

	<p style="text-align: center;"><b>Safeguarding Policy (including Vulnerable Persons)</b></p> <p style="text-align: center;">(applies to the protection of children, young people and adults at risk)</p>
<p><b>Policy statement</b></p>	<p>Paradigm Housing Group ('Paradigm) is committed to safeguarding children, young people and adults at risk of abuse and will uphold its responsibility (non-statutory duty of care) in preventing, being alert to, responding to abuse and/or neglect, their wellbeing and keeping them safe from harm.</p> <p>Paradigm believes that living a life that is free from harm and abuse, including the risk of such, is a fundamental right of every person and that safeguarding those at risk of abuse is also everyone's responsibility.</p>
<p><b>Objective</b></p>	<p>Through training, reporting systems and partnership working, Paradigm will raise awareness and develop a culture that does not tolerate abuse and encourages people to raise concerns.</p> <p>To respond promptly where abuse does happen, to make the necessary referrals and engage the appropriate authorities to stop the abuse continuing and to ensure the person harmed receives effective support.</p> <p>To identify vulnerability and appropriate support mechanisms as early as possible.</p>
<p><b>Policy</b></p>	<p><b>Safeguarding</b></p> <p>Safeguarding means protecting a person's right to live in safety, free from abuse and neglect (including self-neglect).</p> <p>Safeguarding is a collective responsibility and all staff at Paradigm, including contractors, are expected to be familiar with this policy and respond promptly to any safeguarding concerns.</p> <p>Paradigm will recognise the role it plays in supporting safeguarding. Paradigm also recognises the types of abuse identified in statutory provisions and guidance.</p> <p>Paradigm supports the six key principles which underpin safeguarding work:</p> <ul style="list-style-type: none"> <li>• <b>Prevention</b> – it is always preferable to take action before harm occurs</li> <li>• <b>Proportionality</b> – the least intrusive response appropriate to the risk presented</li> <li>• <b>Protection</b> – support and representation for those in greatest need</li> <li>• <b>Empowerment</b> – people being supported and encouraged to make their own decisions and informed consent</li> <li>• <b>Partnership</b> – local solutions through services working with communities, who can have a key part to play in preventing, detecting and reporting abuse and neglect</li> <li>• <b>Accountability</b> – accountability and transparency in delivering safeguarding</li> </ul> <p>Paradigm recognises the leading statutory responsibility and duty in coordinating safeguarding work is with local authorities and relevant support teams and our own role is in alerting (as an alerter) social care services (either for adults or children) and the police of any concerns regarding safety.</p> <p>Safeguarding is a multi-agency approach which depends upon effective joint</p>

working.

### **Reporting Safeguarding concerns**

All staff will receive safeguarding training to recognise the signs of abuse, neglect and self-neglect including how to record and report it.

All concerns will be logged and recorded on the housing management system. Once these cases have been entered on our housing management system they will be allocated to a Housing Officer for actioning.

Housing Officers will use their knowledge of safeguarding to consider the actions to take including assessing if it is a safeguarding concern.

Where there is a risk of imminent harm or abuse, the Housing Officer dealing with the case will immediately notify the relevant safeguarding teams and police for safeguarding concerns.

We recognise that information sharing is essential to safeguard people at risk and we will act in accordance with agreed multi-agency information sharing protocols where these exist.

Housing Officers will seek a person's consent to share information as required under the safeguarding principles described above or as required under UK Data Protection Law. However, we cannot guarantee full confidentiality when our responsibility to safeguard adults or children is at risk, or the public interest is greater than our responsibility to an individual.

### **Raising an alert to the Safeguarding team**

Where it has been deemed by the Housing Officer that an alert is required to be raised with the Safeguarding team (social care services - either for adults or children) or Police they will seek the person's consent in the first instance. If however the Housing Officer is unable to gain this consent, they will raise the alert as per our Duty of Care (non statutory duty).

Alerts will be raised to Safeguarding teams or Police within one working day of Paradigm identifying the safeguarding concern.

Once the Housing Officer has made an alert to the Safeguarding team or Police, the Housing Officer will co-operate fully with all relevant agencies in accordance with any inter-agency protocols e.g. by responding to any information requests or attending any multi-agency meetings / case conferences as requested.

In cases of Paradigm being made aware by a third party of suspected or actual abuse, Paradigm will encourage the third party to report or alert the Safeguarding Teams (social care services – either for adults or children) or the Police direct. Paradigm will follow up with the third party and will report the abuse where the third party has not.

The Housing Management system (or Duty of Care system as it is known) will be used to capture all safeguarding concerns, reports, alerts, actions taken, and outcomes achieved and reported to the Head of Operations.

### **Vulnerable Persons**

Paradigm's definition of vulnerability, not only includes those who may be considered as vulnerable for the purposes of those in need of community care and support services, but also extends to anyone who experiences difficulties with everyday living and/or who needs additional support to meet their obligations under their tenancy/licence/lease.

Paradigm acknowledges that not all those falling within the protected characteristics as defined by the Equality Act will be vulnerable, and people may be vulnerable for reasons other than those specifically covered by this Act.

Paradigm will not assume that whole groups of people are vulnerable, and that vulnerability need not be a permanent state and that people may be vulnerable at different times for different reasons (e.g. bereavement, relationship breakdown, times of financial hardship, ill health and at times where circumstances are beyond their control such as a pandemic).

### **Approach to supporting vulnerable people**

Paradigm will seek to identify potentially vulnerable people at an early stage to enable preventative and timely action and provide targeted support.

Examples of arrangements in place where vulnerability can be identified include, but not limited to:

#### *Nominations:*

- All nominations for housing are assessed in terms of their capability to hold and sustain a tenancy and to determine any support that will be required.

#### *In person viewings:*

- In-person viewings are always accompanied as a further means of identifying vulnerability and assessing suitability of the property offered.

#### *Customer Profiling Questionnaire:*

- Completed at the pre-lettings visit, this includes information on disability and other health issues, communication needs and other support requirements.

#### *Post lettings visit (PLV):*

- This virtual visit is carried out 2-6 weeks after sign-up, depending on the circumstances of the household, and provides a further opportunity to identify any vulnerability concerns or support needs.

#### *Starter Tenancy visits:*

- Intensive management during the first 12 months of the tenancy includes visits every three months with a view to identifying any issues which may affect the sustainability of the tenancy.

#### *Support Needs and Risk Assessments (SNaRs) and SNaR Reviews:*

- SNaR's are undertaken for customers living in Paradigm's Older Persons accommodation and the Welwyn Hatfield Foyer & Small Steps Scheme, in order to assess the level of support required and to inform the customer's Support Plan.

The nature of the support provided and/or signposted will depend on the level of vulnerability and the individual's, or household's circumstances. The support level will be assessed by the Housing Officer on a case by case basis and support will either be provided by Paradigm directly or indirectly by referral to a specialist external agency.

The role of carers, care workers, advocates and other personal representatives will have their views taken into account when consulting vulnerable residents.

Where the role of carer falls upon a minor (Young Carer), there is often a negative impact on the wellbeing of the young person. In situations such as this, Paradigm will have due regard for any secondary safeguarding issue and the Housing Officers will raise alerts to Safeguarding Teams accordingly.

Profiling information from our housing management system will be used to tailor our services to the individual needs of residents.

Where a potential resident is a known risk to others, a risk assessment will be obtained by the Lettings and Allocations team regarding the appropriateness of any proposed letting and to agree how risks will be managed.

Paradigm will work in partnership with the relevant Multi Agency Risk Assessment

	<p>Conference (MARAC) or Multi Agency Public Protection Arrangements (MAPPA) in this respect.</p> <p>Paradigm will ensure that contractors and sub-contractors have an effective safeguarding policy in place and, where not, that they are willing to work in accordance with our policy and processes.</p>
<p><b>Scope</b></p>	<p>This Safeguarding Policy (including vulnerable persons) is an over-arching policy, applying across our business. It is important that all staff, managers, directors, board members and involved customers are aware that safeguarding is ‘everyone’s responsibility’ and that we all have a responsibility to act on concerns of abuse or neglect. Safeguarding is not restricted to staff working in support, care or children’s services.</p> <p>This policy applies:</p> <ul style="list-style-type: none"> <li>• to the protection of children, young people and adults at risk of abuse</li> <li>• across all tenures</li> </ul>
<p><b>Roles and Responsibility</b></p>	<p>Safeguarding is everyone’s responsibility. <b>All staff</b> must:</p> <ul style="list-style-type: none"> <li>• ensure they maintain clear professional boundaries at all times. Further information is available in the Staff Code of Conduct.</li> <li>• be vigilant as to what is happening around them – with both customers and colleagues – and be aware of the different types and indicators of abuse.</li> <li>• be familiar with this Safeguarding Policy (including Vulnerable Persons), the supporting process / guidance and the Duty of Care reporting system</li> <li>• undertake safeguarding awareness training as appropriate to their role</li> <li>• report any safeguarding concerns they may have through the Duty of Care system.</li> </ul> <p><b>All managers</b> must ensure that:</p> <ul style="list-style-type: none"> <li>• they contribute to developing a culture that does not tolerate abuse and which encourages people to raise concerns</li> <li>• they listen to and support staff raising concerns</li> <li>• their staff are familiar with Paradigm’s Safeguarding Policy and supporting processes and that they and their staff undertake Safeguarding training</li> <li>• ensuring the necessary DBS (Disclosure and Barring Service) checks are undertaken when recruiting staff (currently for the Foyer only)</li> <li>• Accurate records of any incident / concern are kept on the most appropriate fields of our access controlled Duty of Care system.</li> <li>• Access to the information is limited only to those who need it. It is important to take care in ensuring the accuracy of this information, limiting it to known facts and avoiding assumptions or personal opinion.</li> </ul> <p><b>Specific responsibilities</b></p> <p>Paradigm’s designated <b>Lead Officer for Safeguarding</b> is the Head of Operations. This role has the following responsibilities:</p> <ul style="list-style-type: none"> <li>• owner of the Safeguarding Policy and the supporting procedures / guidance</li> <li>• embedding safeguarding practice across the organisation</li> <li>• overseeing training on safeguarding, liaising with our Learning &amp;</li> </ul>

Development team ensuring there are safeguarding training materials available through the Learning Management System

- ensuring concerns of abuse or neglect within supported housing are reported to the relevant Safeguarding Team and, where requested, to the local authority Supporting People Team
- overall monitoring of Duty of Care concerns, with a view to identifying trends and lessons to be learnt for the future, including recommendations for changes to policy, procedure or service delivery
- reviewing individual safeguarding cases, at least annually, to identify any learning for the organisation.

They are supported in this role by the **ASB and Support Services Manager**

The **ASB and Support Services Manager** is responsible for:

- reporting on all open Duty of Care cases including cases which are not meeting the required timescales of action every 14 days (every 7 days for cases with a safeguarding element). The report will be provided to the Senior Regional Housing Operations Managers and Head of Operations on a monthly basis.
- providing regular supervision and ensuring supported decision making in their area of geographic operation
- providing management oversight and ensuring high standards of practice in their area of geographic operation
- authorising alerts to local Safeguarding Teams in their area of operation
- supporting and advising on information sharing practice in their area of operation
- ensuring that adequate, accurate and up to date records are kept
- advising the Communications Team of potential media interest in a case.

Each **Housing Officer** is responsible for:

- familiarising themselves with the procedures and protocols used by the local Safeguarding Teams in the geographic areas where they work
- receiving Duty of Care concerns in relation to the wellbeing of customers, including concerns of abuse or neglect, raised by staff, contractors, neighbours or other organisations
- agreeing, together with their manager, an appropriate course of action, accessing expert advice where necessary.
- authorising and raising alerts to local Safeguarding Teams or police
- co-operating with Safeguarding Teams (social care services - either for adults or children) or the police in any enquiry or investigation
- keeping adequate, accurate and up to date records via the Duty of Care system.

Each **ASB Case Manager** is responsible for:

- familiarising themselves with the procedures and protocols used by the local Safeguarding Teams in the areas where they work
- agreeing, together with their manager, an appropriate course of action, accessing expert advice where necessary.
- authorising and raising alerts to local Safeguarding Teams or police
- co-operating with Safeguarding Teams (social care services - either for

	<p>adults or children) and/or the police in any enquiry or investigation</p> <ul style="list-style-type: none"> <li>• keeping adequate, accurate and up to date records via the ASB system.</li> </ul> <p><b>Senior Regional Housing Operations Managers and Housing Team Leaders</b> are responsible for:</p> <ul style="list-style-type: none"> <li>• providing regular supervision and supporting Housing Officers in their geographic area of operation</li> <li>• providing management oversight and ensuring high standards of practice in their area of operation</li> <li>• authorising alerts to local Safeguarding Teams in their area of operation</li> <li>• supporting and advising on information sharing practice in their area of operation</li> <li>• ensuring that adequate, accurate and up to date records are kept, including via the Duty of Care system in their area of operation</li> <li>• monitoring all open Duty of Care cases in their area and authorising closure of cases</li> <li>• ensuring a monthly audit is carried out on Housing Officer contacts to mitigate the risk of concerns not being added to the Duty of Care system</li> <li>• advising the Communications Team of potential media interest in a case in their area of operation.</li> </ul> <p>The <b>Tenancy Sustainment Advisors</b> are responsible for:</p> <ul style="list-style-type: none"> <li>• a monthly audit of a sample of closed duty of care cases to ensure cases are being managed properly.</li> </ul> <p>The <b>Communications Manager</b> will be responsible for:</p> <ul style="list-style-type: none"> <li>• handling any media interest in a safeguarding case.</li> </ul> <p>The <b>Head of Procurement</b> is responsible for:</p> <ul style="list-style-type: none"> <li>• ensuring that our procurement documentation and processes adequately reference our requirements regarding contractors, subcontractors and agents.</li> </ul>
<p><b>Monitoring / Reporting and Assurance Controls</b></p>	<p>All documents are stored on the housing management system. This ensures good record keeping (clear, concise, factual and accurate) in safeguarding, enabling an appropriate response to concerns. It can also be key to preventing abuse as it can provide indicators of particular risks or vulnerabilities. This ensures that all elements of Duty of Care and Safeguarding concerns can be recorded, including details of concern, actions, referrals and consent to disclose.</p> <p>The ASB &amp; Support Service Manager will carry out monthly contact audits to mitigate the risk of concerns, documents and actions taken not being added to the Duty of Care system.</p> <p>The Duty of Care system enables the recording and tracking of all concerns raised in relation to our customers. It also assists managers to monitor cases in their areas, as well as enabling the central review of cases in order to identify any learning points for the organisation in terms of policy and practice.</p> <p>The system requires users to take an action/activity every seven days for safeguarding cases (in all other cases it is fourteen days). A monthly report on all open duty of care cases is provided to the Senior Regional Housing Operations Managers and Head of Operations. The report provides detail on cases with missed actions, under performance by staff, any spikes in cases being opened</p>

	<p>and identifies which area they are being opened in.</p> <p>A sample of closed duty of care cases is audited on a monthly basis by the Tenancy Sustainment Advisors to ensure correct actions have been taken and that alerts have been raised in line with our duty of care.</p> <p>Senior Regional Housing Managers review all duty of care notes, actions taken and if the correct referrals have been made before they agree it can be closed. Housing Officers are not authorised to close a duty of care independently.</p> <p>All records of safeguarding training are stored electronically on the learning management system, supported by a reporting function to identify where training is required.</p>
<b>Cross References</b>	<ul style="list-style-type: none"> <li>• Recruitment Policy</li> <li>• Reporting Concerns at Work Policy (Whistleblowing)</li> <li>• Discipline at Work Policy</li> <li>• Grievance Policy</li> <li>• Staff Code of Conduct Guidance on the Mental Health Capacity Act 2005</li> <li>• Data Protection Policy</li> </ul>

<b>Policy Author</b>	ASB and Support Services Manager
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