



Safeguarding and Domestic Abuse Policy

October 2021

| MONITORING, APPROVAL AND REVIEW | |
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Safeguarding and Domestic Abuse Policy

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1. Purpose

- 1.1 To provide effective and consistent support through partnership working to prevent abuse.
- 1.2 To comply with the Regulatory Framework for Social Housing in England and relevant legislation e.g. The Care Act 2014.
- 1.3 To outline First Choice Homes Oldham's (FCHO) commitment to ensuring that all children and adults are protected and kept safe from harm whilst engaged in services organised by FCHO.
- 1.4 This policy is for all FCHO colleagues, Non-Executive Directors, volunteers, or anyone working on behalf of, delivering a service for, or representing FCHO.

2. Policy Details

2.1 Aims of the Policy

This policy aims to ensure that FCHO will:

- Provide sensitive, timely and appropriate responses to customers and colleagues
- Provide a range of services that maintain the safety and security of customers
- Recognise the different access needs of diverse communities and respond positively to the sensitive personal needs and issues facing customers
 - Provide responsive and timely support to FCHO customers through Neighbourhood and Community Support Services to enable them to sustain their tenancies
 - Provide advice on the housing options that are available to the victims/survivors of domestic abuse and consider these customers as exceptions to the FCHO Lettings policy
- Refer (or signpost where appropriate), customers experiencing domestic abuse to the appropriate services as soon as possible
- Promote advice and support services for the victims and survivors of domestic abuse via the FCHO website
- Follow any relevant child protection/safeguarding procedures where it is believed a child is at risk
 - Provide timely intervention and advice to prevent and reduce homelessness in relation to domestic abuse
 - Explain to perpetrators the consequences of their actions in line with FCHO's antisocial behaviour policy and take enforcement action if required
 - Use a partnership approach to dealing with safeguarding and domestic abuse, by working with local, regional, and national agencies (e.g., Oldham Refuge, Women's Aid, MASH, Vulnerable Adult Services, and the Forced Marriage Unit)
- Provide colleagues with training and support to enable them to take appropriate action in relation to this policy and the needs and circumstances of individual customers
- Work in partnership with other agencies recognising FCHO's role in dealing with safeguarding and domestic abuse in a multi-agency context
- Contribute through service provision and participation, in all protection arrangements (e.g., MARAC and MASH)

- Refer victims of abuse to the Multi-Agency Safeguarding Hub (MASH) or other appropriate agency (IDVA/Police)
- Take positive action to gain possession of FCHO tenancies where the perpetrator remains in the property and is under-occupying or where tenancy enforcement action may be taken in line with the Anti-Social Behaviour Policy

3. FCHO's Approach

- 3.1 FCHO has two identified Safeguarding Leads, as well as Designated Safeguarding Officers (DSO) across the business. The role of DSO is to act as a point of contact for colleagues to discuss and record concerns, offer support to colleagues, and facilitate the contact with the relevant Social Care Agency/Police.
- 3.2 Designated Safeguarding Officers also record safeguarding concerns on FCHO systems, highlight any issues or training gaps at the Safeguarding Group meeting and promote Safeguarding within teams.
- 3.3 Contact details of current Safeguarding Leads and DSO are made available to colleagues through mandatory training and via the FCHO Intranet. These are reviewed on a six-monthly basis (minimum) to ensure they remain current.
- 3.4 Clear guidelines and processes are in place for colleagues in the event they identify a safeguarding concern or domestic abuse (see appendices).
- 3.5 FCHO has procedures in place to ensure that DBS checks are carried out for relevant roles across the business.

4. Monitoring and implementation

- 4.1 The following safeguarding performance information is monitored monthly:
 - Number of safeguarding alerts raised
 - Number of raised safeguarding alerts actioned by partner agencies (e.g., MASH, IDVA, Police)
 - Number of FCHO household members subject to MARAC cases (including both victims and alleged perpetrators)
 - Percentage of FCHO colleagues who have completed mandatory safeguarding training (target 100%)
 - Number of safeguarding cases opened
 - Number of safeguarding cases closed
 - Number of current safeguarding cases audited by Safeguarding Leads (target 100%)
 - Number of safeguarding cases reviewed prior to closure by Safeguarding Leads (target 100%)
- 3.2 FCHO will regularly monitor and review services to ensure continuous improvement. This information will be used to inform further service and policy development, training and raising awareness of safeguarding and domestic abuse.
- 3.3 Mandatory safeguarding training is provided to all FCHO colleagues at induction and refreshed every three years. Clear guidance and processes are in place for colleagues in the event they identify a safeguarding concern or domestic abuse.

4. Links to First Choice Home's Strategic Plan

- 4.1 Excellent Landlord:
- Improve customer services
 - Develop options that allow us to meet greater housing need
- 4.2 Create Thriving Communities:
- Develop successful services that provide effective partnerships and joint evaluation with health, support and criminal justice services

5. Links to other FCHO Policies, statements and procedures

- Vulnerable Customers Policy
- Antisocial Behaviour Policy
- Modern Slavery and Human Trafficking Statement
- Disclosure Barring Service procedure

6. Links to local Safeguarding Boards, Policies and Strategies

- 6.1 Oldham Council Multi-Agency Safeguarding Adults Policy:
https://www.oldham.gov.uk/downloads/file/4707/multi-agency_safeguarding_adults_policy
- 6.2 Oldham Council Multi-Agency Safeguarding Adults Policy, Part 2: Operational Procedures for Safeguarding Adults at Risk
https://www.oldham.gov.uk/downloads/file/4708/multi-agency_safeguarding_adults_policy_part_2
- 6.3 Oldham Council Multi-Agency Safeguarding Adults Policy, Part 3: Procedures for Responding to and Reporting Allegations, Concerns or Suspicions of Adult Abuse
https://www.oldham.gov.uk/downloads/file/4709/multi-agency_safeguarding_adults_policy_part_3
- 6.4 Policy and procedures for safeguarding people at risk of being drawn into terrorism, or extremism leading to terrorism:
<https://www.osab.org.uk/cms-data/depot/hipwig/Policy-and-procedures-for-safeguarding-people-at-risk-of-being-drawn-into-terrorism-or-extremism-leading-to-terrorism.pdf>
- 6.5 Oldham Safeguarding Children Partnership policies and procedures:
<https://www.olscb.org/professionals/policies/>

7. Legislative or Other Guidelines

- 7.1 FCHO will ensure that its approach to working with customers at risk of abuse and survivors/victims of domestic abuse is in line with the Regulator of Social Housing regulatory framework.
- 7.2 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:

- **Empowerment** – people being supported and encouraged to make their own decisions and informed consent
- **Prevention** – it is better to act before harm occurs
- **Proportionality** – the least intrusive response 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 safeguarding practice

7.3 The policy has been written with reference to relevant legislation and guidance, including:

- Children's Acts 1989 and 2004
- The Government's guidance: Working Together to Safeguard Children 2015
- Care Act 2014
- Mental Capacity Act (2005) and Mental Capacity Act – code of practice (2007) (provide a framework to empower and protect people who may lack capacity to make decisions for themselves)
- Human Rights Act (1998) (includes a duty on public bodies to intervene proportionately to protect the rights of citizens)
- Data Protection Act (2018) (governs the protection of personal data and provides a framework to ensure that personal information about a person is shared appropriately)
- Equality Act (2010)
- Mental Health Act (2007)
- Criminal Justice Act (2003)
- Public Interest Disclosure Act (1998) (places a duty on everyone to report something that leaves someone at risk)
- Health and Social Care Act 2012

Appendix 1 – Safeguarding Guidance for FCHO colleagues

(An interactive version of this guidance is available for colleagues on FCHO's intranet)

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FCHO DSO's List

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Safeguarding is everyone's responsibility

Safeguarding is about keeping people safe from harm and protecting their right to live in safety, free from abuse and neglect.

Everyone has a right to be safe and well, and we all have a role to play to ensure our customers are safe and free from the risk of abuse.

First Choice Homes Oldham (FCHO) is committed to safeguarding and promoting the welfare of children, young people, and adults at risk, and expects all colleagues and volunteers to share this commitment

Here at FCHO we are well placed to identify people who may be at risk of abuse through our contact with customers and we have a vital role to play as a component of local multi-agency safeguarding partnerships

Many colleagues visit customers within their own homes. This places us in a very privileged position, where we may see things which would otherwise be hidden. You may also identify concerns through your contact with customers on the telephone, when they visit offices, through contact with other residents who may share concerns with you or when you are out and about in Oldham.

It is vital that any concerns we may identify are shared, with the overarching aim of improving lives and keeping people safe.

FCHO's campaign 'Something Not Right' has been praised by safeguarding board partners for its simple message. Sometimes a concern is exactly that – something 'not right' – a gut feeling or something we have seen or heard that makes us uneasy or just does not sit right. We may not always see the full picture, but if we are concerned that a customer is at risk, it is very important that we share this so that the appropriate steps can be taken, and support can be put into place.

If children and families or vulnerable adults are given help it can stop them from being harmed, end the cycle of abuse, enhance their lives and – worst case scenario – save lives!

FCHO has Designated Safeguarding Officers (DSO) across the business. DSO are a point of contact for colleagues to share and discuss any concerns and who can provide advice about what happens next. If a DSO is not available, you should speak with your line manager. Any concerns should be shared as soon as you become aware of the issue.

Passing on Concerns / Raising a Safeguarding Alert

I have concerns:

- Note the signs and symptoms that have alerted you
- Keep notes of what you have said and done
- Discuss your suspicions with your DSO who will tell you what will happen next.

I am told something:

- Note the signs and symptoms that have been told to you
- Reassure them that they are doing the right thing
- Tell them that you will have to tell someone else
- If you need someone to cover your role, speak to your line manager
- Contact your DSO and discuss your suspicions. Your DSO will tell you what will happen next.

Remember, if you witness or become aware of an urgent concern you should phone 999!

Complete a 'Let Someone Know' form and select 'safeguarding'

FCHO Safeguarding Leads, Designated Safeguarding Officers and Domestic Violence Champions

| Safeguarding Leads | | |
|---------------------------|--------------------------|---|
| Name | Position | Contact |
| Bev Bertenshaw* | Community Impact Manager | Bev.bertenshaw@fcho.co.uk Tel: 0161 393 5435 |
| Dave Brereton* | Community Impact Manager | Dave.brereton@fcho.co.uk Tel: 0161 393 5462 |

| Designated Safeguarding Officers | | |
|---|-------------------------------------|---------------------|
| Name | Position | Service Area |
| Vicky Campbell* | Assistant Community Impact Manager | Community Services |
| Emma Cafferky | Stronger Communities Manager | |
| Julie Goreham | Learning and Development Advisor | |
| Paula Field* | Community Legal Manager | Legal |
| Martin Dawber | Community Legal Officer | |
| Becki Mercer | Community Legal Officer | |
| Catherine Stopford* | Community Legal Officer | |
| Ashley Feest | Community Legal Officer | |
| Anthony Pickover | Community Legal Officer | |
| Graham Owens | Community Legal Officer | |
| Sara Smith | Contact Centre Manager | Contact Centre |
| Janine Ashburn | Contact Centre Team Manager | |
| Michael McGeoch | Contact Centre Team Manager | |
| Adele Prudham | Housing and Advice Manager | Neighbourhoods |
| Julie Jones* | Neighbourhood Manager | |
| Lee Holden | Neighbourhood Manager | |
| Chris Noble | Neighbourhood Manager | |
| Juliet Bennett | Assistant Income Collection Manager | Income Collection |
| Vanessa MacDonald | Assistant Income Collection Manager | |
| David Wrigley | Head of Neighbourhood Care | Neighbourhood Care |
| Emma Gillespie | Operational Manager | Property Care |
| Jennifer Maguire | Operational Manager | |
| * Domestic Abuse Champion | | |

What is abuse?

Abuse is:

- When a person is hurt or harmed by another person in a way that causes significant harm, to that person, and which may influence that person's health, development, or wellbeing.
- a violation of someone's human and civil rights by another person or group of people

The person causing harm may be known to the person suffering abuse. They may be in a position of trust and power. They may be a professional in healthcare, social care, or education. They could be a friend, relative or neighbour.

Abuse can happen anywhere, including at home or in public places. It can happen at school or college, or in resource centres or accommodation services.

Abuse can be a single incident or repeated acts of abuse and neglect.

There are different categories of abuse when it comes to children/young people and adults.

Children and Young People

Before we look at the categories of abuse when it comes to children and young people firstly it is important to understand the legal definition of a child. **A “child” is the term used when the child or young person is under the age of 18.**

The categories of abuse when it comes to children and young people are listed below –

Physical Abuse is actual physical harm, or the failure to prevent harm. For example:

- Shaking
- Hitting
- Poisoning
- Burns
- Broken bones

Physical abuse can also be caused when a parent or carer feigns the symptoms of or deliberately causes ill health to a child for whom they are caring.

Sexual Abuse involves forcing or enticing a child to take part in sexual activities. For example:

- Physical contact
- Penetrative sex
- Prostitution
- Use of pornographic material
- Use of internet
- Visual, i.e., television/videos
- Watching sexual activities or encouraging children to behave in sexually inappropriate ways

The most common indicator of sexual abuse is when a child tells someone what is happening.

Neglect is the persistent failure to meet the child’s basic physical/psychological needs which is likely to result in the serious impairment of the child’s health and development.

Neglect can also occur during pregnancy because of maternal substance misuse.

Signs of neglect can be:

- Poor hygiene
- Dirty clothes
- Poor state of living conditions
- Underweight/overweight
- Inadequately clothed
- Poor hair quality/frequent infestations
- Poor skin condition
- Financial issues
- Poor language skills

Emotional Abuse is the persistent emotional ill treatment of a child to cause severe and persistent adverse effects on a child’s emotional development. It may involve:

- Conveying to a child they are worthless, unloved, or inadequate use of negative language
- Prevention of social interaction

- Bullying or exploitation or corruption
- Seeing or hearing the ill treatment of another (for example domestic violence within the household)

Some level of emotional abuse of emotional abuse is present in all forms of maltreatment, but it can occur alone.

Definition of Adult Abuse

The Care Act 2014 defines safeguarding duties apply to an adult who:

- Has needs for care and support (whether the Local Authority is meeting any of those needs) and
- Is experiencing, or at risk of, abuse or neglect and
- 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

The categories of abuse when it comes to Adults at Risk are listed below:

Physical Abuse

Pain or physical injury caused deliberately or through lack of care (this can also include misuse of medication).

Sexual Abuse

Direct or indirect involvement in sexual activity without consent (the adult at risk may not have the capacity to give consent). This also includes sexual exploitation.

Emotional/Psychological Abuse

- Denial of basic human rights including choice, opinion, and privacy, including the right not to be treated in an inhumane or degrading way
- Threats, fears, or bribes to negate a vulnerable adult's choice, independence, wishes and self-esteem
- Threats of harm or abandonment, humiliation, coercion, blaming, intimidation, harassment
- Cyber bullying
- Isolation or unreasonable and unjustified withdrawal of services or supportive networks

Financial or Material Abuse

- Inappropriate use of resources or funds by a third party
- Theft, fraud, internet scamming, postal scams, doorstep crime, exploitation, or pressure in connection with wills, property, inheritance or financial transactions
- Misuse of or misappropriation of property, possessions, or benefits

Neglect and Acts of Omission

- Not providing care, or acting in a manner than no reasonable person would act
- Deprivation of help to perform activities of daily living
- Failure to keep the adult at risk clean, warm and in good health
- Ignoring medical or physical care needs
- Failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the capacity to assess risk for themselves

Discriminatory Abuse

- Unequal treatment of a person due to race, age, disability, sexual orientation, gender reassignment, marriage and civil partnership status, pregnancy and childbirth and religion
- Failure to take account of the person's religious or cultural needs
- Excluding a person from activities on the basis that they are 'not liked'

Discriminatory abuse is linked to all the other forms of abuse

Organisational Abuse

- Neglect and poor professional practice
- Abuse or mistreatment may be due to an omission (failure to act) or commission (organisational) and could include
- Lack of choice, stimulation, or supervision for service users/residents
- Denial of privacy
- Routines to meet the needs of the organization, not the person
- A lack of respect of a person's human rights

Modern Slavery

- Slavery, servitude and forced or compulsory labour
- A person being forced to work – through mental or physical threat
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or has restrictions placed on his/her freedom of movement
- Human trafficking

Domestic Abuse

The definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behavior, violence, or abuse between those aged 16 or over who are, or who have been, intimate partners or family members. (See separate section of this guidance for further information relating to domestic abuse).

Self-Neglect

This covers a wide range of behaviours to care for one's personal hygiene, health, or surroundings
Includes behaviour such as hoarding

Domestic Violence and Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial/economic
- emotional

Domestic Abuse is a pattern of behaviour, through which one partner gains power and control over another. Perpetrators frequently use 'brain-washing' tactics, like those used on prisoners of war and hostages. The abuse has a psychological effect and victims may stay in the relationship, even when they are aware that it is abusive.

Domestic abuse can be any of (or a combination of) the following:

Controlling behaviour - Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour - Coercive behaviour 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 their victim.

- Threats of physical violence even though no actual physical force
- Physical violence (such as shoving, hitting, kicking, head-butting, burning, choking etc.).
- Being forced to have sex.
- Mental/emotional/psychological cruelty such as name calling, isolation from family and friends, deprivation of family income, being prevented from leaving the home, damage to pets or other personal items.
- Using and abusing children in various ways to frighten or force compliance.
- Forced marriage.
- Female genital mutilation and 'honour-based' violence.
- Elder abuse when committed within the family or by an intimate partner.

Warning signs – there are some signs of domestic abuse which housing colleagues should be alert to, these could be:

- Repeat minor repairs
- Holes punched in doors
- Broken photo frames
- Broken door locks
- Shouting/speaking over someone on the phone
- Reports from neighbours – arguing/fighting
- Presenting with bruising/injuries
- Rehousing requests

Domestic abuse alerts must be raised in a specific way to ensure the correct support can be offered to victims. A special assessment is used and colleagues across the business have been trained to complete these. The assessment is the 'DASH' risk assessment (which stands for the Domestic Abuse, Stalking and Honour Based Violence).

Any concerns relating to domestic violence or abuse should be reported to your DSO or Line Manager. FCHO also have Domestic Violence Champions who can also offer advice and support.

Local Strategies

Oldham Adults Safeguarding Board

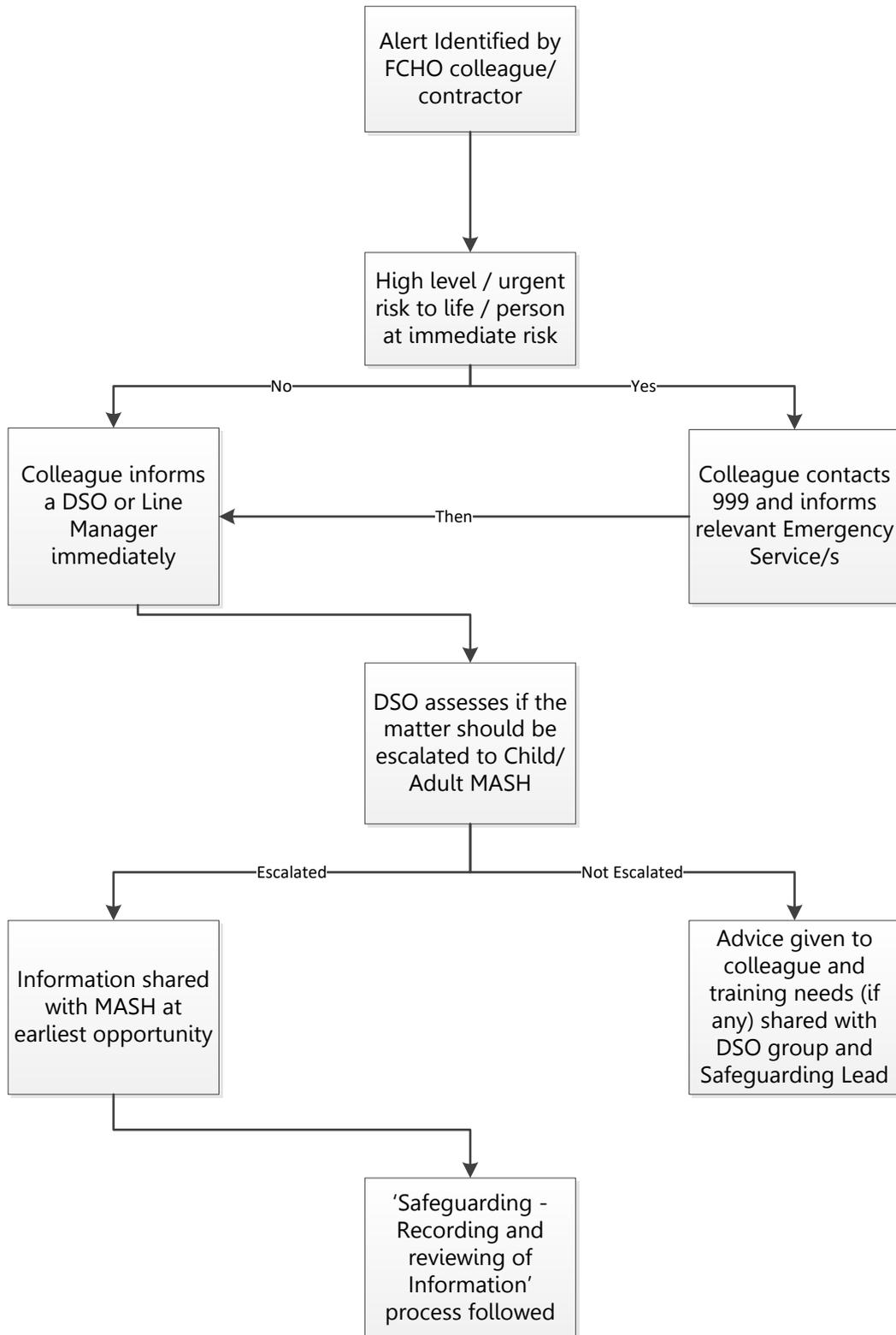
Oldham Safeguarding Adults Board is a partnership of organisations whose aim is to safeguard adults who are vulnerable to, at risk of or are experiencing abuse and neglect.

As a statutory body the primary role of Oldham Safeguarding Adults Board is to strategically lead adult safeguarding within Oldham. The board is also required to assure itself that organisations and agencies across Oldham are effectively ensuring the safety and promoting the interests of adults who are vulnerable to abuse and neglect.

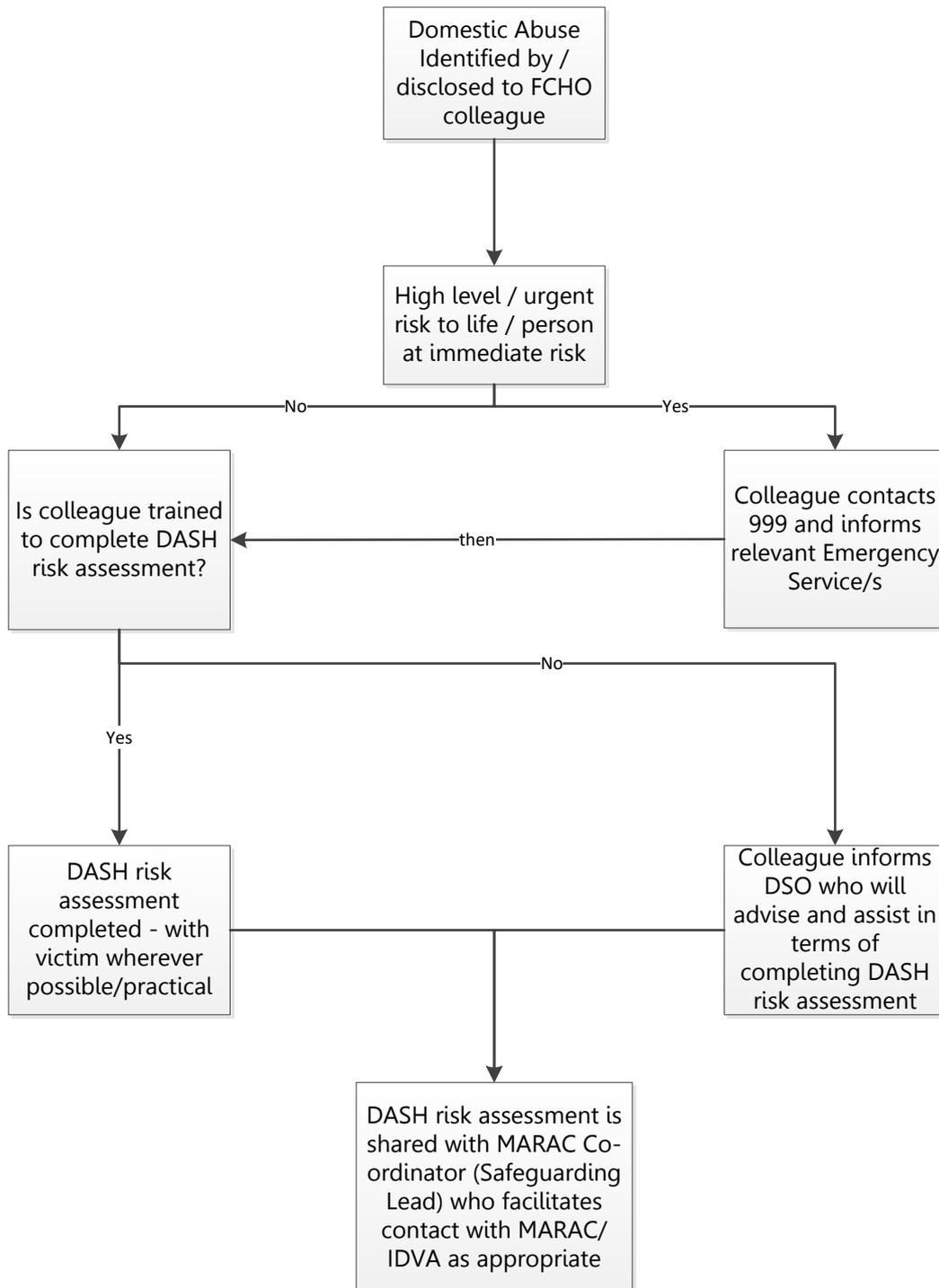
Oldham Strategic Safeguarding Partnership

The Oldham Strategic Safeguarding Partnership has been developed by Oldham Council, Greater Manchester Police, and the Oldham Clinical Commissioning Group to ensure that all children and young people in the area get the safeguarding and protection they need to help them to thrive. The partnership will provide leadership and accountability for the promotion of children and young peoples' well-being and the prevention and protection from harm. The partnership will promote a child-centred approach to safeguarding, listening to children, empowering families and, where needed, providing services that are professional, evidenced-based, and effective. The partners will continuously strive to improve and challenge each other to learn the lessons from daily practice.

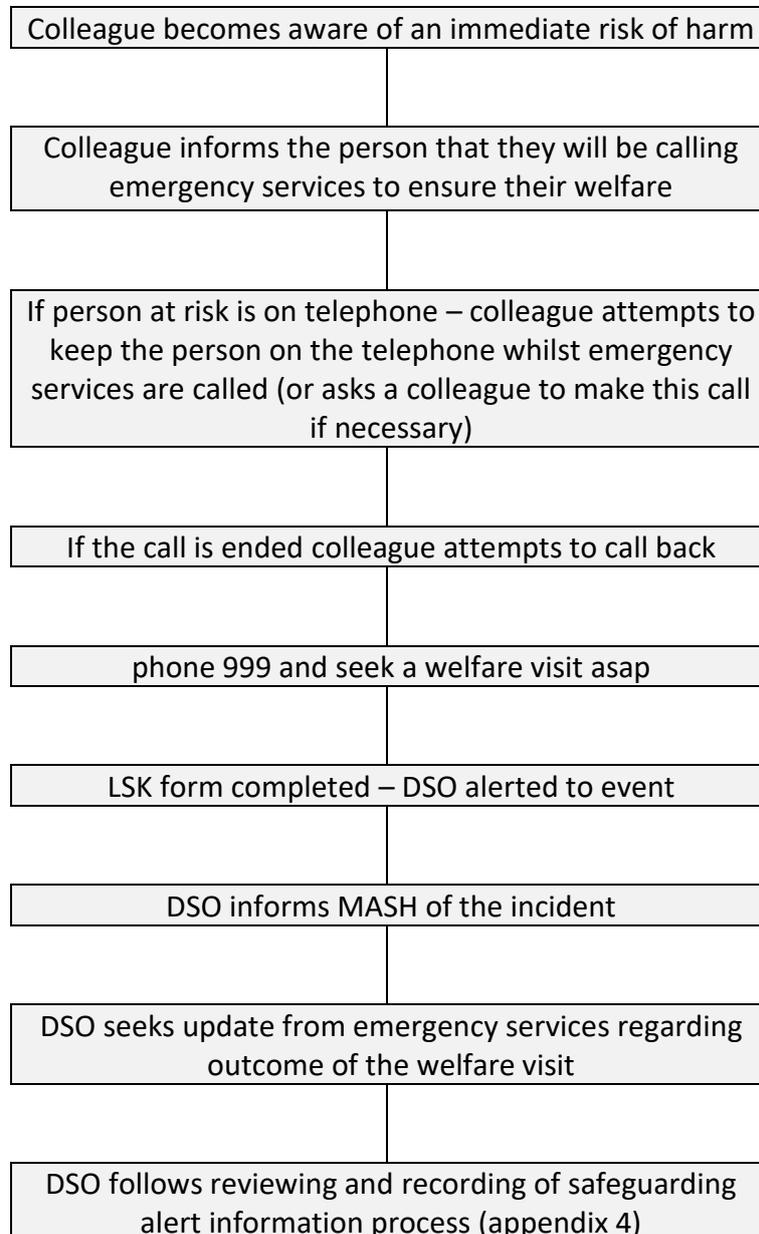
Appendix 2 - Safeguarding concern identified by colleague



Appendix 3 - Domestic abuse concern identified by colleague



Appendix 4 – Threats of Suicide / Self-Harm, or where an immediate risk of harm/to life is identified. Colleague Process



Appendix 5 – Reviewing and recording of safeguarding alert information for FCHO Designated Safeguarding Officers

