Safeguarding Policy

Version Number	4
Date Applies From	30/01/2026
Policy Owner	Executive Director of Customer
Next Review Date	30/01/2029
Strategy Link	• Customer focused and equitable services • Safe, well maintained, sustainable and affordable homes

Key connected legislation/regulation:

- Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012
- The Children Act 1989 and 2004
- Working together to Safeguard Children 2023 (updated June 2025)
- The Care Act 2014
- The Care Act – Care and support statutory guidance (updated July 2025)
- Modern Slavery Act 2015
- Sexual Offences Act 2003
- Mental Capacity Act 2005 and Deprivation of Liberty Safeguards
- Counter Terrorism and Security Act 2015 - Section 29 Prevent duty guidance (2015)
- Public Interest Disclosure Act 1998
- GDPR and Data Protection Act 2018
- Domestic Abuse Act 2021

Annual Checks

Policy owners should ensure that an annual check of hyperlinks, roles, and names is undertaken. These checks are in addition to formal review process. Please see Policy and Procedure framework guidance for further details.

If you need this information in an alternative language please call

0161 605 7260

For other formats please call

0300 123 5522

Introduction

This policy 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 ForHousing properties or who are engaged in services organised or delivered by ForHousing.

Safeguarding is everyone's business and ForHousing is committed to safeguarding and promoting the welfare of children, young people and adults at risk. ForHousing expects all colleagues and contractors to share this commitment. It is the responsibility of all individuals working for, or with ForHousing, including colleagues, contractors, agency staff, Board or Committee members, volunteers and involved customers, to respond, in line with this policy, to any concerns for tenant or customer welfare or suspected or actual abuse of a child or adult at risk.

This policy applies to all ForHousing colleagues (including those on fixed term contracts), agency workers, consultants, volunteers and contractors.

This policy also applies to:

- any contractors and sub-contractors who are providing services to ForHousing and its
- tenants or customers.
- any ForHousing services that are delivered under a different brand name.

Scope of Policy

Safeguarding means protecting a person's right to live in safety, free from abuse and neglect. Working with other organisations, we safeguard tenants and customers by aiming to prevent and stop both the risks and experience of abuse or neglect. Safeguarding applies to children, young people and adults at risk.

Child

Anyone who has not yet reached 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 his/her status or entitlements to services or protection

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 2023 https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children 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.

Young Person

A young person here is:

- a care leaver, a person who is aged 16 to 25 years but is still receiving children's services. For example, a person who has substantial and complex needs and continues to be supported to live independently;
- someone aged 16 to 17 who may be homeless or at risk of becoming homeless.

Adults

Any person who is 18 years of age or over, and who is or may be in need of community care services by reason of for example, a physical or mental disability, a learning difficulty, reduced physical or mental capacity due to old age, dependency on drugs, alcohol or medication and is unable to protect themselves from abuse or neglect.

Definitions for adults are taken from Care and Support Statutory Guidance updated July 2025 – Issued under the Care Act 2014
https://www.gov.uk/guidance/care-and-support-statutory-guidance/safeguarding

Safeguarding duties apply to an adult who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing, or is at risk of, abuse or neglect; and;
- 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 adults are 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.

Whilst Local Authorities play a lead role, safeguarding children, young people and adults at risk is the responsibility of every agency.

ForHousing recognises it has a statutory 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 (2023).

ForHousing uses the six principles of safeguarding enshrined in the Care Act Statutory Guidance updated 2025. (Applicable to Adults only)
https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

Empowerment

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

Prevention

It is better to take action before harm occurs.

Proportionality

Proportionate and least intrusive response appropriate to the risks presented.

Protection

Support and representation for those in greatest need.

Partnership

Local solutions through services working with the communities.

Accountability

Accountability and transparency in delivering safeguarding.

Adult Safeguarding - Making Safeguarding Personal

In addition to these principles, it is also important that all safeguarding partners take a broad community approach to establishing safeguarding arrangements. It is vital that all organisations recognise that adult safeguarding arrangements are there to protect individuals.

Making safeguarding personal means it should be person-led and outcome-focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety.

Personalised care and support is for everyone, but some people will need more support than others to make choices and manage risks. Supporting people to understand risk is crucial to empowering and safeguarding adults and in recognising people as “experts in their own lives”. A person-centred approach is supported by the provision of personalised information and advice and, where needed access to advocacy support.

Children’s Act

Under section 11 of the Children’s Act 2004, a range of agencies are required to cooperate with local authorities to promote the well-being of children in each local authority area. This cooperation should exist and be effective at all levels of the organisation, from strategic level through to operational delivery.

Local Adult Safeguarding Boards and Safeguarding Children Partnerships have responsibility

to hold Safeguarding Adult Reviews and Child Safeguarding Practice Reviews. Upon request, ForHousing will take part in these reviews via co-ordination from Senior Management and Designated Safeguarding Officers.

Equity, Diversity, and Inclusion

We value diversity and work to create an inclusive environment for our customers and colleagues, where everyone has access to the same opportunities. We welcome our responsibility to comply with equalities legislation and regulatory requirements that relate to equity, diversity and inclusion and aim to do more. Through our activities we aim to remove systemic barriers to equal opportunities and eliminate all forms of discrimination, harassment, and victimisation within our organisation.

We are committed to providing excellent customer services, which are fair, equitable and inclusive. As such, we will endeavour to understand and make any reasonable adjustments required for customers in line with ForHousing's Reasonable Adjustment Statement and the Equality Act 2010. Any reasonable adjustment provided will be recorded and kept under active review.

Implementation and Communication

Responsible Officers

Operational and Strategic Responsible Officers (named within the Safeguard Case Management procedures) will co-ordinate activity and provide training and guidance to colleagues on safeguarding and vulnerability issues.

Training

This policy will be available to all colleagues and relevant colleagues will receive training to ensure they are aware of responsibilities around safeguarding.

Training will be delivered in accordance with a competency framework which clearly outlines the knowledge and skills required by colleagues carrying out specific identified roles in relation to safeguarding. This approach ensures that all safeguarding issues are addressed in an appropriate manner.

A variety of training methods will be provided internally as well as relevant courses available from local safeguarding boards.

Professional Curiosity

Professional curiosity is a golden thread through all Safeguarding Partnership learning reviews and audits and ForHousing recognises that this is an essential part of safeguarding. Nurturing professional curiosity is a fundamental aspect of working together to keep children, young people and adults safe. Colleagues within ForHousing are supported and encouraged to be professionally curious within their operational practice which includes a combination of **looking**, **listening, asking direct questions, checking out** and **reflecting** on information received, which can often mean having difficult conversations with tenants and customers

about their personal or family situation. Colleagues are supported to triangulate information from different sources to gain a better understanding of any safeguarding situation which, in turn, helps to make predictions about what is likely to happen in the future. This approach is supported through reflective practice discussions and access to regular good quality supervision.

Prevent

Prevent addresses all forms of extremism and is a vital part of the Government's Counter Terrorism Strategy. At the heart of prevent is safeguarding children and adults and providing early intervention, advice and support to protect and divert people away from being drawn into terrorist activity. Prevent is about stopping people from being radicalised and becoming terrorists or supporting terrorism and it is a crucial tool in the ForHousing approach to safeguarding tenants. ForHousing colleagues are often out in the community and may encounter tenants who could be vulnerable or susceptible to being exploited or 'groomed' on a range of issues from sexual abuse through to gangs or drugs. ForHousing will work with Local Authority Prevent Teams ensuring colleagues have access to training and resources and understand the factors that can make people more vulnerable to being radicalised.

Safe Recruitment Practices

ForHousing will ensure that recruitment and relevant organisational development procedures take account of safeguarding children and adult at risk, where relevant. All appropriate frontline colleagues (i.e. those who carry out Regulated Activity) will be subject to the relevant Disclosure and Barring Service (DBS) check and supervision and support will be used to assess and manage any risk issues relating to colleagues. Where relevant, DBS checks will be renewed as appropriate. Safeguarding will feature in role profiles (reviewed regularly), person specifications and included in interview questions, where relevant. This will extend to vetting successful applicants, for example through references.

Confidentiality and Information Sharing

ForHousing will share information appropriately with partners that have a statutory responsibility to investigate safeguarding concerns, including Children and Adult Social Care Departments of Local Authorities and Police Authorities

Information can be shared lawfully within the parameters of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). ForHousing will ensure that all colleagues understand that data protection does not prevent the sharing of information where it would protect the welfare of children and promote the wellbeing of adults. Measures are in place to ensure that data is shared in a secure method and that all partners have measures in place to protect data.

Emergency or life-threatening situations may warrant the sharing of relevant information with the relevant emergency services without consent. Where the issue relates to a child, we do not need to seek consent to make an alert. In an emergency or life-threatening situation, the legal basis for sharing of information relating to safeguarding will rarely be consent and ForHousing will not seek consent unless it is absolutely necessary.

It is very important that the risk of sharing information is also considered. In some cases, such as domestic abuse or hate crime, it is possible that sharing information could increase the risk

to the individual. ForHousing will need to work jointly with Safeguarding partners to provide advice, support and protection to the individual.

Mental Capacity and Best Interest

People must be assumed to have capacity to make their own decisions and be given all practicable help before they are considered not to be able to do so. If there is a concern that an adult may lack capacity around making a specific decision a referral must be made to the Adult Social Care. Where an adult is found to lack capacity, then any action taken, or any decision made for, or on their behalf, must be made in their best interests. Professionals and other colleagues have a responsibility to ensure they understand and always work in line with the Mental Capacity Act and understand circumstances that may indicate a potential deprivation of liberty, any concerns must be referred to the relevant Local Authority.

Escalation and Resolution

Effective working together depends on resolving disagreements to the satisfaction of colleagues and partner agencies, and a belief in partnership and joint working to safeguard children, a young person or an adult. Whilst each Local Authority may have different processes for escalation, the focus of ForHousing will be to ensure resolution and the continuation of good partnership working, managing disagreements at the lowest possible level. At no time must any professional disagreement undermine the safeguarding of a child, young person or adult. The welfare and safety of the individual must remain paramount throughout.

Where a ForHousing colleague feels they do not have sufficient status or experience to challenge a partner agency, they must seek guidance from their Safeguarding Lead.

Reporting

ForHousing emphasises the responsibility of all colleagues to record and report safeguarding concerns promptly as detailed in safeguarding procedures. Safeguarding concerns are discussed as part of supervision appropriate to the role. ForHousing will also maximise available opportunities to provide, or signpost tenants and customers to information and advice regarding safeguarding and ensure people are supported to report any safeguarding concerns. If colleagues become aware that there are problems with the effective operation of this policy or associated procedures, they should report this to their line manager who will discuss with the policy owner. This feedback will be incorporated into the policy and procedural review process.

Whistleblowing

ForHousing’s Whistleblowing Policy encourages and supports colleagues to report concerns about the conduct of other colleagues.

Conduct of Staff

ForHousing take seriously any safeguarding allegations made regarding the behaviour of colleagues, contractors and volunteers.

Under the Care Act 2014 statutory guidance each Local Authority is required to establish and agree a framework and process for responding to allegations against anyone in a professional

or voluntary role who has contact with adults with care and support needs. This is referred to as 'People in Position of Trust' (PiPoT) framework. Each partner agency or employer is responsible for having its own internal procedures consistent with the overarching local frameworks for dealing with PiPoT concerns. If any concerns arise about a colleague's behaviour whether inside or outside of work that may pose a risk to adults at risk, a PiPoT process may be initiated with the relevant Local Authority. This process ensures that any potential safeguarding concerns are assessed and managed appropriately, balancing the rights of the individual with the need to protect others. It is not a disciplinary procedure, but a safeguarding response that involves multiagency collaboration to determine any necessary actions.

For matters concerning children ForHousing will report any safeguarding concerns raised about the conduct of colleague members to the Local Authority Designated Officer (LADO) and act in accordance with the LADO's advice and guidance.

Monitoring, Recording, Reporting

There is a Strategic Safeguarding Assurance Group that meets bi-annually and consists of Senior Management representatives, Neighbourhoods, Community Safety, Supported Housing, Employment & Enterprise, HR and Assets Contract Management. This group will monitor and assure safeguarding within ForHousing and will set standards and performance indicators as relevant to the organisation.

The organisation has a nominated safeguarding lead whose role it is to; keep up to date with policy and legislative updates, undertake monthly audits in accordance with procedures, attend ForHousing safeguarding operational leads meetings and cascade information down to teams, provide advice and guidance on safeguarding issues and deliver in-house training.

All safeguarding alerts will be recorded on ForHousing IT systems. Responsible Officers will compile statistical reports relating to all instances.

ForHousing will monitor and report performance in compliance with this Policy:

- Internal audits
- Section 11 Audits submitted to Local Authority
- Safeguarding system reports
- Tenant and customer feedback
- Management reports
- Quarterly update to Customer Committee

Safeguarding cases will be subject to the management assurance framework for audit purposes.

Related Documents

External Documents:

- Local Authority guidance including multi agency safeguarding procedures. This must be considered when deciding whether this Policy is applicable since the Local Authority has

a statutory duty of care in all safeguarding cases.

Internal Documents:

- Safeguarding procedures and associated documents
- Domestic Abuse policies and procedures and associated documents
- Anti-social behaviour policies and procedures and associated documents
- Equality, Diversity and Inclusion policy
- Whistleblowing Policy and Speak Up Arrangements
- Code of Conduct
- Modern Slavery Statement
- Data Protection Policy
- Recruitment and Selection Policy

Co-production

The following customer consultation / business intelligence methods have been used to develop this Policy:

- Legislation, regulation and best practice
- ForHousing Senior Management Team
- ForHousing Safeguarding Assurance Group
- ForHousing Internal Operational Safeguarding Leads
- Local Authority Safeguarding Leads

Approval & Review History

With effect from 23/10/2024 the approval route for the Safeguarding Policy is:

EMT - ARC (Noting)

Date	Version	Approved by	Detail
13/03/19	1		
28/07/20	2		
10/01/23	3	Executive Management Team representative(s)	Inclusive Decision Making Framework review and advise, Health and Safety review and advise 15/12/2022. Data protection impact assessment, Legal review and advise, Human Resources review and advise 16/12/2022.
06/08/24	3.2		Inclusion of paragraph related to reasonable adjustment statement of intent.
22/04/25	3.3	Head of Supported Living	Copied text from old template to new template – Updated statutory guidance dates. Added Domestic Abuse Act 2021
30/01/26	4	EMT (ARC 11/02/26 – Noting)	• Updated statutory guidance dates • Removed specific reference to the Housing Management Contract for CW&C

Date	Version	Approved by	Detail
			• Conduct of staff section - Included information on PiPot – Persons in position of trust (information agreed by HR) • Included section on 'Professional Curiosity' as recommended by KMBC Safeguarding Adult Review for Jackson Gardens – October 2024 • Reporting arrangements – Quarterly updates will now be submitted to Customer Committee rather than Audit & Risk Committee