



**Halton**  
Housing

# Policy

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## 1. Introduction

- 1.1 At Halton Housing (HH) we believe that every person has the right to live in safety, free from abuse, harm, or neglect. Safeguarding is the term used to describe the process and activity taken to protect children, young people, or vulnerable adults / adults at risk from neglect, harm, or abuse of any kind.
- 1.2 This policy outlines our commitment and approach to safeguarding children, young people and adults who are being or at risk of being abused, harmed, or neglected.
- 1.3 Halton Housing has a statutory duty to protect the people who use our care and support provision from abuse and harm. We also have a central role to play safeguarding in general needs housing, as we are well placed to spot early signs of abuse or neglect of tenants who may need, but do not receive, care and support services.
- 1.4 This policy is prepared in line with the safeguarding requirements under the Care Act 2014. We acknowledge the Serious Crime Act 2015 (Part 5: Enhancing the protection of children and others) Halton Borough Council's "Safeguarding Adults in Halton Inter-Agency Policy, Procedures and Good Practice Guidance", the Children Act (1989 and 2004), Working Together to Safeguard Children (updated 2015) and Children's Safeguarding Procedures, which are approved and operating within Halton. We are members of HBC Safeguarding Board, MARAC and MAPPA.
- 1.5 In addition, the Counterterrorism and Security Act 2015 sections 36 to 41 set out the duty on local authorities and partners to establish and cooperate with a local Channel programme of 'Channel panels' to provide support for people, children, and adults vulnerable to being drawn into terrorism. It is essential that Channel panel members, partners to local panels and other professionals ensure that children, young people and adults are protected from harm. We work closely with statutory agencies, such as the Police, NHS, HBC Adult Social Care, HBC Safeguarding Team, Schools and HBC Children's and Young Peoples Services in the interests of adults and children at risk in Halton.

## 2. Policy Statement

- 2.1 Our policy and supporting procedures are based on the six key principles which underpin safeguarding:-
  - Prevention – it is always preferable to act before harm occurs.
  - Proportionality – the least intrusive response appropriate to the risk presented.
  - Protection – support and representation for those in greatest need.

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- Empowerment – people being supported and encouraged to make their own decisions and informed consent.
  - Partnership – local solutions through services working with communities, who can have a key part to play in preventing, detecting, and reporting abuse and neglect.
  - Accountability – accountability and transparency in delivering safeguarding.

### **Who does this policy safeguard and protect?**

2.2 Halton Housing’s core purpose is the provision of affordable housing; however we recognise that our colleagues and customers will be in contact with children and vulnerable adults and as such it is essential that we consider the safeguarding of adults and children who live in our properties and also any colleagues contractors/partners that are accessing customer’s homes.

### **What is abuse?**

2.3 Abuse is the violation of an individual’s human and civil rights by any other person or persons. Abuse can occur in any relationship and may result in significant harm to the person subjected to it. Abuse may consist of a single act or repeated acts, and it can be intentional or unintentional. There are many types of abuse – the categories generally recognised in Adult Safeguarding and in the Safeguarding of Children and Young People are listed below.

### **Adult safeguarding**

2.4 This means protecting an adult’s right to live safely, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s well-being is promoted including, where appropriate, making it personal to them having regard to their views, wishes, feelings and beliefs in deciding on any action that is to be taken.

### **Adult: Anyone over the age of 18**

2.5 Adult at risk: This term is increasingly replacing the term ‘vulnerable adult’. The provisions for safeguarding adults at risk of abuse or neglect contained within the Care Act 2014, apply to an adult who meets the following three-part ‘test’:

- has care and support needs (whether the authority is meeting any of those needs or not)
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it

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2.6 An adult at risk may be a person who:

- Is elderly and frail due to ill health
- Has a learning disability
- Has a physical disability and/or a sensory impairment
- Has mental health needs including dementia or personality disorder
- Has a long-term illness or condition
- Misuses substances or alcohol
- Is unable to make their own decisions (lacks the mental capacity to make certain decisions) and needs care and support
- Is a young adult, over the age of 18, who has care and support needs and is 'in transition' from children's to adults' services
- Is a carer (looking after another person with care and support needs)

2.7 It is important to be clear that not everyone in the identified groups listed above will automatically be 'at risk', similarly there will be people that do not fall into these groups that could be at risk.

2.8 The extent to which someone is at risk will be determined by a range of factors including personal characteristics (e.g. mental capacity, ability to communicate, degree of physical dependency) and factors associated with their situation (e.g. extent of support network, access to information).

### Types of abuse (adults)

2.9 The Care Act 2014 encourages local authorities not to limit their view of what constitutes abuse or neglect, and to consider each case individually. The Act lists the following types of abuse, but this is not intended to be exhaustive:

2.10 **Physical abuse** - including pushing, shaking, pinching, hitting, slapping, kicking, force feeding, inappropriate restraint.

2.11 **Psychological abuse** - threats of harm or abandonment, humiliation, harassment, blaming, intimidation, controlling, deprivation of contact, isolation, verbal abuse and preventing access to information, advice or services which could help them.

2.12 **Sexual abuse** – any sexual acts to which the adult at risk has not consented fully, or could not consent, or was pressured into consenting including rape, sexual assault, incest, inappropriate touching, and encouragement to watch pornographic material.

2.13 **Financial abuse** – inappropriate use of the adult at risk's financial resources or property such as theft, pressure in connection with wills or the misuse or misappropriation of property, possessions or benefits.

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- 2.14 **Neglect and acts of omission** – the withholding of the necessities of life such as adequate nutrition, medication and heating; failure to provide appropriate intervention or support to access health, social or educational services.
- 2.15 **Discriminatory abuse** – motivated by discriminatory and oppressive attitudes including racist and sexist treatment.
- 2.16 **Institutional abuse** – relates to regimes and practices such as poor care standards, inadequate staffing, insufficient knowledge within the service, unacceptable treatments such as withholding food or drink and seclusion and unauthorised use of control and restraint.
- 2.17 **Domestic abuse** – encompasses controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members. Includes so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage.
- 2.18 **Modern slavery** - encompasses slavery, human trafficking, forced labour and domestic servitude.
- 2.19 **Self-neglect** – neglecting to care for one’s personal hygiene, health or surroundings, including behaviour such as hoarding. Whether a response is required will depend on the adult’s ability to protect them by controlling their own behaviour.
- 2.20 **Exploitation** - is defined as the act of using resources or the act of treating people unfairly in order to benefit from their efforts or labour. A further type of abuse is known as Mate Crime – where someone befriends a vulnerable person deliberately to take advantage of them or Cuckooing - which is a form of crime in which drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing.
- 2.21 **Radicalisation / Extremism** – increasingly radicalisation and extremism are being included within multi-agency policy and procedures, with the aim of early identification and early intervention to divert people away from being drawn into terrorist activity.
- 2.22 Abusers may be relatives, friends, care workers, neighbours, or any other person with a legitimate reason to have contact with the person, or strangers who deliberately seek out to abuse vulnerable people. Abuse can happen anywhere.

### **Safeguarding Children**

- 2.23 Safeguarding and promoting the welfare of children is defined as:

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- protecting children from maltreatment
  - preventing impairment of children's health or development
  - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best life chances

2.24 Children and young people, refers to children who have not yet reached their 18th birthday. Where someone is 18 or over but is still receiving children's services and a safeguarding issue is raised, the matter should be dealt with through adult safeguarding arrangements.

### Types of abuse (children)

2.25 The following categories of child abuse are generally recognised, and a child may suffer more than one type at a time:

2.26 **Physical abuse** – can include hitting, kicking, biting, scalding/burning, inappropriate moving and handling techniques, fabricated induced illness and poisoning.

2.27 **Emotional abuse** – can include the lack of praise or encouragement, comfort or love, attachment, appropriate stimulation, continuity of care, overprotective and possessive behaviour.

2.28 **Sexual abuse** –rape, anal or oral sex, sexual harassment, making a child watch sexual acts, inappropriate touching, sexualised language/conversations and can included the grooming and sexual exploitation of children and young people.

2.29 **Neglect** - is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment.

2.30 **Bullying and Cyberbullying** - is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home or online. It is usually repeated over a long period of time and can hurt a child both physically and emotionally.

2.31 **Child Trafficking** - Trafficked children experience many types of abuse and neglect. Traffickers use physical, sexual, and emotional abuse as a form of

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control. Children and young people are also likely to be physically and emotionally neglected and may be sexually exploited.

## **HH Responsibilities**

2.32 The Executive Management Team has responsibility for ensuring that the organisation meets the legislative and regulatory duties relating to adult safeguarding and the protection of adults and children at risk.

2.33 We recognise that all HH colleagues have responsibility for reporting issues, and they must be clear regarding their roles in safeguarding adults and children at risk, as uncertainty could delay appropriate action being taken.

2.34 Head of Neighbourhoods is the Strategic lead for safeguarding and has responsibility within the organisation for:

- Ensuring policies and procedures are in place relating to the safeguarding of children and adults at risk
- Representing and reporting issues relating to Safeguarding to the relevant management meetings
- Maintaining a cross organisational focus and attention to matters relating to the safeguarding of children and adults
- Ensuring that strategic initiatives, policies or procedures are instigated in response to internal and external learning, and/or new legislative policy and guidance
- In partnership with HR, allocating and coordinating investigations into allegations of abuse in relation to the allegations against employees
- Allocating and coordinating any requests from the local authority to 'make enquiries' as per Section 42 of the Care Act 2014

2.35 However, we recognise that safeguarding is a multi-agency approach which depends upon effective joint working and HH will do the following:

## **Prevention**

2.36 We agree that it is better to act before harm occurs. We will:

- aim to hold up-to-date information on customers' support needs and vulnerabilities. We will use this data to inform our approach to safeguarding
- ensure that all staff are aware of the safeguarding policy and are appropriately trained and understand their responsibilities and required actions
- ensure that contractors are aware of the potential signs and symptoms of abuse



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- carry out preventative communications and campaigns for our customers to enable them to identify potential early warning signs of safeguarding issues

### **Raising a concern**

2.37 Halton Housing is responsible for making a referral in accordance with the local area procedures. Halton Borough has a Local Safeguarding Board which has a multi-agency policy and procedure, providing the local framework for partner organisations to work together enabling a consistent approach when responding to safeguarding concerns.

2.38 Colleagues must familiarise themselves with the policy and processes in place, but also follow Halton Housing procedures on reporting any safeguarding concerns in their area. The referral should be made direct to the Head of Neighbourhoods, to a Neighbourhood Manager or to the employees Line Manager.

2.39 If there is immediate risk the police should be contacted.

### **Mental capacity**

2.40 Capacity and consent are central themes in safeguarding. Every adult has the right to make their own decisions and a person is assumed to have capacity to do so unless it is proved that they do not. The Mental Capacity Act 2005 sets out a clear test for whether a person lacks capacity to take a decision at a time. If there are concerns that a person being abused lacks mental capacity, a referral must be made to the local adult safeguarding Social Care Team so a Mental Capacity Assessment can be undertaken.

### **Consent and Confidentiality**

2.41 Information may be shared without consent if it is to prevent or detect a crime or when the enquiry is urgent and seeking consent will cause delay which will lead to significant harm.

### **Recruitment**

2.42 HH operates a robust recruitment procedure in relation to employees, contractors and volunteers that work directly with customers. This includes:

- confirming relevant qualification and experience
- receiving satisfactory references; and
- undertaking Disclosure and Barring Service (DBS) checks

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## Empowerment

### 2.43 Halton Housing will:

- actively promote the empowerment and wellbeing of adults and children by ensuring, where appropriate, they are given information about their rights and the options available to them that could protect them from abuse and how to report abuse
- respect and support the right of the individual to lead an independent life based on self-determination and personal choice, even though that may involve an element of risk. HH will ensure that such risk is acknowledged and understood by all concerned, and minimized wherever possible; and
- recognise and support people who are unable to make their own decisions and/or protect them

## Training

### 2.44 Halton Housing will:

- make Safeguarding training mandatory for all HH employees as part of the induction process
- make available Safeguarding training through HH's e-learning programme
- ensure all frontline staff receive regular refresher training in relation to safeguarding, this includes the following key staff groups:
  - Tenancy Support Officers
  - Debt Recovery officers
  - Welfare Benefit Money Advice Officers
  - Neighbourhood Safety Officers
  - Maintenance Technicians
  - The Neighbourhood Support Team
  - Customer Care Team
  - Neighbourhood Officers

## 3. Regulatory and/or Legal Compliance

### 3.1 The regulatory compliance we must adhere to and legislation that directly affects the policy is:-

- Public Interest Disclosure Act 1998
- Data Protection Act 2018 and UK GDPR
- The Human Rights Act 1998
- The Mental Capacity Act 2005 (and supporting Code of Practice 2016)
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012

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- Care Act 2014
  - Children Act (1989 and 2004) – legislation regarding the safeguarding of children.
  - Section 11 of the Children Act 2004
  - Working Together to Safeguard Children 2015
  - Housing Act 1985 (as amended by the Housing Act 1996)
  - Homelessness Act 2002
  - Disability Discrimination Act 1995
  - Race Relations Act 1976 and the Race Relations (Amendment) Act 2000
  - Equality Act 2010
  - The Modern Slavery Act 2015
  - Domestic Abuse Act 2021

## 4. Diversity Considerations

- 4.1 An initial screening checklist has been completed on this policy which confirms that a full Equality Impact Assessment does not need to be carried out.

## 5. Links to Strategies, Policies and Associated Documents

- 5.1 This policy underpins the following priorities within our Corporate Plan:-

- Customer Focus
- Healthy Organisation
- Brand and Reputation

- 5.2 The following policies and procedures are associated with this policy:

- Safeguarding Adult Procedure
- Safeguarding Children Procedure
- Anti-Social Behaviour Policy & Procedure
- Disciplinary Procedure
- Grievance Procedure
- Employee Code of Conduct
- Domestic Abuse Policy
- ASB and Hate Crime Policy
- ASB and Hate Crime Procedure
- Data Protection Policy



Translations available on request by phoning 0303 333 0101 or  
via email at [info@haltonhousing.org](mailto:info@haltonhousing.org)

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