

#### 1. Background and objectives

- 1.1. The purpose of this policy is to set out the values, principles and policies underpinning the safeguarding of adults and children at risk of abuse.
- 1.2. The Care Act (2014) states that the following 6 key principles must underpin all adult safeguarding work:
  - 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** The 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.
  - Accountability Accountability and transparency in delivering safeguarding.

The Care Act refers to 'making safeguarding personal' meaning it should be personled 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.

- 1.3. The 1989 Children Act identifies 4 categories of child abuse:
  - Physical
  - Sexual
  - Emotional
  - Neglect.

Further detail on the types and indicators of abuse is given in the Safeguarding Children Procedures to assist colleagues how to recognise and deal with child safeguarding concerns.

#### 1.3.1. This policy is based on:

Statutory guidance under the Children's Act 1989 and 2004 with the purpose of protecting children from maltreatment, preventing impairment of health or development, and ensuring children grow up with safe, effective care and have optimum life chances to enter adulthood successfully

The North Somerset Safeguarding Children Board E-Safety Strategic Framework and other good practice guidance in relation to the appropriate and safe use of internet and digital media by children and young people.

1.4. There are 10 main types of abuse of adults at risk:



- Physical abuse
- Sexual abuse
- Psychological/emotional abuse
- Financial or material abuse
- Neglect and acts of omission
- Discriminatory abuse
- Organisational abuse
- Modern slavery
- Self-neglect
- Domestic abuse.

Further information on types and indicators of abuse is given in the Safeguarding Adults Procedure and Guidance.

- 1.5. Alliance Homes has separate Safeguarding Adults Procedures and Safeguarding Children's Procedures to ensure colleagues/ contractors know how to recognise and deal with suspected abuse.
- 1.6. This policy is based on adults and children at risk having the right to live free from abuse.
- 1.7. Cath Stenson (Service Director Customer Service Operations) is the designated Safeguarding Lead for Alliance Homes, responsible for the safeguarding of both adults and children. The lead provides a link to the local authority Safeguarding Team and Board, reports on referrals and supports Alliance Homes colleagues.

#### 2. Policy detail

- 2.1 Alliance Homes is committed to ensuring that adults and children who live in our homes or use our services are not exploited or abused, and that our working practices minimise the risk of abuse.
- 2.2 This policy applies throughout Alliance Homes and extends to contractors used by Alliance Homes. Support colleagues are more likely to come across suspected abuse due to the nature of their work, but any colleague or contractor may potentially identify a person at risk in the course of their work.
- 2.3 Alliance Homes have adopted the following definition of abuse:
  - "Abuse is a single or repeated act, or lack of appropriate action, occurring within a relationship, where there is an expectation of trust, and which causes harm or distress to a person". (Adapted from Action on Elder Abuse's definition of elder abuse).
- 2.4 The Care Act 2014 states that the safeguarding duty applies to an adult who:



- has needs for care and support (whether or not the Local Authority is meeting any of these needs), and is experiencing, or at risk of, abuse or neglect, and
- as a result of care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
- 2.5 This policy covers abuse of adults at risk such as tenants, leaseholders, or other customers by anyone who has a relationship of trust with them friends, relatives, care staff, housing colleagues, support team etc. Sometimes an act between customer and customer may also come within the scope of the Safeguarding Procedures rather than Nuisance or Harassment procedures because of the vulnerability of the victim and the nature of the act.
- 2.6 This policy covers abuse of children, who may live in Alliance Homes' properties, or visit them.
- 2.7 Alliance Homes recruitment processes are designed to minimise the risk of recruiting colleagues who present a risk to customers; these include obtaining 'Enhanced' Disclosure and Barring Service checks for all colleagues that meet the current eligibility criteria and having robust selection and interviewing process.
- 2.8 All relevant customer facing colleagues are required to receive training on how to identify report and act on abuse. All colleagues will follow Alliance Homes guidance on Professional boundaries designed to prevent opportunities for financial or other exploitation (see Professional practice and boundaries guidance located on HOME).
- 2.9 Alliance Homes will work in co-operation with the local authority safeguarding adults and safeguarding children's teams and where relevant, agencies such as doctors, the police and victim support agencies.
- 2.10 Colleagues must respect individuals' confidentiality and not divulge information given in confidence unless justified as an assessed risk to the adult at risk or child. All suspected cases should be reported to an Alliance Homes line manager
- 2.11 Alliance Homes acknowledges individuals' rights to privacy, dignity, independence, and choice, and recognises that these rights will sometimes involve a degree of risk. Where an individual chooses to accept this risk, their wishes will be respected subject to their capacity to anticipate and understand the risk.
- 2.12 Further guidance on the Mental Capacity Act is located on the North Somerset Safeguarding Adults pages: MCA-DoLs local practice guidelines.docx
- 2.13 Customers of support services are informed at the start of their service about this policy, in a manner or alternative format appropriate to their needs. Other methods are also used to explain abuse such as leaflets, handbooks or flyers on notice boards in communal areas and via our website www.alliancehomesgroup.org.uk



- 2.14 Procedures ensure that all cases are properly and objectively recorded and monitored by Managers. The information is securely stored in accordance with UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018 and Alliance Homes Group's Data Protection policy and procedures.
- 2.15 When adult or child abuse is suspected or identified, colleagues will follow Alliance Homes Safeguarding Adults or Children's procedures and guidance, both located on HOME.
- 2.16 Colleagues are encouraged to act when suspicious that abuse is occurring at work, no matter who the perpetrator is. Alliance Homes will respect and not penalise those who stand up for anyone who is suspected of being abused. Further information on 'whistle blowing' and who to contact is given in the Alliance Homes Counter Fraud, Corruption and Bribery Policy, or further support to identify where a concern should be raised can be found on HOME under 'report a concern'.
- 2.17 If allegations are made against a colleague, an investigation will follow and, if required, action taken in line with Alliance Homes Capability and Disciplinary Procedure.
- 2.18 Alliance Homes complies with North Somerset Councils' 'Persons in Position of Trust' (PiPoT) framework and support collaborative working between agencies where allegations of safeguarding are made against persons in positions of trust. More detail is provided in the Safeguarding Adults procedure.
- 2.19 Alliance Homes holds internal Case Conferences to discuss high-risk, complex cases, identify learning from Safeguarding Adult Reviews and escalating concerns where the local authority response is deemed insufficient. More detail is provided in the Case Conference Terms of Reference on HOME.
- 2.20 Alliance Homes participates in North Somerset Multi-Agency Risk Management [MARM] meetings to discuss / find solutions where agencies are challenged to find an appropriate way to support people experiencing vulnerability. More information is available at: Multi-Agency Risk Management (MARM) | Adult Safeguarding Board (nssab.co.uk) and can also be found on HOME.

#### 3. Monitoring, consultation, and review

- 3.1 The Safeguarding Lead is responsible for the implementation and review of this policy.
- 3.2 The Safeguarding Lead will monitor Safeguarding Referrals, reporting to Senior Management and provide an annual report.
- 3.3 This policy will be reviewed within 3 years of its Board approval date.



## 4. Equality and diversity

- 4.1 This policy has been subject to an Equality Impact Assessment.
- 4.2 The purpose of such an assessment is to consider the effect of the policy regarding the recognised protected characteristics of equality ad ensure that it does not unfairly impact any individual or group. The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity or other grounds set out in our Equality and Diversity Strategy and Single Equality Scheme. Remedial action will be undertaken if a detrimental effect is identified.
- 4.3 The EIA also requires the policy author to consider whether the policy is likely to negatively impact on a person's Human Rights.
- 4.4 This policy and any other related Alliance Homes publications can be provided in other formats for those with visual, literacy or language difficulties.

#### 5. Complaints

- 5.1 If you would like to raise a complaint in relation to this policy, you can do this by calling us on **03000 120 120** or emailing us at **act@alliancehomes.org.uk**.
- 5.2 All complaints will be handled in line with the latest Alliance Homes Complaint Handling Policy.

#### 6. Associated documents

- Safeguarding Adults Procedure
- Safeguarding Children Procedure
- North Somerset Safeguarding Adults Policy and multi-agency procedures
- North Somerset Multi-Agency Risk Management protocol [MARM]
- Capability and Disciplinary Procedure
- Alliance Case Conference Terms of reference
- Dignity at Work Policy
- Counter Fraud, Corruption and Bribery Policy
- Professional practice and boundaries guidance
- Human Rights Policy
- Modern Slavery and Human Trafficking Statement



- Domestic Violence and Abuse Policy
- Data Protection policy and procedures.

## 7. Version control and approval dates

Approval stage	Date completed
Policy Reviewed	01 August 2025
EIA reviewed by Equality & Diversity Manager	June 2025
SLT review / approval	22 <sup>nd</sup> August 2025
Board Approval	3 <sup>rd</sup> September 2025
Next review date	31 <sup>st</sup> August 2028

#### Minor amends in between reviews:

- **Feb 2024** Minor update made to clause 1.7 and approved by the Board.
- **Nov 2024 -** Minor additions to clause 1.8 and 1.9 in response to Tenant Safeguarding Audit Aug 2024.
- June 2025 Minor amend made to in insert standard complaints section and format for external publication
- August 2025 Routine Policy Review



#### **Appendix A: Equality Impact Assessment**

An Equalities Impact Assessment must be conducted alongside the review of an existing policy or the creation of a new one.

GUIDANCE ON COMPLETING AN EQUALITY IMPACT ASSESSMENT IS AVAILABLE HERE

1. Name the Strategy, Policy, Procedure or Function (SPPF) being assessed and name of author.

Safeguarding Policy

#### 2. Aims of the SPPF being assessed.

- Whose need is it designed to meet?
- Are there any measurable elements such as time limits or age limits?

This policy gives a high-level overview of how Alliance Homes colleagues will work to protect customers [Adults and Children] who use its services. The policy is supported by separate procedures for Adults and Children which provide detailed guidance on raising concerns and supporting customers when abuse is identified.

#### 3. Who has been consulted in developing the SPPF?

• Make reference or links to consultation/evidence documents

The 2025 review of the safeguarding policy has been circulated to senior and frontline operational managers for review / amendments.

It should be noted that the policy did have interim updates in 2024 following the Tenant Safety Audit to include references to PIPOT [Persons in a position of trust], internal case conferences and MARM [Multi-agency risk management meetings].

4. Does the SPPF promote equality of opportunity?

The policy promotes equality of opportunity across the protected characteristics as follows:

Those at risk of abuse are most likely to be customers experiencing a vulnerability. The Life through your Lens project has given us more data about protected characteristics and equalities helping colleagues to better understand customers. This will allow us to better understand customers diverse needs and address them.

All frontline colleagues are trained to understand and identify abuse – doing nothing is not an option.



- 5. Identify potential impact on each of the diversity "groups" by considering the following questions (the list is not exhaustive but an indication of the sort of questions assessors should think about):
  - Might some groups find it harder to access the service?
  - Do some groups have particular needs that are not well met by the current SPPF?
  - What evidence do you have for your judgement (e.g. monitoring data, information from consultation/research/feedback)?
  - Have staff/residents raised concerns/complaints?
  - Is there local or national research to suggest there could be a problem?

Protected Characteristic	No impact	Negative impact	Positive impact	Information source/s **	Comments/evidence
Race			Х		Ongoing monitoring and review will ensure that the Safeguarding Policy continues to
Disability			X		be effective and fair and to take account of customers' needs where possible.
Gender			X		We will ensure that the policy is available
Transgender			Х		in different formats, e.g. easy read, large print, alternative languages etc, and take
Sexual orientation			X		account of communication difficulties.  Alliance colleagues will receive relevant
Religion or belief			X		training on how to identify and respond to safeguarding concerns in a way that is sensitive to the needs of different groups
Age			Х		and try to remove any barriers for customers from different cultural
Marriage & Civil Partnership			X		backgrounds.  The policy details, or makes reference to
Pregnancy and Maternity			Х		policies that cover domestic abuse which has a disproportionate impact on women, explains our commitment to safeguarding children and young people and adults with care and support needs, covers customers experiencing cultural issues such as forced marriage, FGM, and modern slavery. People impacted by these events will have a number of protected characteristics.
Rural issue			Х		
Social mobility			X		



Was there a negative impact identified in question 5? If yes go to question 6. if not go to question 7.

6. If "negative impact" identified in table (4) above is it?

Legal - What is the level of impact? -

YES	NO
HIGH	<mark>LOW</mark>

If it is <u>not</u> legal and/or <u>high</u> impact – (i.e.: if you have highlighted NO to legal and HIGH to impact then the document <u>should be referred to Head of HR)</u>

7. If positive impact has been identified in table 4 above, how can it be improved upon or maximised, either in this SPPF or others?

A new workflow is being developed in Cx to improve reporting and monitoring. This will further improve transparency of safeguarding across the organisation.

# 8. Full EIA (or if you decide full EIA is not necessary but some changes should be considered)

- Are there changes you could introduce which would make this SPPF work better for this group of people?
- Is further research or consultation required?

#### 9. Does this proposal have any potential Human Rights implications?

If yes please describe (if necessary please make reference to the Alliance Homes Group Human Rights Policy)

The policy supports Article 8: Right to respect for private life, family life and the home and Article 14: Prohibition of discrimination