

	<h2 style="text-align: center;">Safeguarding Policy</h2> <p style="text-align: center;">(for the protection of children, young people and adults at risk)</p>
<b>Policy statement</b>	<p>We are committed to safeguarding children, young people and adults at risk of abuse and will uphold our 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>We believe 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>
<b>Objective</b>	<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>
<b>Policy</b>	<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>In line with statutory provisions and other guidance, we support 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>We respect the leading role of local authorities and relevant support teams in co-ordinating safeguarding work and accept that a multi- agency approach depends on joint working.</p> <p>We support this approach through alerting social care services (of concerns about adults or children) or the police (for any concerns regarding safety).</p> <p><b>Reporting Safeguarding concerns</b></p> <p>We train all our staff to recognise the signs of abuse, neglect and self-neglect including how to record and report it.</p> <p>Staff log and record all safeguarding concerns on the housing management system. Once these cases have been entered, they are allocated to a Customer &amp; Neighbourhood Officer for actioning.</p>

	<p>Customer &amp; Neighbourhood Officers use their knowledge of safeguarding to consider the actions to take including assessing if it is a safeguarding concern.</p> <p>Where there is a risk of imminent harm or abuse, the Customer &amp; Neighbourhood Officer dealing with the case will immediately notify the relevant safeguarding teams and police for safeguarding concerns.</p> <p>We recognise that information sharing is essential to safeguard people at risk and we act in accordance with agreed multi-agency information sharing protocols where these exist.</p> <p>Customer &amp; Neighbourhood 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.</p> <p><b>Raising an alert to the Safeguarding team</b></p> <p>Where the Customer &amp; Neighbourhood Officer identifies a need to alert the Safeguarding team or Police this will be done within one working day. They will seek the person's consent in the first instance. If however the Customer &amp; Neighbourhood Officer is unable to gain this consent and there is a high risk, they will also raise a Safeguarding concern with the LA.</p> <p>Once the Customer &amp; Neighbourhood Officer has alerted the Safeguarding team or Police, the 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.</p> <p>Where we are told by a third party of suspected or actual abuse, We will encourage the third party to report or alert the Safeguarding Teams (Social Services) or the Police direct. We will follow up with the third party and will report the abuse where the third party has not.</p> <p>We will use our Housing Management system to capture all safeguarding concerns, reports, alerts, actions taken, and outcomes achieved.</p> <p><b>Vulnerable Persons</b></p> <p>Our definition of vulnerability extends to anyone who experiences difficulties with everyday living and/or who needs additional support to meet their obligations under their tenancy/licence/lease, as well as those needing community care and support services.</p> <p>We acknowledge that people may be vulnerable for reasons other than those specifically with protected characteristics covered by the Equality Act 2010.</p> <p>We do not assume that whole groups of people are vulnerable. We also accept 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).</p> <p><b>Approach to supporting vulnerable people</b></p> <p>We will seek to identify potentially vulnerable people at an early stage to enable preventative and timely action and provide targeted support.</p> <p>Examples of arrangements in place where vulnerability can be identified include, but not limited to:</p>
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	<p><i>Nominations &amp; pre-tenancy assessments:</i></p> <ul style="list-style-type: none"> <li>• We assess all nominations for housing in terms of their capability to hold and sustain a tenancy and to determine any support that will be required.</li> </ul> <p><i>In person viewings:</i></p> <ul style="list-style-type: none"> <li>• We accompany in-person viewings as a further means of identifying vulnerability and assessing suitability of the property offered.</li> </ul> <p><i>Customer Information Form (CIF):</i></p> <ul style="list-style-type: none"> <li>• We complete this form at the pre-lettings visit, this includes information on disability and other health issues, communication needs and other support requirements.</li> </ul> <p><i>Post lettings visit (PLV):</i></p> <ul style="list-style-type: none"> <li>• This virtual or face to face visit is carried out 2 weeks after sign-up, depending on the circumstances of the household, and provides a further opportunity to identify any vulnerability concerns or support needs.</li> </ul> <p><i>Starter Tenancy visits:</i></p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p><i>Support Needs and Risk Assessments:</i></p> <ul style="list-style-type: none"> <li>• We carry out these risk assessments with customers living in Paradigm's accommodation at the Welwyn Hatfield Foyer &amp; Small Steps Scheme, to help us assess the level of support required and to inform the customer's Support Plan.</li> </ul> <p><b>Assessment and Support Plans</b></p> <ul style="list-style-type: none"> <li>• The Customer Support Assessment &amp; Support Plans ensures customers' who need additional support to sustain their tenancy are assessed. Gaps in support provision are identified and customers are encouraged to engage with in-house and specialist support services</li> </ul> <p>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 Customer &amp; Neighbourhood 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.</p> <p>The role of carers, care workers, advocates and other personal representatives will have their views taken into account when consulting vulnerable customers.</p> <p>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, we will have due regard for any secondary safeguarding issue and the Customer &amp; Neighbourhood Officer will raise alerts to Safeguarding Teams accordingly.</p> <p>We will use profiling information from our housing management system to tailor our services to the individual needs of our customers.</p> <p>Where a potential customer 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.</p> <p>We work in partnership with the relevant Multi Agency Risk Assessment Conference (MARAC) or Multi Agency Public Protection Arrangements (MAPPA) in this respect.</p> <p>We 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>
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<b>Scope</b>	<p>This Safeguarding Policy 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>
<b>Legal and regulatory framework</b>	<p>While Paradigm is not technically considered a public authority, the nature of our function as a provider of social housing means our actions will be open to a challenge on public law grounds. For example, where we fail to follow its own policy (without good reason), fail to give adequate reasons for our decisions, fail to carry out our public sector equality duty.</p> <p><b>Care Act 2014</b> The Care and support statutory guidance states that 'all workers need to be vigilant about adult safeguarding concerns and that safeguarding practice should be underpinned by the six safeguarding principles: <b>Empowerment, Prevention, Proportionality, Protection, Partnership, Accountability.</b></p> <p><b>The Mental Capacity Act (MCA) 2005</b> sets out the role everyone plays in safeguarding. It applies to everyone involved in the care, treatment and support of people aged 16 and over living in England and Wales who are unable to make all or some decisions for themselves. It also sets out the types of abuse identified in statutory provisions and guidance</p> <ul style="list-style-type: none"> <li>• Mental Capacity Act - Deprivation of Liberty Safeguards (DoLS)</li> <li>• Children Act 1989 and Children Act 2004:</li> <li>• Protection of Children Act 1999:</li> <li>• Safeguarding Vulnerable Groups Act 2006:</li> <li>• Mental Capacity Act 2005:</li> <li>• Care Act 2014:</li> <li>• Counter-Terrorism and Security Act 2015</li> <li>• Female Genital Mutilation Act 2003:</li> <li>• Modern Slavery Act 2015:</li> <li>• Domestic Abuse Act 2021</li> </ul>
<b>Risk</b>	<p>If we do not deliver this policy effectively then there is a risk to the safety, health and wellbeing of some of our most vulnerable customers, their families and their communities impacting their housing and ability to maintain a tenancy.</p> <p>If we are not able to identify, prevent and support families effectively this may present significant issues for Paradigm (financial &amp; reputational) and have a lasting impact on the families and communities we work with.</p>
<b>Equality, Diversity and Inclusion</b>	<p>We completed an Equality Impact assessment in June 23.</p> <p>The assessment concluded that we need to take no further action as this identified few or limited adverse effects on one or more of the protected groups, customers, service users and/or employees</p>

<b>Roles and Responsibility</b>	<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 Customer Support Policy), the supporting process / guidance and the Safeguarding case management system</li> <li>• undertake safeguarding awareness training as appropriate to their role</li> <li>• report any safeguarding concerns they may have through the Safeguarding case management 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>• the necessary DBS (Disclosure and Barring Service) checks are undertaken when recruiting staff at The Foyer</li> <li>• accurate records of any incident / concern are kept on the most appropriate fields of our access controlled Safeguarding case management 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>Safeguarding Lead</b> is the <b>Executive Director of Customer</b></p> <p><b>Customer Support &amp; Partnerships Manager</b> has the following responsibilities:</p> <ul style="list-style-type: none"> <li>• author of the Safeguarding Policy and the supporting guidance</li> <li>• embedding safeguarding practice across the organisation</li> <li>• overseeing training on safeguarding, liaising with our Learning &amp; Development team ensuring there are safeguarding training materials available through the Learning Management System</li> <li>• overseeing open Safeguarding cases including cases which are not meeting the required timescales of action every 7 days for cases with a safeguarding element and 14 days for Wellbeing or Welfare (WoW) concerns in their area of operation</li> <li>• providing management oversight, ensuring supported decision making and ensuring high standards of practice in their area of operation</li> <li>• supporting and advising on information sharing practice in their area of operation</li> <li>• oversight of ensuring accurate and up to date records are kept in their area of geographic operation</li> <li>• advising the Communications Team of potential media interest in a case</li> <li>• liaising with the Communications Team to produce promotional literature and awareness campaigns externally to customers and to colleagues across the business</li> </ul> <p>Each <b>Customer &amp; Neighbourhood Officer</b> is responsible for:</p> <ul style="list-style-type: none"> <li>• familiarising themselves with the procedures and protocols used by the local Safeguarding Teams in the geographic areas where they work</li> <li>• receiving Safeguarding concerns in relation to the wellbeing of customers,</li> </ul>
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	<p>including concerns of abuse, neglect (or self-neglect), raised by staff, contractors, neighbours or other organisations</p> <ul style="list-style-type: none"> <li>• carrying out the initial investigation and agreeing, together with their manager, an appropriate course of action, accessing expert advice where necessary</li> <li>• co-operating with Safeguarding Teams (social services - either for adults or children) or the police in any enquiry or investigation</li> <li>• making internal referrals to the Customer Support Team where necessary for ongoing casework</li> <li>• keeping adequate, accurate and up to date records via the Safeguarding case management system</li> </ul> <p>Each <b>ASB Case Manager</b> is responsible for:</p> <ul style="list-style-type: none"> <li>• familiarising themselves with the procedures and protocols used by the local Safeguarding Teams in the areas where they work</li> <li>• agreeing, together with their manager, an appropriate course of action, accessing expert advice where necessary</li> <li>• co-operating with Safeguarding Teams (social care services - either for adults or children) and/or the police in any enquiry or investigation</li> <li>• keeping adequate, accurate and up to date records via the Safeguarding case management system</li> </ul> <p>Each <b>Customer Support Case Manager</b> is responsible for:</p> <ul style="list-style-type: none"> <li>• familiarising themselves with the procedures and protocols used by the local Safeguarding Teams in the areas where they work</li> <li>• agreeing, together with their manager, an appropriate course of action, accessing expert advice where necessary</li> <li>• co-operating with Safeguarding Teams (social care services - either for adults or children) and/or the police in any enquiry or investigation</li> <li>• keeping adequate, accurate and up to date records via the Safeguarding case management system</li> <li>• assessing and accepting referrals (where appropriate) from the Customer &amp; Neighbourhood Officer (following their initial investigation) of safeguarding cases where ongoing casework is required by the customer support team</li> </ul> <p><b>Neighbourhood Managers</b> are responsible for:</p> <ul style="list-style-type: none"> <li>• providing regular supervision and supporting Customer &amp; Neighbourhood Officers in their geographic area of operation</li> <li>• providing management oversight and ensuring high standards of safeguarding practice 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 Safeguarding Case Management system in their area of operation</li> <li>• monitoring all open Safeguarding cases every 7 days and ensuring cases are not overdue in their area and authorising closure of cases</li> <li>• ensuring a comprehensive quality assurance framework is in place and adhered to relating to safeguarding cases in their area of operation to address learning and outcomes from failed audits</li> <li>• advising the Communications Team of potential media interest in a case in their area of operation.</li> <li>• the Neighbourhood Managers will provide quarterly updates to the Safeguarding Panel of trends, issues and lessons learnt.</li> </ul>
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	<p><b>The Safeguarding Panel</b> (comprising of senior managers across the business) are responsible for overseeing and monitoring the performance of Paradigm's response to safeguarding issues, including:</p> <ul style="list-style-type: none"> <li>• monitoring volumes of alerts and themes</li> <li>• ensuring case handling is responsive and effective</li> <li>• review Local Authority accepting and responding to alerts and ensure strategic response where required</li> <li>• quality assurance</li> <li>• learning, reviewing trends and implementing actions for improvement and ensuring they are completed</li> </ul> <p>To develop recommendations for:</p> <ul style="list-style-type: none"> <li>• ways to identify cases more proactively,</li> <li>• identifying organisation learning and service improvement,</li> <li>• the appropriate resources needed to meet our statutory responsibilities,</li> <li>• additional controls that may be required to mitigate future risk,</li> </ul> <p>The <b>Head of Communications</b> will be responsible for:</p> <ul style="list-style-type: none"> <li>• handling any media interest in a safeguarding case</li> <li>• collaborating with the Customer Support &amp; Partnerships Manager to promote and raise awareness of safeguarding</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>The <b>Learning and Development Team</b> will be responsible for:</p> <ul style="list-style-type: none"> <li>• enabling the safeguarding training required for Paradigm staff to complete to the level required for their role</li> <li>• ensuring the Safeguarding e-learning module is up to date. Line managers are responsible for ensuring teams complete the relevant safeguarding training</li> <li>• all records of safeguarding training are stored electronically on the learning management system, supported by a reporting function to identify where training is required.</li> </ul>
<p><b>Monitoring / Reporting and Assurance Controls</b></p>	<p><b>Data</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.</p> <p>It can also be key to preventing abuse as it can provide indicators of particular risks or vulnerabilities. This ensures that all elements of Safeguarding concerns can be recorded, including details of concern, actions, referrals and consent to disclose.</p> <p><b>Systems</b></p> <p>The Safeguarding system enables us to record and track all concerns raised in relation to our customers. It also assists managers to monitor cases in their areas, and the central review of cases to identify any learning points for the organisation in terms of policy and practice. The system requires users to take an action/activity every seven days for safeguarding cases (in all other cases it is fourteen days).</p>

	<p><b>Monitoring</b></p> <p>The Neighbourhood Managers are to download and analyse a weekly safeguarding power BI report for the areas of their operation. This identifies whether any cases have been missed or actions need to be taken, under performance by staff, any spikes in cases being opened and identifies which area they are being opened in.</p> <p>All team managers of staff who manage safeguarding cases (Neighbourhoods, Customer Support &amp; ASB teams) review all Safeguarding notes, actions taken and if the correct referrals have been made in their area of operation before they agree it can be closed.</p> <p>The Safeguarding Panel meets quarterly to oversee and monitor the performance of Paradigm's response to safeguarding issues.</p> <p>An annual safeguarding report is completed for Customer Experience Committee to review.</p> <p><b>Controls</b></p> <p>Customer &amp; Neighbourhood Officers, Customer Support Case-Managers and ASB Case Managers are not authorised to close a Safeguarding case independently.</p> <p><b>Disclosure &amp; Barring Service (DBS)</b></p> <p>Any roles or work requiring a DBS (Disclosure &amp; Barring Service) check will be dealt with by the HR team for staff or Procurement team for Contractors.</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> <li>• Domestic Abuse Policy</li> <li>• Customer Support Policy</li> <li>• Safeguarding procedures (KPIs, assurance framework)</li> </ul>

<b>Policy Author</b>	Customer Support & Partnerships Manager
<b>Policy Owner</b>	Assistant Director of Customer
<b>Date of Board approval</b>	July 2023
<b>Effective date</b>	July 2023
<b>Next review date</b>	July 2026
<b>Version Control</b>	V3 supercedes v2 dated July 2021



Record of Amendments			
Date	Version	Approved By	Details of Amendments
July 2021	V2	Board	Safeguarding Policy
June 2023	V3	ExBo	<ul style="list-style-type: none"> <li>• Job titles amended to reflect changes in structure</li> <li>• Accountability and responsibility section amended to reflect changes in ownership of monitoring and controls</li> <li>• Amendments to remove all reference to duty of care and replaced with Safeguarding case management system</li> <li>• Amendments to frequency of reporting and audience to report to</li> <li>• Added roles and responsibility of the Safeguarding Panel</li> <li>• L&amp;D has the enabling responsibility for safeguarding training.</li> <li>• Annual Safeguarding report for Customer Experience Committee</li> </ul>