

# SAFEGUARDING POLICY

<b>Effective Date</b>	July 2021	<b>Version</b>	4.0
<b>Recommended Review</b>	July 2024	<b>Review Frequency</b>	3 years
<b>Author</b>	Laura Giles		
<b>Job Title</b>	Head of Strategy and Compliance		
<b>Owner</b>	Group Director of Care and Support		
<b>Approved By</b>	Executive Management Team		

## 1. PURPOSE

- 1.1 The purpose of this policy is to set out The Barnet Group's approach to safeguarding children and adults at risk. It replaces any previous versions endorsed by the Group and its subsidiaries.

## 2. SCOPE

- 2.1 This policy applies to The Barnet Group including its component parts, Boards and Committees, and staff, including consultants, contractors, and volunteers.
- 2.2 In implementing this policy The Barnet Group will:
- comply with relevant legislation;
  - comply with the Care and Support Statutory Guidance;
  - comply with the approach of the London Multi-Agency Adult Safeguarding Policy and the London Child Protection Procedures;
  - observe appropriate guidance, including Making Safeguarding Personal and Working Together to Safeguard Children; and
  - ensure that suspected abuse or neglect is identified and reported.
- 2.3 This policy applies to the protection of all the residents and service users of Your Choice (Barnet), Barnet Homes, and Opendoor Homes, including children, young people, and adults at risk of abuse, across all services and tenures.
- 2.4 This policy is supported by the Safeguarding Procedure.

## 3. POLICY STATEMENT

- 3.1 The Barnet Group provides housing, support, and care services to a wide range of people; some of whom may, at some point, be vulnerable to abuse or neglect. This policy sets out what we will do if suspected abuse or neglect is reported or identified.
- 3.2 Safeguarding is everyone's responsibility. As an organisation we have a duty to keep our residents and service users safe from harm, and all staff have a duty to act on concerns of abuse or neglect. There are several routes through which concerns raised in relation to our customers may be most appropriately handled, including via health and safety procedures, tenancy management and enforcement, the provision of tailored support to vulnerable people, and through the application of this policy and associated procedure for adults and children who are at risk of being abused or neglected by others.
- 3.3 Our policy reflects the commitment of organisations in Greater London to work together to safeguard adults and children at risk, aiming to make sure that their needs, interests, and

human rights are always respected and upheld; and a proportionate, timely, professional, and ethical response is made.

- 3.4 We will work in partnership with agencies and individuals to investigate actual or suspected abuse and neglect by working to the six principles of safeguarding from the Care Act 2014:
- empowering adults to make their own decisions and be provided with support and information;
  - developing strategies to prevent abuse and neglect and promote resilience and self-determination;
  - taking a proportionate and least-intrusive response, balanced with the level of risk.
  - offering ways for adults to protect themselves, ensuring there is a coordinated response to safeguarding;
  - working in partnership with other services within communities to provide local solutions; and
  - ensuring accountability and transparency in delivering a safeguarding response.
- 3.5 We aim to:
- raise awareness about the abuse and/or neglect of children, young people, and adults at risk;
  - develop a culture that does not tolerate such abuse and which encourages people to feel confident to raise concerns;
  - prevent abuse or neglect from happening wherever possible;
  - respond promptly and proportionately where abuse does happen; and
  - make the necessary referrals and engage the appropriate authorities to stop the abuse and ensure the person harmed receives effective support.

## 4. RESPONSIBILITIES

- 4.1 **The Board** and the **Executive Management Team** have overall responsibility for The Barnet Group's compliance with safeguarding legislation and statutory guidance. This includes a responsibility for ensuring that children and adults at risk who come into contact with our services are protected from abuse and that appropriate action is taken if abuse is alleged or suspected.
- 4.2 The **Safeguarding Lead** (the Group Director of Care and Support) is responsible for this policy and takes the lead for organisational safeguarding. They will attend the Safeguarding Adults Board (SAB) and liaise with Barnet Council on safeguarding matters.
- 4.3 The **Heads of Care and Support** for regulated and non-regulated services (for incidents regarding Your Choice (Barnet)) and the **Head of Housing Management** and **Head of Housing Options** (for incidents regarding Barnet Homes or Opendoor Homes) are responsible for coordinating the approach to safeguarding, for monitoring and reporting on safeguarding incidents and action taken, and for providing advice to staff.
- 4.4 **The Barnet Group's Safeguarding Group**, which will be chaired by the Head of Care and Support and attended by representatives from all frontline services and from the council's Adults and Children's services, will be convened as required to discuss current safeguarding issues and concerns and discuss good practice.

#### 4.5 **All managers** must ensure that:

- they contribute to developing a culture that does not tolerate abuse and which encourages people to raise concerns;
- they listen to and support staff raising concerns;
- their staff are familiar with this policy and the supporting procedure, and that they undertake any required training;
- action is taken, and in accordance with the requirements of Alerting Managers (any managers who report safeguarding concerns) where relevant, to prevent and respond to allegations in accordance with this policy and the associated procedure; and
- safer recruitment practices, including robust selection and vetting processes are implemented.

#### 4.6 **All staff** must:

- be vigilant as to what is happening around them with customers and colleagues, and be aware of the different types and indicators of abuse;
- be familiar with this Safeguarding Policy and the supporting procedure.
- undertake safeguarding training as appropriate to their role;
- raise any concerns they may have; and
- keep factual records of any incident or concern.

### 5. **DEFINITIONS**

5.1 Please see Appendix 1 – Safeguarding Definitions.

### 6. **POLICY**

#### 6.1 **The Barnet Group's approach**

6.1.1 Under the Care Act 2014, The Barnet Group and its subsidiaries have a duty to cooperate with local authorities and work with relevant agencies to safeguard people who are experiencing or are at risk of abuse and neglect. Under the Children Act 2004, it has a duty to make arrangements to safeguard and promote the welfare of and improve the outcomes for children. These duties may include carrying out enquiries into incidents, sharing information, and participating in local Safeguarding Adult and Children Boards. We must also ensure that our staff are familiar with the principles of safeguarding and are appropriately trained to in recognising the symptoms of abuse, being vigilant, and responding to safeguarding concerns.

6.1.2 Safeguarding is a multi-agency approach that depends on effective joint working, and we recognise our role in working with partners in the coordination of safeguarding work.

6.1.3 Appropriate information sharing between organisations is essential to safeguard people at risk, and we will act in accordance with agreed inter-agency information sharing protocols. Where possible we will seek a person's consent to share information; however, we cannot guarantee full confidentiality when our responsibility to safeguard adults or children at risk, or the public interest, is greater than our responsibility to an individual, or where seeking consent to share information may place a child or adult at increased risk of significant harm.

#### 6.2 **Risk factors**

6.2.1 Staff should be aware of the following factors that may increase the risk of abuse or neglect:

- social isolation;
- poor, long-term relationship between Victim and alleged Perpetrator;

- pattern of family violence;
- dependency for accommodation, financial, emotional support;
- mental health or drug/alcohol problems;
- communication difficulties;
- behavioural problems;
- higher need of care than family carers can provide; and
- relatives' wishes over-riding those of the Service User.

### **6.3 Responding to suspected or alleged abuse or neglect**

6.3.1 Safeguarding of children and vulnerable adults is a complex area which must be dealt with by the appropriate agencies and channels. The Barnet Group will refer any concerns over the abuse or neglect of a child or a vulnerable adult to Social Services in the first instance and, where appropriate, the Police.

6.3.2 The Barnet Group will follow the established procedures that support the London Multi-Agency Adult Safeguarding Policy and the London Child Protection Procedures, and will engage with appropriate mechanisms to support safeguarding including:

- Adults' Multi-Agency Safeguarding Hub (MASH) which aims to keep adults at risk safe and supported;
- Children's MASH, which aims to keep children and young people safe and supported;
- Multi-Agency Risk Assessment Conference (MARAC), which aims to protect those affected by domestic abuse;
- Multi-Agency Public Protection Arrangements (MAPPA), which aim to protect the public from further risk from offenders;
- Multi-Agency Sexual Exploitation Panels (MASE), which aim to protect children at risk of sexual exploitation;
- Safeguarding Adults Board (SAB), which aims to protect adults at risk;
- Barnet Safeguarding Children Board (BSCB), which aims to protect children at risk; and
- Community Multi-Agency Risk Assessment Panels.

6.3.3 The Barnet Group's staff will be vigilant and will take action to recognise, record, and report safeguarding concerns. If a member of staff suspects or has received a report of abuse they will:

- in the event of disclosure, take the resident or service user seriously;
- report it to their service manager or any other senior manager immediately. They will not investigate suspected abuse or neglect;
- accurately, thoroughly, and promptly record discussions and actions completed following suspected or alleged abuse or neglect; and
- fully cooperate with any agencies involved with cases of alleged abuse or neglect.

6.3.4 A manager receiving reports of suspected abuse (the 'Alerting Manager') will act in line with the Safeguarding Procedure, including making an assessment of the risk and safeguarding the individual where necessary, and reporting the concern to all relevant parties.

6.3.5 Where a person suspected of abuse or neglect is a member of staff, an investigation will be carried out immediately and appropriate action will be taken in line with our Disciplinary Policy.

## 6.4 Preventing Abuse

- 6.4.1 The Barnet Group has a duty of care for its residents and service users, and works to ensure a respectful and non-abusive culture in its services. We are committed to prevention and early intervention in recognising potential abuse and learning from past situations.
- 6.4.2 The Barnet Group's safer recruitment practices, including selection, support, supervision, and training of staff, will take into account the need to promote the health and safety of residents and service users, and safeguard them from abuse. We will ensure that all appropriate potential employees are subject to a standard or enhanced (dependent on role) disclosure check through the Disclosure and Barring Service (DBS), and in delivering our Regulated Activities will not employ or use the services of any person who is barred from, or whose previous conduct or records indicate that he or she would present a risk to residents or service users.
- 6.4.3 We will implement a robust framework to ensure we meet the expected standard of care, including regular appraisals. All new starters will undertake Safeguarding Awareness e-learning, which will be refreshed as appropriate to the role on at least a biennial basis. Appropriate staff according to their role will also receive targeted, more extensive training in the implications and processes involved with the safeguarding of vulnerable adults and children, and will be trained in how to identify signs of abuse and neglect.
- 6.4.4 We will work with our service users to promote proactive advocacy and empowerment, create person-centred care plans, and ensure they are aware of abuse through information and training.
- 6.4.5 We will participate in local and national safeguarding and related initiatives, where appropriate, to enhance our approach, and to promote the health and safety of residents and service users, and safeguard them from abuse.

## 7 FEEDBACK

- 7.1 Anyone who is dissatisfied with any aspect of the services provided by The Barnet Group will have the opportunity to seek redress through our Complaints and Compliments policy. We welcome all feedback, good or bad, in all formats, and will provide support, as required, to enable people to make complaints. An Easy Read guide to making complaints is available on our website and in hard copy in our schemes.

## 8 MONITORING AND REVIEW

- 8.1 We will monitor the effectiveness and implementation of this policy and will recommend changes to improve service delivery where appropriate to ensure that we learn from past situations to inform better practice.
- 8.2 The Heads of Care and Support, Head of Housing Management, and Head of Housing Options will report safeguarding incidents to the appropriate body and ensure The Barnet Group responds according to the recommendations of that body.
- 8.3 We will report to the Council on the number of safeguarding alerts that have been made regarding Your Choice (Barnet) services, and the number upheld.

## 9. COMMUNICATION

- 9.1 This policy is available on the intranet for staff and The Barnet Group's websites for customers and other interested parties.

## 10. CONFIDENTIALITY AND ACCESS TO INFORMATION

10.1 If any person wishes to inspect the information about them that is held on file, they may contact us and request to do so electronically or by appointment during normal working hours.

## 11. RELEVANT LEGISLATION

- Care Act 2014
- Care Quality Commission Regulation 13.
- Mental Capacity Act 2005 and Code of Practice
- Deprivation of Liberty Safeguards 2009 (DoLS)
- Public Interest Disclosure Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1998
- Children Act 1989
- Children and Families Act 2014
- Modern Slavery Act 2015
- Equality Act 2010
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

## 12. LINKS WITH OTHER POLICIES AND DOCUMENTS

- Safeguarding Procedure
- Managing Accusations Procedure
- Modern Slavery Act Compliance Policy
- Equality, Diversity, and Inclusion Policy
- Disclosure or Barring Service (DBS) Policy
- Data Protection Policy
- Disciplinary Policy
- Health and Safety Policy
- Whistleblowing Policy
- Domestic Abuse Policy

## DOCUMENT CONTROL

Version	Type of Change	Date	Revisions from Previous Issues
1.0	Document creation	Oct 2013	
2.0	Review	May 2016	Updated with latest legislation and guidance.
2.1	Review	April 2017	Updated to include safeguarding children and separate procedure from policy.
3.1	Review	Oct 2020	Updated to reflect changes to external agencies, incorporate London Child Protection Procedures, and extend lead officer roles for Barnet Homes and Opendoor Homes

## Appendix 1 – Safeguarding Definitions

**Adult at risk** – a person aged 18 years or over, who is or may be in need of community care services because of:

- a physical disability;
- a physical or mental illness;
- a learning difficulty;
- a reduced physical or mental capacity due to older age;
- a dependency on alcohol, illegal drugs, or medication;
- an inability to take care of themselves, or to safeguard themselves against significant harm or exploitation.

Whether or not a person is vulnerable in these cases will depend upon surrounding circumstances, environment and each case must be judged on its own merits.

Safeguarding adults at risk means protecting their rights to live in safety, free from abuse and neglect. It involves working with other organisations to prevent the risk of abuse or neglect and stop them from happening. It also means making sure people's wellbeing is promoted, taking their views, wishes, feelings, and beliefs into account.

**Child** – a person who has not yet reached their 18th birthday.

Safeguarding children involves protecting individual children identified as suffering or likely to suffer significant harm. It includes:

- protecting children from physical, emotional, psychological, and sexual abuse, neglect, and maltreatment;
- protecting children from controlling or coercive behaviour;
- preventing impairment of children's health or development;
- ensuring that children can grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

**Abuse** – a violation of an individual's human and civil rights by any other person/s which results in significant harm. Friends, strangers, family members, and professional staff can all be guilty of abuse.

Abuse can be:

- physical / inappropriate restraint;
- sexual;
- psychological / emotional;
- financial and material;
- neglect and acts of omission;
- discriminatory;
- institutional;
- hate / hate crime;
- modern slavery;
- human trafficking;
- sexual exploitation;
- forced marriage;
- female genital mutilation; and/or
- radicalisation.

It can take place anywhere, and may be:

- misuse of power and control of one person over another, especially where there is a dependency;
- a single or repeated acts;
- act of neglect, omission, or failure to act;
- planned or unintentional; and/or
- multiple acts e.g. neglect and financial abuse.