

# Safeguarding Children & Adults At Risk Policy

<b>1.</b>	<b>Policy objectives</b>
1.1	To protect children and adults at risk of abuse or neglect through appropriate awareness and application of this Policy and its associated Procedures by all staff (including temporary staff and staff working in our hubs and communities), Group Board and Committee members, volunteers and contractors who come into contact with Watford Community Housing's ("WCH") customers (i.e. tenants, residents and service users) and children who live in, visit our properties or use our services.
1.2	This Policy relates to concerns raised which may warrant a formal Safeguarding referral, either raised by an internal WCH staff member or by an external agency. This Policy and its Procedure (Appendix 1) should be read in conjunction with the Concerns Procedure (Appendix 1.4 of the Safeguarding Procedure).
<b>2.</b>	<b>Roles &amp; Responsibilities</b>
2.1	<p>The Assistant Director of Customers &amp; Communities is WCH's Executive Safeguarding Champion. They have overall responsibility for maintaining an appropriate safeguarding approach across the organisation. Specifically, their role is to: -</p> <ul style="list-style-type: none"> <li>- Maintain our commitment to safeguarding as a key corporate concern;</li> <li>- Ensure we commit appropriate resources to recognising and responding to safeguarding concerns and risks;</li> <li>- Oversee the induction and training of staff;</li> <li>- Act as a source of support, advice and expertise to staff on complex cases;</li> <li>- Ensure all members of staff understand the Safeguarding Policy and Procedure and the requirements and expectations they impose;</li> <li>- Ensure all contractors working for or on our behalf are aware of the Safeguarding Policy and Procedure and the requirements and expectations they impose;</li> <li>- Address and implement any lessons learned through internal case reviews at the conclusion of all safeguarding cases; and</li> <li>- Ensure the Safeguarding Policy and Procedure is reviewed annually and earlier where specific issues require.</li> </ul>
2.2	<p>For Safeguarding cases we have specific Case Handlers in the form of: All Housing Officers, Temporary Accommodation Officers and our Community Support Officer. They have responsibility for:</p> <ul style="list-style-type: none"> <li>- Reporting and managing concern cases assigned to them;</li> <li>- Ensuring Safeguarding referrals are raised to the appropriate agencies; and</li> </ul>



	<p>2. <b>Protection:</b> providing support and representation for those in greatest need;</p> <p>3. <b>Prevention:</b> proactively preventing safeguarding concerns from developing in the first place;</p> <p>4. <b>Proportionality:</b> utilising preventative measures to respond to a safeguarding issue in the most unobtrusive way possible;</p> <p>5. <b>Partnerships:</b> co-operating with local services to help prevent, detect, and report suspected safeguarding concerns; and</p> <p>6. <b>Accountability:</b> taking responsibility for and being transparent about the safeguarding practices used to support vulnerable adults.</p>
3.2	<u>Regulatory</u>
3.2.1	<p>RSH Tenant Involvement &amp; Empowerment Standard 2017 (Para 1.3)</p> <p>‘1.3 Understanding and responding to the diverse needs of tenants</p> <p>1.3.1 Registered providers shall:</p> <ol style="list-style-type: none"> <li>Treat all tenants with fairness and respect</li> <li>Demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.’</li> </ol>
4.	<b>Scope</b>
4.1	All children and adults at risk have the right to protection from abuse and neglect whatever their age, gender/gender identity, racial/ethnic origin, language, sexual orientation, religion or health status.
4.2	This Policy applies to the Watford Community Housing Group, including its subsidiary and joint venture companies. The Policy and its associated Procedures cover all customers who use our services and all children who live in or visit our properties and Joint Ventures.
4.3	The Policy and Procedure must be adhered to by all staff (including temporary staff), Group Board members, volunteers and contractors working for us.
4.4	Staff and contractors are expected to behave towards our customers, in a way which maintains strong professional boundaries and demonstrates their commitment to this Policy and Procedure. All our contractors will be required to read and sign the Policy and the Procedure in agreement with and commitment to our approach and ensure that all members of their staff carrying out work for us do the same, with additional training on its practical application as necessary. The WCH Category Manager relevant to the contract in question will be responsible for working with contractors on these matters.
4.5	Failure to adhere to this Policy and Procedure could result in disciplinary action being taken following our Conduct Policy and a statutory bar from working with children or adults at risk and/or the termination of relevant contracts.
4.6	The Safeguarding Policy and Procedure aims to provide comprehensive guidance where it is known or suspected that abuse or neglect of a child or adult at risk is taking place or is likely to do so.

5.	Definitions
5.1	<p><b><u>Concern:</u></b></p> <p>A Concern relates to all cases where it is suspected or known that an adult or child is at risk. All Concerns must be reported using the relevant “Concerns Procedure” (Appendix 1.4 of the Safeguarding Procedure). All Concerns will be logged onto CAS in Orchard and investigated by one of our recognised Case Handlers defined at 2.2 above. Investigation of a concern may highlight the need for a formal safeguarding referral, or that a formal safeguarding referral already exists. This would escalate the case to a Safeguarding concern and the Safeguarding Procedure at Appendix 1 should be followed accordingly.</p>
5.2	<p><b><u>Safeguarding:</u></b></p> <p>A Safeguarding case are cases which have resulted in a Safeguarding referral. This could be completed by any WCH staff member, Volunteer, Contractor or external agency e.g. the Police, Local authority, and/or Social Services.</p>
5.3	<p><b><u>Adult At Risk</u></b> (Care Act 2014)</p> <p>An individual aged 18/above with care and support needs who’s experiencing, or at risk of experiencing, abuse or neglect which, due to their care and support needs, means they’re unable to protect themselves from that abuse or neglect i.e. they lack the capacity to protect themselves from abuse. ‘Care and support needs’ in this context are needs arising from or related to a physical or mental impairment/illness.</p> <p>The extent to which a person is at risk will be determined by a range of factors including their personal characteristics (mental capacity, ability to communicate, degree of physical dependence etc) and their situation (the extent of any support network around them, their access to help and information etc).</p>
5.4	<p><b><u>Child/Children</u></b></p> <p>Anyone who has not yet reached their 18<sup>th</sup> birthday (including unborn children) and children who may be living independently, in further education, in the armed forces, in hospital or in custody. Children can be abused in a family, institutional or community setting by a person or another child, a person known to them or (more rarely) a stranger.</p>
5.5	<p><b><u>Female Genital Mutilation (FGM)</u></b></p> <p>A procedure (other than an operation) involving the partial or total removal of the external female genitalia or injury to the female genital organs whether for cultural or other non-therapeutic reasons. FGM and the taking by a UK resident / national of a girl abroad (or assisting others to do so) are criminal offences under the Female Genital Mutilation Act 2003.</p>
5.6	<p><b><u>Forced Marriage</u></b></p> <p>The arrangement of a marriage without the consent of one or both parties. Some element of (physical or psychological) duress is also involved. Forced Marriage is distinct from arranged marriage where both parties are free to choose whether to accept the arrangement.</p>

5.7	<p><b><u>“Honour-Based” Violence</u></b></p> <p>An incident/crime that may have been committed to protect or defend the “honour” of a family or community. It’s often linked to family members or acquaintances mistakenly believing someone has brought “shame” on their family or community by offending their traditional cultural beliefs.</p>
5.8	<p><b>Abuse</b></p> <p>The violation of a person’s civil or human rights by another person. Abuse may be just one act / omission or a series of them. It can occur in any relationship and can lead to significant harm to/exploitation of the victim. It can take any one of the following forms, or a combination of them: -</p> <p>5.8.1 <b><u>Types of Abuse (with non-exhaustive examples)</u></b></p> <p><u>Physical abuse</u>: includes hitting, slapping, shaking, throwing, kicking, poisoning, burning, drowning/suffocation, rough or inappropriate handling, medical mistreatment and physical confinement. It also includes Female Genital Mutilation and “Honour-Based” Violence.</p> <p><u>Domestic abuse</u>: includes any incident/pattern of incidents of controlling, coercive, threatening behaviour or violence or other form of abuse between people aged 16/above who are/have been intimate partners or are family members.</p> <p>A new criminal offence of coercive and controlling behaviour in intimate and familial relationships was introduced under the Serious Crime Act 2015. “Honour-Based” Violence can also manifest itself as domestic abuse.</p> <p>Our Domestic Abuse Policy &amp; Procedure available on Grapevine should be referred to in any case of domestic abuse coming to our attention.</p> <p><u>Sexual abuse</u>: includes inappropriate touching (including over clothing) or sexual acts to which the person has not consented or could not understand; rape and sexual assault; indecent exposure, voyeurism and exposure to pornography.</p> <p><u>Psychological/emotional abuse</u>: includes threats of harm, intimidation, harassment, verbal abuse, cyber abuse, enforced isolation/deprivation of contact, control/coercion and denial of basic human rights such as the right to privacy and dignity. Psychological/emotional abuse can accompany Forced Marriage and “Honour-Based” Violence.</p> <p>In the case of a child, psychological/emotional abuse can manifest in making a child feel worthless, inadequate or unloved, threatening their abandonment, setting unreasonable standards/demands, deliberating silencing and ridiculing them. It can cause severe and enduring negative effects on their emotional development.</p> <p><u>Discriminatory abuse/hate crime</u>: verbal harassment, prejudice towards a person’s age, gender, gender identity, disability, race/ethnicity, colour, sexual or religious orientation. Discrimination can also be behind other forms of abuse.</p> <p><u>Financial or material abuse</u>: includes theft, fraud, internet scamming, coercion over a person’s property, inheritance, financial transactions, possessions &amp; benefits. Can occur in isolation but often combines with other forms of abuse. This may</p>

	<p>include an individual who has been ‘cuckooed’. Cuckooing involves gangs which use violence and abuse to target the homes of vulnerable people and use them as bases for drug dealing.</p> <p><u>Neglect</u>: includes ignoring medical, emotional or physical care needs; denying access to health, care, support or educational services; withholding key necessities such as medication, heating and nutrition.</p> <p><u>Self-neglect</u>: covers a wide range of behaviour including neglect for one’s personal hygiene, health or surroundings. Hoarding is a specific example (and dealt with under our Hoarding Policy available on Grapevine). Self-neglect will become a safeguarding issue when the person is unable to protect themselves by controlling their behaviour, necessitating additional support.</p> <p><u>Modern Slavery</u>: includes slavery, human trafficking, forced labour and domestic servitude.</p> <p><u>Child Sexual Exploitation (CSE)</u>: involves exploitative situations, contexts &amp; relationships where a child (or possibly other person) receives “something” (e.g. food, accommodation, drugs/alcohol, cigarettes, affection, money or gifts) for performing (or others performing on them) sexual activity.</p> <p>CSE can occur through the use of technology without the child’s immediate awareness. The exploiter has power over the child by virtue of their age, gender, intellect, mental capacity, physical strength, economic or other resources.</p>
<b>6.</b>	<b>Safeguarding Principles</b>
6.1	We recognise that, in providing our services, those working for or on our behalf may come into contact with children or adults at risk of abuse or neglect. An increasing number of customers in general needs housing are, for instance, older, disabled, with long-term limiting health conditions or dependencies that increase their vulnerability. People can however become vulnerable at any point in their life for any reason.
6.2	The responsibility to be aware of and vigilant about the risk of harm to children and adults at risk lies with <b>everyone</b> (including our contractors) coming into contact with children or adults at risk through their work for us. This is a statutory duty upon us as a housing provider under the Care Act 2014.
6.3	Swift and appropriate action must be taken <b>to act on concerns</b> in all cases where abuse or neglect is known or suspected, irrespective of who the perpetrator(s) may be in order to protect the individual concerned from harm or further harm. See the Safeguarding Procedure at Appendix 1.
6.4	We will ensure that publications or communications containing photos or videos of children or adults at risk will only be produced with the express written consent of the child’s responsible adult or, in the case of an adult at risk, them or their advocate. Children and adults at risk will never be portrayed in an inappropriate way. Personal information will not be displayed which identifies their whereabouts.
<b>7.</b>	<b>Customer Profiling</b>
7.1	We will use a ‘VULNBL’ UDC marker to identify to our staff/contractors a customer or child considered to be vulnerable e.g. on account of their age, mental and/or

	physical health, care or support needs, history (including in relation to domestic abuse/ASB) community or family situation.
7.2	The marker will be applied as soon as the person is considered to be vulnerable, whether at the initial sign-up stage or thereafter. See also section 4.3 of the Safeguarding Procedure at Appendix 1.
7.3	The use of UDC markers such as this is governed by the Person UDC Policy and Procedure, which should be followed whenever Person UDCs are used. See Appendix 2 of our Data Protection Policy for further guidance.
<b>8.</b>	<b>GDPR</b>
8.1	Effective information sharing underpins integrated working and is a vital element of both early intervention and safeguarding. This means that our associated Safeguarding and Concern Procedures often involves the processing of special category personal data.
8.2	<p>Due to the sensitivity of the personal data being shared within safeguarding cases, it is imperative that all staff, volunteers, and contractors confidently adhere to our relevant Data Protection Policy and Data Sharing Policy and Procedures. Please remember to:</p> <ul style="list-style-type: none"> <li>• Share information securely through secure means (Mimecast, a secure link or a password protected document);</li> <li>• Comply with the principle of data minimisation by only sharing data that is relevant and necessary;</li> <li>• Ensure any documents relating to safeguarding are saved in a secure location and in accordance with its set retention period (refer to the Personal Data Retention Policy for more information);</li> <li>• Before sharing any personal data externally with partner agencies, contractors or suppliers, ensure a data protection sharing agreement is in place and they have undergone our due diligence process;</li> <li>• Contact your Data Champions or our Data Protection Officer where you have any data protection queries.</li> </ul>
<b>9</b>	<b>Recruitment</b>
9.1	All members of staff and volunteers having regular contact with children or adults at risk will undergo an enhanced Disclosure & Barring Service check on their recruitment and every 3 years thereafter. The Human Resources team retains a list of affected roles which should be consulted where necessary.
<b>10.</b>	<b>Staff Training</b>
10.1	We will provide all staff with mandatory role-appropriate training in good safeguarding practice and prevention including the six principles of: empowerment, prevention, proportionality, protection, partnership and accountability. Training will take place every <b>two years</b> as a minimum. This will be documented in the organisation's Training Plan overseen by the HR team.
10.2	Managers will be alerted as to when their staff need to attend introductory or refresher training for their role.
10.3	On occasions E-learning topics around safeguarding will be compulsory for all staff e.g. Modern Slavery e-learning.



<b>11.</b>	<b>Wider Partnership with Agencies</b>
11.1	Alongside our duty to refer safeguarding concerns, we also have a duty to share information and generally co-operate with the Local Authority in assisting the Local Authority to meet its own safeguarding duties. This may involve sharing information about a child or adult at risk with the Local Authority.
11.2	In all cases, an applicable information sharing protocol will be followed and where possible the consent of the individual (or their responsible adult/advocate) will be obtained in accordance with the UK General Data Protection Regulation and Data Protection Act 2018. Information may need to be shared without consent where it is necessary to protect a person's vital interests or those of a third party or where it is necessary for the prevention or detection of a crime. Our Data Protection Policy found on Grapevine gives further information and guidance in this area.
<b>12.</b>	<b>Supporting Staff</b>
12.1	We offer access to an Employee Assistance Programme (EAP) for staff members affected by a safeguarding (or any other) issue to receive confidential, specialist (telephone or face to face) counselling as a means of support. The service is available 24 hours a day all year-round. Individuals can access this directly themselves or through their line manager.
<b>13.</b>	<b>Internal Case Review</b>
13.1	At the end of any safeguarding case we deal with, the Head of Housing will review the case with the HOM and all staff members involved to assess whether lessons can be adopted to ensure our methods could be improved on future safeguarding cases. This process will also be followed when an external serious case review involving the group has been completed by the local authority or Hertfordshire County Council.
13.2	Where additional training is required this will be arranged in early course and outcomes monitored by the Assistant Director of Customers & Communities as part of the Operations risk map to ensure all relevant objectives are met.
<b>14.</b>	<b>Equality &amp; Diversity Considerations</b>
14.1	We are committed to fairness and equality for all and will not discriminate against any person in its application of this Policy and Procedure by reason of their age, gender/gender identity, racial/ethnic origin, language, sexual orientation, religion or health status.
<b>15.</b>	<b>Related documents</b>
	<p>Watford Community Housing Safeguarding Register</p> <p>Person UDC Policy &amp; Procedure</p> <p>Anti-Social Behaviour Policy &amp; Procedure</p> <p>Harassment &amp; Hate Crime Policy &amp; Procedure</p> <p>Domestic Abuse Policy &amp; Procedure</p> <p>Whistleblowing Policy</p> <p>Recruitment Policy</p> <p>Hoarding Policy &amp; Procedure</p> <p>Subject Access Request Policy &amp; Procedure</p> <p>Data Protection Policy &amp; Person</p> <p>Talent Development Policy</p> <p>Conduct Policy &amp; Procedure</p> <p>Personal Data Retention Policy</p>
<b>16.</b>	<b>Policy Monitoring</b>



16.1	Concerns recorded under the Safeguarding Policy and Procedure and their progress/outcome, will be reported on quarterly to the Customer Experience Committee. The Assistant Director of Customers & Communities will consider any necessary changes or improvements to this Procedure or the Safeguarding Policy accordingly.
<b>17.</b>	<b>Appendices</b>
	Appendix 1 – Safeguarding Procedure
<b>18.</b>	<b>Approval</b>
	Approved by : EMT
	: GMT
	Review date : April 2022
	Next review date: April 2024
	Policy owner : Head of Housing

## Safeguarding Children & Adults At Risk Procedure

<b>1.</b>	<b>Purpose of Procedure</b>
1.1	This Procedure forms part of our Safeguarding Children and Adults At Risk Policy ("the Safeguarding Policy") and should be considered in conjunction with the Concerns Procedure at Appendix 1.4.
1.2	This Procedure aims to provide comprehensive guidance where it is known or suspected that abuse or neglect of a child or adult at risk is taking place or is likely to do so.
1.3	Swift and appropriate action must be taken in all cases where abuse or neglect is known or suspected, irrespective of who the perpetrator(s) may be in order to protect the individual concerned from harm or further harm.
1.4	Like the Policy, this Procedure must be read, understood and followed, by all staff (including temporary staff and staff working in our hubs and communities), Group Board members, volunteers and contractors who come into contact in the course of their work with our customers and children who live in, visit our properties or use our services. Obligations upon contractors are further detailed at section 3 below.
1.5	Failure to adhere to the Safeguarding Policy or this Procedure could result in disciplinary action being taken, a statutory bar from working with children or adults at risk and/or the termination of relevant contracts.
<b>2.</b>	<b>Scope</b>
2.1	<u>Scope</u>
2.1.1	All children and adults at risk have the right to protection from abuse and neglect whatever their age, gender/gender identity, racial/ethnic origin, language, sexual orientation, religion or health status.
2.1.2	Like the Safeguarding Policy, this Procedure covers all customers who use our services and all children who live in or visit our properties and Joint Ventures.
<b>3.</b>	<b>Contractors' Responsibilities</b>
3.1	Like all our staff, contractors working for or on behalf of WCH are expected to behave towards our customers in a way which maintains strong professional boundaries and demonstrates their commitment to the Safeguarding Policy and this Procedure.

3.2	All our contractors will be required to read and sign the Policy and Procedure in agreement with and commitment to our approach and ensure that all members of their staff carrying out work for us do the same, with additional training on its practical application as necessary. The WCH Category Manager relevant to the contract in question will be responsible for working with contractors on these matters.
<b>4.</b>	<b>Reporting and Recording Incidents</b>
4.1	Recognising abuse can be difficult; it's not the responsibility of those working for us to <i>investigate or evidence</i> abuse or neglect of a child or adult at risk. The responsibility is to <i>act on</i> concerns by reporting them to the appropriate lead agencies and to then work in partnership with those agencies in safeguarding the individual concerned under a specific action plan.
4.2	We will take seriously any matter raised in good faith by a member of staff and take steps to protect those making a report from any form of reprisal in accordance with our Whistleblowing Policy. An isolated concern may appear insignificant but fit into a wider pattern of behaviour, so should still be properly addressed under the Procedure.
4.3	<b><u>Step 1 - Reporting Procedure</u></b>
4.3.1	All Safeguarding Concerns should be reported using our "Concerns Procedure" at Appendix 1.4.
4.3.2	The concern(s) should be reported by email via secure means to the <b>Concern</b> Inbox (" <a href="mailto:Concern@wcht.org.uk">Concern@wcht.org.uk</a> "). The Concern email group consists of: - <ul style="list-style-type: none"> <li>- Assistant Director of Customer &amp; Communities;</li> <li>- the Safeguarding Leads referred to at section 2.4 of the "Safeguarding Policy".</li> </ul>
4.3.3	Any concern should be reported to the Safeguarding Leads as soon as possible and in all cases within <b>one working day</b> of the concern coming to light. The Concerns inbox should be made aware of <b>all</b> cases, including those where a Safeguarding referral may already have been completed.
4.3.4	Once made aware, the Community Safety Co-ordinator or relevant Safeguarding Lead will log the case as a Concern on CAS using the User guide at Appendix 1.5.
4.4	<b><u>Step 2 - Managing a Safeguarding Case</u></b>
4.4.1	Once logged, the Case Handler will be assigned to the case. All Concern cases will have an action plan and the Case Handler will need to meet these deadlines accordingly.
4.4.2	When managing the case, if the Concern warrants a formal safeguarding referral, this <u>must</u> be logged as 'Escalated to Formal Safeguarding' within the 'Events' tab on CAS, and the following Safeguarding Children and Adults at Risk Procedure should be applied accordingly.
4.4.3	Please refer to the Managing a Concern case on CAS User Guide at Appendix 1.6 for further guidance.
4.5	<b><u>Step 3– Considering Consent</u></b>

4.5.1	The issue of the victim's consent to us making an external referral should be considered and a decision taken by the Service Safeguarding Lead and/or the Housing Operations Manager with the Head of Housing whether consent should or should not be sought.
4.5.2	<p>Where the concern relates to an <u>adult at risk</u>, their consent should be obtained before making a referral unless:</p> <ul style="list-style-type: none"> <li>• They are considered to lack mental capacity – see section 6 for further guidance;</li> <li>• Their refusal presents risk to others;</li> <li>• The alleged perpetrator has care or support needs themselves;</li> <li>• Sharing the information could prevent a crime; or</li> <li>• Coercion is involved.</li> </ul>
4.5.3	They should always be informed why we are making an external referral, to whom and what information will be shared.
4.5.4	Where the concern relates to a <u>child</u> who lacks capacity to consent, we should obtain the consent of the person with parental responsibility ("PR") (or the main parental responsibility) for them, taking the child's views into account where possible. We may decide to share information without consent of either the child or person with PR where seeking or obtaining it would cause an unreasonable delay or prejudice the child's safety or wellbeing.
4.5.5	If consent has been sought, that fact and the outcome should be recorded by the Case Handler in the CAS case on Orchard. For example, the Case Handler will add as an Event in CAS: 'Adult safeguarding referral made'. The Case Handler will then include the appropriate details for who gave consent in the notes section.
4.5.6	If consent has not been sought, that fact and the reason(s) why should also be recorded by the Case Handler on the form(s) completed under Step 4 below. Additionally, this should be added as an 'Event' in CAS.
4.6	<b><u>Step 4 - External Reporting</u></b>
4.6.1	<p>The concern should be reported by the Case Handler via one of the following avenues: -</p> <ul style="list-style-type: none"> <li>○ The <b>Safeguarding Adults Care Services Portal</b> (at <b>Appendix 1.1</b>) in relation to an adult at risk;</li> <li>○ Completing a <b>Child Protection Contact Form</b> (at <b>Appendix 1.2</b>) in relation to a child; or</li> <li>○ Completing a <b>Mental Health Referral Form</b> (at <b>Appendix 1.8</b>) in relation to concerns for the individual's mental health.</li> </ul>
4.6.2	<p>Where the alleged perpetrator is a member of our staff, Board Member or a contractor and the matter concerns a child:</p> <ul style="list-style-type: none"> <li>○ a <b>LADO Referral Form</b> (at <b>Appendix 1.3</b>) should be completed as well as the Child Protection Referral Form. This form must be submitted before the alleged perpetrator is informed of the concern/allegation.</li> <li>○ The HR team will be informed to investigate whether any further action is necessary.</li> </ul>

4.6.3	<p>The form(s) completed above should be sent to the relevant lead agency using their preferred method: -</p> <ul style="list-style-type: none"> <li>Adults Care Services and Children Services referral's should be sent securely via the associated <b>Portal</b>.</li> <li>Mental Health Services request the referral is sent by email to: <a href="mailto:HPFT.SPA@nhs.net">HPFT.SPA@nhs.net</a>. This should be sent via secure means, i.e., through a password protected document.</li> </ul>
4.6.4	<p>In addition to the above, the Case Handler should also notify the Corporate Safeguarding Manager at Watford Borough Council of any Safeguarding referrals made. Please email: <a href="mailto:Glen.Channer@watford.gov.uk">Glen.Channer@watford.gov.uk</a> a copy of the completed form(s). Ensure this is password protected and sent via Mimecast.</p>
4.6.5	<p><b>Response</b></p> <p>A response should be given by the lead agency <u>within 48 hours</u>; if we do not receive a response within this timescale the Case Handler must follow up the referral.</p> <p>Where there is an immediate risk to a child or adult at risk or there's an urgent medical requirement, the emergency services should be contacted on 999.</p> <p>If a concern arises which suggests a criminal offence has/may have been committed, the Police should be informed.</p> <p>All responses and updates for the case should be sent to the Concerns Inbox (<a href="mailto:Concern@wcht.org.uk">Concern@wcht.org.uk</a>) the same day, and CAS is to be updated accordingly.</p>
4.7	<p><b><u>Step 5 - Internal recording</u></b></p>
4.7.1	<p>The Case Handler should record all information relating to the case in CAS.</p>
4.7.2	<p>All completed forms should be stored by the Case Handler in N/Safeguarding/[<i>street/block name, flat/house number and Child/Adult at Risk's initials</i>]. Access to the N/Safeguarding folder is restricted to the Assistant Director of Customers &amp; Communities and Safeguarding Leads to keep information appropriately secure and confidential.</p>
4.7.3	<p>Information recorded on referral forms and otherwise should be clear, comprehensive and factual. It is likely to be disclosable to those it concerns under our Subject Access Request Policy &amp; Procedure available on Grapevine.</p>
4.8	<p><b><u>Step 6 – Updating the Notes</u></b></p>
4.8.1	<p>The Case Handler should record the following <b>restricted information</b> about the concern(s) in the customer's Notes on Orchard:</p> <p style="text-align: center;"><u>"CONCERN – Adult"</u> <u>"CONCERN – Child"</u></p>
4.8.2	<p>The purpose is to make staff/contractors visiting the customer/property broadly aware of the basis of a pre-existing issue concerning the household so that they remain vigilant in identifying any further concern(s) without having "unnecessary" information about those involved under data protection law. Any further concern(s) coming to light would be reported in the same way under Steps 1 – 6 above.</p>

4.8.3	Further information about all concerns and reports is held by the Safeguarding Leads and Assistant Director of Customers & Communities in the <i>N/Safeguarding</i> restricted folder who will share this with our staff/contractors only on a 'need to know' basis.
4.9	<b><u>Step 7 – Adding a UDC Marker</u></b>
4.9.1	The Service Safeguarding Lead <b>must</b> add a 'VULNBL' Person UDC to the victim's Person ID on Orchard following an external safeguarding referral, by following section 8 of the Person UDC Policy and Procedure. This Safeguarding Procedure has not been fully complied with unless and until this happens. The purpose is to enable us to take the customer's needs into account appropriately when in our subsequent dealings with them or in managing the tenancy.
4.9.2	The Service Safeguarding Lead <b>must consider</b> adding a 'VULNBL' Person UDC to the person's Person ID on Orchard following a concern being raised which, by exception, does <u>not</u> result in an external safeguarding referral being made. A decision should be taken based on the nature of the concern(s) and the particular needs and circumstances of the individual concerned.
4.9.3	A 'VULNBL' UDC must be added within <b>two working days</b> of the initial safeguarding concerns being reported at Step 1 above (section 4.3).
4.10	<b><u>Step 8 - Closing a Safeguarding Case</u></b>
4.10.1	Closing a Safeguarding case is different to closing a 'concern' and requires additional authorisation from a weekly housing panel meeting. <ul style="list-style-type: none"> <li>➤ When closing a case, the Case Handler will refer to the closure guidance notes at Appendix 1.7. If satisfied, they will review this decision with their Line Manager at their weekly ASB and Safeguarding meetings.</li> <li>➤ On agreement with their Line Manager, the case will then be raised at the weekly Housing Panel meeting. The Panel will review the actions of the case and 'Events' in CAS and close the case if seen as suitable.</li> </ul>
4.10.2	The Community Safety Co-ordinator may audit some of these closures and will liaise with the relevant Case Handler for further detail into the reasons for closure.
4.11	<b><u>Step 9 - Case Monitoring</u></b>
4.11.1	The Community Safety Co-ordinator will be checking in with each Case Handler regularly for updates on open cases, and to provide further support. The Community Safety Co-ordinator will then present all high-risk cases at a Monthly Safeguarding meeting.
4.11.2	The Assistant Director of Customers & Communities will meet with the Safeguarding Leads to monitor the status and progress of all cases on the Safeguarding Register on a quarterly basis. A case will not be removed before <b>three years</b> from the end of the tenancy of the child/adult at risk concerned.
<b>5</b>	<b>Section 47 and Section 17 requests</b>
5.1	The Concern inbox will receive Section 47 and Section 17 requests from Herts County Council Children's Services. This relates to crucial information sharing for the effective safeguarding of children and young people.

	<ul style="list-style-type: none"> <li>Section 47 – A form used to aid Children’s Safeguarding Services in Child Protection Enquiries under Section 47 of the Children Act 1989. This must be returned <b>within 24 hours</b> of receiving the request.</li> <li>Section 17 – A form used to aid Children’s Safeguarding Services in Child in Need Assessment’s under Section 17 of the Children Act 1989. This must be returned <b>within 48 hours</b> of receiving the request.</li> </ul>
5.2	Both forms ask WCH as the Housing Provider to share information regarding the relevant person(s) tenancy, including whether they are in rent arrears, have any previous ASB history, and other relevant information which could assist with the enquiries.
5.2.1	It is the responsibility of the Community Safety Co-ordinator or those defined at Section 2.4 of the Safeguarding Policy to return the form to social services within the expected timeframes.
5.2.2	Often the Concerns inbox will receive S17’s and S47’s via the Herts County Council’s Secure File Exchange System – “HertSFX”. To access this, the Community Safety Co-ordinator or Area Manager, will need to login using <a href="mailto:Concern@wcht.org.uk">Concern@wcht.org.uk</a> as the username, and associated password. This method allows emails to be returned to Herts County Council (HCC) securely.
5.2.3	S47’s and S17’s which are not sent by HertSFX, should be returned to the relevant contact in a protected Word document, and via Mimecast.
5.3	<b>Closing a S17 and S47</b>
5.3.1	In most cases, a S17 and S47 should be closed the same day that it is completed and returned to Herts County Council. Receiving a S17 and S47 is confirmation that Social Services have taken on the case, and unless there are outstanding actions required from WCH as the Housing Provider, this can be closed internally. S17 and S47 closures do not need to be authorised by the Housing Panel.
5.4	<b>Reporting</b>
5.4.1	S17’s and S47’s must be logged in CAS the same way as all Concern cases. Please refer to the Concerns Procedure at 1.4 for guidance on this.
5.4.2	S17’s and S47’s will be reported as Safeguarding cases.
<b>6</b>	<b>Internal Case Review</b>
6.1	Every month the HOM will hold a review of the cases on the Safeguarding Register with the Safeguarding Leads and all staff members involved in the cases concerned in order to assess whether future approaches could be improved.
6.2	Where additional training is required this will be triggered by Safeguarding Leads and approval sought from the Assistant Director of Customers & Communities to ensure all relevant objectives are met.
6.3	If a case is closed, then it will be reviewed by the Service Safeguarding Leads as to whether the UDC can be removed.
<b>7.</b>	<b>Mental Capacity</b>



7.1	Assessing a person's capacity must be undertaken in accordance with the Mental Capacity Act 2005 and its associated Code of Practice (Mental Capacity Act 2005 Code of Practice). The Act identifies that a person will lack capacity when they lack the ability to make a particular decision or take a particular action for themselves when it needs to be taken. The Act and Code of Practice assumes that a person has capacity to make a decision unless it is established otherwise and that they are supported to help make decisions which are in their "best interests".
<b>8.</b>	<b>Monitoring</b>
8.1	Concerns recorded under the Safeguarding Policy and Procedure, and their progress/outcome, will be reported on quarterly by the Group Director of Operations to the Customer Experience Committee. S/he will consider any necessary changes or improvements to this Procedure or the Safeguarding Policy accordingly.
<b>9.</b>	<b>Appendices</b>
	Appendix 1.1 – Hertfordshire Safeguarding Adults Care Services Portal <a href="https://hcsportal.hertfordshire.gov.uk/web/portal/pages/home">https://hcsportal.hertfordshire.gov.uk/web/portal/pages/home</a> Appendix 1.2 – Hertfordshire Child Protection Referral Form <a href="https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/report-child-protection-concern.aspx">https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/report-child-protection-concern.aspx</a> Appendix 1.3 – Local Authority Designated Officer (LADO) Form Appendix 1.4 – Concerns Procedure Appendix 1.5 – Logging a Concern case on CAS User Guide Appendix 1.6 – Managing a Concern case on CAS User Guide Appendix 1.7 – Closing a Safeguarding case Guidance Notes Appendix 1.8 - Mental Health Referral Form
<b>10.</b>	<b>Approval</b>
	Approved by : Assistant Director of Customers & Communities : EMT : Customer Experience Committee : GMT
	Date of approval : April 2022
	Date of review : April 2024
	Procedure owner: Head of Housing