



## Safeguarding Policy & Procedure

### Document Control

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<b>APPROVER</b>	Senior Leadership Team
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Signed off by: Richard Vaughan (Manager / Director)

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### Document Release:

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## 1. Introduction

Cadwyn recognises we have a key safeguarding role to play, alongside other professionals and organisations, in keeping people safe. This policy details Cadwyn's position to ensure effective safeguarding within its premises and services, especially when working with vulnerable people and children.

Links to other policies:

- Recruitment Policy
- Data Protection Policy
- Disciplinary Policy
- Equal Opportunities Policy
- Complaints Policy
- Health and Safety Policy

## 2. Aims

This policy applies to all staff, including Directors, Managers, Board, paid staff, volunteers, agency and relief staff, consultants, contractors and/or anyone working on behalf of Cadwyn Housing Association.

The purpose of this policy:

- To protect children and adults who are housed by Cadwyn or use its services. This includes the children of adults who use our services.
- To provide staff and volunteers with the overarching principles that guide our approach to safeguarding and child protection.

Cadwyn believes that children/'adults should never experience abuse of any kind. We have a responsibility to promote the welfare of all children/'at risk' adults and to keep them safe. We are committed to practise in a way that protects them.

## 3. Definitions

According to Social Services and Wellbeing Act Wales 2014 the following definitions will be used:

Children:

A child is defined as a person who is aged under 18.

A child at risk is defined under Section 130 as a child who:

## Safeguarding Policy and Procedure

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- Is experiencing or is at risk of abuse, neglect or other kinds of harm
- Has needs for care and support (whether or not the Authority is meeting any of those needs)

### Unborn Children:

The Children Act 1989 is the relevant legislation relating to unborn children. It is important Cadwyn staff react appropriately to any concerns during pregnancy and they are reported as soon as they come to their attention. Concerns may include: use of substances, domestic abuse, other children in household on child protection register, parent(s) ability to care for a baby.

### Adult:

An Adult is defined as a person over 18.

Section 126 (1) of the Social Services and Wellbeing Act (Wales) 2014 defines an adult at risk as a person over the age of 18 who:

- Is experiencing or is at risk of abuse or neglect
- Has needs for care and support (whether or not the authority is meeting any of those needs) and
- As a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.

For both Adults and Children, the term 'at risk' means that actual abuse or neglect does not need to occur, rather interventions should be made to protect people considered at risk to prevent actual harm, abuse or neglect.

**Abuse:** Abuse is when a person or persons cause harm to another person. Abuse can happen anytime and anywhere: in a person's home, someone else's home, a public place or a place of work. The types of abuse listed below can effect both Children and Adults. Abuse usually falls into the following examples:

- **Physical abuse** - includes hitting, kicking, misuse of medication, inappropriate sanctions or unlawful / inappropriate restraint.
- **Domestic abuse** - is "an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse... by someone who is or has been an intimate partners or family member regardless of sexuality.
- **Sexual abuse** - includes rape and sexual assault or sexual acts to which the adult at risk has not consented or could not consent or was pressured into consenting.

## Safeguarding Policy and Procedure

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- **Emotional/Psychological abuse** - includes threats of harm or abandonment, humiliation, blaming, controlling, coercion, harassment, verbal abuse.
- **Financial and material abuse** - includes theft, fraud, exploitation, pressure in connection with financial matters, or the misuse of someone else's finances.
- **Modern slavery** - includes human trafficking, forced labour and domestic servitude.
- **Neglect and acts of omission** - includes ignoring medical or physical care needs, and the withholding of necessities, such as medication and adequate nutrition.
- **Discriminatory abuse** - includes abuse, such as harassment, slurs or hate crime based on a person's race, sex, disability, faith, sexual orientation, or age.
- **Organisational abuse** - where any of these forms of abuse noted above are caused by the way an organisation practices, this is called 'organisational abuse'.
- **Self-neglect** - includes situations where a person is declining support with their care needs, hygiene, health or their environment, and this is having a significant impact on their overall wellbeing.

### **Risks of actual or potential abuse can also arise from:**

- Criminal exploitation such as County Lines
- Child Sexual Exploitation
- Radicalisation
- Female Genital Mutilation

## **4. Legal Framework**

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004

## Safeguarding Policy and Procedure

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- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2014
- Special educational needs and disability (SEND) code of practice:0-25 years – Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015
- Working together to safeguard children, a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015
- Social Service and Wellbeing Act (Wales) 2014
- All Wales Child Protection Procedures 2008
- Data Protection Act 2018
- Ending Physical Punishment (Wales) 2022

This policy should be read alongside other relevant policies and procedures.

### **5. Policy Statement**

If anyone representing Cadwyn has a safeguarding concern they have a responsibility to bring the matter to the attention of their manager or any of the contacts listed in this document. The manager (or contact) will consider if it should be referred to Social Services and will follow the procedure from 6.2 onwards.

We recognise that:

- the welfare of the child is paramount, as enshrined in the Children Act 1989
- all children and adults, regardless of age disability, gender, racial heritage, religious belief, sexual orientation, or identity, have a right to equal protection from all types of harm or abuse.
- some children and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- working in partnership with children, young people, vulnerable adults, their parents, carers and other agencies is essential in promoting young people and vulnerable adult's welfare.
- the importance of data protection and privacy whilst ensuring that we collect and protect an appropriate amount of information to enable us to support vulnerable individuals.

We will keep children and adults safe by:

## Safeguarding Policy and Procedure

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- valuing them, listening to and respecting them
- appointing a Designated Safeguarding officer (DSO) and deputies for safeguarding children, and adults
- adopting child protection and safeguarding practices through procedures and a code of conduct for staff and volunteers
- providing effective management to staff and volunteers including training, supervision, support, code of conduct and quality assurance measures
- recruiting staff and volunteers safely, ensuring all necessary checks are made, and including safeguarding in induction and training.
- recording and storing information professionally and securely, sharing information about safeguarding and good practice with children, their families, staff and volunteers via leaflets, posters, one-to-one discussions
- using safeguarding procedures to share concerns and relevant information with agencies who need to know and involving children, young people, vulnerable adults, parents, families and carers appropriately.
- using our procedures to manage allegations against staff, volunteers, contractors and consultants working on our behalf, appropriately.
- creating and maintaining an anti-bullying environment and ensuring that we have policies and procedures to help us deal effectively with any bullying that does arise.
- ensuring that we have effective complaints and whistleblowing measures in place.
- ensuring that we provide a safe physical environment for our children, young people, vulnerable adults, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.
- monitoring the operation of our safeguarding procedures.

### 6. Contact Details

Designated Safeguarding Officer (DSO)

Name: Sarah Black

Phone:

[Sarah.Black@cadwyn.co.uk](mailto:Sarah.Black@cadwyn.co.uk)

Deputy DSO's:

Name: Kerry Rowlands

[Kerry.Rowlands@cadwyn.co.uk](mailto:Kerry.Rowlands@cadwyn.co.uk)

07912780887

Name: Stacey Anastasi

[Stacey.Anastasi@cadwyn.co.uk](mailto:Stacey.Anastasi@cadwyn.co.uk)

07708510537

## Safeguarding Policy and Procedure

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Name: Agnieszka AJ. Rutkowska  
[AJ.Rutkowska@cadwyn.co.uk](mailto:AJ.Rutkowska@cadwyn.co.uk)  
07593130811

## PROCEDURE

### 7.0 Responsibilities

#### 7.1 Staff & Volunteers and anyone working on our behalf:

Everyone has a responsibility to:

- be alert to concerns and raise their concerns straight away.
- undertake awareness training as part of their core induction and any additional and refresher training required for their role. (It is recommended that for all customer-facing roles refresher training is every two years)
- understand the nature of abuse, identifiers of abuse and how to prevent abuse occurring.
- follow Safeguarding procedures when they have concerns about families/individuals they come into contact with
- familiarise themselves with Cadwyn's policy and procedure on Safeguarding including
  - what is expected of them
  - how to raise a concern about a child/ /'at risk' adult
  - the importance of maintaining maintain strong professional boundaries with all individuals.
- Have access to and comply with All Wales Safeguarding Procedures
- Record any concerns, discussions and outcomes on relevant recording system.

#### 7.2

##### **Management:**

All Cadwyn Managers

- Be responsible for overseeing appropriate referrals are submitted to Multi-Agency Safeguarding Hub (MASH) via a Multi-Agency Referral Form (MARF)
- Understand and be familiar with safeguarding legislation and policies.
- Understand and follow the Cadwyn's policy and procedure on safeguarding.
- Ensure that the correct recruitment practice is undertaken in checking a candidate's work history and taking up references.
- Provide training and support for staff in relation to safeguarding, including regarding this policy and procedure, responsibilities, code of conduct and reporting concerns.
- Ensure staff are compliant with learning and development requirements outlined in the policy and associated procedures.
- Undertake regular observation and supervision of staff.



## Safeguarding Policy and Procedure

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- Ensure that effective safeguards are in place to prevent harm to any children//vulnerable adults engaging with Cadwyn.
- Be alert to concerns and raise any concerns straight away.
- Provide appropriate support to individuals reporting concerns.
- Provide or obtain appropriate support to individuals at risk of or experiencing abuse.
- Make decisions with relevant staff input regarding:
  - referrals to statutory agencies
  - follow up referrals
- To support staff through formal proceedings and be accountable for decision making.
- Reinforce whistleblowing procedures and reassure staff that concerns will be taken seriously and acted upon.
- Record accurate data on number of referrals made in line with protected characteristics to identify any trends and any bias (unconscious or conscious) Data to be discussed every 6 months at internal safeguarding group.

7.3

### The **Executive Team**:

- Ensuring that key people contribute to the development of policies and procedures in order that robust operating procedures are in place for use with people using our services.
- Providing and ensuring there is robust leadership and governance for all safeguarding activity.
- Leading on the policies and procedures on safeguarding – this includes monitoring their implementation; ensuring staff have the appropriate training and skills, and regular reporting to the Board.
- Ensuring that robust policies and procedures are in place to ensure people are safe and confident to express concerns relating to abuse or the possible risk of abuse without fear of recrimination.
- Ensuring robust recruitment and selection arrangements are in place to ensure that staff are only employed once relevant checks have been completed and the organisation is satisfied that the references are from a credible source.
- Being alert to concerns and raise concerns straight away.

7.4

The **Board** will review safeguarding via the quarterly governance compliance report. Data and information will be collected by the customer-facing teams to feed into this report.

## 8.0 Reporting a Concern

**If a member of staff identifies a concern, they always have a duty to act.** This is not a matter of individual choice, and the concern must be raised without delay.

## Safeguarding Policy and Procedure

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If there are immediate concerns phone 999 without delay.

Concerns about a child:

Where possible, consent from the parent should always be sought unless it is believed that this could result in further harm to the child. Where this is either not possible, consent is refused or if seeking consent could result in further harm to the child, this should not prevent the staff member from making the referral. Staff should make it clear on the referral form if a decision was made to not seek consent and the rationale behind it.

Step 1: Concern is identified

Step 2: Does the member of staff feel confident and trained to make a referral?

Yes: Go to Step 4

No: Go to Step 3

Step 3:

Concerns are escalated to line manager or Designated Safeguarding Officer or Deputy to determine whether to make a referral.

Step 4:

Referral is sent via a Multi Agency Referral Form (MARF) Appendix 1 and sent to Cardiff MASH [CSmash@cardiff.gov.uk](mailto:CSmash@cardiff.gov.uk) via encrypted email.

The referral should ideally be made by the member of staff with the concerns with support from line manager where appropriate. The DSO and/or deputy DSO should be cc'd into the referral so that they can record it.

Staff can also call Childrens Services to discuss any concerns prior or following submitting a referral on 029 20 536490. Any phone call should not be in place of submitting a referral.

If concerns arise out of hours, concerns should be phoned through to the Emergency Duty Team on 029 20 788570

Concerns about an Adult:

Where possible consent should be obtained prior to making a referral. There may be occasions when staff make a decision to not seek consent if it would place that adult at further risk. Staff should make this clear in the referral form if consent was not sought and the rationale behind this.

Step 1: Concern is identified

Step 2: Does the member of staff feel confident and trained to make a referral?

Yes: Go to Step 4

## Safeguarding Policy and Procedure

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No: Go to Step 3

Step 3:

Concerns are escalated to line manager or Designated Safeguarding Officer or Deputy to determine whether to make a referral.

Step 4:

Referral is sent via an AS1 form(Appendix 1) and is sent to Adult Social Services [safeguardingadults@cardiff.gov.uk](mailto:safeguardingadults@cardiff.gov.uk) via encrypted email.

The referral should ideally be made by the member of staff with the concerns with support from line manager where appropriate. The DSO and/or deputy DSO should be cc'd into the referral so that they can record it.

Staff can also phone Adults Social Services prior or submitting a referral on 029 22 330888. Any phone call should not be in place of submitting a referral.

If concerns arise out of hours, concerns should be phoned through to the Emergency Duty Team on 029 20 788570

If the concern is deemed not to meet the threshold for a referral to be made, this does not mean further action is not required. Advice can be sought from line managers, Designated Safeguarding Officer or the deputies. The local Safeguarding Board and social services may also be a useful resource. Remember to prioritise the needs of the child/'at risk' adult.

**9.0** If further concerns are identified following the referral, these too must be passed on to Social Services.

### **After making a referral:**

- Staff should continue trying to engage with the child and/or adults.
- Staff should update any relevant other agencies to notify them of concerns e.g. health visitor, mental health team etc.
- Social Services will feedback their decision within 10 working days. If staff have not had a response, they should make contact with social services for a decision.
- If social services decide to open a safeguarding investigation, staff and line manager to discuss involvement of Cadwyn in possible future safeguarding meetings relating to the child and/or adult.
- Line managers to ensure appropriate support is offered to member of staff attending safeguarding meetings and offering de-brief support after meetings.

**10.0**

### **Whistleblowing – escalating concerns**

In instances where a line manager decides not to refer, contrary to the opinion of the staff member, the staff member should challenge the line

manager. If this fails, they should escalate this with the Designated Safeguarding Officer or the deputies. If this still does not result in a referral, the staff member may consider referring the concern to the Safeguarding Board directly in accordance with Cadwyn's Whistleblowing procedure.

### 11.0

#### **Concern about a staff member or volunteer carrying out abuse**

This should be reported to the Designated Safeguarding Officer. If the concern is about the Designated Safeguarding Officer then this should be reported to the deputies or the Head of People Services directly.

This concern will then be passed on straight away to the local authority. We will also inform the Local Authority if we become aware of any reason why the individual is no longer suitable to work with children/young people/'at risk' adults.

The Designated Safeguarding Officer or deputy will inform People Services in order for internal procedures to be followed.

12.0 Cadwyn will ensure full cooperation with any investigation carried out by the Local Authority as well as consulting with them before following our own internal procedures.

#### **Working with families/individuals who are engaged with social services**

Cadwyn should seek to make contact with Social Services if child and/or adult moves into a Cadwyn property with known social services involvement.

13.0 Cadwyn has a duty to inform Social Services when a family/individual moves out of their tenancy. The member of staff responsible for the individual/family should record all interactions with social services on the appropriate system for the family/individual.

#### **Confidentiality/ disclosure of information**

- Individual employees, professionals and independent contractors cannot remain anonymous when making a referral. However, members of the public may remain anonymous if they wish to.
- The safety of the child/young person/vulnerable adult takes precedence over the need to maintain professional confidentiality. It is the responsibility of each agency or individual professional to contribute all the relevant information when requested and not just 'edited highlights'.

## Safeguarding Policy and Procedure

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- The law is rarely a barrier to disclosure of information.
- There is no restriction in the Data Protection Legislation or any other legislation that prevents concerns regarding individuals being highlighted and shared between appropriate agencies for the purpose of protecting children/young people/'at risk' adults. Whenever possible, consent should be obtained before sharing personal information with third parties, but the public interest in safeguarding always overrides the public interest in maintaining confidentiality or obtaining consent

### 14.0 Review

This policy will be monitored, reviewed and evaluated every three years to ensure that it continues to meet good practice, any new legislative and regulatory requirements and has the desired impact.

### Appendix 1

Multi-Agency Referral Form:



4.CH\_227-Cardiff-Multi-Agency-Referral-Form

### Appendix 2

Duty to Report



Adult-Safeguarding-Duty-to-Report-Adult