# Safeguarding Policy

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| Policy Owner | Paul Seymour, Executive Director Customers and Communities |
| Approval Level | Customer Experience Committee |
| Resident Input | Customer Experience Committee July 2025 (WCHG) and Southway Audit and Risk Committee Feb 2026 (Southway) |
| Policy Review Due | September 2029 |
| EIA Date | August 2026 |
| Linked strategies/policies | This policy should be read alongside the ASB Policy, Tenancy Agreement, Domestic Abuse Policy, Allocations Policy and Data Protection Policy, Whistleblowing Policy, Recruitment Policy and Hate Crime Policy |
| Version | 1 |
| Date of Approval | November 2026 |
| We want everyone to be able to access and understand this policy. If you need this information in another language or format, such as large print, audio, Braille or Easy Read, please contact us and we will support you. | |

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## 1. What this policy is for

1.1 This policy sets out Southway Wythenshawe Homes's commitment to safeguarding children, young people and adults who may be at risk of abuse, neglect, exploitation or harm, and explains the expectations placed on those who work for or act on behalf of Southway Wythenshawe Homes.

1.2 Safeguarding is everyone's responsibility. Everyone has a role in recognising and responding to concerns, reporting them appropriately and promoting the safety and wellbeing of others. Concerns must be reported promptly. No one should delay reporting while trying to establish all the facts or obtain proof.

1.3 We are committed to embedding a strong and consistent safeguarding culture. We recognise the significant role housing providers play in safeguarding. Through our contact with customers and communities, we are well placed to identify concerns, support individuals and work collaboratively with partner agencies to reduce risk and protect people from harm.

1.4 For the purposes of this policy, Southway Wythenshawe Homes defines Safeguarding as:

Protecting children, young people and adults from abuse, neglect, exploitation and harm, and promoting safety, wellbeing and positive outcomes.

## 2. Who this policy applies to

| Group | How the policy applies |
|---|---|
| **Customers and household members** | People who live in, receive services from, or are affected by Southway Wythenshawe Homes homes, neighbourhoods and services. |
| **Visitors and community users** | People who visit Southway Wythenshawe Homes homes, offices, community spaces, events or services. |

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| **Colleagues** | All employees, managers, directors, apprentices, students and temporary workers. |
| **Volunteers and involved customers** | People who support Southway Wythenshawe Homes services, events, governance, scrutiny or engagement activity. |
| **Contractors, agents and suppliers** | People or organisations acting on behalf of Southway Wythenshawe Homes, including those entering homes or working with customers. |
| **Board and Committee members** | People responsible for governance, oversight, challenge and assurance. |

2.1 This policy applies to concerns about children, young people and adults at risk, including concerns that arise in a home, family, neighbourhood, community setting, online space or through the actions of someone acting on behalf of Southway Wythenshawe Homes.

## 3. Regulation and Legal Requirements

3.1 This policy supports Southway Wythenshawe Homes to meet its legal, regulatory and partnership responsibilities. It should be read alongside the detailed safeguarding procedures and local safeguarding partnership arrangements.

3.2 Key legislation, guidance and regulatory requirements include:

- Care Act 2014 and Care and Support Statutory Guidance
- Children Act 1989 and Children Act 2004, including Section 11 duties
- Working Together to Safeguard Children 2026 Statutory Guidance
- Mental Capacity Act 2005 and Mental Health Act 2007
- Domestic Abuse Act 2021
- Modern Slavery Act 2015

- Counter-Terrorism and Security Act 2015, including Prevent duties where applicable
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018 and UK General Data Protection Regulation
- Human Rights Act 1998 and Equality Act 2010
- Housing Act 2004, Homelessness Reduction Act 2017 and Social Housing (Regulation) Act 2023
- Regulator of Social Housing Consumer Standards, including expectations around safety, local cooperation, neighbourhoods, domestic abuse, fairness, transparency and accountability
- Local Safeguarding Children Partnership and Safeguarding Adults Board procedures, including LADO and Persons in Positions of Trust arrangements.

## 4. What we will do

### Our Principles

4.1 We will promote and embed a positive safeguarding culture across Southway Wythenshawe Homes. To achieve this, we will apply the following safeguarding principles:

| Principle | What this means in practice |
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| **Everyone's responsibility** | Everyone must act on concerns. No one should assume that someone else will report or deal with a safeguarding issue. We will promote a culture where safeguarding concerns are recognised, reported and acted upon promptly. |
| **Making Safeguarding Personal** | We will seek to understand what matters to the person, capture their voice and focus on outcomes that support safety, dignity and wellbeing. |
| **Think Family** | We will consider the needs, risks and strengths of the whole household and wider family network, not |

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| | just the person who first presents with a concern. We will be alert to risks arising both within and outside the home, including exploitation, county lines, cuckooing and online abuse, and consider how these may affect different members of the household. |
| **Prevention and early intervention** | We will act early, provide support and signposting where appropriate, and seek to prevent harm from escalating. |
| **Professional curiosity** | We will respectfully ask questions, notice patterns, challenge assumptions and seek advice when something does not feel right. |
| **Trauma-informed practice** | We will respond with empathy, choice, trust and collaboration, recognising the impact that trauma can have on behaviour, engagement and disclosure. |
| **Partnership working** | We will work with local authorities, police, health services, safeguarding partnerships and other relevant organisations. We will share information lawfully, proportionately and securely to protect people from harm. This includes actively participating in local safeguarding partnerships, boards and assurance arrangements. |
| **Proportionate and accountable action** | We will respond appropriately to the level of risk, maintain clear safeguarding procedures, seek consent where appropriate, keep accurate records and be clear about who is responsible for decisions, actions and follow-up. |
| **Safety and protection** | We will use tenancy management, support, enforcement and legal remedies where appropriate |

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| | to reduce risk and protect people from harm. We will ensure contractors, agents and others acting on our behalf understand and meet our safeguarding expectations. |
| **Learning and continuous improvement** | We will learn from safeguarding cases, audits, complaints, reviews and best practice to continuously improve our services and safeguarding arrangements. |

**Reporting and Referrals**

4.2 We will maintain safeguarding procedures that support the effective identification, recording, reporting and management of safeguarding concerns.

4.3 Safeguarding concerns will be responded to appropriately and, where necessary, referred to relevant statutory agencies in accordance with our safeguarding procedures.

4.4 Where there is an immediate risk of serious harm or danger, appropriate emergency action will be taken without delay, including contacting the emergency services where necessary.

4.5 Our response times to safeguarding concerns will be in line with existing procedures.

## 5. Consent, Information Sharing and Record Keeping

5.1 We will seek consent wherever it is safe, appropriate and lawful to do so. Where there is a safeguarding concern, information may be shared without consent where there is a legal basis or where it is necessary to protect a child, young person or adult at risk.

5.2 We will share information lawfully, proportionately and securely to safeguard individuals and support effective partnership working.

5.3 Where possible, we will tell the customer what information is being shared and why, unless doing so could increase the risk of harm or it is not possible to contact them.

5.4 Any information shared without consent will be limited to what is necessary to protect safety, recorded appropriately, and discussed with the relevant manager or safeguarding lead.

5.5 We recognise that safeguarding action can sometimes create additional risk, anxiety or unintended harm. We will therefore consider the person's wishes, safety and wider circumstances, assess the potential impact of action, and take the least intrusive proportionate action consistent with our legal safeguarding responsibilities. Where it is safe to do so, we will explain proposed action and keep the person involved in decisions.

5.6 We will maintain accurate and appropriate records of safeguarding concerns, decisions and actions taken.

5.7 We will maintain appropriate records of vulnerabilities and support need where lawful and necessary to support safe service delivery.

5.8 Safeguarding procedures will provide further guidance on consent, information sharing, record keeping and responding to specific safeguarding risks.

## 6. Professional Boundaries, Allegations and Whistleblowing

6.1 Southway Wythenshawe Homes expects everyone acting on its behalf to maintain appropriate professional boundaries and conduct themselves in a safe, respectful and professional manner when working with customers, colleagues and communities.

6.2 Any concerns, allegations or disclosures regarding the conduct of colleagues, volunteers, contractors, Board members or others acting on

behalf of Southway Wythenshawe Homes must be reported promptly. We will investigate concerns and, where appropriate, utilise safeguarding, disciplinary, contractual, whistleblowing, Local Authority Designated Officer (LADO) or Persons in Positions of Trust (PiPoT) processes.

6.3 We will support colleagues, volunteers and contractors to raise safeguarding concerns through its Whistleblowing Policy where concerns relate to staff conduct, organisational practice or failures to safeguard children or adults at risk.

## 7. Safe Recruitment

7.1 Southway Wythenshawe Homes is committed to safer recruitment practices to help protect children, young people and adults at risk. Southway Wythenshawe Homes will complete appropriate pre-employment checks, including DBS checks where eligible, references and other required checks, in line with legal requirements and procedures. Southway Wythenshawe Homes will maintain a DBS framework to identify eligible roles and monitor compliance.

7.2 Colleagues are expected to disclose any circumstances that may affect their suitability to undertake their role. Southway Wythenshawe Homes will take appropriate action where concerns are identified to protect customers, colleagues and communities.

## 8. Training and Competence

8.1 Southway Wythenshawe Homes will ensure colleagues, volunteers and others acting on its behalf receive safeguarding training appropriate to their role and responsibilities.

8.2 Contractors and partners acting on our behalf will receive appropriate safeguarding information and be required to report concerns in line with our safeguarding arrangements.

8.3 Training will support colleagues to recognise safeguarding concerns, respond appropriately, understand reporting requirements and work effectively with partners to protect children, young people and adults at risk.

8.4 Southway Wythenshawe Homes will monitor safeguarding training compliance and use learning from safeguarding cases, reviews, audits and complaints to develop staff knowledge, skills and practice.

## 9. Equality, Diversity and Inclusion

9.1 An Equality Impact Assessment (EIA) was completed 24/08/2026. The actions from this are:

| Action | Policy Change |
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| **Accessible information** | Commitment to reasonable adjustments, accessible communication and alternative formats included. |
| **Inclusive practice** | Policy requires trauma-informed, person-centred and Think Family approaches and recognises that some groups may face additional barriers to reporting concerns or accessing support. |
| **Monitoring equality impacts** | Safeguarding activity, outcomes and learning will be monitored to identify and address any disproportionate impact on protected groups and those at increased risk of harm. |

9.2 We recognise that some people and groups may face additional barriers to reporting abuse, accessing support, being believed or understanding safeguarding processes. We will consider these barriers when designing services, communicating with customers and making safeguarding decisions.

## 10. Who is responsible

10.1 The people responsible for overseeing this policy are listed below

| Officer | Responsibility |
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| Executive Director of Customers and Communities | Policy owner |
| Executive Director of Customers and Communities and Assistant Director Customers and Communities | Strategic oversight |
| Head of Housing Management and Support and Head of Community Development & Support | Operational delivery and policy implementation |
| Head of Housing Management and Support, Housing Managers and Living Well Manager | Day-to-day service management and assurance |

## 11. Monitoring and Reporting

11.1 The Safeguarding policy will be reviewed by our Customer Experience Committee every three years. The Parent Board will receive an annual update on how the policy is being delivered.

11.2 This will include reporting on:

- Safeguarding activity, types and outcomes.
- Safeguarding referrals, decisions and escalations.
- Training compliance and development.
- Case audits and quality assurance.
- Learning from reviews, complaints and serious incidents.

11.3 The next review date for this policy is shown on the cover sheet.

## 12. Glossary

| Term | Definition |
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| **Adult at risk** | A person aged 18 or over who has care and support needs, is experiencing or at risk of abuse or neglect, and may be unable to protect themselves because of those needs. |
| **Child** | Anyone who has not yet reached their 18th birthday. |
| **Consent** | The person's informed agreement to an action, referral or information sharing, where they have capacity and it is safe and appropriate to seek consent. |
| **County lines** | A form of criminal exploitation in which organised groups use children, young people or vulnerable adults to move, store or sell drugs or money, often through coercion, intimidation, violence or debt. |
| **Cuckooing** | A form of exploitation in which a person or group takes over someone's home and uses it to facilitate criminal activity, often targeting people who are vulnerable, isolated or have support needs. |
| **DBS (Disclosure and Barring Service)** | The government body responsible for helping employers make safer recruitment decisions and preventing unsuitable individuals from working with children or adults at risk. |
| **Discriminatory abuse** | Abuse, harassment or unfair treatment linked to a person's identity, background or protected characteristics. |
| **Exploitation** | Taking unfair advantage of a person for another person's benefit or gain. This may include criminal, financial, labour or other forms of exploitation and may involve coercion, control, deception or abuse of vulnerability. |
| **Financial or material abuse** | Theft, fraud, coercion, exploitation or improper use of a person's money, property, benefits, possessions or financial arrangements. |
| **Homelessness-related safeguarding risk** | Risk of abuse, neglect, exploitation or harm that may be caused or increased by homelessness, insecure housing, rough sleeping or reliance on unsafe accommodation or relationships. |

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| **LADO** | Local Authority Designated Officer, responsible for managing allegations against people who work with children. |
| **Making Safeguarding Personal** | An approach that seeks to understand the person's wishes, views and desired outcomes, and keeps them involved wherever safe and possible. |
| **Modern slavery and human trafficking** | Exploitation involving slavery, servitude, forced or compulsory labour, trafficking, forced criminality or other forms of exploitation. |
| **Neglect and acts of omission** | A failure to meet a person's basic physical, medical, emotional or care needs, including withholding or failing to provide appropriate support, food, shelter, medication or access to services. |
| **Online abuse** | Abuse, harassment, exploitation, coercion or harm carried out or facilitated through digital technology, social media, messaging services, gaming platforms or other online spaces. |
| **Organisational abuse** | Poor or abusive practice within an organisation or care setting, including neglect, inappropriate routines, unsafe practices or a failure to respect dignity, choice and rights. |
| **Physical abuse** | The deliberate use of physical force that causes, or may cause, injury, pain or impairment. It can include inappropriate restraint or misuse of medication. |
| **PiPoT** | Persons in Positions of Trust arrangements for concerns about people working with adults with care and support needs. |
| **Prevent** | Safeguarding work to reduce the risk of people being drawn into terrorism or radicalisation. |
| **Psychological or emotional abuse** | Behaviour that causes emotional harm, fear or distress, including threats, intimidation, humiliation, coercion, isolation, controlling behaviour or persistent verbal abuse. |
| **Think Family** | Considering the needs and risks of the whole household and family network when responding to concerns. |

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| **Trauma-informed practice** | Working in a way that recognises the impact of trauma and promotes safety, trust, choice, collaboration and empowerment. |
| **Safeguarding** | Protecting children, young people and adults from abuse, neglect, exploitation and harm, and promoting safety, wellbeing and positive outcomes. |
| **Self-neglect** | A serious failure by a person to care for their own health, personal care, safety or surroundings, including hoarding, where this creates a risk of harm. |