

Safeguarding Policy



Introduction

Great Places Housing Group (GPHG) accommodates and provides support services to some of the most vulnerable members of society within the communities it serves. GPHG recognises that we have a statutory obligation and moral duty to enable children and adults to live life free from abuse or neglect, as defined in the legal framework contained in the Care Act 2014 for Adults and Working together to Safeguard Children (2018). This Policy and accompanying procedure aims to deliver safe working practices which identify safeguarding concerns and ensure appropriate action is taken in order to safeguard the wellbeing of children and adults at risk that reside in Great Places properties or who are engaged in services organised or delivered by Great Places.

Concerns regarding the safeguarding of colleagues should be reported to the relevant People Advisor or Business Partner for the colleague's department and any allegation about a colleague in relation to safeguarding customers should be dealt with via the Speak Up Policy (Whistleblowing).

Colleagues should be aware that this policy is underpinned by other policies including: Domestic Abuse, Anti-Social Behaviour (ASB), Hoarding, Recruitment and Selection policy, Acceptable Use of Business Systems and Speak Up (Whistleblowing) policy.

Great Places is signed up to the Chartered Institute of Housing and Domestic Abuse Housing Alliance "Make A Stand" pledge.

It is the responsibility of all colleagues to respond, in line with this policy, to any concerns for customer welfare or suspected or actual abuse of a child or adult at risk.

In this policy, the term 'colleague' refers to all individuals working for, or with Great Places, including employees, contractors, agency staff, Board Members and volunteers.

In this policy, the term 'customer' refers to anyone who colleagues have contact with in carrying out their role for Great Places.

This policy will cover both safeguarding children and adults who are vulnerable and at risk of abuse and neglect. Definitions are included in Definition of Safeguarding Terms which accompanies the Safeguarding Policy and Safeguarding Procedure (Guidance Notes).

There is a clear line of governance and accountability in the implementation of this policy;

- The Board
- CEO
- Executive Directors
- Directors

Safeguarding Policy



- Managers
- Colleagues

Context

This policy has been developed with reference to the following national legislation and safeguarding guidance:

A) Safeguarding Children

Working Together to Safeguard Children 2015, updated 2018 is the guide to Inter Agency working to safeguard and promote the welfare of children.

Whilst Local Authorities play a lead role, safeguarding children and protecting children from harm is the responsibility of every agency. Everyone who comes into contact with children and families has a role to play.

Local agencies including police, health, education, voluntary and community services and housing providers also have a duty under section 11 of the Children's Act 2004 to ensure that they consider that they have arrangements in place to safeguard and promote the welfare of children when carrying out their functions.

Under Section 10 of the same act, Local Authorities are required to make arrangements with their relevant partners; these arrangements are to be made with a view to improving the wellbeing of all children including protection from harm and neglect.

The following definitions for children are taken from 'Working together to safeguard children' – *A guide to inter-agency working to safeguard and promote the welfare of children 2018*

<https://www.gov.uk/government/publications/working-together-to-safeguard-children>

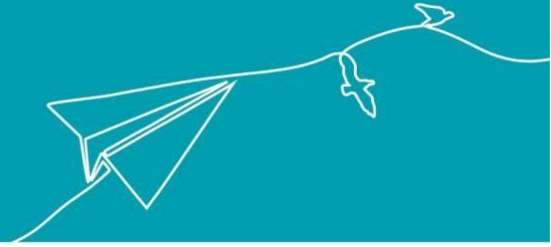
Definition of 'child'

The definition of a child is any person who is yet to reach their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment .
- Preventing impairment of children's health and development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking actions to enable all children have the best outcomes.

Safeguarding Policy



Emphasis is put on 'Early Help': local agencies should have in place effective ways to identify emerging problems and unmet needs for children and families.

B) The Care Act 2014

This Act passed into law in April 2015. The Care Act refers to Adult Safeguarding as 'protecting people with care and support needs from abuse or neglect' and puts it on a legal footing.

The Act sets out specific responsibilities for each Local Authority, which must:

- Make enquiries, or ensure others do so, if it believes an adult is subject to, or at risk of abuse or neglect. An enquiry should establish action needed to be taken to stop or prevent abuse and by whom.
- Set up Safeguarding Adults Boards (SAB) with core membership from the Local Authority, the Police and the NHS (specifically Clinical Commissioning Groups)
- Arrange for an independent advocate to represent and support an adult who is subject to a safeguarding enquiry
- Co-operate with each of its relevant partners in order to protect adults experiencing or at risk of abuse or neglect.

Definitions for adults are taken from *Care and Support Statutory Guidance updated February 2017 – Issued under the Care Act 2014*

<https://www.gov.uk/guidance/care-and-support-statutory-guidance/safeguarding>

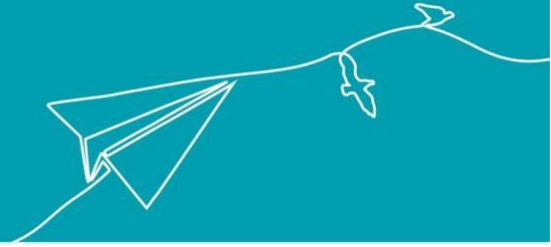
Safeguarding adults is defined as:

- Protecting the rights of adults to live in safety, free from abuse and neglect.
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect.
- People and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action.
- Recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing.

Safeguarding adults duty applies to an adult who is 18 or over and who:

- Has a care and support need, whether or not this is being met by the local authority.
- Is experiencing, or at risk of abuse or neglect.
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Safeguarding Policy



C) Other government guidance relevant to this policy:

- The Children Act 1989 and 2004
- Working together to Safeguard Children 2018
- The Care Act 2014
- The Care Act Statutory Guidance (updated March 2020)
- The Supported Accommodation (England) Regulations 2023

Six Principles of Safeguarding

The statutory guidance refers to the six principles of safeguarding:

1. Empowerment – presumption of person led decisions and informed consent
2. Prevention – it is better to take action before harm occurs
3. Proportionality – proportionate and least intrusive response appropriate to the risk presented
4. Protection – support and representation of those in greatest need
5. Partnerships – local solutions through services working with their communities
6. Accountability – accountability and transparency in delivering safeguarding

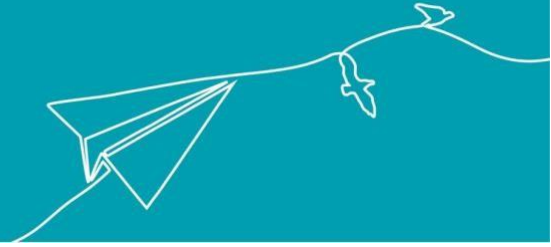
Aims and objectives

- This policy contains information about safeguarding children and adults at risk and the policy context in which we operate.
- This policy recognises the importance of interagency working and that safeguarding is the responsibility of every agency and their colleagues.
- To describe the robust structure for accountability and responsibility for safeguarding at all levels of the organisation.
- The Safeguarding Procedure (Guidance Notes) should be read in conjunction with this policy. The procedure clarifies roles and responsibilities for colleagues when reporting concerns.
- This policy contains concepts and definitions under the safeguarding agenda

Guiding Principles

1. Colleagues in contact with customers understand how to recognise and respond to suspected child or adult abuse and are supported in raising a concern.
2. Colleagues receive training appropriate to their role and management support to reflect on their practice and the impact of their handling of a concern.
3. Colleagues make an appropriate, timely, professional and ethical response to any concerns of abuse.
4. When raising a safeguarding concern, colleagues assume that the adult has capacity to decide whether they wish a safeguarding alert to be raised on their behalf, and their

Safeguarding Policy



informed consent is always sought; if there is a decision to make a concern without consent it is because there is a greater risk to the adult or child.

What is involved?

Reporting, Recording and Referring Safeguarding Concerns

Responsibilities

Colleagues

Colleagues have a responsibility to:

1. Know Great Places policies and procedures, and those working with children and adults at risk should be aware of issues of abuse and neglect, or exploitation.
2. Act in a timely manner where they have a concern of abuse and ensure this is assessed and investigated.
3. Where they suspect that a crime has been committed, or that there is immediate risk of harm or the need for medical treatment, they should make a report to the police or emergency services by calling 999.
4. Know how to report abuse, including how to make a direct referral to the relevant Safeguarding Authority (Child or Adult).
5. Make a clear and factual record of their concern and the action taken.
6. Challenge/escalate concerns if a response is not received or the response does not manage the risk identified.
7. Remain compliant with all mandatory safeguarding training identified for their role.

Managers

Managers have a responsibility to:

1. Ensure that all colleagues are compliant with the appropriate safeguarding training associated with their job role.
2. Ensure that the child or adult at risk is made safe if appropriate and possible.
3. Ensure any colleague who may be alleged to have caused harm is not in contact with the child or adult who may be at risk and ensure concerns are raised with the People Team and dealt with appropriately.
4. Ensure information is provided to the Safeguarding Authority in a timely way.
5. Provide support to colleagues who seek advice regarding safeguarding concerns, including assessing any information flagged to them and make an informed decision regarding the case/concern.
6. Review all cases with colleagues monthly and ensure that all relevant actions are clearly recorded.



7. Managers are not responsible for carrying out a safeguarding investigation into alleged abuse. This duty lies with the local authority although Great Places colleagues may be required to be involved.

Monitoring and Review

A report of safeguarding data, including cases, training, DBS information and Formal Safeguarding Review findings is reported monthly to the Safeguarding Service Excellence Group (SEG), quarterly to Strategic Safeguarding Group and six monthly to Board.

Formal Safeguarding Review

If there is a serious safeguarding incident or an unexplained death, a Formal Safeguarding Review will be completed by a colleague nominated by the Director of Independence & Wellbeing and reported to the Strategic Safeguarding Group. This review will examine the case and identify any learning and recommendations to address any areas of practice and reduce risks in the future.

Training and recruitment

Safer Recruitment

We apply a fair and consistent approach to recruitment to draw our workforce from the widest pool and select the best people on merit. As an organisation committed to safeguarding children and adults at risk we have robust recruitment policies including requiring references and appropriate use of Enhanced DBS to minimise the risk of recruiting colleagues who may pose a risk to children and vulnerable adults. (See Recruitment and Selection Policy)

Competent and confident workforce

We provide mandatory safeguarding induction and refresher training and role-specific training. This includes the training and development of our workforce within professional regulatory requirements. We ensure that our frontline and specialist staff have the skills they require, and we support all colleagues to trust their judgement and act on safeguarding concerns. Safeguarding training requirements for roles within Great Places can be found in the Safeguarding Training Matrix.

Safeguarding training is of the highest importance to the organisation and there is an expectation that colleagues remain compliant with the relevant training requirements for their role at all times. Non compliance will be managed via the Learning and Development policy.

Safeguarding Policy



Partnership Working and Contract Management

We work in partnership with contractors to ensure that DBS and Safeguarding Training requirements are managed effectively. The Safeguarding in Procurement and Contract Management Procedure details the requirements for all contracts held by Great Places and how these are to be managed.

Who is involved?

Safeguarding Accountability

Safeguarding is everyone's responsibility and Great Places ensures that all colleagues are aware of safeguarding concerns and our duty to report and protect children and adults from suspected harm and abuse.

The lines of accountability for safeguarding are: Board, CEO, Executive Directors, Directors, Managers, Colleagues.

Board Safeguarding Lead

Great Places has a designated Executive Director who is responsible for safeguarding to ensure that safeguarding is given a high level of scrutiny by the Board. The role of the Executive Director Safeguarding Lead is to:

- Ensure that safeguarding is appropriately considered by the Board during relevant meetings
- Present a biannual report to the Board on Great Places' management of safeguarding
- Assist the strategic and operational safeguarding leads in learning lessons following Serious Case Reviews (external), Formal Safeguarding Reviews (internal) and safeguarding case data

Director of Independence and Wellbeing

The Great Places senior manager responsible for safeguarding is the Director of Independence and Wellbeing with responsibility for all concerns of safeguarding children and vulnerable adults. Their roles and responsibilities include strategic oversight to:

1. Ensure procedures support all colleagues to be aware of their duty to report and record allegations and suspected abuse internally, and the local authority where necessary, and ensure management, supervision and support structures are in place to identify and respond to possible abuse and neglect.
2. Ensure Safer Recruitment practices are in place, including appropriate use of relevant Disclosure and Barring Services (DBS) for all employees who are in direct contact with children or adults.

Safeguarding Policy



3. Ensure that relevant training is in place and delivered to colleagues according to their role and responsibilities.
4. Ensure that an adequate whistleblowing policy is in place and colleagues who raise concerns are supported (Great Places' Speak Up Policy).

Head of Independent Living

The Head of Independent Living has strategic and operational responsibility, through line management of the Safeguarding Partner and partnership working with relevant departments, to ensure all policy, procedure and processes are in place to safeguard children and vulnerable adults. Their roles and responsibilities include strategic and operational oversight to:

1. Ensure procedures support all colleagues to be aware of their duty to report and record allegations and suspected abuse internally, and the local authority where necessary, and ensure management, supervision and support structures are in place to identify and respond to possible abuse and neglect.
2. Ensure Safer Recruitment practices are in place, including appropriate use of relevant Disclosure and Barring Services (DBS) for all employees who are in direct contact with children or adults.
3. Ensure that relevant training is in place and delivered to colleagues according to their role and responsibilities.
4. Ensure that an adequate whistleblowing policy is in place and colleagues who raise concerns are supported (Great Places' Speak Up Policy).

Safeguarding Partner

Reporting to the Head of Independent Living, the Safeguarding Partner acts as an expert advisor to the business by:

1. Ensuring that the business is compliant with all requirements within safeguarding legislation and best practice
2. Embedding a safeguarding culture across the business
3. Delivering high-quality training, policy and guidance
4. Advising senior leaders and Strategic Safeguarding Group of obligations under safeguarding best practice, in particular safeguarding legislation, DBS legislation and best practice
5. Liaising with Local authority Safeguarding Boards and coordinate Great Places' response to Serious Case Reviews and Safeguarding Adult Reviews
6. Providing advice and guidance to case managers and line managers regarding safeguarding concerns.

Safeguarding Policy



SSG

There is a Strategic Safeguarding group (SSG) that meets quarterly. The SSG is led by the Director of Independence and Wellbeing with support from senior managers from across the business.

The role of the SSG is to provide strategic oversight of safeguarding at Great Places to ensure that adequate policy, procedure, training, case management and safer recruitment resource is in place to maintain compliance with legal requirements and the Great Places Safeguarding Policy.

Safeguarding SEG

The Safeguarding Service Excellence Group (SEG) meets monthly. The Safeguarding SEG is chaired by the Head of Support Services, attended by the Safeguarding Partner, with representation of colleagues from across the business. The role of the Safeguarding SEG is to maintain oversight of the performance and effectiveness of Great Places' safeguarding framework, including case management, training and safer recruitment.

Operational Responsibilities

Colleagues with responsibility for providing support and guidance to colleagues are detailed within the Safeguarding Procedure (Guidance Notes).

Information Sharing and Partnership working

In line with Government legislation, we will work in partnership with other relevant agencies in order to protect Children and Adults at Risk from harm. This will mean attending and contributing to meetings, raising concerns and issues where we feel relevant. The Data Protection Act 1998 and GDPR 2018 is not a barrier to sharing information but provides a framework to ensure that personal information about people is shared appropriately.

Review arrangements

Great Places will review this policy every three years. In cases of relevant legal or local procedure changes, we will review this policy accordingly.

Safeguarding Policy



Links to related policies, strategies, and procedures

We have a range of policies and procedures that set out Great Places expectations of colleagues in relation to safeguarding. Policies reflect new learning, and are consistent with best safeguarding practice and legislation and guidance.

Domestic Abuse Policy
Anti-Social Behaviour (ASB) Policy
Hoarding Policy
Recruitment and Selection Policy
Acceptable Use of Business Systems Policy
Speak Up Policy (Whistleblowing)
Safeguarding in Procurement and Contract Management Procedure
DBS Policy

Policy approval date:	21 September 2023
Equality impact assessment date:	August 2023
Reducing carbon impact assessment date:	NA
Safeguarding/Modern Slavery impact:	Yes
Policy review date:	September 2026
Lead team:	Independence & Wellbeing - Safeguarding
Level of authorisation required:	Board
Please record all authorisation meetings, with dates and details	Joint Exec Directors Meeting on 07/09/23 Amendment made following recommendations from internal audit. Amendments signed off at SSG on 27/03/24 Reviewed October 2025 to change reference to OSG to Safeguarding SEG (approved by SSG)