

Safeguarding of Children and Adults at risk. Policy and Procedure for Ashley Community Housing & Himilo Training.

CONTENTS:

	Page No.
SECTION 1	
1: PURPOSE	2
2: PRINCIPLES	2
3: SCOPE	3
4: DEFINITIONS	3
5: SUPPORTING GUIDANCE AND LEGISLATION	4
6: SAFEGUARDING GOVERNANCE	4
7: POLICY STATEMENT (includes whistleblowing and Prevent)	5
8: CONSENT AND CAPACITY	7
9: RECRUITMENT, SELECTION AND TRAINING	8
SECTION 2	10
10: PROCEDURES	11
HOW CONCERNS ARISE	11
REFERRAL PROCESS FOR DISCLOSURES OF RADICALISATION OR EXTREMISM	12
EMERGENCY SITUATIONS / RISK OF IMMEDIATE HARM	12
CLIENTS WITH SEX OFFENCES	13
PROCESS OF TAKING DISCLOSURES	13
CONFIDENTIALITY	14
RECORD KEEPING	15
SAFEGUARDING PROCEDURE FLOWCHART	16
DISCLOSURE / ALLEGATION ABOUT A MEMBER OF STAFF / PERSON IN POSITION OF TRUST	17
11: APPENDICES	19
Appendix 1 – Categories of abuse	24
Appendix 2 – Contact Details ACH Safeguarding Team & Local Authorities	25
Appendix 3 – Safeguarding Incident Report Form	25
12: COMMITMENT	29

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1: PURPOSE

- Ashley Community Housing/Himilo Training consider the issue of safeguarding children and adults at risk to be of the utmost importance. The organisation has developed a policy and procedures that aim to prevent occurrences of harm or abuse to those at risk and to protect those adults and children who are in danger of radicalisation or developing extremist tendencies, whereby appropriate support will be sought under the PREVENT strategy or through CHANNEL.
- It is stressed by Ashley Community Housing/Himilo Training that all our employees, contracted staff and volunteers have a duty to adhere to this policy, and all other related policy and procedure, at all times.
- This Safeguarding Policy provides the broad preventative and precautionary approach to planning and procedures necessary to protect children and adults at risk from any potential or actual current harm or abuse, and describes how any allegations, reports or suspicions of abuse will be handled.

It aims to:

- Protect children and adults at risk who use Ashley Community Housing and/or Himilo Training services.
- Ensure all staff and volunteers have clear guidance on our approach to safeguarding and are aware of their roles and responsibilities in the event that any allegations, reports or suspicions of abuse may arise.

The procedures aim to make sure that:

- The needs and interests of children and adults at risk are always respected and upheld. This includes children or adults who use our services.
- The Human Rights of children and adults at risk are respected and upheld.
- A proportionate, timely, professional, and ethical response is made to child or adult at risk who may be experiencing harm or abuse, or are at risk of doing so.
- To provide all staff and volunteers with the overarching principles that guide our approach to safeguarding.

This policy should be read alongside our:

- | | |
|---------------------------------------|---------------------------------------|
| • Code of conduct | • Missing child policy |
| • Company handbook | • Anti bullying and harassment policy |
| • Health and safety policy/procedures | • Equality and diversity policy |
| • Lone workers policy | • Confidentiality policy/procedures |
| • Whistleblowing policy | • Complaints policy |
| • Disciplinary policy | |

2. PRINCIPLES

Ashley Community Housing/Himilo Training recognises that:

All adults and children have a right to dignity and respect. As a provider of care services, we have a duty of care to all residents. There is a zero-tolerance response to any allegation of suspected abuse, and to do nothing is not an option. Residents, their families, or representatives are advised of our Safeguarding policies and procedures and the reasons why they are in place.

We adhere to six key principles to underpin all adult and children safeguarding work:

Empowerment

People being supported and encouraged to make their own decisions and to use informed consent.

Prevention

It is better to take action before harm occurs.

Proportionality

Use the least intrusive response appropriate to the risk presented.

Protection

Provide support and representation for those in greatest need.

Partnership

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.

Accountability

Use accountability and transparency in delivering safeguarding.

3: SCOPE

This policy applies to all staff including agency, contracted and freelance workers, volunteers, sessional workers, students, people on placement, or anyone working on behalf of ACH or Himilo Training. For the purpose of this policy, all those listed above will be referred to as 'staff'.

'Child(ren)' refers to anyone up to the age of 18 years.

Ashley Community Housing / Himilo Training policy and procedure documents may be distributed to suppliers, accreditation, and compliance bodies and any other relevant third parties. In some cases, third parties will be expected to be familiar with and adhere to our policies, which will be made available where applicable.

4: DEFINITIONS

Safeguarding is the actions taken to protect and promote the welfare of children and adults at risk.

Safeguarding children

In 'Working Together to Safeguard Children 2018' safeguarding and promoting the welfare of children is defined 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;
- taking action to enable all children to have the best outcomes.

Safeguarding adults at risk

The Care Act 2014 describes Safeguarding adults as being the process of protecting adults with 'care and support needs' from abuse or neglect. At ACH / Himilo Training it can be described as:

- stop abuse or neglect wherever possible;
- prevent harm and reduce the risk of abuse or neglect to adults with care and support needs;
- safeguard adults in a way that supports them in making choices and having control about how they want to live;
- promote an approach that concentrates on improving life for the adults concerned;

- provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern
- address what has caused the abuse or neglect (if appropriate)
- in general, promoting adult's wellbeing in all policy and practice

5: SUPPORTING GUIDANCE AND LEGISLATION

This Policy and Procedure has been developed in accordance with and guided by the following (this is not an exhaustive list) Education Act 2002, Children Acts 1989 and 2004, Guidance for safer working practice for those working with children and young people in education settings 2022, Working Together to Safeguard Children 2018, What to do if You are Worried A Child is being Abused -Advice for Practitioners (March 2015), Southwest Child Protection Procedures, The Care Act 2014, The Mental Capacity Act 2005, Counterterrorism and Security Act 2015, Revised Prevent Duty Guidance for England and Wales (Home Office July 2005), Safeguarding Vulnerable Groups 2006, Female Genital Mutilation Act of 2003, Keeping Children Safe in Education Act 2023, The Equality Act 2010, The National Standards for the Provision of Children's Advocacy Services 2003, The UN Convention on the Rights of the Child, Data Protection Act 1998, Amended Sexual Offences Act 2003, Care and Support Statutory Guidance 2023, General Data Protection Regulation (GDPR) 2018, Information sharing: advice for practitioners providing safeguarding services 2023 and Social Housing (Regulation) Act 2023, (expected to come into force 2024)

6: SAFEGUARDING GOVERNANCE

This policy will be reviewed at least annually and in accordance with any local updates and governmental developments or changes to governmental policy, or when there are significant internal changes (staff or procedural changes).

Ashley Community Housing and Himilo, will ensure that all staff are kept fully up to date and aware of their responsibilities regarding the safety and well-being of its children and adults at risk. When sharing updated versions of safeguarding policy and procedure, and in every new employee and volunteer's induction, all staff are required to sign to say they have read, understand, and commit to these documents.

Ashley Community Housing / Himilo's Board of Directors have overall responsibility for ensuring that individuals are aware of, understand and commit to the principles of this policy. They are responsible for ensuring the staff team can effectively follow safeguarding process and procedure.

This policy and related procedures are owned and maintained by the Designated Safeguarding Lead. Policies are ratified by the Board of Directors before being shared.

The Designated Safeguarding Lead, or an appointed Deputy, reviews safeguarding trends and statistics regularly and reports to the leadership team on these so that they can consider any strategic or operational responses needed. Safeguarding is a standing agenda item at all Board meetings; the staff team ensures the Board is well informed about all complex/high level current cases, numbers of cases, patterns and trends and challenges.

7: POLICY STATEMENT

Approach

Ashley Community Housing and Himilo will:

- 7.1. Take a preventative approach to protecting children and adults at risk from potential harm, abuse or radicalisation or being drawn into terrorism (non - violent and violent extremism). Ashley Community Housing / Himilo Training are committed to ensuring that the requirements of effective safeguarding are integrated throughout the organisation, to minimise the likelihood of safeguarding issues arising, and reacting appropriately when they do.
- 7.2 Ashley Community Housing and Himilo Training follow careful procedures to minimise the risks of harm for children and adults at risk. These ensure that:
- Ashley Community Housing and Himilo has as its upmost priority the health, safety and welfare of children, children and adults at risk engaged with us as tenants or clients or engaged in activities for whom we hold responsibility.
 - Health and Safety Procedures are in place to reduce the likelihood of risk to the wellbeing of adults and children and that risk assessments are carried out when applicable to minimise the risk of harm to an adult or child. See our Health and Safety Policy for more details.
 - Tenants and service users have full and appropriate inductions.
- 7.3 Ashley Community Housing and Himilo and its staff, including contractors, have a Duty of Care both collective and individual to ensure that they:
- Fulfil their responsibilities around the prevention of the abuse of children and Adults at Risk.
 - Refer any abuse which is discovered or suspected.
 - Ensure that there is promotion of an open work culture and the implementation of a "Whistleblowing" policy
 - All appropriate actions are taken to address concerns about the welfare of children and adults at risk;
 - Reduce the risk of any tenant or service user being drawn into terrorism by following the correct procedure of reporting.

Whistleblowing Policy

Ashley Community Housing and Himilo will promote practical arrangements for whistleblowing to enable its staff and contractors to work in an open culture where they can raise any concerns in confidence without fear of repercussion. to voice their concerns, made in good faith, without fear of repercussion.

Any person who uses the 'whistleblowing' policy and procedure will be made aware that their employment rights are protected.

Staff and contractors will be supported in this individual responsibility to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children, and adults may be at risk.

7.4 Ashley Community Housing and Himilo will ensure that all tenants and service users are made aware of the following:

- relevant policies including Safeguarding, Complaints and Confidentiality policies, and support workers discuss vulnerability and abuse with tenants.
- Comprehensive information about the accommodation, facilities or services, additionally how to raise a concern or complaint, and the standards that ACH as a landlord are expected to meet in relation to complaint handling. Tenants will also be made aware of how to report a lack of compliance with standards, bad practice, and lack of response to safety issues to the Housing Ombudsman Service.

- The standards of behaviour and conduct they can expect from staff and volunteers.
- What to do if they experience or suspect any abuse, including sexual harassment and online sexual abuse.
- The expectation that members of the Ashley Community Housing and Himilo community seek consent whenever possible before any intervention or sharing of personal information and not disregarding the right to choose with those who have the capacity to do so.

7.5 Ashley Community Housing and Himilo will work with appropriate regional agencies such as: Keeping Bristol Safe Partnership, Bristol City Council's Keeping Children Safe in Bristol; The Birmingham Safeguarding Children Board and The Birmingham Safeguarding Adults Board; Coventry Safeguarding Adults Board and the Coventry Safeguarding Children's Partnership; Wolverhampton Safeguarding Together. It will also use a consultative approach with Local Prevent Partnership Boards. Ashley Community Housing / Himilo Training agree to comply with their published safeguarding standards, will ensure they receive their relevant updates and information, and are aware of their duty to cooperate in information sharing such as to contribute to safeguarding practice reviews. They will also work closely with statutory and referral agencies such as social care, the police and health, and again are aware of the duty to share necessary information to assist in safeguarding investigations.

7.6 Ashley Community Housing and Himilo adopts the Safer Recruitment Consortium's "Guidance for safer working practice for those working with children and young people in education settings" (February 2022)

7.7 Ashley Community Housing and Himilo recognises that any child or adult at risk can be subject to abuse, harm or radicalisation. All allegations of abuse or concerns about radicalisation will be taken seriously and treated in accordance with Ashley Community Housing and Himilo procedures. This includes any adult or child who makes repeated allegations; each allegation will be treated without prejudice and will be responded to under these procedures.

7.8 Ashley Community Housing and Himilo recognise that it is the responsibility of all staff to act upon any concern, no matter how small or trivial it may seem. This should be reported into the Safeguarding Team **as soon as possible and within 24 hours**.

7.9 All staff must comply with our code of behaviour at all times. Please refer to the Staff Handbook for guidance.

7.9 All staff will be made aware and expected to sign up to our code of conduct when inducted, and again if there are any significant changes. Failing to abide by this policy and procedure document and all other related policy and procedure documents, including all referred to in this policy, at all times is likely to result in disciplinary procedures for staff as defined in our disciplinary policy, and the dismissal of volunteers.

7.10 Ashley Community Housing and Himilo has one Designated Safeguarding Lead, one Designated Board Member responsible for this and at least one Deputy Safeguarding Lead on each of its sites, as a result at least 4, who are responsible for coordinating action within Ashley Community Housing and Himilo and liaising with other communities.
CONTACT DETAILS CAN BE FOUND IN APPENDIX 2

7.11 All members of the safeguarding team will take safeguarding referrals, action them fully in line with Ashley Community Housing and Himilo procedures. All cases should be referred into the Safeguarding Team within 24 hours and will be written up on the internal report form and uploaded to a secure and restricted SharePoint site for monitoring and evidence purposes.

7.13 ACH / Himilo Training recognises the impact dealing with safeguarding concerns can have on its staff. Any staff reporting a safeguarding concern will be offered a debrief

session. DSLs/Deputy DSLs will be given time for safeguarding specific supervision with a member of staff trained and competent to facilitate. Staff required for safeguarding meetings/investigations etc. will be offered support, guidance and the time to do so.

7.14 Disclosure of abuse or criminal activity may also be made by a person not covered by the definitions of an adult at risk or child within this policy. You may still need to act on this information. Please see the ACH Information Sharing Policy for further advice.

Radicalisation or extremism:

Prevent

Prevent is part of the Government's counter-terrorism strategy CONTEST and aims to stop people becoming terrorists or supporting terrorism.

Prevent focuses on all forms of terrorism and operates in a pre-criminal space, providing support and redirection to vulnerable individuals at risk of being groomed into terrorist activity before any crimes are committed. Radicalisation is comparable to other forms of exploitation. Individuals may be susceptible to recruitment into violent and non-violent extremism by radicalisers. The aim is to attract people to their reasoning, inspire new recruits, embed their extreme views, and persuade vulnerable individuals of the legitimacy of their cause. If the person susceptible is a child or an adult at risk, a safeguarding referral must be made as well as a referral through the Channel process.

Clients/ potential tenants or clients with PREVENT related offences/ cautions or concerns wishing to engage with ACH and Himilo in a specific capacity will be subject to a risk assessment. The risk assessment enables consideration to the risk they may pose to others within ACH and to ensure that they can be kept safe within ACH. Risk Assessments will be required for:

- Anyone who has been cautioned with Terrorism related offences.
- Anyone who communicates PREVENT related offences/ cautions/ concerns that they have had.

The DSL, CEO and Board will discuss the way forward for the client and make a decision if the client can be welcomed into the ACH community. If they decide they can support the individual, these risk assessments will continue to be reviewed monthly or when there is any significant change or incident. They will be shared with all staff working with the individual on a need-to-know basis only.

8: CONSENT AND CAPACITY

From the very first stage of concerns being identified, the views of the adult should be sought. This will enable the adult to give their perspectives about the abuse or neglect concerns that have been raised, and what outcomes they would like to achieve. These views should directly inform what happens next.

Ashley Community Housing / Himilo Training will:

- assume a person has the capacity to make a decision themselves, unless it's proved otherwise (not including if it is felt they have made previous unwise decisions)
- wherever possible, help people to make their own decisions
- obtain consent whenever possible

If there is a situation where we are required to make a decision for someone who is assessed to not have capacity, it must be in their best interests, and the least restrictive of their basic rights and freedom.

If consent is withheld but there are risks to others including children and other adults at risk, or the risk to the adult at risk is serious, or a crime has or may have been committed, a referral to adult social care or the police should still be made and the adult at risk informed that this has been done.

Children under the age of 18 can be seen to have the capacity to consent if they have enough maturity, competence and understanding of what is involved (Gillick competent). Someone who has parental responsibility for a young person may be asked to make decisions for them if they lack capacity to make the decision for themselves. In regard to a safeguarding concern where someone is currently experiencing harm or is at risk of doing so, consent to act does not have to be sought from the child, though it should be sought whenever possible.

9: RECRUITMENT, SELECTION AND TRAINING

This policy is to be read alongside our Recruitment and Selection Policy and our Equality and Diversity policy when recruiting to any role.

ACH / Himilo Training will ensure that as far as is possible, all staff are safe and trustworthy to work with children and adults at risk by enforcing robust recruitment procedures and complying with all relevant guidance and legislation.

All new staff and volunteer positions will make it clear in advertisements and application forms of the need to undergo a DBS disclosure check and include a statement of our commitment to safeguarding. ACH / Himilo Training will ensure a formal application process including the submission of application forms, panel shortlisting and interviews, and safeguarding questions in all interviews. Suitable references will be sought for all appointments, and relevant DBS checks will be conducted on all those eligible (staff will not be able to start in roles until these are completed and cleared). Formal offers will be made conditional to the satisfactory completion of pre-employment checks, i.e. identity, references, qualifications, right to work in the UK and DSB certificate checks. ACH / Himilo Training will also make the new Social Housing Regulation training requirements clear in its recruitment process.

All employed staff members to be subject to a 3-month probation period. All staff have a time of induction when they are new in post. During this time, they are required to read and record their understanding and commitment to this policy and all related procedures. Staff will be offered the opportunity to discuss the safeguarding policy within their regular supervision and will be asked at each annual appraisal to state whether they still feel confident around this policy and committed to its content. All employed workers will have training in basic safeguarding awareness within their probation period. Line managers are responsible for ensuring this practice.

Our commitment to safeguarding will also be shown by ensuring our safeguarding policy is easily accessible to all staff, service users and external parties, such as featuring it on our website.

Training

All staff employed by Ashley Community Housing and Himilo who work with children and adults at risk will undertake training to equip them to carry out their responsibilities for safeguarding children and adults at risk effectively including the PREVENT strategy. They will be kept up to date by refresher training at a maximum of two-year intervals and in line with their role, and with subject specific annual updates as issues emerge as well as an annual refresher of our procedures.

All Designated Safeguarding leads and Deputy Designated Safeguarding Leads are required to attend DSL refresher training every 2 years. As part of the role, they are also to develop their knowledge through regularly accessing further training, articles, forums, conferences, newsletters, mentoring etc. Responsible for overseeing ACH / Himilo Training's safeguarding frameworks as part of the Board, we will consider our Trustee Safeguarding Lead also being

included in the above.

The Board of Trustees should attend relevant safeguarding training refreshed, at a minimum, every 2 years.

Safeguarding training and development is an ongoing process and not a one-off event.

The Social Housing Regulations Act 2023 introduced standards focused on the competence and conduct of individuals involved in the provision and management of social housing, requiring them to obtain specific professional qualifications. 'Senior housing executives' (someone within ACH who has responsibility for the day-to-day management of the provision of services and is part of the ACH's senior management team) will require a foundation degree or level 5 qualification, whilst 'senior housing managers' will require a level 4 qualification in housing management. Roles classed as 'senior housing managers' within ACH include (delete as appropriate) Neighbourhood housing manager / Neighbourhood investment manager / Property manager / Voids and lettings manager / Assets manager / Incomes manager / Resident involvement manager / Supported housing manager / Leasehold manager etc.

SECTION 2 – PROCEDURES

10: Procedures:

The purpose of these guidelines is to ensure the protection of the rights of the child or Adult at Risk by means of staff awareness and the following of the statutory and local guidelines in the reporting of concerns.

We expect all of our staff to share a commitment to safeguarding at all times. Part of this commitment includes following our procedures below whenever relevant, regardless of the type of abuse or harm.

Any failure to follow these safeguarding procedures may make you liable to disciplinary procedures. You will be asked to read these Safeguarding Policy and Procedures and sign that you have understood your safeguarding responsibilities.

How Concerns Arise:

The possibility of abuse or harm can come to light in various ways, for example:

- An active disclosure.
- A concern or allegation raised by someone else who has identified the signs or indicators of abuse.
- A growing awareness that "something is not right" a 'gut feeling'
- A complaint or concern raised by someone who does not recognise that it is abuse.
- Directly witnessing someone being harmed by an adult or another child, or behaviour that gives cause for concern
- Somebody says (e.g. a member of the public) either face-to-face or by any other means of communication, that a child/adult at risk is being harmed or is at risk of harm;
- An adult survivor of abuse or a child talks about an experience of abuse in their past which can be referred to as 'non-recent historical abuse'. However, the perpetrator may still be alive, and others may therefore still be at risk, so such a concern still needs to be acted upon.

Remember: Doing nothing is not an option. You must report your concerns.

**Please see Appendix 2 for definitions of abuse.*

It is the responsibility of all staff working at ACH to:

- a. Record and refer in a timely manner (and within 24 hours) concerns regarding the safeguarding of children and Adults at Risk even if this is based just on suspicions or rumours (this should be made clear in the report).
- b. Maintain confidentiality by not discussing it with anyone other than the Designated Safeguarding Lead or relevant Deputy Lead Safeguarding Officer.

If a child or adult at risk comes to you with a disclosure of apparent abuse or concern, you should:

- Allow the child or Adult at Risk to speak freely without interruption and do not ask leading questions.
- Be reassuring. Let them know that they have done the correct action in speaking up.
- Be honest and let the child or Adult at Risk know that you cannot keep confidentiality that you will need to refer it on to get them the support that they need. Be clear so they know what will happen next.
- Never trivialise, exaggerate, or make suggestions as you listen to the disclosure.
- Try not to show your emotions, as they may feel they are upsetting you and stop talking or they may feel that your feelings are directed towards them.
- Refer in a timely manner to the relevant Deputy or the Designated Safeguarding Lead as soon as possible and within 24 hours, then follow their guidance.

The Referral Process for Disclosures of Radicalisation or Extremism:

If the DSL and Deputy judge the client to be in immediate danger or likely to act imminently then the DSL will contact the Police CHANNEL and also make a Prevent referral to the local authority depending on the site:

Bristol:

[Welcome to the Keeping Bristol Safe Partnership website. \(bristolsafeguarding.org\)](http://bristolsafeguarding.org)

Coventry:

[Prevent referrals - Coventry City Council](#)

Wolverhampton:

Community Safety Team:

[Prevent / Extremism - Wolverhampton Safeguarding Together](#)

Birmingham:

[Contact Us | West Midlands Police \(west-midlands.police.uk\)](http://west-midlands.police.uk)

Waqar Ahmed@ birmingham.gov.uk

Diagram 1: Prevent and Channel referral pathway

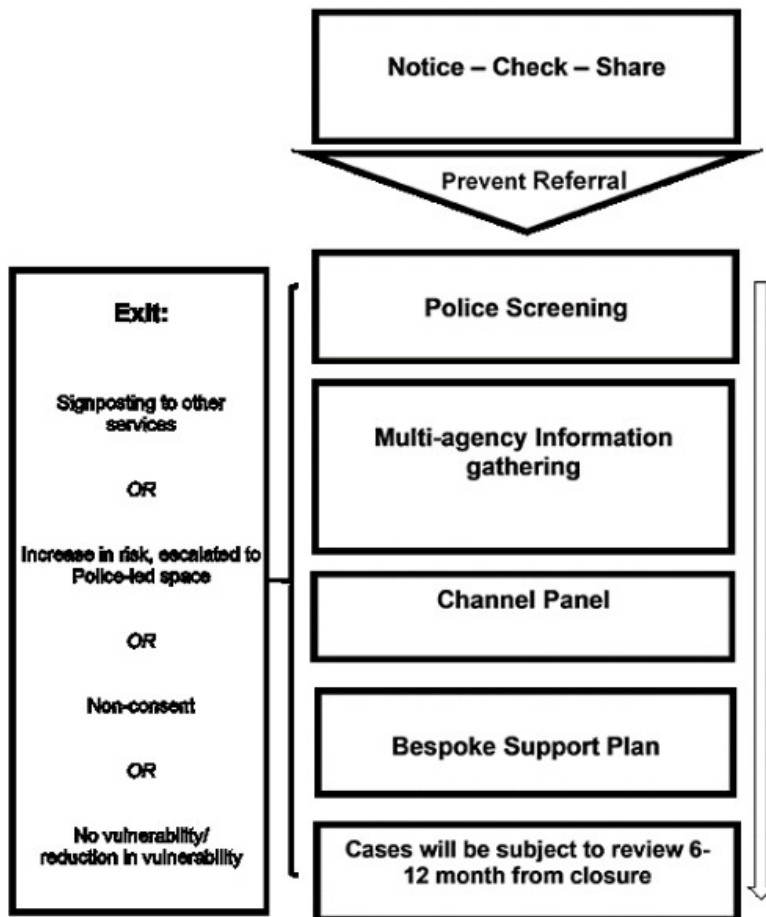


image from www.government.uk site

Emergency Situations / Immediate Risk of Harm

In all other safeguarding situations, if the situation is an emergency, with a child or adult at Risk in immediate danger, staff are instructed to assess the situation and call for assistance and/or the emergency services immediately.

Security team..... contact
Emergency services - call 999. Wait for them to arrive.
NHS 111 can be used for medical help or advice when it's not a life-threatening situation.

Those that are comfortable with and/or qualified to do so should give any necessary physical or mental health first aid

If the abuser remains present and poses a threat to any company staff present as well as the victim, staff are not expected to put themselves at risk of violence or other harm. They should then put into action company procedures on how to respond to abusive, aggressive, or violent behaviour, which forms part of the company's policies on Health and Safety of its staff, which can be located on Myhrtoolkit.

- Take steps to preserve any physical evidence if a crime may have been committed.
- Make a written record of all key facts (what, when, where, who) and what was agreed, what action/s have been taken and make a record of any evidence that has been preserved and where it is stored etc.

All emergency action must be reported to the Designated Safeguarding Lead or the relevant Safeguarding Deputy.

Clients with Sex Offences

Any potential client or tenant with sex related offences will need a risk assessment. The types of situations which will require a risk assessment are for example:

Those with Child Sexual Offences. Those on the Sex Offenders Register. Those subject to a Sexual Risk Order.

Those subject to a Sexual Harm Prevention Order.

Those subject to a Community Order.

Anyone who discloses that they have sexual offence must be referred to the Designated Safeguarding Lead, who will then bring this to the attention of the CEO and Board to discuss the way forward and to make a decision. This may also require a multi-agency meeting involving the police, probation, and social workers to decide on if this can be worked with. The Board will make the final decision. If they decide they can support the individual, these risk assessments will continue to be reviewed monthly or when there is any significant change or incident. They will be shared with all staff working with the individual on a need-to-know basis only.

Process of taking disclosures

From the very first stage of concerns being identified, the views of the adult should be sought. This will enable the adult to give their perspectives about the abuse or neglect concerns that have been raised, and what outcomes they would like to achieve. These views should directly inform what happens next.

The adult must also be asked for their consent to report the concern. If consent is withheld but there are risks to others including children and other adults at risk, or the risk to the adult at risk is serious, a referral to adult care should still be made and the adult at risk informed that this has been done.

If you suspect a child or adult may be at risk, or a child or adult discloses to you, it is your duty to report it. You must pass on any concern to the appropriate person, even if it seems minor. It is the role of the DSLs or Deputy Designated Safeguarding Leads or a trained member of the

Board/CEO only to investigate any concern. They will decide whether it is significant, whether it constitutes a safeguarding concern, and how they will proceed with that information.

If you are in any doubt, speak to your DSL or deputy DSL (or relevant Board member if they are unavailable).

How to respond:

- Adopt an approach of listen, hear, believe, and try not to show if you are shocked. Do not press for detail as this could be stressful and jeopardise future investigations.
- Do not attempt to contact or question the alleged perpetrator as you may be placing the adult at further risk of harm.
- Let the client know that you will be telling the safeguarding team. They may ask you not to, but you must let them know this is your duty. (See Section Below on Confidentiality.)
- Contact the Designated Safeguarding Lead or relevant Deputy for your site as soon as possible and within 2 hours of the disclosure if there is an immediate concern and within 24 hours for all other cases.
- If during out of hours (9pm – 6am e.g.), alert the relevant Security Guard in the first instance – contact details....
- Outline to the Designated Safeguarding Lead and/or relevant Deputy what has been disclosed by you, what you have overheard or your suspicions, making clear what is fact and what is opinion.
- Write up to the best of your memory as soon as possible but definitely within 24 hours all key facts, opinions, and anyone else involved/witnessed your concerns. This will ideally be on a safeguarding report form – available on... or paper copies....and emailed to the secure email address...? Or passed by hand to the relevant DSL/Deputy DSL.
- This will be stored in the Safeguarding Secure Area and the case will be opened on the client log.
- If reported to a Deputy they will take the case forward with the support of the Designated Safeguarding Lead. The report will be discussed, and appropriate referrals and action made
- You may be asked for updates. Although you may receive feedback about any concern you have reported, it should not be expected.
- If required the DSL will complete an Adult Social Care referral or for a child will get in touch with the First Response Team or Child Social Care Team according to the location. They will then take control of the situation and determine what further action is required.
- The Designated Safeguarding Lead and when necessary, the relevant Deputy will present ACH / Himilo? at discussions, Core Groups and also Multi-Agency Meetings.
- When there is no longer a concern, the case will be closed.

Confidentiality:

Although confidentiality should be maintained as far as possible, the child or adult at risk should always be informed that there will be a need to pass on the information as early as possible in the disclosure to the safeguarding team.

All conversations regarding safeguarding disclosure should be held in private if at all possible. ACH / Himilo understands and complies with all data protection requirements, however, "Fears around sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children" (KCSIE 2023)

Workers with concerns about the welfare of a child or adult, must not discuss these with other staff, parents, carers, or other people involved with the person, until they have passed on the concerns and received advice and instructions from a (Deputy) Designated Safeguarding Lead, or the Board Safeguarding Lead if these are not able to be reached.

Record Keeping:

The safeguarding team have a secure area where they keep all clear and comprehensive records of allegations made and actions taken to follow up and support the alleged victim.

Safeguarding records will be kept in guidance from the Records Management Society, which states where a child is concerned, records should be kept until the child's 25th birthday, thus 7 years after the milestone age of 18. We will also keep adult records for up to 7 years. All records will be kept securely in a secure SharePoint area. These will be stored in line with our document retention policy (see the Company Handbook). All procedures will be reviewed regularly to ensure best practice.

Safeguarding Procedure – No Immediate Risk of Harm

Staff member is concerned about learner/ tenant/



Adult or child has not disclosed anything, but staff member has suspicion of one of the following occurring:

- Physical abuse
- Sexual abuse
- Psychological/emotional abuse
- Neglect
- Financial/ Material abuse
- Neglect and acts of omission - Discriminating abuse.
- Self-neglect
- Modern slavery
- PREVENT

Adult or child confides incident(s) of apparent abuse to staff member.



Staff member to listen carefully (no probing/investigating). Explain that you **will** have to disclose to the Safeguarding Lead to reassure them.



Staff member to write clear and concise report of disclosure and pass to the relevant Safeguarding Deputy

Staff member to record suspicion and report to Designated Safeguarding Lead or relevant Safeguarding Deputy for further action/investigation.

Receiving DSL/Deputy to keep log of reports. Deputies to work with the DSL to define further action(s).



Safeguarding Deputy and Designated Safeguarding Lead discuss the case and ways forward to include relevant referrals.



Staff member with the relationship will be informed on a need-to-know basis and asked for updates until the case is closed.

SEE APPENDIX 2 FOR ALL RELEVANT CONTACT DETAILS

Disclosure / Allegation against a member of staff/ Person in a Position of Trust.

The primary concern of ACH and Himilo is to ensure the safety of the child or adult at risk. A Person in a Position of Trust (PiPoT) includes any employee, volunteer, or student, paid or unpaid, who works with or cares for adults with care and support needs, or has direct and regular contact with children.

Where a safeguarding concern or allegation is made regarding a person any staff member (paid or unpaid) including a PiPoT, these procedures will be followed.

Reporting Safeguarding Concerns

Any allegation against people who work with children or Adults at Risk should be reported immediately to the Designated Safeguarding Lead, or if they are not available the CEO/Board safeguarding lead. The DSL will take the matter to the CEO or other appropriate senior member of staff.

Any allegations about DSLs/Deputy DSLs should be referred to the CEO. If the allegation is about the CEO, it should be referred to the Trustee Safeguarding Lead or if they are not available/it concerns the Trustee Safeguarding Lead, then contact the Chair of the Executive Committee:

Contact details and availability

Designated Safeguarding Lead:

Sheena Dermanis

T: 0117 9540 433 E: sheena.dermanis@ach.org.uk

Board Representative for Safeguarding:

Mashkura Begum: mashkura.begum@ach.org.uk

An allegation is a concern if the individual has:

- Behaved in a way that has harmed or may have harmed a child or adult with care and support needs.
- Possibly committed a criminal offence against or related to a child or adult with care and support needs.
- Behaved towards an adult with care and support needs in a way that indicates she/he is unsuitable to work with a child or adult with care and support needs.
- Behaved in a way that has harmed children or may have harmed children which means their ability to provide a service to a child or adults with care and support needs must be reviewed.
- May be subject to abuse themselves and as a consequence means their ability to provide a service to adults with care and support needs must be reviewed.
- Behaved in a way which questions their ability to provide a service to a child or an adult with care and support needs which must be reviewed e.g. conviction for grievous bodily harm against someone who is not an adult with care and support needs.

It must also be noted that where a member of staff in Ashley Community Housing / Himilo Training holds information regarding a member of staff/PiPoT in another organisation or agency, they would normally make them aware, and give them the chance to share the information with their employer first. If the member of staff/PiPoT declines to share it with their employer for whatever reason, this does not mean the information cannot be shared. However, any decision to share must be considered on its own merits, with

due regard to the Data Protection legislation.

Assessment of concern and taking action

Where an allegation is made against a member of staff (paid or unpaid) of Ashley Community Housing / Himilo Training, the Designated Safeguarding Lead (or CEO/Board member if they are in receipt of the concern) will assess the situation inform the CEO and People and Culture Manager.

They will take the appropriate next steps which could be:

- Assess whether the individual concerned meets the definition of a PiPoT - they will make a record of the discussion and decision and the reasons for this conclusion.
- Act immediately to investigate any further incidences of abuse or neglect in the organisation and protect children and Adults at Risk from harm as soon as possible; and
- Consult with relevant statutory agencies and make formal referrals as appropriate. Continue to communicate with and act in accordance with their guidance.
- If the allegation concerns a child, inform the local authority designated officer (LADO) in accordance with the local policy and procedures.
- Consider what support and advice they will make available to their staff or volunteers against whom allegations have been made. Any member of staff about whom there are concerns should be treated fairly and honestly. Ashley Community Housing and Himilo Training as an employer recognise a duty of care towards them. Any decisions will be confirmed in writing. It is likely the individual will be suspended without prejudice pending investigation. Information about the subject's rights to representation and support will be provided.
- If the member of staff is removed by either being dismissed or permanently redeployed to a non- regulated activity because they pose a risk of harm to children or adults with care and support needs, then Ashley Community Housing / Himilo Training have a legal duty to refer the person to the Disclosure and Barring Service.
- If a person subject of a safeguarding investigation attempts to leave their employment by resigning in an effort to avoid the investigation or disciplinary process, the Ashley Community Housing / Himilo Training is entitled not to accept that resignation, conclude whatever process has been utilised and, if the outcome warrants it, dismiss the employee or volunteer instead.

Appendix 1. Definitions of Abuse

(With some reference to Source NHS Choices)

Physical Abuse:

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm of a child or Adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or Adult. Physical abuse includes assault, hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate sanctions or force-feeding, inappropriate methods of restraint, and unlawfully depriving a person of their liberty.

Emotional Abuse:

The continuous emotional maltreatment of a child or Adult such as to cause severe and persistent adverse effects on the victim's emotional development. It could involve encouraging a child or adult to believe that they are worthless or unloved or inadequate. It may include not giving the child or adult at risk opportunities to express their own views. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that they are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning or preventing a child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve bullying (including cyber-bullying) causing children or Adults to often feel frightened or in danger.

Sexual Abuse:

Involves forcing or encouraging a child or Adult at Risk to take part in sexual activities, whether or not the victim is aware of what is happening, and the activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative. They may also include non-contact activities, such as involving children or adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate online abuse. This includes Indecent exposure; Sexual harassment; inappropriate looking or touching; sexual teasing or innuendo; sexual photography; being forced to watch pornography or sexual acts, being forced, or pressured to take part in sexual acts; rape. With children, sexual abuse is not solely perpetrated by adult males and can also be perpetrated by women and also other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) *. Any sexual relationship that develops between adults where one is in a position of trust, power, or authority in relation to the other (e.g. day Centre worker/social worker/residential worker/health or care worker etc.) may also constitute sexual abuse.

**See explanation below*

Sexual exploitation

For children and Adults at Risk this involves exploitative situations, contexts, and relationships where adults with care and support needs (or a third person) receives affection or inclusion or some type of "reward", for example food, accommodation, drugs, alcohol, cigarettes, gifts, money) as a result of performing sexual activities, and/or others

performing sexual activities on them.

Sexual exploitation can occur through the use of technology without the person's immediate recognition. This can include being persuaded to post sexual images or videos on the internet or a mobile phone or being sent such an image by the person alleged to be causing harm.

As above, sexual exploitation can be perpetrated by an individual or a group of perpetrators. It does not always involve physical contact but can happen through the use of technology.

Child on Child Abuse

This can include but not be restricted to any of the following:

- Bullying (including cyberbullying).
- Abuse in intimate personal relationships between peers
- Physical abuse, such as hitting, kicking, hair pulling or otherwise causing physical harm.
- Sexual violence, such as rape, assault by penetration and sexual assault.
- Sexual harassment, such as sexual remarks, jokes, and online sexual harassment.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and or videos) also known as sexting or youth produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or harm.
- Initiation/hazing type of violence and rituals (this can involve activities used as a way of initiating a person into a group and may also include an online element).

Child Criminal Exploitation

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child under the age of 18. They control the victim who may have been criminally exploited even if the activity appears consensual.

Child Criminal Exploitation is broader than just County Lines and includes for instance children forced to work illegally including forcing them into shoplifting, pickpocketing, and threatening other young people.

Female Genital Mutilation

Female genital Mutilation (FGM) is illegal in the UK. It is a procedure where the female genitals are deliberately cut, injured, or changed, but where there is no medical reason for this to be done. FGM is most often carried out on girls between infancy and the age of 15, most often before puberty starts.

Professionals should be aware that any disclosure may be the first time that a woman has ever discussed her FGM with anyone. A referral to the police should not be an automatic response for all adult women who are identified as having had FGM; cases must individually have assessed, and a safeguarding adults referral made for any woman who is also an

adult at risk. An adult woman who has had FGM may also be a sign that others in the family, including children, may be a risk of FGM. There is a mandatory requirement to refer children who are at risk of, or have had, FGM, as a child protection referral through First Response.

Neglect and Acts of Omission

This is indicative through the persistent failure to meet an adult or child's basic physical and / or psychological needs, such as not providing adequate food, likely to result in the serious impairment of the adult in need or child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to meet certain needs.

Possible indicators:

- Adult/child has inadequate heating and/or lighting.
- Adult/child's physical condition/appearance is poor (e.g. ulcers, pressure sores, soiled or wet clothing)
- Adult/child is malnourished, has sudden or continuous weight loss and/or is dehydrated.
- Adult/child cannot access appropriate medication or medical care.
- Adult/child is not afforded appropriate privacy or dignity.
- Adult and/or a carer has inconsistent or reluctant contact with health and social services.
- Callers/visitors are refused access to the person.

Self-Neglect

This is indicated through a lack of self-care, such as a neglect of personal hygiene, nutrition, hydration, and health, thereby endangering safety and well-being; it may also include a lack of care of environment or living space evidenced through dirty living conditions and hoarding, and/or a refusal of services that would mitigate risk of harm. People who self-neglect can present through a variety of key episodes such as fire risks, drugs and alcohol abuse, untreated diabetes, or other serious medical conditions.

Possible indicators:

- Living in very unclean conditions which may have attracted vermin.
- Poor self-care leading to a decline in personal hygiene.
- Poor nutrition.
- Neglecting household maintenance.
- Poor health with a refusal to take prescribed medication or follow medical advice.

Modern Slavery

This includes slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have to force, coerce, and deceive those at their mercy into a life of abuse, servitude, and inhumane treatment.

Modern Slavery should be considered if a person is for example:

The adult or child is not in possession of their legal documents (passport, identification, and bank account details) and they are being held by someone else.

- The adult or child is not allowed to go out alone.
- The adult or child is forced to work through means of mental or physical threat.

- The adult or child is owned or controlled by an 'employer', usually through the threat or actual episodes of physical and/ or mental abuse.
- The adult or child is treated in a demeaning, dehumanised manner, treated as a commodity or bought and sold as 'property'.
- The adult or child is physically constrained or has restrictions placed on their freedom.
- The adult or child looks malnourished, unkempt, or appears withdrawn.

Financial Abuse

This can include theft, fraud, telephone and internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits. A person living in poverty who cannot afford the basic necessities of life, but has adequate income, may be being deprived of money by others.

Sometimes adults at risk are manipulated or "groomed" for financial gain, e.g. a perpetrator may disclose sad family circumstances, borrowing small sums of money, breaching professional boundaries. Family members, friends or professionals may be the perpetrators of such abuse.

Possible indicators:

- Unusual bank account activity where sums withdrawn cannot be accounted for.
- Lack of heating, clothing, or food.
- Inability to pay bills/unexplained shortage of money, especially after benefit day.
- Unexplained loss/misplacement of financial documents.

Extremism

Extremism is defined in the Counter Extremism Strategy of 2015 as the vocal or active opposition to our fundamental values, including the rule of law, mutual respect and individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

Extremism is not only terrorism and includes those people who target the vulnerable – including children by seeking to cause division between communities on the basis of denomination, faith and race; it seeks to justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the rule of law and democracy in society.

Discriminatory Abuse

This includes some forms of harassment, slurs of unfair treatment because of race, sex, sexual orientation, gender and gender identity, age, disability, religion, being married or in a civil partnership, being pregnant or on maternity leave.

Possible indicators:

- Adult exhibits significant changes in sexual behaviour or outlook.
- Adult experiences pain, itching or bleeding in the genital/anal area.
- Adult's underclothing is torn, stained or bloody.
- A woman who lacks the mental capacity to consent to sexual intercourse becomes pregnant.

Domestic abuse

This is defined as an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is or has been an intimate partner or other family member regardless of gender or sexuality. Domestic abuse may include psychological, physical, sexual, financial, emotional abuse; so-called 'honour-based' violence; Female Genital Mutilation (FGM) and forced marriage.

Psychological Abuse

Psychological abuse includes 'emotional abuse' and takes the form of threats of harm or abandonment, humiliation, rejection, blaming, intimidation, coercion, indifference, harassment, verbal abuse (including shouting or swearing), cyber bullying or "trolling", isolation or withdrawal from services or support networks.

Psychological abuse includes the denial of a person's human and civil rights including choice and opinion, privacy and dignity and being able to follow one's own spiritual and cultural beliefs or sexual orientation/gender orientation.

Historical Disclosures of Child Abuse

If an adult at risk discloses abuse that happened when they were a child and from which they are now safe, i.e. they have no contact with the alleged perpetrator; this is not a concern that needs to be reported under safeguarding adults. However, several courses of action must still be considered:

- If the person has the capacity to decide they may wish to report their abuse to the police. This decision must not be rushed, and the person should be well supported throughout the process.
- If the person does not have the mental capacity to make those decisions for themselves, a report may be made on their behalf if it is decided it is in their best interests to do so.

If children are thought to be at risk from the alleged perpetrator whether the victim consents or not, you have a duty to report this information to Children Services via First Response.

Significant Harm

Some children are in need because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life which is in the best interests of the children concerned.

Appendix 2: Contact Details ACH Safeguarding Team and Local Authorities:

Safeguarding Representative for the Board: **Mashkura Begum**

Email: mashkura.begum@ach.org.uk

Designated Safeguarding Lead: **Sheena Dermanis**

Telephone: 0117 9540 433

Email: sheena.dermanis@ach.org.uk

If Sheena is unavailable/on leave, please contact Tom Dixon, SMT Safeguarding Representative: Tom.Dixon@ach.org.uk

Deputy Designated Safeguarding Lead (Birmingham): **Mary Unsworth**

Telephone: 0121 565 3384

Email: mary.unsworth@ach.org.uk

Deputy Designated Safeguarding Lead (Bristol): **Devina Bolina**

Telephone: 0117 9540 433

Email: Devina.bolina@ach.org.uk

Shalini Sivakrishnan

Telephone: 0117 9540 433

Email: shalini.sivakrishnan@ach.org.uk

Deputy Designated Safeguarding Lead (Coventry): **Mirwan Yafai**

Telephone: 0247 531 2470

Email: mirwan.yafai@ach.org.uk

Deputy Designated Safeguarding Lead (Wolverhampton): **Fajaquir Choudhury**

Telephone: 01902 425751

Email: fajaquir.choudhury@ach.org.uk

OUT OF HOURS EMERGENCY - contact the security team on.... Or the emergency services (999). Report to the DSL or deputy DSL as soon as they are available.

Statutory Agencies Safeguarding Contacts

Always consider if there are children or other adults with care & support needs who are at risk of harm and take appropriate steps to safeguard them.

In all cases of children (including unborn children) and adults at risk, a referral should be made to the Police via 999, otherwise a referral should be made via 101.

Local Authority safeguarding contacts

Bristol First Response (0117 903 6444).

Children's Advice and Support Services (CASS)

Birmingham (01213031888).

Coventry Children's Social Care (02476788555).

Wolverhampton Council's Children Social Care (01902 555392).

Appendix 3 – Safeguarding report form

CONFIDENTIAL

To be completed as fully as possible if you have concerns regarding a child/adult at risk.

Once completed pass to a deputy DSL, or the Designated Safeguarding Lead. _

IF YOU THINK A CHILD OR ADULT WITH CARE AND SUPPORT NEEDS IS IN IMMEDIATE DANGER, DIAL 999

ACH / HIMILO	Record of Concern	Part 1
Name of adult/ child:		
Adult/ child’s address (if known):		
Adult/ child’s date of birth (if known, if not include approx. age):		
Contact details (if known):		

ACH / HIMILO	Record of Concern	Part 2 Consent – ADULTS ONLY
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Has the adult at risk given consent for this referral?	Yes	No
If no, why is this referral being made without consent?		

Is the adult at risk aware this referral has been made?	Yes	No
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If no, why have they not been made aware?		

ACH / HIMILO Record of Concern Part 3 The concern / incident

What is said to have happened or what was seen? Include

- when and where it occurred,
- if other people were present
- *record using their own words and be considerate of language barriers*
- *state whether you are recording this as fact, opinion or hearsay*
- *record any details of alleged offenders, and their relationship to the adult/child*

Were there any obvious signs e.g., bruising, bleeding, changed behaviour?

Who has been told about it (include dates)?

Do the relevant parents/carers/guardians/family members know (if applicable)? If yes, what was said and what are their views?

Have you spoken to the child/discussed your concerns with the adult at risk?
If yes, what was said? What are their views, what outcomes have they stated they want (if any)?

Does the child/adult at risk continue to be at risk? Is there anyone else, including children, also at risk?
If yes, describe the risks that remain, and any immediate action needed:

Is there anything else you think the deputy/DSL should know?

Print name and signature of person filling in record

Date of record

ACH / HIMILO Record of Concern Part 4 (for Safeguarding leads ONLY)

Consultation taken (including who was in the discussion):

Decision made:	No further action	
	Continued Monitoring	
	Formal Referral	
Date:		
Details of decision made:		
Details of Formal Referral (including Agency to which the case is being referred, contact name within the agency and date of referral)		
Designated Safeguarding Officer:		
Name:		
Signature:		
Date:		
Copy of Record Form to:		

12: Commitment

I have read, understood and will commit to ACH / Himilo's Safeguarding policy and procedures, will act according to them at all times, and I fully understand my safeguarding responsibilities as outlined in this document. I also understand the possible consequences of not complying at any time.

Signed:

Name:

Date: