

	OPS 22
	Page 1 of 12
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Safeguarding and wellbeing policy

Section 1

Contents

1.	Policy statement.....	2
2.	Scope.....	2
3.	Purpose.....	2
4.	Background	3
5.	Policy principles	5
6.	Staff and client awareness.....	6
7.	Recruitment and selection.....	7
8.	<i>MyJourney</i> - Risk assessment and management (see also OPS 38).....	7
9.	Responsibilities	8
10.	Responding to allegations or suspicions of abuse relating to clients	10
11.	Working in a multi-agency way	11
12.	Prevent (our approach to counterterrorism).....	12
13.	Review and monitoring.....	12
14.	Policy review	12



Safeguarding and wellbeing policy

Section 1

OPS 22

Page 2 of 12

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1. Policy statement

- 1.1 This policy, and the procedure which supports it, sets out how we will safeguard individuals, how we support people to improve or resolve their circumstances, and how we will respond when there is a concern that abuse has been or is occurring.

2. Scope

- 2.1 This policy sets our expectations with respect to:

- supporting and safeguarding adults at risk
- safeguarding children and young people associated with our services, either as clients or where they have any involvement with our adult clients
- our duty of care to clients, including actively checking on their continued wellbeing
- the rights of staff and how they should respond where abuse is alleged against them within either a criminal or disciplinary context

3. Purpose

- 3.1 We house and provide services for a wide range of people who are at risk of different types of harm, including abuse, some of whom may have been perpetrators of abuse in the past.
- 3.2 The structure of our policy manual reflects these different, but inter-related, priorities.
- 3.3 Our policy manual applies to our board and all staff, including senior managers, paid staff, volunteers, relief workers, agency staff, students and anyone working on our behalf. Our policy provides staff and volunteers with guidance on procedures they should adopt in the event that they suspect an adult at risk, child or young person may be experiencing, or be at risk of, harm.
- 3.4 Our policy sets out how we contribute to safeguarding practices.
- 3.5 Our manual is made up of:
- Safeguarding an adult at risk – Section 2
 - Safeguarding children and young people – Section 3
 - Client wellbeing (welfare) checks – Section 4
 - Missing people – Section 5
 - Female genital mutilation – Section 6
 - Forced marriage, honour-based violence, and breast ironing – Section 7
 - Prevent – counterterrorism and radicalisation – Section 8
 - Domestic abuse and MARAC Procedures – Section 9
 - Sexual exploitation (adults and children), and grooming – Section 10
 - Cyber bullying and internet abuse procedures – Section 11

- Modern slavery – Section 12
- Gangs, county lines and cuckooing – Section 13
- Dealing with allegations about people who work with children and young people – Section 14
- Self-harm and suicidal behaviour – Section 15
- Safeguarding the unborn baby and the new-born baby (bruising and safe sleeping) – Section 16
- Safeguarding children where parents have additional support needs (mental ill health, drug, and alcohol misuse) – Section 17
- Managing medical emergencies – Section 18
- Managing falls – Section 19
- Safeguarding processes – Section 20
- Safeguarding training and supervision framework – Section 21

4. Background

- 4.1 Our policy and procedures conform to the requirements of relevant legislation including
- Equality Act (2010)
 - Mental Capacity Act (2005)
 - Public Interest Disclosure Act (1998)
 - Human Right Act (1998)
 - Safeguarding Vulnerable Groups Act (2006)
 - Enterprise and Regulatory Reform Act (2013)
 - Care Act (2014)
 - Housing Act (1996)
 - Children Act (2004) and Children Act (1989)
 - Working together to safeguard children (2026)
 - Making Safeguarding Personal (2014)
 - Modern Slavery Act (2015)
 - PREVENT Strategy (2011)
 - NHS England Prevent Training and Competencies Framework (2002)
 - Female Genital Mutilation Act (2003)
 - Serious crime act (2015)
 - United Convention of the Rights of the Child (1991)
 - Protection of Freedoms Act (2012)
 - Counter terrorism and security Act (2015)
 - General Data Protection Regulations and Data Protection Act (2018)

- NICE Guidance Looked After Children (2021)
- Promoting health and wellbeing of Looked after Children (2015)
- Children's and Family Act 2014
- Safeguarding children, young people and adults at risk: NHS Safeguarding accountability and assurance framework (2024)
- Special educational needs and disability (SEND) Code of Practice: 0 to 25 years - Statutory Guidance for organisations which work with and support children and young people who have special educational needs or disabilities: January 2015
- The Supported Accommodation (England) Regulations (2023) (Ofsted regulation 20)

We have agreed to work within our local authorities' policies and procedures. These documents complement this policy and will be added to all policy manuals as endorsed policies. Our staff are expected to be fully familiar with these local policies and must, at all times, as with all our policies, adhere to their guidelines.

4.2 This policy and associated procedure should also be read in conjunction with our following additional policies and procedures:

- [MyJourney](#) (support planning and client-based risk assessment)
- [Whistleblowing](#)
- [Staff induction](#)
- [Supervision and performance management](#)
- [Recruitment and selection](#)
- [Disciplinary policy and procedures](#)
- [Grievance procedure](#)
- [Code of conduct](#)
- [Equality, diversity and inclusion policy](#)
- [Confidentiality policy](#)
- [Visitors](#)
- [Preventing evictions and abandonments policy](#)
- [Information, communication and technology policy](#)
- [Lone working policy](#)
- [Serious incident reporting procedure](#)
- [Mental capacity and deprivation of liberty safeguards](#)
- [DBS policy and procedure](#)
- [Tell us \(complaints and compliments\)](#)

5. Policy principles

- 5.1 Our approach to safeguarding adults follows guidance from The Care Act 2014 (see **section 2** of this manual for more details). This includes definitions of abuse.
- 5.2 Our approach to safeguarding children and young people is supported by Working together to safeguard children 2026 (see **section 3** of this manual). This includes definitions of abuse.
- 5.3 We will seek to balance a commitment to zero tolerance of abuse with a commitment to empowering individuals and managing risk in such a way that this is maintained. We promote the principle that staff should respect at all times a client's right to privacy and not enter a client's private space unless they have been invited, it is an emergency or is related to a health and safety issue. This policy therefore also outlines the guidelines that we expect our staff to adhere to when entering a client's accommodation.
- 5.4 Our approach to safeguarding adults and young people is underpinned by our [MyJourney](#) policy and procedure and is person-centred. It supports individuals to recognise their strengths and assets and to build new skills. We seek to empower individuals through supporting them to complete actions through providing support and guidance. Our approach is to work alongside an individual but not to do things for an individual. We take time to understand what is working well for them. What they are worried about? What they think needs to happen? We support individuals to develop their plans to help ensure that they are protected from harm. In some cases, we will support adults or young people who have children, and we will take steps to enable them to understand what they need to do to keep their children or unborn child safe too.
- 5.5 In this regard, the aims of the policy are to ensure:
 - all clients have clear and accurate information about our procedures concerning entering a client's accommodation
 - all clients are treated fairly
 - all staff are aware of their responsibilities regarding entering a client's accommodation
 - clients understand their responsibilities regarding our duty of care
 - Adults, children, and young people are involved and empowered in decision-making processes which take place to safeguard individuals from harm

6. Staff and client awareness

6.1 Staff awareness and training

All staff will be made aware of the organisation's policies and internal guidelines in relation to the safeguarding adults at risk, children, and young people as part of the standard induction procedures.

All staff; volunteers and board members will receive safeguarding training within six months of taking up a position with the organisation; this includes recognising, understanding, and preventing abuse. In addition, service staff and managers will receive training on responding appropriately to allegations of abuse, making the necessary reports, and working with other agencies to investigate and manage the consequences of that investigation.

This training will be provided by us. All training will be renewed annually or more frequently if procedures change. In-house training will be carried out at induction. All staff must ensure that they know the safeguarding procedures that are in force locally, and which staff member is responsible for safeguarding issues. Staff are also encouraged and supported to access local authority training on safeguarding.

The procedures setting out what to do to minimise the likelihood of abuse and how to respond in the event of suspicions being raised, or a specific incident, will be kept readily accessible in all service offices or other workplaces. Periodically line managers will, as part of routine supervision, check that staff are aware of the procedures and that they understand where they can go for more information if required.

6.2 Information for clients

Clients will be informed in a number of ways of our policy in relation to the safeguarding of adults and children. This includes what to do if they experience abuse or observe others being abused in any way. This will include a clear description of the policy and procedures in the Service Guide and as part of the client induction procedures. In particular, attention will be drawn to the limitations to the principle of confidentiality in relation to incidences of abuse. All staff should work towards empowering individuals with knowledge and understanding so that they will be aware of what is appropriate or inappropriate behaviour towards them and others. Staff will also ensure clients are aware of their rights including our complaints procedure.

All support workers will raise with their clients at their initial meeting, after specific incidents, and at other relevant junctures the importance of abuse and what to do if they experience or observe it.

7. Recruitment and selection

7.1 Our safer recruitment process supports our commitment to safeguarding through:

- compliance with disclosure, vetting and barring regulations

7.2 The selection process will:

- comply with vetting and barring regulations
- use applications forms, CVs and personal statements
- check for any gaps in employment history and explore these gaps during interview
- ensure at least one reference is from a previous employer and ask for confirmation of suitability for the role. This information will be compared with that provided by the applicant. Any inconsistencies or concerns regarding the information provided in a personal reference will be followed up directly with the referee
- always ensure that any other uncertainty or inconsistency about the information provided about the applicant is followed up and resolved

8. **MyJourney** - Risk assessment and management (see also OPS 38)

8.1 Risk assessment procedures (**MySafety** and **MySafetyPlan**) will seek to safeguard clients in the widest sense. They also seek to identify those who are potentially at risk of experiencing abuse, including those who have experienced abuse in the past. Risk management plans will be drawn up accordingly for these clients and kept under regular review. They aim to reduce overall risk and safeguarding concerns to individuals. They involve other agencies where appropriate.

8.2 Some of the clients that we house, or support are likely not only to have been victims of abuse in the past but may also be guilty of abusing others. The risk assessment process will also seek to identify this and put in place appropriate management practices. We will not operate any form of automatic exclusion in such cases but will need to use our discretion in some circumstances to decide whether such risks are manageable in particular service settings.

8.3 Where we are providing a service to someone who does present a risk of harm then we will seek to participate in the multi-agency management of that risk, through multi-agency public protection and other arrangements. It will normally be the contracts and performance manager who will attend the relevant multi-agency public protection arrangement meetings, but on occasion, this may be the individual's key worker.

9. Responsibilities

9.1 Staff responsibilities

Our staff have the following responsibilities to:

- be aware of abusive, oppressive, and poor care and support practices
- advise clients about our policies in relation to safeguarding adults at risk and children
- voice their concerns, suspicions, or evidence of abuse which they may see or hear about, using a Serious Incident form
- stay curious and use critical thinking to explore what may be happening even when a so-called “truth” may have been established. This will help ensure that facts are gathered, and that individual’s voices continue to be heard
- build trusting relationships with clients, enabling staff to understand the risks each person faces
- highlight strengths of individuals who are involved in safeguarding alerts, including sharing approaches of what works and what has not worked
- co-operate with any investigation of abuse
- never prevent or dissuade another person from expressing their concerns about abuse
- attend training and supervision as directed to ensure that they are able to apply procedures and agreed working practices within the context of their professional role
- staff should refer to the Whistleblowing policy if they feel they are unable to follow the normal reporting procedures
- take part in reflective learning about individual safeguarding cases so that knowledge and best practice can be shared and learned

9.2 Management responsibilities

Our **line managers** have a responsibility to ensure that all staff understand and adhere to their responsibilities in relation to this policy. Any breaches of procedures, guidelines and working practices, including ignoring abuse or suspected abuse, that may compromise the safety of a child or an adult at risk will prompt our disciplinary procedure to be invoked as appropriate.

Managers working in services that admit visitors (including children and young people) must complete a thorough risk assessment and put appropriate visitor guidelines in place. These guidelines must be authorised by a contracts and performance manager or regional director. Staff must ensure that the visit reflects the practice set out within the risk assessment. All visitors must be given appropriate induction to the building including visitor guidelines, health and safety information including, fire, evacuation and needlestick information.

Appropriate action must be taken to minimise risk by stopping children visiting the service when any client is likely to present a risk to children. Information on this may arise:

- due to previous convictions, or
- on the advice of the statutory agency

Line managers should ensure that all staff:

- receive a full induction at the point that their employment is taken up. This must include all the policies listed above
- are given regular supervision that consistently confirms working practices and our policies and procedures
- explore with staff when safeguarding concerns are raised, what is working, what is not working and what needs to happen. Line managers will support staff to enable clients to build on their strengths whilst taking approaches to minimise risks
- attend the core training programme that includes Adult/Children safeguarding, [MyJourney](#) and Health and Safety
- respond to any safeguarding queries raised by external agencies in consultation with support staff and contracts and performance manager
- should receive supervision in line with our policy and procedures including reviewing safeguarding issues that the staff member is currently supporting clients to manage and reviewing what is working well and what other steps could be taken to further reduce risks. This space should offer the chance for the staff member to reflect on their own approaches.

- 9.3 Our **contracts and performance managers** have responsibility for ensuring that any specific incident or allegation of abuse is appropriately assessed and recorded and that appropriate referrals are made, and action plans drawn up. Contracts and performance managers have responsibility for ensuring that all staff are appropriately trained and inducted and checking that this policy and procedure is followed at all times. They are responsible for carrying out reflective learning with the team.
- 9.4 Our **head of operational support** is responsible for ensuring that the policy and procedure is kept under review and that the review is carried out thoroughly and rolled out through the organisation.
- 9.5 Our **chief executive** has overall responsibility for the strategic direction of safeguarding and is our designated lead. Our chief executive may delegate responsibilities as appropriate.
- 9.6 Our **executive director of client services** has responsibility as our **registered service manager** for the leadership and management standard of our young people services and will deputise for the chief executive on overall strategic direction of safeguarding as and when required.



Safeguarding and wellbeing policy

Section 1

OPS 22

Page 10 of 12

Issued: September 2017

Reviewed: March 2026

Next review: March 2027

- 9.7 Our **regional directors** have responsibility for ensuring all safeguarding incidents are recorded and communicated to the local safeguarding team. They are both able to deputise for the registered service manager as the lead for our young people services.
- 9.8 Our **human resources manager** is responsible for ensuring that all staff and volunteers are subject to the appropriate level of Disclosure and Barring Service (DBS) check before they are able to work in or visit our services unsupervised. We check with the DBS to ensure that applicants are not barred from working with adults at risk or children where the role they are engaged in comprises of regulated activity.
- 9.9 Beyond this, we seek to ensure our staff working directly with clients have the necessary experience, values, attitudes, and aptitudes to work effectively with adults at risk and children.

Our commitment to the provision of information and empowerment of individuals is an important part of minimising the risk of abuse.

10. Responding to allegations or suspicions of abuse relating to clients

- 10.1 Our procedures clearly state how staff should respond to allegations or suspicions of abuse towards our clients (adults or young people aged 16-18 (children)) or their children.
- 10.2 Our procedures also cover what we should do as an organisation if we have concerns or if we have reports that a member of staff or volunteer is abusing a client.
- 10.3 Whilst every effort should be made to ensure confidentiality is preserved, this will be governed by what may be an overriding need to protect someone who is, has been, or is at potential risk of being abused. Whenever a disclosure is made that may indicate abuse or potential abuse staff must make it clear to the person disclosing information that confidentiality cannot be maintained if the withholding of that information would prejudice the welfare of the person or persons concerned and/or other clients and/or a child. This is particularly so when a criminal offence may have been committed. Staff must always inform clients whenever possible before clients disclose any information about themselves that staff are not in a position to keep secret, and information will be shared with other members of the team. The contracts and performance manager must contact the local authority designated officer in the case of alleged harm against a child, the local authority in the case of alleged harm against an adult at risk, and the relevant commissioning team for housing support services in all cases.
- 10.4 We subscribe to a policy that respects confidential information unless either the client gives their consent for it to be shared, or it is in the public interest for the information to be disclosed.

10.5 Relevant risks could include:

- risk to a child: the protection of children overrides all other interests
- an active police investigation
- a significant risk of suicide
- a significant risk of harm to a third party
- the mental capacity of the adult at risk
- a significant level of risk to the adult at risk

10.6 Responsible sharing of information in the public interest is supported by: The Public Interest Disclosure Act, Enterprise and Regulatory Reform Act, Data Protection Act, General Data Protection Regulations and the Crime and Disorder Act.

11. Working in a multi-agency way

11.1 Our approach to safeguarding adults at risk and children requires us to work with a wide range of agencies. All our services must have information sharing protocols in place to ensure good practice when working with other agencies. We are committed to working with other agencies, including local authorities and other service providers, to develop effective shared procedures to minimise the risk of abuse.

11.2 We will work in **collaboration** with other agencies to ensure that there is a shared understanding of the risk and that we agree actions that need to take place to minimise risk. Where we are unsure or disagree, we will raise our concerns to enable a shared understanding to take place and to ensure that risk plans are robust.

11.3 Where requested, we will participate in the local safeguarding adult's multi-agency boards or children's safeguarding boards. This involvement is likely to be at contracts and performance manager level.

11.4 We will co-operate in full with any investigation into allegations of abuse reported to others. In some circumstances this may simply involve providing information as required, but in other circumstances this might involve the contracts and performance manager taking responsibility for the investigation itself or parts thereof, if requested by the relevant officer. It might alternatively involve attendance at a specific "strategy meeting" to discuss the appropriate response to the incidents and taking an active part in any subsequent Safeguarding Plan.

11.5 Any staff involved in the above processes should ensure that the clients affected are involved appropriately in drawing up the Safeguarding Plan.

11.6 Our regional directors are the named, delegated safeguarding leads for the organisation to ensure that there is a planned approach and information sharing protocols.



Safeguarding and wellbeing policy

Section 1

OPS 22

Page 12 of 12

Issued: September 2017

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Next review: March 2027

12. Prevent (our approach to counterterrorism)

12.1 We will work with local authorities to deliver their strategies around government's "Prevent Strategy" which forms part of the CONTEST counter-terrorism strategy. Concerns will be recorded using our serious incident process and will be logged with local safeguarding teams. All staff and clients will be given information on how to contact the anti-terrorist helpline as part of their induction process and will be briefed on potential signs that could mean a client was at risk of being radicalised. All accommodation services and offices will display the police anti-terrorist hotline number.

13. Review and monitoring

13.1 We are a learning organisation and seek to learn from safeguarding incidents.

Incidents of alleged, suspected or confirmed abuse will be recorded on a serious incident form. This will be reviewed, and a report prepared on a minimum of a quarterly basis with other serious incidents for our executive team and our Board to consider by our head of operational support.

14. Policy review

14.1 This procedure will be reviewed annually by the head of operational support or whenever relevant legislation changes.