

Safeguarding Policy Children, Young People & Adults

2025

Monitoring and review

Document owner	Approved by	Authorised by	Effective date	Review date
Title: Head of Homelessness & Specialist Support	Title: Director of Homes & Communities	Title:		In line with any legislative changes
Name: Charlotte Gibbons/ Kay Bourne	Name: Angela Barnes	Name:		

Document History

Version	Summary of changes	Document Status	Date
V1.0			25.11.2023
V2.0	Early identification of concerns via SIRS Reference to City of Wolverhampton Council Safeguarding Framework Reference to procurement framework incorporating safeguarding.		04.02.2024

Contents Page

1.0 Background

Wolverhampton Homes' Safeguarding Policy reflects the commitment of the organisation to work with everyone to prevent and reduce the risk of harm to children, young people, and adults.

All children (including unborn) young people, and adults, regardless of age, disability, gender, ethnic background, religious belief, sexual orientation, or identity, have a right to equal protection from all types of harm, abuse, or exploitation.

Some children, young people and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

Early identification of need contributes to better outcomes for children, young people, and adults.

2.0 Purpose and scope

To ensure that children, young people, and adults (with care and support needs) in Wolverhampton are protected from abuse and as far as possible, take appropriate measures to promote their health, safety, and well-being.

Safeguarding is everybody's business, with everyone playing a part in preventing, identifying, and reporting abuse.

We will:

Enshrine the principles of **Think Family** in our approach to Safeguarding. A Think Family approach refers to the steps taken by children's, young peoples, and adult practitioners to identify wider family needs which extend beyond the individual they are supporting.

For example, in relation to safeguarding, if you work primarily with adults, you still consider the safeguarding needs of children, and if you work with children, you still consider the needs of the vulnerable adults. Safeguarding is everyone's responsibility.

Further information about the Think Family approach can be found here [Think Family - Wolverhampton Safeguarding Together](#).

One of our core aims is to prevent risk of harm from escalating through early intervention and by working collaboratively with individuals, families, and agencies to agree the outcomes the individual wants to achieve.

We will ensure all employees, our contractors and anyone working on behalf of Wolverhampton Homes, either paid or unpaid have access to relevant mandatory safeguarding training and the processes that guide our approach to safeguarding.

3.0 Statement of intent

To achieve this, we are committed to:

- Increasing awareness and best practice in terms of safeguarding in the context of housing
- Providing clear definitions on what constitutes abuse, neglect and exploitation using the Think Family approach.
- Clearly outlining the roles and responsibilities for staff at all levels of Wolverhampton Homes in terms of making safeguarding personal
- Provide employees with the mechanism to identify and report concerns whilst in the community via the See It Report It digital process.
- Demonstrating our accountability by maintaining accurate records, and collating feedback for best practice
- Safer recruitment, ensuring safeguarding and promotion of welfare is central to the recruitment process.
- Appropriately share information with statutory agencies and partner organisations about individuals who may require safeguarding interventions with due regard to confidentiality and information sharing legislation and protocols.
- Meeting our statutory safeguarding requirements in line with our existing legislation which informs our policies and procedures.
- Whenever a case review is completed, we will ensure that the recommendations and learning from the review helps to improve the way we work with other agencies to safeguard children, young people, families and adults at risk.

4.0 Policy definitions

Wolverhampton Homes recognises and acknowledges its legal duties and obligations relating to safeguarding. As a member of Wolverhampton Safeguarding Together, we will work in close collaboration to safeguard and promote the welfare of all children, young people and adults with care and support needs in Wolverhampton.

Types of abuse

Physical abuse - a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. For adults, this may include misuse of medication, inappropriate sanctions, for example: force feeding or not feeding, inappropriate restraint and unlawful deprivation of liberty.

Neglect - 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. For adults, neglect can be acts of omission – such as ignoring care needs, not providing, or preventing access to essential services, failure to intervene in situations which are dangerous to an individual or others.

Emotional abuse – for children and young people, this can include persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. For adults, this can take the form of threats of harm or abandonment, deprivation of contact, humiliation, rejection, coercion and controlling, indifference, harassment, verbal abuse, cyberbullying, isolation or withdrawal from network or support services.

Self-Neglect - For young people and adults covers a range of behaviours which includes hoarding, living in unsanitary conditions, neglect of personal hygiene, or failure to take prescribed medication. Please note, poor environments and personal hygiene may be a matter of personal or lifestyle choice or other issues, such as insufficient income.

Sexual abuse - involves forcing or enticing a child, young person, or adult to take part in sexual activities, whether the individual is aware of what is happening. This includes, rape, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts. Specifically for adults, indecent exposure and sexual assault or sexual acts to which an adult has not consented.

Prevent - is about safeguarding children and young people, from the threat of terrorism. The Prevent strategy responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat posed from those who promote these views.

It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support and works with a wide range of sectors where there are risks of radicalisation.

Adults may also be susceptible to recruitment into violent extremism by radicalisers. The Home Office leads on the anti-terrorist strategy - [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/revised-prevent-duty)

Exploitation - occurs when a child, young person or adult with care and support needs, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child, young person, or adult, performing sexual activities, or another person performing sexual activities on the individual. This also encompasses modern slavery, human trafficking, forced and compulsory labour and domestic servitude.

An example of an adult being exploited in the context of housing, can include cuckooing. Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation.

There are different types of cuckooing:

- Using the property to deal, store or take drugs.
- Using the property to sex work
- Taking over the property as a place for them to live

- Taking over the property to financially abuse the tenant or household member.

Financial or material abuse – includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs, e.g., wills and property, or the misuse or misappropriation of property, possessions, or benefits.

Discriminatory Abuse - Includes discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation, and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person's disability or any other form of harassment, slur, or similar treatment. Hate crime can be viewed as a form of discriminatory abuse, although will often involve other types of abuse as well. It also includes not responding to dietary needs and not providing appropriate spiritual support. Excluding a person from activities on the basis they are 'not liked' is also discriminatory abuse.

Organisational abuse - Includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or where care is provided within their own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice because of the structure, policies, processes, and practices within an organisation.

Position of Trust – position of trust (PoT) relates to when there is an allegation or suspicion that a person working with children, young people or adults with care and support needs, and has behaved in a way which has harmed or caused harm, possibly committed a criminal offence, or behaved in a way which indicates she/he is unsuitable to work with children, young people, or adults.

Whistleblowing - Wolverhampton Homes has a Designated Adult Safeguarding Manager (DASM) who is responsible for the oversight of individual complex cases whereby allegations or concerns have been raised about an individual employee. Our [Whistleblowing Policy - May 2020](#) provides people within the organisation protection from victimisation or detriment when raising concerns.

Domestic Abuse – is defined by the Domestic Abuse Act 2021 as.

Behaviour of a person ("A") towards another person ("B") is "domestic abuse" if—
A and B are each aged 16 or over and are personally connected to each other, and
the behaviour is abusive.

Behaviour is "abusive" if it consists of any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional, or other abuse.

Children and young people are deemed to be victims of abuse under the DA Act 2021 if they are seeing, hearing, or otherwise affected by domestic abuse.

For further information, please refer to Wolverhampton Homes Domestic Abuse Policies for Customers and Employees.

[Domestic Abuse Policy - Customer.docx \(sharepoint.com\)](#)

[Domestic Abuse Policy - Employee.docx \(sharepoint.com\)](#)

Female Genital Mutilation (FGM) - is a procedure where the female genitals are deliberately cut, injured, or changed, but where there is no medical reason for this to be done. It is very painful and can seriously harm the health of women and girls. It causes long-term problems with sex, childbirth, and mental health. FGM is illegal in the UK and is abuse.

Forced marriage and Honour-Based Abuse (HBA) – Children, young people and adults can be subjected to abuse perpetrated to force them into marriage or to ‘punish’ them for ‘bringing dishonour on the family’. The victim may be subjected to abuse over a long period to a variety of different abusive behaviours ranging in severity. More information can be found here - [Honour Based Abuse | Your Options | West Midlands Police \(west-midlands.police.uk\)](#)

Child to parent abuse – If a child(ren) is causing harm to an adult with care and support needs, this should be dealt with under Adult Safeguarding Procedures in conjunction with Children’s Services.

5.0 Roles and responsibilities

Safeguarding is everybody’s business, with everyone playing a part in preventing, identifying, and reporting neglect, abuse, or exploitation.

Wolverhampton Homes will seek to keep children, young people and adults with care and support needs safe by:

- Providing robust processes and tools to enable our employees and contractors to raise safeguarding concerns.
- Ensuring our procurement processes incorporate and reference safeguarding.
- Supporting and involving our customers to make their own choices whilst making safeguarding personal.
- Share information appropriately and with the relevant agencies in a timely manner.
- Having a Designated Safeguarding Lead (DSL) who will provide guidance and support to employees and contractors working on behalf of Wolverhampton Homes.

Making safeguarding personal

Making Safeguarding Personal (MSP) is about having conversations with people about how we might respond in safeguarding situations, so they feel in control and that their involvement and the choices they make are being listened to. Ensuring that when working with adults, decisions are not made about them without them.

In some cases, adults can lack the capacity to consent to what is deemed by others as being in their best interests or which will protect them from harm. Where this care might involve depriving vulnerable people of their liberty in either a hospital or a care home, extra safeguards have been introduced in law – Deprivation of Liberty Safeguards, to protect their rights and ensure that the care or treatment they receive is in their best interests.

Wolverhampton Homes does not tolerate any form of neglect, abuse or exploitation and will investigate and take appropriate action against any tenant or employee who perpetrates or facilitates abuse or wilful neglect. We will ensure any action taken does not compromise the safety of an individual or their family.

Consent:

Any referrals made to Wolverhampton MASH should have the consent of the person at risk or for children, the person with parental responsibility.

In cases where it is believed consent will increase risk, please seek further advice from a manager or contact Wolverhampton MASH - Multi Agency Safeguarding Hubs (MASH) - Wolverhampton Safeguarding Together.

6.0 Monitoring

Good record-keeping is an essential part of the accountability of organisations to those who use their services. Maintaining proper records is vital to an individual's care and safety. If records are inaccurate, future decisions may be wrong and harm may be caused to the individual. Where an allegation of abuse or neglect is made all agencies have a responsibility to keep clear and accurate records. It is fundamental to ensure that evidence is protected and to show what action has been taken and what decisions have been made and why.

It is equally important to record when actions have not been taken and why e.g., an adult with care and support needs with mental capacity may choose to make decisions professionals consider to be unwise.

Wolverhampton Homes will periodically collate customer feedback and data which will be used to inform and share best practice, whilst enabling us to improve our services and assist in ensuring our policies and procedures are up to date.

This policy will be reviewed every 3 years or earlier if there are significant changes required in the light of best practice and any changes to legislation and Government guidance.

7.0 Interdependencies and related policy

- WH Safeguarding Procedure
- WH Disciplinary Policy and Procedure
- Wolverhampton Safeguarding Together Safeguarding Framework
- West Midlands Regional Multi-agency Policy and Procedures and Practice Guidance
- City of Wolverhampton Council Allocations Policy
- ASB & Hate Crime Procedure
- Community Safety & Harm Reduction Strategy 2020-2023
- WH Customer Domestic Abuse Policy 2022-2025
- WH Employee Domestic Abuse Policy 2022-2025
- Prevent
- Forced Marriage & Honour Based Violence Protocol
- WH Whistleblowing Policy & Procedure
- General Data Protection Regulations (2018)

Legislation

Children & young people	Adults
Children Act 1989	Care Act 2014 https://www.legislation.gov.uk/ukpga/2014/23/contents
Children's Act 2004 https://www.legislation.gov.uk/ukpga/2004/31/contents	Mental Capacity Act 2005 (legislation.gov.uk)
Children & Social Work Act 2017 http://www.legislation.gov.uk/ukpga/2017/16/contents/enacted	Human Rights Act 1998 (legislation.gov.uk)
The Education Act 2002 https://www.legislation.gov.uk/ukpga/2002/32/contents	Housing Act 1996 (legislation.gov.uk)
Keeping Children Safe in Education 2019 https://www.gov.uk/government/publications/keeping-children-safe-in-education--2	Homelessness Reduction Act 2017 (legislation.gov.uk)

Working Together to Safeguard Children 2018 https://www.gov.uk/government/publications/working-together-to-safeguard-children--2	Equality Act 2010 (legislation.gov.uk)
Children (Leaving Care) Act 2000 (legislation.gov.uk)	Family Law Act 1996 (legislation.gov.uk)
Children and Families Act 2014 (legislation.gov.uk)	Protection from Harassment Act 1997 (legislation.gov.uk)
United Nations Convention on the Rights of the Child (UNCRC): how legislation underpins implementation in England - GOV.UK (www.gov.uk)	Crime and Disorder Act 1998 (legislation.gov.uk)
	Anti-social Behaviour, Crime and Policing Act 2014 (legislation.gov.uk)
	Domestic Abuse Act 2021 (legislation.gov.uk)
	Data Protection Act 2018 (legislation.gov.uk)

Information sharing.

Sharing information at the right time, with the right people, is fundamental to good practice in both adult and children's safeguarding. The Mental Capacity Act is also relevant as all those meeting adults with care and support needs should be able to assess whether someone has the mental capacity to make a decision concerning risk, safety or sharing information.

The law does not prevent the sharing of sensitive, personal information within organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified. In addition, the law does not prevent the sharing of sensitive, personal information between organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented.

Wolverhampton Homes in its role as a member of Wolverhampton Safeguarding Together Board, is committed to conducting and contributing to safeguarding enquiries, these may include contribution to Serious Adult Reviews (SAR), Domestic Homicide Reviews (DHR) and Children's Safeguarding Practice Reviews (CSPR).

Wolverhampton Homes understands that occasionally situations arise when workers within one agency feel that the actions, inaction, or decisions of another agency do not adequately safeguard a child or an adult with care and support needs. Should this be the case, Wolverhampton Homes will ensure such situations are addressed by following the WST Safeguarding Escalation Policy.

[WSB Escalation policy Final Draft 1.pdf \(wolverhamptonsafeguarding.org.uk\)](#)

8.0 Equality Impact Assessment

All adults and children have a right to equal protection from abuse, neglect, and exploitation, regardless of age, disability, race, religion or belief, sex, gender identity or gender expression, sexual orientation, marriage or civil partnership, pregnancy or maternity or any other equality characteristic.

Some adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

Working in partnership with other agencies, is essential in promoting the welfare of children, young people, and adults.

9.0 Safeguarding Toolkit

Reporting a concern - [Report a Concern - Wolverhampton Safeguarding Together](#)

Neglect of children and young people - [Neglect - Wolverhampton Safeguarding Together](#)

Exploitation of children, young people and adults - [Exploitation - Wolverhampton Safeguarding Together](#)

Hoarding - [Hoarding - Wolverhampton Safeguarding Together](#)

Modern Slavery [Modern Slavery - Wolverhampton Safeguarding Together](#)

Channel (Extremism) - [Channel-Reporting-Form.doc \(live.com\)](#)

Crying babies and infants [ICON, Babies Cry, You Can Cope - Wolverhampton Safeguarding Together](#)

[Thresholds of Need and Support in Wolverhampton - Wolverhampton Safeguarding Together](#)

