



Policy title:	Safeguarding Policy		
Scope:	Aspire Housing		
Policy owner & job title:	Director of Communities		
Approver:	Executive Director of People		
Date:	March 2024	Review Due Date:	March 2027

1. POLICY SUMMARY

- Aspire believes that children, young people and adults at risk must be protected from harm at all times.
- Aspire will have up to date safeguarding policies, procedures and processes which all appropriate colleagues have read and received training on.
- All colleagues have a duty to ensure that they follow procedures to help ensure that children, young people and adults at risk are protected from harm.

Relevant Legislation and Guidance:

- Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Bill
- Working Together to Safeguard Children 2023
- The Children Act 2004 as amended by the Children and Social Work Act 2017
- The Care Act 2014
- The Children Act 1989
- GDPR and Data Protection Act 2018

2. POLICY STATEMENT

2.1 Scope of Policy

Aspire is committed to safeguarding the welfare of children, young people and adults at risk of harm. This policy and the corresponding procedure aims to meet our

responsibilities to safeguard and how we promote the welfare of children, young people and adults at risk.

This policy applies to Aspire colleagues (including temporary staff), volunteers, contractors and agents who work for Aspire. It also acts as a framework for any organisations offering training to apprentices as a subcontractor on behalf of Aspire.

2.2 Policy Definitions

Safeguarding

Safeguarding of children, young people and adults at risk is defined as:

- Protecting children, young people and vulnerable adults from abuse or neglect.
- Preventing impairment of the health or development of children, young people and vulnerable adults/adults at risk.

Abuse and neglect

- Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child, young person or a vulnerable adult by inflicting harm or by failing to act to prevent harm.
- Children, young people and vulnerable adults may be abused in a family, in an organisation or community setting by those known to them or by others (e.g. via the internet).
- They may be abused by an adult or adults, or by another child/young person or children/young people.
- The source of risk may be intentionally abusing the child, young person or adult with care & support needs or may be causing risk/harm to the person by their inability to cope with a given situation or level of support & care needs.

Abuse is a violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he/she has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

A child or young person

- A child or young person is any person under the age of 18.

Adult at Risk

- Any person aged 18 and over 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 (Care Act 2014).

Types of abuse can include the following. Please note that this list is not exhaustive.

- **Physical:** being hurt or harmed either deliberately or through rough, careless, or thoughtless behaviour, including assault, hitting, slapping, pushing, misuse of medication or inappropriate physical sanctions.
- **Psychological, Emotional, Verbal abuse or bullying:** being humiliated, frightened or intimidated, including threats of harm or abandonment, deprivation of contact, controlling, coercion, verbal abuse and cyber-bullying.
- **Neglect and acts of omission:** not being given the things you need to feel safe and comfortable or not making sure you get the care or treatment you need. A failure to meet basic needs.
- **Sexual abuse** (including sexual harassment and violence), Child Sexual Exploitation or grooming: being made to do something that you don't want to, didn't or couldn't agree to, including rape, indecent exposure, sexual harassment, touching or innuendo and exposure to sexual materials or pornography.
- **Financial or Material Abuse:** someone using your money or possessions in a way that you don't want or isn't in your best interest, includes theft, fraud, internet scamming and coercion in relation to an adult's financial affairs or matters.
- **Discriminatory abuse:** includes forms of harassment, slurs or similar treatment, because of race, gender, age, disability, sexual orientation or religion.
- **Domestic Abuse:** can include physical, sexual, emotional and financial abuse between parties that are personally connected to each other. This can include sexual relationships, sibling groups, children abusing parents and any other close or family relationship. Coercive and controlling behaviours will also likely be present.
- **Self-neglect:** includes vulnerable adults who for reasons such as mental ill-health / physical disability / choice could find themselves in a highly risky and dangerous situation by failing to look after their own overall physical and / or mental wellbeing.
- **Modern Slavery:** includes children, young people and vulnerable adults who are either trafficked and/or imprisoned against their will by people exploiting their vulnerability.
- **Criminal Exploitation and Gangs:** including manipulation or coercion to commit criminal acts and membership of street organised criminal gangs which may include County Lines activities.

- **Female Genital Mutilation (FGM):** the deliberate act of altering or cutting of female genitalia for non-medical reasons. Also known as 'female circumcision' or 'cutting'. For the purposes of safeguarding, FGM is categorised as physical abuse.
- **Organisational:** includes any business giving care & support to children, young people and vulnerable adults. These can be accommodation based including care homes and supported living accommodation and can also include community services including nursing and domiciliary care in the individual's own home.
- **Radicalisation and extremism:** encouragement or grooming to take part in activities in pursuit of terrorist or extremist ideologies. The above types of abuse can also be conducted through the use of computers, electronic devices, phones and the internet.
- **Child on Child Abuse:** Children can abuse their peers through many of the methods described above such as bullying, physical abuse and sexual violence. Allegations of peer-on-peer abuse will be recorded and escalated with the same urgency and seriousness as all other safeguarding concerns through the procedure detailed.

3. Policy

- 3.1 The **Director of Communities** will act as safeguarding lead for Aspire Housing; there will be four trained designated persons (two for children and two for vulnerable adults) to take responsibility for child and adult safeguarding enquiries. These colleagues will also form a panel that will meet regularly to review cases and safeguarding matters and will ensure continuous development and improvement within Aspire Housing.
- 3.2 All colleagues have a duty to ensure that they follow policy and procedures to help ensure that children, young people and adults at risk are protected from harm.
- 3.3 We are committed to working in partnership with agencies that have a statutory responsibility towards children, young people and adults. We recognise our duty to co-operate as defined in the relevant legislation above.
- 3.4 We aim to ensure that our employees are knowledgeable and appropriately skilled for the client groups with which they routinely work.
- 3.5 Where needed we will co-operate fully with Section 44 Subject Access Request (SAR) instigated by our partners in statutory services. Where we have reason to believe that an Aspire colleague may present a risk to children, young people and vulnerable adults, we will take appropriate action with support from the HR team to ensure that children, young people and adults at risk are no longer at risk from this person. This may include rapid, precautionary action such as suspension from duties or a change in duties as

an alternative to suspension, following the completion of a risk assessment. Any such cases will be investigated in accordance with the Disciplinary Rules & Procedures 2018. We recognise our duty to inform the LADO or DASM for children or adults respectively where we've identified that a professional from any service is a risk to others.

- 3.6 Aspire recognise the direction to 'make safeguarding personal' and adhere to it and the ethos of 'no decision about me without me' as set out in the relevant legislation above.

4. Responsibilities

4.1 Responsibilities of Aspire:

- Aspire will have in place appropriately trained Designated People and Safeguarding Champions to help and support colleagues in respect of safeguarding children and adults.
- Aspire will provide appropriate training, updates and support to enable front-line colleagues, volunteers and involved customers to be able to recognise abuse and understand the processes they are required to take. Training will be provided to all colleagues:
 - At least every 3 years with an annual update briefing.
 - Mandatory e-learning as part of onboarding/induction
- Aspire recognises that witnessing and/or reporting abuse can be difficult for the colleague involved and therefore support will always be offered at the time of reporting the abuse and through the check-in process. The manager will support the colleague to access the relevant support either internally via the Designated Lead or through professional organisations.
- Aspire has a duty of care to ensure that all colleagues who have specific and regular contact with children, young people and vulnerable adults or access to their personal information are appropriately checked following the DBS guidelines. The level of check will be stated at the advertisement stage of the recruitment process.
- Colleagues will receive training and guidance on how to approach potentially abusive situations. Colleagues exposed to such situations will be managed in line with the lone working procedure and a risk assessment will be completed.
- Colleagues will receive training, support and guidance on how to deal with abuse which may be targeted at them or a colleague.

4.2 Responsibility of employees:

- When visiting homes, Aspire employees and contractors will show their ID before entering a home, they should never enter unless a responsible adult is present and should avoid being left alone in a room with a child or adult at risk at any time during the visit.
- Where the tenant or licensee is under the age of 18, an assessment will be completed to ascertain whether there is a requirement to visit in twos or if there needs to be an appropriate adult present.
- Aspire colleagues have a responsibility to recognise and address suspected, disclosed or known abuse of children, young people and adults with support & care needs. If any colleague has reason to suspect that abuse is occurring, including where involvement of an Aspire employee is suspected, they must speak to their Line Manager or Designated Person immediately and take steps as set out in the **Safeguarding Children and Adults procedure**.
- All Managers are responsible for any alerts that come to their attention in their service area. They must never ignore, underplay or pass on overall responsibility to another colleague or peer. Managers also have a key role in helping develop understanding, knowledge and confidence to ensure protection procedures are followed effectively, professionally and safely. Arrangements are in place to ensure no member of staff making an alert or indeed, any manager has to shoulder this burden on their own.
- Referrals to investigating agencies should be made by the person who identified the abuse whilst carrying out their job role, supported by the colleague's line manager **WITHIN 24 HOURS** of an incident being reported. If there are immediate protection issues the referral should be made by telephone, to the appropriate Duty Officer (Staffordshire and / Stoke on Trent Adult Safeguarding Partnership, Cheshire West & Chester Community Access Team (CAT) or the Emergency Duty Team (EDT) and Cheshire East Adults) or (Staffordshire and Stoke on Trent Children's Safeguarding Partnership, Cheshire West & Chester Children's Safeguarding Partnership, Cheshire East Safeguarding Children's Partnership (CE SCP)).
- Information will be shared with other agencies in accordance with statutory procedures. If the child or adult is deemed to be at risk or any other person is considered to be at risk, referrals may still be made despite not having consent of the person involved. Where an adult has capacity, they can refuse consent to; share information with non-professionals, a medical examination and to make a complaint to the Police. Each decision whether or not to share and/or breach a person's right to confidentiality will be made by balancing the risk to the individual and others and right to confidentiality of the individual (Article 8 Human Rights Act 1998 / Mental Capacity Act 2005).
- Any criminal offences must be reported immediately to the Police.
- Any incident involving a registered care provider must be reported to the National Care Standards Commission/CQC.
- Any incident which involves an alleged perpetrator who is in a position of trust working with vulnerable people shall also trigger a 'whistle blower' response from Aspire to reduce the likelihood of other children or adults

being abused in accordance with the **Whistle Blowing Policy 2024**. Any incident which involves an alleged perpetrator from our own organisation will also trigger an urgent investigation into their conduct by an investigation officer with support from the HR team.

- Discussions will take place within 24 hours and if a strategy meeting is to be held it should take place within 3 working days of referral.
- Aspire Housing colleagues should never take photographs or recordings of children or young people for any purpose. Aspire Housing's Communications team will follow their own procedures regarding obtaining parental consent which should include specific permission for use.
- Colleagues who arrange, vet and monitor work placements and work-based or workplace learning must undertake appropriate safeguarding training.

5. Reporting

Aspire colleagues will follow the procedure as set out in the accompanying Safeguarding Procedure document. Through these procedures we aim to ensure;

- 5.1 Safeguarding concerns should be recorded on the Safeguarding Referral Form AS1. Reports of safeguarding concerns about children, young people and adults at risk will be kept, even where there is no need to refer the matter immediately.
- 5.2 Colleagues must report any concerns or allegations about safeguarding to a designated Safeguarding Officer and must not investigate these themselves. Staff must not promise confidentiality to children, young people or vulnerable adults making a disclosure.
- 5.3 All safeguarding concerns are recorded on a confidential centralised database, which will include as a minimum, name and address of the person at risk, name of reporter, name of manager or designated person, what the concern was, what actions were taken and the reasons for the decision. Referrals to external agencies and local partners will be recorded on the database. Additional information will be stored confidentially and electronically where required. Access to the database and records will be strictly restricted to designated colleagues.
- 5.4 Where appropriate, and using a safety-first approach, relevant information relating to safeguarding concerns will be shared with the relevant local Safeguarding Children Board. Where reports of abuse are raised there should be a co-ordinated multi-agency approach to tackling the abuse or neglect. All agencies and departments involved, including social and health services and support agencies should be informed of the report and an immediate course of action should be agreed and taken to resolve the issues. This should where appropriate, include a review of the whole service including those provided by other agencies.

- 5.5 Where reports of abuse are made, there should be a planned approach to victim support. Victims should be advised of and supported to contact appropriate support networks and agencies.
- 5.6 Perpetrators of abuse should be dealt with in a planned way in accordance with Aspire policies and procedures including Anti-Social Behaviour, Complaints, Nuisance and Harassment.

6. Disclosure of Information

- 6.1 Confidential information will only be passed to external organisations with the individual's consent except in the case of exceptional circumstances as detailed in the Data Protection Act 1998. These circumstances would include:
- where there is clear evidence of fraud
 - to comply with the law
 - in connection with legal proceedings
 - to protect the health and safety of the individual, where the health and safety of the individual would be at risk if the information were not disclosed, or there is a legal requirement to do so.
- 6.2 Assurances of absolute confidentiality should not be given in reports of abuse. The Data Protection Act should not be a barrier to sharing information that needs to be shared (on a need to know basis).

7. Monitoring and Review

- 7.1 Implementation of this policy and relevant procedure will be subject of an annual audit. The policy will be reviewed every 3 years.

8. Equality & Diversity:

This policy and accompanying procedure has been considered against our Equality and Diversity Policy and is applicable to all children, young people and vulnerable adults no matter what their ethnic group, religion, gender, ability/disability or sexual orientation.

An equality impact assessment has been carried out against this policy.

Where people have specific needs to access the policy, or progress a matter via the policy, reasonable support would be given. By way of example, this may include the provision of the policy in alternate forms e.g. braille, large print or audio versions and ensuring that the process followed was reasonably adapted to reflect the needs of the individual.

Appendices

- Appendix 1- List of reference documents
- Appendix 2- Glossary of terms
- Appendix 3 – Safeguarding flowchart

Appendix 1- Reference Documents / Further Reading and Guidance Points

- Keeping Children Safe in Education 2021
- The Children Act 2004 (with consideration for legislative changes)
- Safer Working Practice for Adults who Work with Children and Young People 2015
- Safeguarding Children and Safer Recruitment in Education 2010
- Working Together to Safeguard Children 2023
- Information Sharing Guidance for Practitioners 2015
- Staffordshire and Stoke on Trent Adult Safeguarding partnership:
<https://www.ssaspb.org.uk/Home.aspx>
- Cheshire West & Chester Community Access Team (CAT) or the Emergency Duty Team (EDT):
<https://www.cheshirewestandchester.gov.uk/residents/health-and-social-care/adult-social-care/keeping-safe/vulnerable-adults>
- Cheshire East Adults <https://www.cheshireeast.gov.uk/livewell/staying-safe/community-safety/safeguarding-adults-at-risk.aspx>
- Staffordshire Safeguarding Children Board:
<http://www.staffsscb.org.uk/Home.aspx>
- Stoke on Trent Safeguarding Children Board
<http://www.safeguardingchildren.stoke.gov.uk/ccm/portal/>
- Cheshire West & Chester Children's Safeguarding Partnership:
<https://www.cheshirewestscp.co.uk/>
- Cheshire East Safeguarding Children's Partnership (CE SCP):
<https://www.cheshireeast.gov.uk/livewell/care-and-support-for-children/services-from-childrens-social-care/child-protection/child-protection.aspx>
- Working Together to Safeguard Children 2018:
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- No Secrets, Department of Health 2000
- Care & support Statutory Guidance, Issued under the Care Act 2014, Department of Health (Section 14 Adult Safeguarding
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366104/43380_23902777_Care_Act_Book.pdf

Appendix 2 - Glossary of Terms

- SAR-Safeguarding Adult Review
- LADO-Local Authority Designated Officer
- DASM-Designated Adult Safeguarding Manager