the customer, their family, carers and support network so they can stay safe
- be aware of needs and risks for families with disabled children
- take time to think about what life might be like for the customer and their family, including any carer, so we can understand the effect that the issue is having on them
- be sensitive to a customers needs including in terms of their age, gender, race, disability or sexual orientation
- consider how we can minimise the risk for both the customer and us
- treat reports as confidential, unless there is a risk of serious harm
- process and store data in line with the current Data Protection legislation

# When we report concerns to a statutory body

When we do this we'll:

- seek the customers permission (unless the concern is about an individual causing serious harm to themselves or other people)
- always report concerns about children to statutory agencies
- report concerns if we think a customer is being pressured into not giving their consent, we'll explain to the local authority that the person doesn't want action taken
- provide clear information about our concerns, as well as highlighting the risks involved, considering our customers preferred outcomes and explaining what life is like for them
- work with other agencies such as family members and support agencies to improve customers safety
- use our legal tools to protect our customers and their families
- use our legal powers to take action against our customers who are involved in perpetrating abuse



# Storing and sharing information

We'll treat any information given to us confidentially and in line with the current Data Protection legislation. We will only pass it on to others if:

- the person who gave us the information has said we can share it
- if the information is about a concern for a child
- we have an information sharing protocol, contract or confidentiality agreement in place.

But we don't need permission to share information about our customers if it:

- places a child or adult at risk of serious harm
- could prevent serious harm occurring
- will prevent or help detect or prosecute a crime
- is required by the law
- leads to delay in making enquiries about an allegation of abuse.

When we store or share information we will consider the JAPAN test:

<b>Justified</b>	Is what we're doing justifiable in the circumstances i.e. can we justify the need to collect/store/share/destroy the personal information we are handling?
<b>Authorised</b>	Are we authorised to do this? Or is someone else designated as responsible for managing the recording or disclosure of this personal information?
<b>Proportional</b>	Is what we are doing proportional to the purpose? Could we achieve it by recording or sharing less or no personal information?
<b>Auditable</b>	Have we recorded what we've shared, with whom and why, so there is evidence of our actions?
<b>Necessary</b>	Is what we are doing necessary or can the end result be achieved in some other way without this disclosure?

# Other important aspects of our policy

## Review

If a customer feels we haven't kept to our safeguarding policy, they can ask us to review our management of their case. A manager will carry out this review and conclude an outcome which we will share with our customer. This will consider any learning outcomes or changes to actions.

## Challenging a local authority decision

Occasionally we won't be happy with the response from a local authority or the police, as we might think the person is still at risk.

When this happens we'll ask a senior manager within the statutory agency to look into the concern explaining the risk and why we are worried, as well as what we'd like to see happen. If we're still concerned with the response, we'll use our [Escalation procedure](#). This ultimately leads to our Chief Customer Officer, responsible for safeguarding, asking the equivalent officer in the local authority or chair of the safeguarding board to consider the case.

## Supporting our people

We'll train our people to spot signs of harm, abuse and neglect and make sure they know how to report concerns.

Where our employees have been affected by safeguarding issues, we'll make sure they have the help and advice they need. Anyone who needs support can contact their line manager, mental health first aiders or the Employee Assistance Programme. Where there has been a serious incident we will refer impacted people to the EAP or provide group or individual critical incident support internally or via a commissioned provider.

## Allegations against our people

If we receive any allegation that one of our people has abused or neglected a customer we'll report this to HR, the local police and safeguarding team as appropriate. We'll work with the police and local authority safeguarding team to investigate. (Employees who want to raise a concern can find more information about our whistleblowing policy on the intranet). Where a staff member has been found to have perpetrated abuse we will report this to the Disclosure and Barring Service (DBS) as appropriate. For allegations where there is an alleged child victim this may also be reported via LADO (local authority designated officer) process.

# **Our commitment to customers and employees**

At Sovereign, our commitment is to make sure that no individual or group experiences unfair, discriminatory, or prejudicial treatment in recruitment, pay or promotions, housing, or any other service we provide, such as lettings, tenancy advice, repairs or rent collection. Sovereign strives to be an open, inclusive, and diverse organisation where everyone has a right to be treated with dignity, fairness, and respect. As an organisation we value the diversity and talents of all individuals and the richness that brings to our culture.

We understand the varying needs of our customers and communities and promote equality of opportunity in employment and service provision. We deliver appropriate, accessible, and flexible services, being tolerant, understanding and not judging others or their lifestyle choices. We stand up to and challenge prejudice, discrimination, and harassment in all its forms.