



Safeguarding Policy

February 2024

**Owner: Lettings & Homeless Service Manager and Tenancy Services
Manager**

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Version history

Version No.	Purpose/Changes	Approval Date	Approved By	Suggested Review Date
12.0	Full review	16/02/2024	Executive Leadership team	March 2025
11.0	Directorate Transformation	09/03/2022	Executive Leadership team	March 2023
10.0	Update to section 4.7.1	19/03/2021	Director for Communities	August 2021
9.0	Compliance check	07/10/2020	Director for Communities	August 2021
8.0	Annual check	07/11/2019	Heads of Service team	November 2020
7.0	Annual check	02/08/2018	Heads of Service team	August 2019
6.0	Annual check	04/05/2017	Heads of Service team	May 2018
5.0	Annual check	03/11/2016	Heads of Service team	October 2017
4.0	Annual check	17/09/2015	Ongo Board	September 2016
3.0	Annual check	04/06/2014	Heads of Service team	April 2015
2.0	Annual check	24/07/2013	Heads of Service team	July 2014
1.0	New policy	05/03/2012	Operations Committee	March 2013

1. Our policy is...

- 1.1 As a social landlord we have a duty to keep our customers safe from harm. This policy outlines our approach to safeguarding children, young people and vulnerable adults who are or are at risk of being abused or neglected.
- 1.2 Our Safeguarding Policy is based on the key principles of the Working Together 2018, and Care Act 2014 Statutory Guidance for inter-agency working to safeguard children and adults. (refer to appendix 1 – 6 key principles of safeguarding).
- 1.3 A vulnerable adult in the context of the legislation, specific safeguarding duties apply to any adult who:
 - Has care and support needs, and
 - Is experiencing, or is at risk of, abuse or neglect, and
 - Is unable to protect themselves for either the risk of, or the experience of abuse or neglect, because of those needs
- 1.4 It is the role of the Local Authority to investigate and establish abuse. It is the role of all Ongo employees or anyone providing a service on our behalf, to report any suspicions or evidence of abuse or neglect and provide information as required to assist the LA in their investigations.
- 1.5 It is important to safeguard individuals who are vulnerable to radicalisation through the Prevent agenda (see what we mean section 11).
- 1.6 We recognise that safeguarding can be a sensitive issue and we will ensure that our employees understand their role and feel confident and supported when reporting concerns.
- 1.7 There are Designated Safeguarding Persons (DSPs) across the organisation whose role it is to ensure that the Safeguarding Policy and Procedure is followed, and to provide guidance and support to colleagues and customers. These individuals will receive a higher level of training to confidently carry out this role.

2. It applies to...

- 2.1 This policy applies to everyone who works at Ongo and everyone providing a service on our behalf, including agency workers, apprentices, fixed term workers, consultants, secondees, Board members and volunteers as well as potential employees and contractors who may provide a service on our behalf.
- 2.2 This policy applies to apprentices and temporary workers employed through Ongo Recruitment in cases where the host employer does not have its own policy in place.
- 2.3 This policy applies to all our tenants and customers who engage in the use of our services.

3. Because we want to...

3.1 The main aims of this policy are:

- To be transparent, fair and equitable when dealing with cases in relation to safeguarding children and vulnerable adults
- To comply with legislation, regulation and local authority policy

4. We will...

4.1 We will raise awareness and promote a culture that does not tolerate abuse and/or neglect of children, young people and adults.

4.2 We will make safeguarding personal and put the victim at the heart of any decision making.

4.3 We will actively train, support and encourage everyone to raise safeguarding concerns and provide a clear pathway to make reporting simple and accessible.

4.4 We will ensure everyone follows the Safeguarding Policy and associated procedures.

4.5 We will respond and act promptly and proportionately in instances and allegations where abuse has occurred.

4.6 We will develop new and strengthen existing partnerships with all relevant external agencies, across all areas of operation including and not limited to Health, Adult and Children's Services and the Police.

5. Consent and Mental Capacity

5.1 We recognise that vulnerable adults have the right to be supported in making their own decisions about how they wish to proceed in the event of abuse / self-neglect and will respect their wishes wherever possible. We aim to seek consent before making any referrals outside of Ongo, however, in some circumstances, the vulnerable adult's wishes may be overridden where the safety of the individual or others may be at significant risk.

5.2 Although consent is not mandatory when making children's referrals our practice would be to ensure the victim and parent / guardians are informed of our actions.

5.3 If there are concerns that the vulnerable adult lacks mental capacity, a Mental Capacity Assessment will be completed before any further action is taken using appropriate specialist support in line with the *Mental Capacity Procedure*.

6. Dealing with concerns and allegations of abuse effectively and efficiently

6.1 Our Safeguarding Procedure details the process on how to raise safeguarding alerts in line with this policy.

- 6.2 If an employee suspects that a colleague is involved in abuse or neglect, they should report this immediately by following the Safeguarding Procedure or PIPOT (Person in Position of Trust) Procedure.
- 6.3 Where an employee is suspected of abuse or neglect, there may be four strands of investigation:
- Child Safeguarding investigation (led by the Local Authority Designated Officer (LADO))
 - Vulnerable Adult Safeguarding investigation (led by the Local Authority Designated Officer)
 - Criminal Investigation (led by Police)
 - A disciplinary or misconduct investigation (led by Ongo)
- 6.4 We will assess each individual allegation on its own merits, taking into account the findings of any criminal investigation.
- 6.5 Depending on the outcome of the investigation, we will assess the appropriateness of the employee returning to work in their previous environment.
- 6.6 We will consider North Lincolnshire Councils policies and procedures as our main Local Authority partner. However, the relevant local authorities policies and procedures will be referred to when concerns relate to anyone outside of the North Lincolnshire area:
- Children <https://www.northlincsmars.co.uk/wp-content/uploads/2022/07/9-Procedures-for-managing-allegations-against-people-who-work-with-children-July-22.pdf>
 - Adults - <http://www.northlincssab.co.uk/wp-content/uploads/2020/12/PiPoT-policy-V6.pdf>
- 6.7 Employees and those providing services on behalf of Ongo must always maintain professional boundaries in line with relevant policies and procedures.
- 6.8 **Address safeguarding in all recruitment and selection processes**
- 6.8.1 We will make sure all reasonable steps are taken to prevent unsuitable people from working with children and / or vulnerable adults as detailed in the Ongo Recruitment and Retention Policy and DBS (Disclosure & Barring Service) Procedure.
- 6.9 **Colleague skills and knowledge**
- 6.9.1 All our employees will undertake safeguarding and Prevent training at the level appropriate to their role to ensure that they are equipped to recognise abuse and deal with concerns in the appropriate manner.
- 6.9.2 Refresher training will be provided at appropriate intervals dependent on the role.

6.9.3 Safeguarding will be included in the employee induction programme for all new employees via e-learning.

6.10 **Our contractors**

6.10.1 We will make sure all partnering contractors or sub-contractors who are likely to come into contact with children or vulnerable adults have their own adequate Safeguarding Policy and provide their employees with relevant training. Failing this, they will comply with the terms of this policy and receive training from Ongo. Where necessary, refresher training will be required.

6.11 **Maintain Confidentiality**

6.11.1 We will always treat any sensitive or personal information given to us as confidential in accordance with the Data Protection Act 2018 and General Data Protection Regulations (GDPR 2018).

6.11.2 Information will be handled and disseminated on a need-to-know basis. We will not disclose information to other agencies without the prior consent of a victim of abuse except where:

- There is a risk of serious harm to the individual or someone involved in the situation
- The victim is a child
- The individual has been assessed as incapable of making an informed decision
- A serious crime has been committed
- Terrorism and terrorist-related activities

7. **The Prevent Strategy**

7.1 The Prevent strategy is focused on safeguarding people who are vulnerable to radicalisation or extremism. We will work with statutory partners and the local community to safeguard children and adults from being drawn into terrorist related activities.

8. **Making sure we do what we say**

Who?	Responsibilities
The Director of Customer Services will:	<ul style="list-style-type: none"> • Represent Ongo Homes on the Safeguarding Adults Board (when required) in the areas in which we operate • Present the annual Safeguarding Report to Ongo board
The Head of Landlord Services will:	<ul style="list-style-type: none"> • Ensure the adoption of and adherence of the Safeguarding Policy and Associated Procedures • Deputise for the Director of Customer Services • Overarching governance of Safeguarding
The Safeguarding Lead for children, young people and adults will:	<ul style="list-style-type: none"> • Overarching governance and monitoring of all reported safeguarding cases concerning Ongo.

Who?	Responsibilities
	<ul style="list-style-type: none"> • Ensuring that Ongo is represented at relevant safeguarding meetings for vulnerable adults and children at the appropriate level • Be responsible for writing, reviewing and communication of the Safeguarding Policy and Procedures across the organisation • Responsibility for the development and delivery of the Safeguarding training for all employees • Attend all relevant training associated with the Safeguarding Lead Role • Governance on training completion & escalation where necessary • Carry out regular case reviews to ensure consistency and compliance and identify any learning requirements and best practice • Ensure all safeguarding allegations and reports are on a ROPA (Record of Processing) data retention schedule • Writing of annual Ongo Board Report • Responding to all requests from LA for information including engaging in self assessments • Responsible for contributing to the LA strategic plans for safeguarding • Ensure key safeguarding information is accessible to all employees & regularly reviewed and updated
Prevent lead	<ul style="list-style-type: none"> • Act as the Prevent lead for the organisation • Providing advice, guidance and support to employees in respect of Prevent • Ensuring appropriate Prevent referrals are made to the Local Authority • Where the case does not meet the Prevent referral threshold ensure the cases will be supported by Ongo and/or signposted to relevant specialist agencies • To ensure accurate record keeping and data protection and retention policies are followed
Designated Safeguarding Person	<ul style="list-style-type: none"> • Act as the safeguarding champion for their service area • Ensuring appropriate safeguarding adult referrals to the Local Authority • Ensuring all child protection referrals are made to the Local Authority

Who?	Responsibilities
	<ul style="list-style-type: none"> • Where the case does not meet the safeguarding threshold ensure the cases will be supported by Ongo and/or signposted to relevant specialist agencies • Providing advice, guidance and support to employees in respect of safeguarding vulnerable adults and children • To ensure accurate record keeping and data protection and retention policies are followed
Service managers are responsible for ensuring that:	<ul style="list-style-type: none"> • Where relevant, the safeguarding of vulnerable adults and children is considered in policies, plans and services • The promotion of the importance of safeguarding and how it is everyone's responsibility • They and their teams understand the Safeguarding Policy and associated procedures and know how to use this in practice • They inform the relevant Designated Safeguarding Person of any safeguarding or child protection issues raised to them • Ensure that employees reporting any safeguarding concerns are provided with appropriate support • All employees have undertaken safeguarding e-learning training and other relevant training appropriate to their role
The People and Culture team is responsible for:	<ul style="list-style-type: none"> • Ensuring all employees working with vulnerable adults and children have employment checks appropriate to their role in line with the Recruitment and Retention Policy and DBS Procedure • Keeping up-to-date with safer recruitment policies, procedures and training • Development and review of People in Position of Trust procedure
The Procurement & Vfm Manager is responsible for:	<ul style="list-style-type: none"> • Ensuring that safeguarding is considered within all contracts where contractors employees come into direct contact with Ongo customers
The Contract Manager is responsible for:	<ul style="list-style-type: none"> • Ensuring that all contractors who have customer facing employees adhere to their own or adhere to our Safeguarding Policy • Identifying contractors that need safeguarding training

Who?	Responsibilities
All employees and persons working on our behalf, whether they work directly with, or come into contact with, vulnerable adults and children have a responsibility to:	<ul style="list-style-type: none"> • Report any suspicions or concerns regarding the welfare of vulnerable adults and children in relation to safeguarding or the Prevent agenda. This duty extends to the identification of abuse, poor practice and allegations brought to the attention of employees by a member of the public • Contribute to investigations of suspected abuse • Take part in safeguarding training relevant to their role • Keep clear and accurate records in relation to safeguarding • Adequately inform customers of the Safeguarding Policy and provide them with support to help them understand it

8.1 We will monitor outcomes of safeguarding alerts made and review via case audits internally.

8.2 We will represent Ongo at appropriate external reflective practice forums.

8.3 An annual report will be provided to the Board annually, to provide assurance to them in respect of our approach and management of Safeguarding. This will include reference to children, vulnerable adults and Prevent.

9. Other things to bear in mind...

9.1 This policy has been developed to comply with the legal framework and published guidance relating to the safeguarding of children and vulnerable adults.

9.2 This policy clarifies our role and our employees' role in safeguarding children and vulnerable adults.

9.3 Legislation and Regulations relevant to this policy include:

- ASB, Crime and Policing Act 2014
- Crime and Disorder Act 1998
- Counter-Terrorism and Security Act 2015
- General Data Protection Regulation
- Domestic Violence, Crime and Victims Act 2004
- Domestic Abuse Act 2021
- Equality Act 2010
- Human Rights Act 1998
- Police and Criminal Evidence Act 1984
- Public Concern at Work
- Public Interest Disclosure Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Sex Offenders Act 1997

- Sexual Offenders Act 1956
- Sexual Offences Act 2003
- No Secrets Guidance (Department of Health, 2000)
- Forced Marriage (Civil Protection) Act 2007
- Mental Health Act 1983
- Mental Capacity Act 2005
- The Care Act 2014
- ADASS Guidance 2013
- Children and Young Persons Act 1933
- The Children Act 2004
- The Children Act 1989
- The Local Safeguarding Children Boards Regulations 2006
- Early Help Assessment Framework

9.4 We will also link to external local documents

- All Local Authority safeguarding Adult's Board Safeguarding Policies & Procedures & Guidance for Adults and Children

10. We'll look at this again...

10.1 This policy will be health-checked at least annually by the Safeguarding Leads for Prevent, Children and Adults.

11. What we mean...

Reference	Definition
Safeguarding	Safeguarding means protecting adults and children from harm, abuse, and neglect. It also entails preventing them from misbehaviour and maltreatment. It helps promote a community where everyone can grow in a healthy and safe environment.
Abuse	'Abuse is a violation of an individual's human and civil rights by any other person or persons' (refer to appendix 2 types of adult abuse Appendix 3 types of child abuse.
Neglect	The failure to meet a child, young person or adult at risk's basic needs.
Vulnerable Adult	A vulnerable adult is an individual who is aged 18 years or over; who may be in need of community care services by reason of mental or other disabilities, age or illness, and who is or may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation.
Child/Young Person	A child is defined as any person under the age of 18. A Young Person is a care leaver aged 18 or over who is receiving children's services.

Reference	Definition
Mental Capacity	<p>Mental Capacity refers to the ability of a person to make decisions about their own life. Some people have difficulties in making such decisions. This is called 'lacking capacity'. This is applicable to people aged 16+.</p> <p>Under the Mental Capacity Act (MCA) there are laws governing who can make decisions on someone else's behalf, which help to safeguard vulnerable people</p>
Prevent Agenda	<p>The aim of Prevent is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. Delivery of Prevent is grounded in early intervention and safeguarding. Prevent is one of the four strands of the government's Contest counter-terrorism strategy; the other strands are Pursue, Protect and Prepare.</p> <p>Channel and Prevent Multi Agency Panel (PMPAP) are part of the Prevent strategy. The process is a multi-agency approach to identify and support individuals at risk of being drawn into terrorism.</p>
Radicalisation	<p>Radicalisation means someone is being encouraged to develop extreme views or beliefs in support of terrorist groups and activities.</p>