

Safeguarding Policy

Safeguarding is a shared responsibility. Employees of Croydon Council, along with service providers, contractors, residents, and other individuals and partners, have a statutory duty to work collaboratively while fulfilling their obligations under the relevant legislation to protect children and adults at risk from abuse, neglect, maltreatment or harm.

The Safeguarding Policy outlines what is expected of Housing Management staff, contractors, individuals and partners, together with the escalation and referral process.

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1. Introduction

- 1.1. The safeguarding of adults and children is a statutory duty for Local Authorities.
- 1.2. The Care Act 2014 and the 1989 and 2004 Children Acts make it clear that safeguarding is everyone's responsibility, and that professionals, organisations and local authorities must work in partnership when carrying out their duties under the relevant legislation.
- 1.3. When working with adults the Care Act 2014 makes it a duty on local authorities to promote individual well-being in the exercise of their functions and to safeguard adults with care and support needs at risk of or experiencing harm, abuse or neglect.
- 1.4. When working with children the 1989 and 2004 Children Acts set out the duties on the local authority to safeguard and promote the welfare of all children and young people in their area.
- 1.5. Croydon Council's approach to these requirements is overseen by the Croydon Safeguarding Children Board and the Croydon Safeguarding Adults Board.

2. Safeguarding Policy for Housing Management

- 2.1. This policy aims to complement and work in tandem with the Pan London Safeguarding policy and Croydon Council guidance [Croydon Safeguarding Children Partnership | Croydon Council](#)
- 2.2. It draws on and reflects the relevant legislation and guidance on safeguarding for both children and adults at risk and sets out the housing management service's aims, role and responsibilities for ensuring effective safeguarding in partnership with other agencies.
- 2.3. This policy is supported by the Housing Management Safeguarding Procedure which outlines what is expected of housing management staff, together with the escalation and referral process.
- 2.4. For the purposes of this policy, safeguarding is taken to mean protecting children and adults at risk from abuse, neglect, maltreatment or harm.

3. Guidance and legislation

The following are the key policies, procedures, codes of practice and local bodies that will inform our practice:

- Croydon Safeguarding Adults Board
- Croydon Safeguarding Children's Board
- Croydon Neglect Strategy 2002-23
- Pan-London Adult Safeguarding Policy and Procedures

- Mental Capacity Act 2005 Code of Practice
- Neglect matters
- Children Act 1989 / 2004
- Working Together to Safeguard Children 2023
- Local LSCB guidance
- London Safeguarding Children Procedures
- Care Act 2014
- Crime and Disorder Act 1998
- Human Rights Act 1998
- The Equality Act 2010

4. Safeguarding Children

- 4.1. In the Government's guidance '[Working Together to Safeguard Children](#)' (Updated 2023) safeguarding and promoting Children's welfare.

5. Safeguarding Adults

- 5.1. The Care Act 2014 defines safeguarding as protecting an adult's right to live safely, free from abuse and neglect and promoting the adult's wellbeing.
- 5.2. It is aimed at people with care and support needs who may be in vulnerable circumstances and at risk of harm, abuse, neglect or exploitation.
- 5.3. The guidance also states that local authorities should not limit their view of what constitutes abuse, harm or neglect, as they can take many forms, and the circumstances of the individual case should always be considered.
- 5.4. Incidents of abuse may also be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm. (Care Act Guidance para 14.18).

6. How we identify children or adults who may be at risk

- 6.1. Government guidance provides examples of the personal circumstances or care and support needs of children and adults which may help identify them as needing early help or being particularly at risk.

6.2. Children who may be at risk

- 6.2.1. Government guidance in 'Working Together to Safeguard Children' 2018 defines a child as being anyone who has not yet reached their 18th birthday.
- 6.2.2. It indicates that providing early help is crucial in safeguarding children and requires all staff to understand their role in identifying emerging problems and sharing information with other professionals.

6.2.3. We will ensure housing management staff are vigilant and proactive in identifying circumstances that may indicate a potential need for early help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs.
- Is a young carer
- Is showing signs of engaging in anti-social or criminal behaviour (There are instances when residents may report this to the Police and or the Council will request information from the Police about incidents reported to Croydon
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic violence.
- Has returned home to their family from care.
- Is showing early signs of abuse or neglect.
- Is vulnerable to exploitation including criminal and sexual

6.3. Adults who may be at risk

6.3.1. The safeguarding duties apply to an adult who:

- has needs for care and support (whether the local authority is meeting any of those needs).
- is experiencing, or at risk of, abuse or neglect.
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

6.3.2. Some adults may be more at risk of abuse because they are:

- Elderly or frail due to ill health.
- Have a physical disability, sensory impairment or a long-term illness/condition.
- Have mental health needs including dementia or a personality disorder.
- Have a learning disability.
- Unable to demonstrate capacity to make decisions.
- Dependent on alcohol, illegal drugs or medication.
- A care leaver.
- Unable to protect themselves against abuse or neglect.

7. Six key principles underpin all adult safeguarding work

- **Empowerment**

People are supported and encouraged to make their own decisions and informed consent.

- **Prevention**

It is better to take action before harm occurs.

- **Proportionality**

The least intrusive response is appropriate to the risk presented.

- **Protection**

Support and representation for those in greatest need.

- **Partnership**

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

- **Accountability**

Accountability and transparency in delivering safeguarding.

8. Making safeguarding personal

- 8.1. Making safeguarding personal means the safeguarding process should be person-led and outcome-focused. It should engage the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety.
- 8.2. Nevertheless, there are key issues that should be considered if there is a suspicion, or staff are made aware of abuse or neglect. If the adult has the mental capacity to make informed decisions about their safety and they do not want any action to be taken, this does not preclude the sharing of information with relevant professional colleagues. This is to enable professionals to assess the risk of harm and to be confident that the adult is not being unduly influenced, coerced or intimidated and is aware of all the options. This will also enable professionals to check the safety and validity of decisions made. It is good practice to inform the adult that this action is being taken unless doing so would increase the risk of harm.

9. Sources of Risk

- 9.1. Identifying Risk

Not every situation or activity will entail a risk that needs to be assessed or managed. The risk may be minimal and no greater for the adult, than it would be for any other person.

- Risks can be real or potential.
- Risks can be positive or negative.
- Risks should consider all aspects of an individual's wellbeing and personal circumstances

9.2. Sources of risk might fall into one of the four categories below:

- Private and family life: The source of risk might be someone like an intimate partner or a family member which is domestic abuse.
- Community based risks: This includes issues like 'mate crime', anti-social behaviour, and gang-related issues; radicalisation, cuckooing, county lines.
- Risks associated with service provision: This might be concerns about poor care which could be neglect or organisational abuse, or where a person in a position of trust because of the job they do financially or sexually exploits someone.
- Self-neglect: Where the source of risk is the person themselves.

10. Types of abuse

10.1. Incidents of abuse may be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm, just as the CCG, as the regulator of service quality, does when it looks at the quality of care in health and care services. Repeated instances of poor care may be an indication of more serious problems and of what we now describe as organisational abuse. To see these patterns, it is important that information is recorded and appropriately shared.

10.2. **Patterns of abuse vary and include:**

- serial abuse, in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern, as well as some forms of financial abuse.
- long-term abuse, in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse.
- opportunistic abuse, such as theft occurring because money, jewellery or other possessions have been left lying around.

10.3. We recognise that abuse can take many forms such as the following:

10.3.1. **Physical abuse including:**

- assault
- hitting

- slapping
- pushing
- misuse of medication
- restraint

10.3.2. Domestic abuse including:

- psychological
- physical
- sexual
- financial
- emotional abuse
- so-called 'honour' based violence

We recognise that domestic abuse isn't always physical. Coercive control is an act or a pattern of acts of assault, threats, humiliation, and intimidation or other abuse that is used to harm, punish, or frighten the individual at risk. This controlling behaviour is designed to make the individual dependent by isolating them from support, exploiting them, depriving them of independence and regulating their everyday behaviour.

10.3.3. Sexual abuse including:

- rape
- indecent exposure
- sexual harassment
- inappropriate looking or touching
- sexual teasing or innuendo
- sexual photography
- subjection to pornography or witnessing sexual acts
- sexual assault
- sexual exploitation and/or acts to which the adult has not consented or was pressured into consenting

10.3.4. Psychological abuse including:

- emotional abuse
- threats of harm or abandonment
- deprivation of contact
- humiliation
- blaming
- controlling

- intimidation
- coercion
- harassment
- verbal abuse
- cyber bullying
- isolation
- unreasonable and unjustified withdrawal of services or supportive networks

10.3.5. **Financial or material abuse including:**

- theft
- fraud
- internet scamming
- coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions
- the misuse or misappropriation of property, possessions or benefits
- other scams such as telephone, postal, doorstep and/or distraction burglary

Financial abuse is the main form of abuse investigated by the Office of the Public Guardian both amongst adults and children at risk. Financial recorded abuse can occur in isolation, but as research has shown, where there are other forms of abuse, there is likely to be financial abuse occurring. Although this is not always the case, everyone should also be aware of this possibility.

10.3.6. **Modern slavery encompasses:**

- slavery
- human trafficking
- forced labour and domestic servitude.
- traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Read [*Modern slavery: How the UK is leading the fight \(Home Office 2014\).*](#)

10.3.7. **Discriminatory abuse including forms of:**

- harassment
- slurs or similar treatment: because of race
- gender and gender identity

- age
- disability
- sexual orientation
- religion

10.3.8. **Organisational abuse**

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

10.3.9. **Neglect and acts of omission including:**

- ignoring medical, emotional or physical care needs
- failure to provide access to appropriate health, care and support or educational services
- the withholding of the necessities of life, such as medication, adequate nutrition and heating

10.3.10. **Self-neglect**

This covers a wide range of behaviour such as neglecting to care for one's personal hygiene, health or surroundings and may include behaviour such as hoarding

10.3.11. **Female genital mutilation (FGM)**

- Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act (2003) makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether it is lawful in another country.
- *Further information on safeguarding women and girls at risk of FGM is available via this link:*
www.gov.uk/government/publications/safeguardingwomen-and-girls-at-risk-of-fgm

10.3.12. **Forced marriages**

Is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse.

10.3.13. **Hate crime**

The police define 'hate crime' as 'any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person's religion, belief, gender identity or disability'. It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence. In addition, it includes incidents that do not constitute a criminal offence. The police monitor five strands of hate crime:

- disability
- race
- religion
- sexual orientation
- transgender.

10.3.14. **Honour-based violence**

Honour-based violence will usually be a criminal offence and referring to the police must always be considered. It has or may have been committed when families feel that dishonour has been brought to them. Women are predominantly (but not exclusively) the victims, and the violence is often committed with a degree of collusion from family members and/or the community.

10.3.15. **Human trafficking**

This problem has a global reach covering a wide number of countries. It is run like a business with the supply of people and services to a customer, all for the purpose of making a profit. Traffickers exploit the social, cultural or financial vulnerability of the victim and place huge financial and ethical obligations on them. They control almost every aspect of the victim's life, with little regard for the victim's welfare and health

10.3.16. **Mate crime**

A 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.'

Mate crime is often difficult for police to investigate, due to its sometimes-ambiguous nature. Mate crime is carried out by someone the adult knows and often happens in private.

10.3.17. **Restraint**

Unlawful or inappropriate use of restraint or physical interventions. Someone is using restraint if they use force, or threaten to use force, to

make someone do something they are resisting, or where an adult's freedom of movement is restricted, whether they are resisting or not.

Restraint covers a wide range of actions. It includes the use of active or passive means to ensure that the person concerned does something, or does not do something they want to do, for example, the use of keypads to prevent people from going where they want from a closed environment.

10.3.18. **Radicalisation**

Radicalisation is comparable to other forms of exploitation, such as grooming and Child Sexual Exploitation. The aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, religious groups or through social media.

11. How Housing Management Services may be involved in the prevention of neglect, abuse or harm

11.1. Safeguarding issues may be brought to the attention of staff directly by residents, neighbours, or other agencies in contact with residents or their families. In addition, housing management staff working with residents or entering residents' homes to carry out visits, repairs, inspections or interviews may encounter situations causing concern for someone's welfare.

For example:

- Children or adults at risk whose care needs appear to be neglected or who appear to be subject to deliberate mistreatment.
- Adults at risk of financial abuse which may be indicated by a lack of heating, clothing or food, inability to pay bills/unexplained shortage of money, unexplained withdrawals from an account, unexplained loss/misplacement of financial documents, the recent addition of authorised signers on a client or donor's signature card, sudden or unexpected changes in a will or other financial documents.
- Children or adults who say they are being abused.
- Signs of self-neglect such as hoarding, unsanitary conditions, or alcohol or substance misuse.
- Repeated instances of poor or neglectful care by health and social care professionals or workers
- Neglect of a person's needs because those around them are unable to be responsible for their care, for example signs a carer may have difficulties caused by poor health, debt, alcohol or mental health problems.

- Difficulties in maintaining tenancy such as arrears or neighbour problems or harassment which may be linked to a learning difficulty or mental health problems and giving rise to exploitation, financial abuse or harassment.
 - Exploitation by acquaintances and or associated persons, including cuckooing.
 - Where there is known or suspected domestic abuse.
- 11.2. We will ensure staff are trained to identify the wide range of circumstances in which potential victims of neglect or abuse may present.
- 11.3. The training that our staff will undertake will include the following:
- 11.4. Guidance for front line staff working with adults is also set out in the handbook 'Safeguarding adults from neglect or abuse' which sets what abuse is, the legal context and the responsibilities of front-line staff who may come into contact with possible cases of abuse and neglect in adults.
- 11.5. Guidance for staff working with children is set out in 'Neglect Matters' and 'Thresholds of Need guide' which help staff to identify possible cases of neglect and officer guidance on how to respond.

12. How we will respond to suspected abuse or neglect

- 12.1. We recognise that abuse, neglect or harm can arise in a range of settings and may be perpetrated by a wide range of people including relatives and family members, professional staff, volunteers, other service users, neighbours, friends and associates, or strangers.
- 12.2. The Housing Management Service will endeavour to safeguard children, young people and adults at risk in the ways outlined in the following sections.

13. Agreed procedures

- 13.1. We will provide guidance and appropriate safeguarding procedures for housing management staff to ensure the timely reporting, management and referral of concerns or suspicions of abuse and neglect of individuals at risk. This is set out in the Housing Management Safeguarding Procedure.
- 13.2. Procedures include guidance and arrangements for supporting individuals at risk and working with different agencies across different local authority areas.

14. Recruitment, induction and training of staff

- 14.1. We will ensure the selection and recruitment of staff, contractors and agencies takes into account the need to promote the safeguarding of children and adults. This will include the following.

- 14.2. All members of frontline staff who have regular contact with adults at risk or children will be subject to employment checks and Disclosure and Barring Service checks, where appropriate.
- 14.3. As part of their induction in the Housing Management Service, all appropriate staff will be required to read and understand this policy and related guidance and procedures.
- 14.4. Staff will receive training in the legal responsibilities and duties in relation to safeguarding and how to identify signs of abuse and neglect, recognise harm and make appropriate referrals in a timely manner.

15. Management and supervision

- 15.1. We will provide direction about the service's responsibilities and the promotion, of effective practice in relation to safeguarding through regular management and supervision of staff and contractors, the monitoring of performance, reporting, complaints and annual review of policy and notable practice.
- 15.2. Managers will ensure through regular supervision that the policy and procedure are adhered to and that adequate arrangements with other parts of the council and other agencies are in place to ensure effective safeguarding and communication.
- 15.3. Safeguarding will be a regular item on team meeting agendas and staff supervision.
- 15.4. We will ensure all staff are enabled to challenge inappropriate behaviour in others, are able to access whistle-blowing procedures and that any issues relating to the conduct of staff are addressed through appropriate procedures.

16. Sharing information

- 16.1. We will ensure that all housing management staff understand government guidance for sharing information with other professionals and that information is shared effectively and efficiently to support early identification and assessment of any concerns.
- 16.2. As a directorate of the London Borough of Croydon, Housing Management shares the commitment to ensure that data collation and processing is in accordance with GDPR 2018 and the Data Protection Act 2018. We will ensure that all data is:
 - processed lawfully, fairly and in a transparent manner.
 - collected for a specific and legitimate purpose and not used for anything other than this stated purpose, or as provided for in our privacy and fair processing notices.

- relevant and limited to whatever the requirements are for which the data is processed.
- accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay.
- stored for as long as required, as specified within Croydon's Records Retention policy.
- secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and accidental loss, destruction or damage.

16.3. We will be open about what and with whom information will or could be shared unless doing so puts the adult or child at increased risk of harm, seeking consent and respecting confidentiality except where we consider safety or wellbeing of the adult or others to be at risk.

16.4. If staff are in any doubt about sharing the information concerned without disclosing the identity of the individual where possible they should contact either the Corporate Information Team or the Housing Management Data Co-Ordinator.

16.5. We will routinely review our data-sharing arrangements to ensure that they are still appropriate.

17. Working with others

17.1. We recognise that safeguarding is achieved through good joint working with other agencies, and organisations and across local authority boundaries. This is an important consideration for the council which owns and manages housing across the local authority area.

17.2. As a provider of social housing and support services we will build and maintain partnerships and effective referral procedures with other local authorities, agencies and organisations to safeguard children and adults at risk.

18. Complaints

18.1. Should there be a complaint from a resident concerning, any aspect of the Safeguarding process, this will be dealt with via the Council's Corporate Complaints Policy.

19. GDPR and Data Protection

19.1. Housing Management recognises the commitment to ensure that all data is:

- Processed lawfully, fairly and in a transparent manner.

- Collected for a specific and legitimate purpose and not used for anything other than this stated purpose, or as provided for in our privacy and fair processing notices.
- Relevant and limited to whatever the requirements are for which the data is processed.
- Accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay.
- Stored for as long as required, as specified within Housing Management's Records Retention policy.
- Secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and accidental loss, destruction, or damage.

Further information about the Council's commitment to the General Data Protection Regulations (GDPR can be found on the Council's website)

21. Roles and responsibilities to implement the policy

21.1. Director of Housing Management

The Director of Housing Management will have overall responsibility for the implementation of the Safeguarding Policy.

21.2. Head of Service

The Heads of Service for Tenancy, Lettings and Income, and Repairs Services will develop, implement, and monitor the effective management of safeguarding.

21.3. Council staff and contractors

Will follow the Safeguarding policy and related policies, associated rules and procedures, and have an awareness of related legislation and regulations to ensure the operational delivery is fair and consistently delivered across our services. Staff and contractors are aware of their roles and responsibilities and regularly carry out mandatory and personal development training offered to them.

22. Monitoring and Review

22.1. This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Council-wide policies.

22.2. Arrangements for a full internal audit of the process to be undertaken by the Council's Internal Auditors. The full scope of the audit will be agreed upon

with the Internal Auditors, Director of Housing Management and Heads of Service.

- 22.3. This policy and its related guidance and procedures will be kept under review (at least annually) by the Housing Management Safeguarding Group and amended to reflect any change in legislation, national guidance or local practice as necessary.

23. Document Control

- 23.1. This is a controlled document and should not be changed unless by authorisation of the policy owner.

Monitoring		
Approved Date:	20 March 2025	
Next Review Date:	March 2028	
Effective date:	22 April 2025	
Consultation Review		
Stakeholders review:	November 2024	
Legal review date:	December 2024	
Residents' reading group:	21 January 2025	
Policy owner:	Director of Housing Management	
Ratified by:	DMT	
Equality impact assessment:	The impact of this policy will be measured as it is implemented and used as part of a scheduled 1-year implementation compliance review.	
Version History		
Version Number	Summary of change	Author and Approver
1.0	New Policy	Reviewed and developed by Housings' subject matter experts and the Residents reading group