

# **Cornwall Rural Housing Association Safeguarding Policy**

## **1. Policy Statement**

1.1 Cornwall Rural Housing Association (CRHA) is committed to safeguarding and promoting the welfare of children, young people and adults at risk, ensuring that our customers and their families are able to live safely in their homes and communities.

1.2 This policy supports compliance with the Regulator of Social Housing Consumer Standards, in particular the Safety and Quality Standard, the Neighbourhood and Community Standard, and the Tenancy Standard. Safeguarding is recognised as a core component of tenant safety and service delivery, and CRHA will take all reasonable steps to prevent harm, abuse and neglect.

1.3 This policy is informed by and complies with the following regulatory and legal framework:

- Children Act 1989 and 2004.
- Mental Capacity Act 2005.
- Health and Social Care Act 2008.
- Equality Act 2010.
- Care Act 2014.
- Care Standards Act 2000.
- Modern Slavery Act 2015.
- General Data Protection Regulation (GDPR) 2018.
- Make Safeguarding Personal.
- Deprivation of Liberty Safeguards (DoLs) 2007.
- The Human Rights Act 1998.
- Family Law Act 1996.
- Education Act 2002.
- Anti-Social Behaviour, Crime and Policing Act 2014.
- Sexual Offences Act 2003.
- Female Genital Mutilation Act 2003.
- Domestic Violence Crime and Victims Act 2004.
- Homelessness Act 2002.
- Regulator of Social Housing Consumer Standards
- Awaab's Law

## **2. Purpose and Scope**

2.1 As a social landlord, we have a responsibility to keep our customers safe from harm. This policy sets out Cornwall Rural Housing Association's (CRHA) approach to safeguarding children, young people and adults who are suspected of or being abused or neglected or are at risk of being abused or neglected.

2.2 The Care Act 2014 places a duty on partner agencies to co-operate with the local authority by sharing information if they reasonably suspect a child, young person or adult meets the criteria for safeguarding and has been, is or at risk of being neglected or abused and is unable to protect themselves.

2.3 The objectives of this policy are to:

- Clearly outline what constitutes abuse, neglect and harm
- Ensure we fulfil our legal obligations to report safeguarding concerns to the relevant authorities
- Support local authorities with their statutory duties relating to safeguarding.

2.4 CRHA considers the abuse of anyone to be wholly unacceptable and fully recognises the harmful effect that abuse has, not just on the victim but also their families and the wider community.

2.5 The protection offered by this policy applies to residents living in homes managed or owned by CRHA.

2.6 This policy also applies to all CRHA employees, board members, any contractors and sub-contractors who are providing services to CRHA and its tenants, leaseholders, applicants and household members

2.7 This policy should be read in conjunction with the Safeguarding procedures, Domestic Abuse policy and Antisocial Behaviour policy.

2.8 CRHA recognises that safeguarding concerns may arise from incidents occurring both within and outside the home.

### 3. Definitions

<b>Safeguard</b>	Means protecting a person's right to live in safety, free from abuse and neglect. Working with other organisations, we safeguard our residents by aiming to prevent and stop both the risks and experience of abuse or neglect. Safeguarding applies to children, young people and adults at risk.
<b>A Child</b>	is anyone who is under the age of eighteen.
<b>A Young Person</b>	is a care leaver, a person who is eighteen and over but is still receiving children's services.
<b>An adult at risk</b> (sometimes called a <b>vulnerable adult</b> )	is someone aged eighteen or over who has needs for care and support (whether or not these needs are being met). Safeguarding applies to adults at risk who are unable to protect themselves from experiencing, or the risk of experiencing, abuse as a result of their care and support needs.
<b>Abuse</b>	is the violation of a person's human and/or civil rights by any other person or persons. <a href="#">The Care and Support Statutory Guidance</a> identifies ten main categories of abuse as set out in appendix 1. The Children Act includes definitions specific to child abuse (see appendix 2). We recognise that as understanding of risks evolves, new abuse types may emerge and therefore these categories do not limit our view of what constitutes abuse.
<b>Neglect</b>	is the failure to meet a child, young person or adult at risk's basic needs. The Care and Support Statutory Guidance identifies two categories of neglect (see appendix 1). The Children Act includes definitions specific to child neglect (see appendix 2).
<b>Harm</b>	is physical and/or psychological injury.
<b>"PREVENT"</b> (see Appendix 4)	is 1 of 4 elements to the Government's counter terrorism strategy known as "CONTEST". It aims to safeguard communities from the

	threat of terrorism, including ensuring vulnerable people are not at risk of radicalisation.
<b>“Channel”</b>	is the Government programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.
<b>“Modern Slavery”</b> (see Appendix 5)	is the severe exploitation and complete control of other people for personal or commercial gain. Modern slavery is often out of sight and people become entrapped by another depriving them of their freedom for profit using violence or the threat of violence to maintain control.

#### **4. Reporting a safeguarding concern**

4.1 We view abuse or suspected abuse as extremely serious and are committed to exposing, investigating and addressing issues of abuse or suspected abuse. We recognise that because of the level of contact we have with residents, we are well placed to identify children, young people or vulnerable adults who may be experiencing, or at risk of, abuse.

4.2 All employees are required to report any safeguarding concerns they have as soon as they arise using our agreed procedures. We fully support members of CRHA to report concerns and ensure that their concerns are taken seriously. We report concerns to the local authority via their referral process.

4.3 If we consider that a criminal offence has occurred, or the resident faces an imminent risk, we will notify the police immediately.

4.4 If we have concerns about the immediate health and welfare of a customer or family member in relation to a safeguarding matter, we will notify the emergency services and local authority as soon as possible.

4.5 In addition to the abuse types defined by the Care and Support Statutory Guidance and Children Act, we will respond to any concerns around radicalisation under our safeguarding process. We will have due regard to our responsibilities under “PREVENT” and work with our statutory partners to counter the risk of terrorism.

#### **5. Responding to a safeguarding concern**

5.1 We aim to minimise the potential for abuse to occur and will take immediate action where there is a risk of serious harm.

5.2 We will contact the emergency services where required.

5.3 We will create a supportive and safe environment so that residents feel that they can report suspected abuse either to us or to a relevant agency. Any report or allegation of abuse will be listened to and investigated. As a responsible provider we adopt the six key principles which underpin all adult safeguarding work (see appendix 3).

5.4 We will support and cooperate with local authorities where they have concerns that relate to one of our residents. We will respond to all local authority requests regarding safeguarding (sometimes referred to as Section 42 requests) in a timely manner.

5.5 We will address any suspected abuse or neglect by an employee through formal safeguarding investigation procedures and our own internal disciplinary procedures. In cases being investigated by other agencies, we will agree a designated lead investigator and investigation timetable. Employees should be aware that abuse is a serious matter that can

lead to dismissal and/or criminal prosecution. Where an allegation is upheld and the risk of harm test is satisfied, we will make a referral to the Disclosure and Barring Service.

5.6 We will address any suspected abuse or neglect by contractors or sub-contractors through our formal safeguarding procedures.

5.7 We will record actions and decisions clearly and accurately. Records will be stored securely in line with Data Protection laws.

5.8 Information about safeguarding concerns will be handled sensitively and shared on a need to know basis.

## **6. Making safeguarding personal**

6.1 We will support our customers through the investigation process. We will ensure that an adult's wellbeing is promoted when reporting and responding to safeguarding concerns. We will have regard to their views, wishes, feelings and beliefs in deciding on any action and support them to share their views with other agencies. We recognise that adults at risk can sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

6.2 We recognise that our customers may include both victims and perpetrators. We will, therefore, work in partnership with other agencies to support victims of abuse and address the risks presented by perpetrators. In cases where a perpetrator is a CRHA customer, we will utilise the most appropriate intervention available to manage their behaviour and will work with relevant agencies to provide appropriate support as needed.

6.3 In child safeguarding cases we will work with the family and other agencies as appropriate to produce a holistic solution that best meets the child and/or family's' needs.

## **7. Partnership working**

7.1 Responsibility for safeguarding children, young people and adults at risk is shared amongst several agencies. We recognise the role we have to play in taking all reports of abuse and neglect seriously and that many organisations share our desire to tackle and eradicate abuse. To this end, we work with other organisations to achieve our aims and recognise our legal requirements.

7.2 Local authorities have specific duties to organise and plan services in order to safeguard and promote the welfare of children, young people and adults at risk. They also have expertise in handling cases of abuse, providing support and counselling to victims of abuse, and in assisting the police with any criminal investigations.

7.3 It is the responsibility of local authorities to arrange advocates for any adults who would be deemed in need of this. We do not usually perform this function.

7.4 We recognise the importance of cooperating with the police to help them protect, investigate and deter abuse. We cooperate with local Safeguarding Children Boards and Safeguarding Adults Boards and inform them of any serious concerns.

7.5 We will work with our partners to safeguard vulnerable people who are at risk of radicalisation, in all its forms. If we suspect that a person is being drawn into terrorism, we will make a referral to "Channel", an early intervention multi-agency panel designed to assess the risk to individuals and decide whether intervention is necessary.

## **8. Consent and capacity**

8.1 We will always assume that an adult has the mental capacity to make decisions about their personal safety, unless we have been formally advised otherwise by an appropriate health and/or social care professional or have seen relevant documentation e.g. power of attorney. If we suspect that an adult may not have mental capacity, we will refer them to the appropriate agency for an assessment.

8.2 Safeguarding information will be handled sensitively and shared on a lawful, necessary and proportionate basis. Information will be shared with consent where possible, and without consent where there is a risk of serious harm or safeguarding duties apply. All information sharing will comply with the Data Protection Act 2018, UK GDPR, and relevant safeguarding legislation.

8.3 The following examples illustrate circumstances in which information may be shared without consent:

- There is a need to safeguard a person/people at risk.
- There is a significant risk of harm to self or others.
- The person lacks the mental capacity to make an informed decision about sharing the information.
- We suspect the person has the mental capacity to make that decision but they may be under duress or coerced.
- We suspect a criminal offence has been or will be committed.
- CRHA are implicated in the allegation.
- Some other legal provision requires it, including under a court order.

8.4 Where the issue relates to a child, we do not need to seek consent to make a referral.

## **9. Responsibilities**

9.1 The Chief Executive has overall responsibility for overseeing matters of safeguarding within the organisation and ensuring the Board of Management has effective governance, oversight, training and assurance of safeguarding arrangements.

9.2 All CRHA colleagues are responsible for recognising safeguarding concerns and reporting them promptly.

9.2 CRHA will contribute to developing a culture that encourages their teams to raise concerns and does not tolerate abuse.

9.3 CRHA will listen to and support staff who raise concerns and ensure all staff are familiar with their agreed Safeguarding policy and procedure and organise any necessary training.

9.4 Ensure that no unsanctioned investigations are conducted.

## **10. Safeguarding Lead Officer**

10.1 CRHA's designated Lead Officer for Safeguarding is the Head of Homes and Customers who owns the Safeguarding policy and supporting procedure.

10.2 They will:

- Embed safeguarding practise across CRHA and oversee training on safeguarding
- Ensure that concerns of abuse and/or neglect are reported to the relevant Safeguarding Team and the Care Quality Commission.

- Monitor Duty of Care concerns to identify learning.
- Review individual safeguarding cases, at least annually, to identify any learning for the organisation.
- Report performance in relating to safeguarding referral to CRHA's board of management.

## **11. Training, Assurance and Competence**

11.1 CRHA will ensure:

- Safeguarding training is mandatory and proportionate to role
- Training is refreshed regularly
- Staff understand their responsibilities under safeguarding legislation and the Consumer Standards
- Managers and safeguarding leads receive enhanced training

11.2 CRHA will ensure that its approach to safeguarding performance aligns with and supports the Regulator of Social Housing's requirements for effective governance and continuous improvement. This will be monitored through:

- Management oversight and reporting
- Review of safeguarding cases and outcomes
- Learning from incidents, complaint and regulatory feedback
- Board oversight and assurance reporting

## **12. Review**

12.1 This policy and the associated procedures are reviewed every three years and in accordance with best practice, or sooner in respect of legislative changes.

## **APPENDIX 1 – Types of adult abuse**

The Care Act 2014 Statutory Guidance identifies the following main categories of safeguarding related abuse.

**Physical Abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

**Domestic Violence** – including psychological, physical, sexual, financial, emotional abuse, so called ‘honour’ based violence and SET procedures have expanded this to include controlling behaviour, coercive control, Female Genital Mutilation, forced marriage.

**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, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

**Emotional and Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

**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, or the misuse or misappropriation of property, possessions or benefits.

**Modern Slavery and Exploitation** – 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.

**Discriminatory Abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

**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.

**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.

**Self-neglect** – this covers a wide range of behaviour neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding.

It is important to note that these categories should not limit our view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered. Exploitation, in particular, is a common theme across the types of abuse and neglect listed above.

## APPENDIX 2 – Types of child abuse

HM Government's [Working Together to Safeguard Children \(2023\)](#) defines Safeguarding and promoting the welfare of children as:

- protecting children from maltreatment
- preventing impairment of children's health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

There are four broad categories of abuse which are used by professionals working in child protection. These are: physical abuse, sexual abuse, emotional/psychological abuse and neglect. These categories overlap and a child may suffer more than one type of abuse.

**Physical abuse:** Physical abuse may take many forms, such as, hitting (including, with an object) or punching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child or young person. It may also be caused when a parent or carer fabricates the symptoms of, or deliberately causes ill health to, a child or young person.

**Sexual abuse:** Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Child Sexual Exploitation:** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. This can include child sexual exploitation related to gangs and/ or child trafficking.

**Emotional/psychological abuse:** The persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.



**Neglect:** The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment.

### **The Statutory Guidance Update December 2023**

The statutory expectations for how organisations and professionals should work together to keep children safe and promote their welfare emphasises a broader and more detailed understanding of harm and risk, including factors that may contribute to abuse or neglect, which includes multiple disadvantage and poverty:

- Domestic abuse
- Parental mental illness
- Parental problem drug misuse (in particular heroin and crack)
- Parental problem drinking
- Parents with a learning disability
- Emerging threats including online harm, grooming, exploitation and radicalisation

## APPENDIX 3 – Six Key Principles of Safeguarding Adults

The Care Act 2014 sets out the 6 key principles:

Principle	What this means for our residents	What we promise to do
<b>Empowerment</b> – People being supported and encouraged to make their own decisions and informed consent.	Residents are asked what they want as the outcomes from the safeguarding process and these directly inform what happens.	Engage directly with our residents and ask for input on our approach, to help them make informed decisions.
<b>Prevention</b> – It is better to take action before harm occurs.	Residents receive clear and simple information about what abuse is, how to recognise the signs and what they can do to seek help.	A proactive approach that reduces the risk for serious harm and allows us to become a stronger voice in our local areas with regards to safeguarding.
<b>Proportionality</b> – The least intrusive response appropriate to the risk presented.	Residents can remain sure that the professionals will work in their interest and will only get involved as much as needed.	Appropriate training to enable our staff to respond in the proper way to a concern and help them determine when a concern becomes a safeguarding concern.
<b>Protection</b> – Support and representation for those in greatest need.	Residents get help and support to report abuse and neglect. Residents get help so that they are able to take part in the safeguarding process to the extent to which they want.	Liaise with local user led groups and residents, getting their views on how to best support them with safeguarding concerns and identifying those in need
<b>Partnership</b> – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.	Staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. Residents can be confident that professionals will work together and with the customer to get the best result for them.	Seek partnerships with other local providers and creating strong links with local authorities and safeguarding boards.
<b>Accountability</b> – Accountability and transparency in delivering safeguarding.	Residents understand the role of everyone involved in their life and so do staff	Ensure that our systems are reliable and transparent, and that requests for information are dealt with in accordance with statutory requirement.

## **APPENDIX 4 – Key Principles of Safeguarding Children**

### **Child-Centred and Whole-Family Focus**

The Governments Working Together to Safeguard Children (2030) explicitly emphasises that safeguarding should be child centred, meaning a child's welfare and lived experience must be at the forefront of all decision making and action.

Children's wishes, feelings and views should be sought, listened to and acted upon appropriately.

### **Principles for Working with Parents and Carers**

The Working Together to Safeguard Children (2023) guidance introduces four specific principles for engagement with parents and carers that further support a child-centred approach:

1. Effective partnership working - build positive, trusting and cooperative relationships.
2. Respectful, clear communication - avoid blaming language; adapt communication to needs.
3. Empowerment of parents and carers - involve them in decision-making and share information.
4. Co-design of processes and services - involve families and communities in shaping safeguarding practices.

These principles underline that working with families is a key part of helping and protecting children and not just identifying risk.

### **Multi-Agency Expectations Across the System**

The Working Together to Safeguard Children (2023) also sets out expectations for effective multi-agency practice at all levels (strategic leaders, managers and direct practitioners), including:

- Collaborate - share information and work together toward shared goals.
- Learn - learn from each other's perspectives and evidence.
- Resource - make sure all practitioners have the support and tools they need.
- Include - recognise and respond to diversity and different circumstances.
- Mutual challenge - respectfully question and address differences in professional views.

### **Shared Responsibility and Early Help**

The guidance emphasises that safeguarding is everyone's responsibility and all organisations and practitioners who come into contact with children, families and carers must work in a joined-up way to identify needs and provide help early, before problems escalate.

### **Paramountcy of the Child's Welfare**

While not always listed as a formal numbered set, The *Working Together to Safeguard Children* (2023) keeps the welfare of the child as the paramount concern a longstanding statutory principle that requires all action to focus first and foremost on what will best safeguard and promote a child's welfare.

## **APPENDIX 5 – Prevent**

Prevent is the name given to part of the Government's strategy to prevent terrorism by reducing the possibility of radicalisation. CRHA has a duty to prevent. The Prevent strategy aims to prevent people from supporting terrorism or become terrorists themselves. Focus of the strategy is in 3 keys areas:-

- Respond to the ideological threat of terrorism and extremism.
- Provide practical help to prevent people from being drawn into terrorism.
- Work with a range of sectors where there is a risk of radicalisation, e.g. education, charities, faiths and criminal justice.

### **Potential signs of Radicalisation**

- An increase in extreme views relating to a social sector or Government policy.
- The downloading, viewing and sharing of extremist propaganda.
- An individual becoming withdrawn and increasingly intolerant of modern views.
- A change in appearance or behaviour, with an individual becoming more isolated.
- The expression of a desire or intent to support or take part in terrorist activity.

## APPENDIX 6 – Modern Slavery

Modern slavery is more about being exploited and completely controlled by someone else, without being able to leave.

Types of Exploitations: -

- **Forced Labour** – any work or services which people are forced to do against their will under the threat of some form of punishment.
- **Human Trafficking** – involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion.
- **Forced and early marriage** – when someone is married against their will and cannot leave the marriage. Most child marriages can be considered slavery.
- **Domestic Servitude** – Individuals whose workplace is a private residence and feel as though they cannot leave; they may also be abused. These individuals lack common benefits including, but not limited to, days off, appropriate compensation and freedom from abuse and violence.
- **Sex Trafficking** – The manipulation, coercion, or control of an adult/child engaging in a commercial sex act. The adult may consent. All forms of commercial sexual acts performed by children are illegal. The child cannot consent. All forms of commercial sexual acts performed by children are illegal. Any physical or psychological manipulation or force used to retain the individual is illegal and is considered trafficking.
- **Forced Child Labour** – Some labour is permissible for children to perform, but there may be symptoms of abuse and trafficking if the child's wages are redirected away from the child or his/her family. There are specific strategies outlined by the Government to combat this unique problem.

Date Reviewed	Changes to the Policy	Date to be Reviewed	Approved By	Author
January 2023		January 2026	Executive	AM
January 2026	Section 1 Policy Statement added. 2.8 section added in Purposes & Scope. Section 3 Preventing risks of abuse has been deleted. Changes to Section 5 8.2 added as a new paragraph. 8.3 is now the section that was 8.2. 8.4 is now the section that was 8.3 Section 11 added. Section 12 now the section that was 11.	January 2029	Executive	AM

	<p>Section 12 from the previous policy has been deleted.</p> <p>Appendix 2 Updated with addition of Statutory Guidance title and reworded.</p> <p>Appendix 4 Key Principles of Safeguarding Children has been added.</p> <p>Appendix 5 Prevent, was previously Appendix 4.</p>			