

CROYDON CHURCHES HOUSING ASSOCIATION

SAFEGUARDING POLICY

1.0 Introduction

- 1.1 Safeguarding is everyone's responsibility. We recognise that all adults and children have a basic right to live free from abuse, neglect and harm. We will support our residents to ensure they are able to achieve this right. We also recognise that our residents have a right to make decisions about their lives and so will always seek to work with them to enable this to happen.
- 1.2 We provide accommodation and tenancy sustainment to people who may be vulnerable or at risk of abuse because of a range of factors. We therefore have a duty to comply with both our statutory responsibilities and with our partner local/health authority safeguarding procedures.
- 1.3 This policy sets out our approach to safeguarding adults and children and how we seek to apply the government objectives to prevent and reduce the risk of harm from abuse or neglect.

1.4 Resident consultation

As part of our commitment to continuous improvement, we have undertaken consultation with residents to understand their experiences and expectations in relation to safeguarding.

Residents told us they want to feel safe in their homes, to be listened to, and to know that safeguarding concerns will be taken seriously and acted upon. They also highlighted the importance of clear communication, joined-up support, and respect for their independence.

This policy has been updated to reflect that feedback, with a stronger focus on early intervention, clear communication, and ensuring residents understand how to raise concerns and what support they can expect.

2.0 Purpose

- 2.1 This policy aims to ensure that our staff and those working for or on behalf of ccha understand their duty of care and that they are able to respond to any concerns in a consistent manner.
- 2.2 We have a duty to cooperate with the safeguarding framework of the local authority and all staff working for or on behalf of ccha should be aware of the role they play in achieving this.

- 2.3 All persons that have contact with our residents, customers and/or their children, should take all reasonable measures to minimise the risk of harm to the welfare of children and adults at risk.
- 2.4 In the event concerns are identified, staff should take appropriate action to address those concerns taking all reasonable measures to report and minimise the risk of harm to the welfare of children and adults at risk.
- 2.5 We will ensure that residents are provided with clear, accessible information about safeguarding, including how to raise concerns and what they can expect from us in response.

3.0 Legal Framework

- 3.1 This policy has been drawn up using law and guidance that seeks to protect vulnerable adults and children. Listed below are some of the key applicable legislation and guidance.
- Deprivation of Liberty Safeguards (DoLS) and forthcoming Liberty Safeguards
 - Modern Slavery Act 2015
 - Working Together to Safeguard Children 2018 (updated 2022)
 - London Multi-Agency Safeguarding Policy and Procedures 2019
 - The Care Act 2014
 - Care and Support Statutory Guidance 2023 (Care Act 2014).
 - Making Safeguarding Personal 2014, LGA
 - Regulatory Framework of Social Housing
 - The Equality Act 2010
 - The Mental Capacity Act 2005 and supporting Code of Practice (2020)
 - Children Act 1989 and 2004
 - Domestic Abuse Act 2021
 - Sexual Offences Act 2003
 - Human Rights Act 1998
 - Housing Act 1985 / 1988 / 2004
 - Family Law Act 1996
 - The Mental Health Act 1983 and 2007
 - The Public Interest Disclosure Act 1998
 - The Data Protection Act (2018)
 - Childcare Act (2006)
 - Health and Social Care Act 2008
 - Safeguarding Vulnerable Groups Act 2006
- 3.2 For more information regarding the latest legislation and / or updates please refer to the Local Authority Safeguarding pages on their websites.

4.0 Related Policies & Procedures

- 4.1 This policy should be read in conjunction with and delivered alongside the following policies and procedures:

- Anti-social Behaviour Policy
- Code of Conduct
- Complaints Policy
- Group Data Protection Policy
- Drugs Procedure
- Equality, Diversity and Inclusion Policy
- Customer Strategy
- Vulnerable Residents Policy
- Health & Safety Policy
- Lone Working Procedure
- Grievance Procedure
- Disciplinary Procedure
- Whistleblowing Policy
- Recruitment & Selection Policy & Procedure
- Sickness & Absence Policy
- Safeguarding Procedure

5.0 Principles

- 5.1 This policy sets out the approach our staff will take in response to allegations or where it is suspected and/or where concerns have been raised.
- 5.2 It sets out the definitions of abuse, the principles of our responsibility and our approach, how we inform our staff and residents of the procedure, and how we monitor and report on safeguarding.
- 5.3 This policy is in line with the 2014 Care Act which places adult safeguarding on a legal footing and requires statutory authorities to establish a Safeguarding Adults Board whose objective is to help and protect adults at risk of abuse and neglect.
- 5.4 We recognise that safeguarding is closely linked to vulnerability. We will identify, record and respond to vulnerabilities to ensure residents receive appropriate and proportionate support.
- 5.5 We will take reasonable steps to identify, record and respond to vulnerabilities to ensure services are delivered in a way that is appropriate, proportionate and responsive to individual needs.
- 5.6 We will take all concerns about a resident's wellbeing seriously, including where risks are not immediately clear, and will act at the earliest opportunity to understand and respond to potential safeguarding concerns.

6.0 Definitions

- 6.1 **Safeguarding** is the action that is taken to promote the welfare, health, wellbeing and human rights of adults and children, to protect them from harm, abuse, and neglect.
- 6.2 The provisions for safeguarding adults at risk of abuse neglect, or harm contained within the Care Act 2014, apply to an adult who meets the following three-part test:
 - Has care and support needs (whether, or not, the Local Authority is meeting those needs)
 - Is experiencing, or is at risk of, abuse or neglect, and
 - As result of those needs, is unable to protect themselves against the abuse or neglect, or risk of it.

6.3 An adult at risk may be someone that:

- Has a learning or physical disability or sensory impairment
- Has a mental health needs including dementia or a personality disorder
- Is dependent upon others to maintain their quality of life
- Has a long-term illness or condition
- Lacks mental capacity to make decisions as is in need of care and support

The above is not an exhaustive list.

6.4 The Care Act 2014 also recognises informal carers as people who may have support needs, and, if so, the Safeguarding Framework applies to them.

6.5 The Care Act sets out six key principles which apply to all sectors. These principles inform the ways in which professionals and other staff work with adults and children.

- Empowerment – People being supported, provided with information, and encouraged to make their own decisions and informed consent.
- Prevention – It is better to act before harm occurs.
- Proportionality – A proportionate and least intrusive response appropriate to the risk presented.
- Protection – 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 – Transparency in delivering safeguarding.

6.6 The categories of abuse and neglect identified in the Care Act and Care and Support Statutory guidance include but are not limited to:

- Physical abuse
- Domestic violence which can include so call ‘honour’ based violence
- Domestic abuse
- Sexual abuse
- Psychological/emotional abuse
- Financial and material abuse
- Modern slavery
- Neglect and acts of omission
- Organisational or institutional abuse
- Self-Neglect
- Discriminatory abuse

6.7 **Safeguarding Children** is defined in the Working Together to Safeguard Children 2018 as “protecting children from abuse & maltreatment, preventing harm to their health or development, ensuring they grow up in circumstances consistent with the

provision of safe and effective care and taking action to enable all children to have the best outcome.”

6.8 **Children** and young people are defined as anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age and is living independently or is in further education does not change their entitlement to services or protection.

6.9 Types of abuse include

- Emotional abuse
- Physical abuse
- Sexual abuse
- Exploitation
- Financial or Material abuse
- Discriminatory abuse
- Neglect and acts of omission 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

6.10 Other areas covered by legislation and guidance include:

- concerns relating to forced marriage and helping to prevent and tackle this
- concerns around the threat of radicalisation and extremism with the aim of early identification and intervention to help divert people away from being drawn into terrorism activity

6.11 **Vulnerability** refers to circumstances where an individual may be at increased risk of harm due to factors such as age, disability, mental health needs, substance misuse, domestic abuse, social isolation or financial hardship. Vulnerability may be temporary, fluctuating or long-term.

7.0 Abuse and Neglect

7.1 Safeguarding applies whether the abuse is from one person to another or self inflicted.

7.2 Abuse may be:

- a single act or repeated acts,
- an act of neglect or a failure to act, or;
- multiple acts, e.g. an adult at risk may be neglected and also being financially abused.

7.3 We will not limit our view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case will always be considered.

7.4 Intent is not an issue at the point of deciding whether an act or a failure to act is abuse; it is the impact of the act on the person and the harm or risk of harm to that individual.

- 7.5 Abuse can take place in settings such as the person's own home, day or residential centres, supported housing, educational establishments, or in nursing homes, clinics or hospitals.
- 7.6 If we consider a criminal offence has occurred or someone is at imminent risk, we will notify the police immediately. If we have concerns about the imminent health and welfare of someone in relation to safeguarding, we will notify the emergency services and local authority as soon as possible.
- 7.7 Where it has been identified that an individual is a victim of domestic abuse, unless the risk is assessed as being high i.e., indicates an immediate risk to the victim of significant harm or death, this information **MUST NOT** be shared with the police unless the victim's consent has been obtained. It is only in cases where the risk is assessed as high that cases can be referred into the police without the victim's consent. This guidance does not prevent the referral of a child at risk of domestic abuse. Where the issue relates to a child, a referral must be made and consent is not required.
- 7.8 We recognise that abuse and neglect may be linked to wider risk factors, including mental ill health, substance misuse, domestic abuse, exploitation and social isolation.
- 7.9 Safeguarding concerns may arise within a housing context and may include issues such as self-neglect, hoarding, poor living conditions, exploitation (including cuckooing), domestic abuse, mental health deterioration, or barriers to accessing support. These risks may not always present as a single incident and should be considered in the context of the resident's overall wellbeing.

8.0 Person-centred

- 8.1 Our approach to safeguarding is that we will make the dignity, safety and well-being of the individual a priority.
- 8.2 Residents are encouraged to make their own decisions and we will always try and work with them and inform them of any action we are taking unless this could endanger others.
- 8.3 We will ensure that our approach takes account of any identified vulnerabilities and will adapt our service delivery to meet individual needs.
- 8.4 We will balance the individual's right to make decisions with our duty to protect them and others from harm.
- 8.5 Where appropriate, we will keep residents informed about action being taken in response to safeguarding concerns, ensuring communication is clear, proportionate, and sensitive to individual circumstances.

9.0 Working with Families

- 9.1 We support residents whose families or carers are closely involved in their lives.

- 9.2 Where someone raises a safeguarding concern, in relation to a member of their family, we will follow our usual procedure. We will work within the lead statutory processes to keep the resident safe and informed of what is happening.

10.0 Consent and Mental Capacity

- 10.1 We will presume that adults have the mental capacity to make informed decisions about their own safety and how they lead their lives.
- 10.2 However, some of our residents may have been assessed under the Mental Capacity Act as lacking capacity in certain areas – which may include lacking capacity to give informed consent to a safeguarding referral. Where this is the case, we will work sensitively with their legal representative and/or follow a multi-agency approach and agree an appropriate way forward.
- 10.3 Where there are concerns that a resident lacks capacity to make informed decisions and it cannot be established if they have been assessed under the Mental Capacity Act, these cases should be discussed with an Operations' Manager to assess the circumstances and risk. We should then look to work with the resident, next of kin and/or relevant agencies to further assess the situation and level of risk and agree an appropriate way forward.
- 10.4 We recognise that mental health needs may impact an individual's ability to make decisions or manage risk. Each situation will be considered on a case-by-case basis and we will seek appropriate professional advice where required.
- 10.5 Where there is a risk of serious harm, abuse or neglect, information may be shared without consent in line with legal requirements and safeguarding guidance.
- 10.6 We recognise that residents have the right to make their own decisions, including where they may choose not to engage with support. In these situations, we will continue to assess and manage risk, seek appropriate advice, and take action where there is a risk of serious harm, in line with safeguarding responsibilities.

11.0 Responsibilities

- 11.1 All members of staff have a responsibility to report any concerns or suspicions that someone is at risk in accordance with this policy and procedure and to attend appropriate training and supervision.
- 11.2 The Board are ultimately accountable for how safeguarding is managed and they delegate operational accountability to the Leadership Team.
- 11.3 The Leadership Team is responsible for ensuring that effective safeguarding systems are in place which meet our statutory obligations, minimise risk to residents and manage any reported instances appropriately.
- 11.4 Within the Leadership Team, the Director of Customers, is the safeguarding champion. Their role is to ensure that staff and residents can recognise safeguarding concerns and know how to report them. They will also ensure that staff understand

their roles and responsibilities in relation to this policy and associated procedure, and that they have access to training that is appropriate to their level of responsibility.

- 11.5 There will always be at least two members of staff in the organisation who are Safeguarding Leads and available to give advice to any member of staff on safeguarding. These leads are the Housing Services Manager and the Neighbourhood Services Manager.
- 11.6 The Managers are responsible for ensuring that safeguarding cases in their patches are managed correctly. They are responsible for reporting concerns to the appropriate agencies and for implementing any action plans to address the safeguarding concern. They will understand the impact of abuse on adults and children at risk and will ensure residents are consulted, kept informed and supported throughout a safeguarding process.
- 11.7 All frontline staff are expected to understand the different forms of abuse and how to recognise signs/indicators. They will also be clear in their role in identifying and reporting concerns regarding abuse.
- 11.8 All staff are expected to demonstrate professional curiosity, recognising that safeguarding concerns may not always be immediately apparent and may require further enquiry.
- 11.9 Managers are responsible for ensuring that safeguarding is considered alongside other housing management functions, including anti-social behaviour, tenancy sustainment and property condition.

11.10 Safeguarding Allegations Against Staff and Contractors

- 11.11 Any safeguarding concerns involving staff, contractors or those acting on behalf of the organisation will be taken seriously.
- 11.12 Such concerns must be reported immediately to a senior manager.
- 11.13 These will be managed in line with safeguarding procedures, HR processes and referred to external agencies where required.
- 11.14 Appropriate action will be taken to ensure residents are protected while any investigation is being undertaken.

12.0 Training and Information

- 12.1 All staff will be informed about this policy and procedure as part of their induction into the organisation. Safeguarding e-learning is part of the organisation's core training and is completed within staff's employment probation period.
- 12.2 All staff receive e-learning refresher training annually and in a classroom setting every three years.
- 12.3 Residents living in ccha's Supported Accommodation, are supported by staff funded by the Local Authority who are responsible for ensuring they are aware of their right to live free from abuse or harassment.

- 12.4 All ccha staff are trained and are expected to be able to explain to all customers of their rights to live free from abuse or harassment.
- 12.5 Those staff working within our Older Persons accommodation promote this during their annual reviews and during welfare calls.
- 12.6 Any information provided is presented in an appropriate format for the customers.
- 12.7 Training will include awareness of:
- Mental health and wellbeing
 - Substance misuse
 - Domestic abuse
 - Modern slavery and exploitation
 - Self-neglect and hoarding

13.0 Monitoring and Reporting

- 13.1 All safeguarding incidents must be reported via the LA portals for reporting Safeguarding incidents and recorded on our safeguarding database log which is located on SharePoint.
- 13.2 Managers should be aware of any safeguarding cases in their patch, that the case has been logged and monitor that appropriate action is being taken.
- 13.3 Safeguarding is a regular agenda item for teams meetings and in one-to-ones.
- 13.4 The KPI spreadsheet will be updated each quarter with the number of cases logged in the period acting as an additional check for managers to ensure that all cases have been appropriately logged and summarised and actions taken in line with this policy.
- 13.5 This information will then be reported to the Audit and Risk Committee on an annual basis. The report will provide a high level summary of the cases and highlight any significant concerns or organisational learning.
- 13.6 Safeguarding data will be reviewed to identify themes, trends and areas for improvement.
- 13.7 Learning from safeguarding cases and resident feedback will be used to inform service delivery, policy development, and staff training, ensuring that our approach continues to reflect the needs and experiences of residents.

14.0 Reporting a Safeguarding Concern

- 14.1 The process staff should be following is shown in **the Flowchart for reporting Safeguarding Concerns**. This includes links to the LA websites for reporting Safeguarding concerns.
- 14.2 Staff should take seriously, listen carefully and report appropriately any safeguarding concerns observed or reported to them.

- 14.3 In accordance with this policy, staff should ensure immediate action is taken if the person/s are in serious danger or a crime is likely/or has been committed.
- 14.4 Staff should ensure they keep accurate records of the allegations, actions they have completed and complete appropriate paperwork, electronic records as stated in this policy.
- 14.5 Proof is not required to report something as a safeguarding concern; all that is required is that there are reasonable grounds to suspect abuse has taken place.
- 14.6 The Care Act 2014 and the Children Act 2004 requires statutory authorities to accept a referral where concerns are identified.
- 14.7 It is the subsequent actions taken which will determine whether the concern can be proven and what suitable actions should be put in place to deal with this situation.
- 14.8 Guidance should be sought during the safeguarding process whether we will report the incident to the police even if the person does not want to report it, if there are public interest or vital interest considerations, or if other people could be at risk from the same person. If we do this or anything else against the wishes of the person, it will be fully explained to the person.
- 14.9 In addition, we will make a referral to the local authority contact point.
- 14.10 All staff should be aware of at least three different ways of raising a safeguarding concern, including one which is external.
- 14.11 These include, but are not limited to reporting this to:
- Their line manager
 - Any other manager
 - A member of the Leadership Team
 - ccha's safeguarding leads
 - The local authority leads
 - The Police
- 14.12 Staff should be aware that safeguarding concerns may arise in a range of situations, including but not limited to:
- Mental health crises
 - Substance misuse
 - Domestic abuse
 - Suspected exploitation, including cuckooing
 - Self-neglect or hoarding
- 14.13 In all cases, staff should consider both the immediate risk and any wider safeguarding concerns, and act in accordance with this policy and procedure.

15.0 Information Sharing and Data Protection

- 15.1 Confidentiality must not be confused with secrecy, that is, the need to protect the management interests of an organisation should not override the need to protect the adult or child.
- 15.2 We have a Whistleblowing Policy and Procedure and staff reporting concerns at work are entitled to protection under the Public Interest Disclosure Act 1998 provided they believe they are acting in the public interest and that the disclosure shows wrongdoing which falls into one or more of the certain categories.
- 15.3 Decisions about what information is shared and with whom will be taken on a case by case basis. Whether information is shared with or without the adult at risk's consent, the information should only be shared if it is:
- Lawful, fair and transparent to do so
 - Necessary for the purpose for which it is being shared
 - The minimum required for the purpose
 - Shared only with those who have a need for it
 - Accurate and up to date
 - Shared in a timely fashion
 - Shared accurately
 - Shared securely
- 15.4 A Data Impact Assessment has been completed for this policy to ensure all information and sensitive information will be stored, retained, and shared in line with our Data Protection Policy.
- 15.5 All information shared will be done so in line with the Data Protection Act 2018 and our and the Local Authority's guidance for sharing of data and sensitive information.

16.0 Equality and Diversity

- 16.1 Services provided should be appropriate to the adult or child at risk and should not discriminate regardless of race, gender, sexual orientation, disability, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and age.
- 16.2 An Equality Impact Assessment has been undertaken and has indicated that this policy would not discriminate against any specific groups.

Version History	
Policy name	Safeguarding Policy
Version code	2.0
Lead Officer	Director of Customers
Data Protection Impact Assessment Completed	April 2026
Equality Impact Assessment Completed	April 2026
Colleague consultation	March 2026
Resident consultation	March 2026
Date of Issue	September 2026
Review Due	September 2029
Policies and procedures replaced	Safeguarding Policy and Procedure 2023