

Safeguarding policy

Policy Statement

HYELM are a housing association, providing sub-market rented accommodation to young adults who are embarking on or in the early stages of their careers and to key workers. It does not provide Social or Supported Housing in the traditional sense of their meaning within the Social Housing sector. This policy applies to all employees at HYELM, including volunteers, contractors, temporary workers on either bank or agency contracts and trustees.

This policy sets out the requirements of HYELM in ensuring the safe and effective management of safeguarding concerns relating to children, young people and adults at risk of abuse and neglect, regardless of whether the individual is in receipt of a service HYELM provides; or is in direct contact with HYELM.

HYELM's duty of care is a fundamental part of safeguarding practice—it underlines the responsibility to act not only when abuse is evident but also when inaction could lead to avoidable harm.

1.0 Purpose

- 1.1 HYELM has both a legal and moral duty of care towards all those who come into contact with the organisation—this includes tenants, staff, contractors, volunteers, visitors, and members of the wider community. This duty means we are responsible for taking reasonable steps to ensure the physical and emotional safety and wellbeing of others, and for preventing foreseeable harm wherever possible.
- 1.2 HYELM has a legal duty to work together with partner agencies and must ensure that all disclosures, concerns and allegations are raised to the relevant statutory agencies.
- 1.3 Even where there is no clear safeguarding concern or statutory threshold met, HYELM may still have a responsibility to act. For example, if someone is displaying signs of distress, experiencing significant life challenges, or is at risk due to their environment or personal circumstances, staff must consider whether any action is needed to offer support, signposting, or to reduce potential harm.
- 1.4 The duty of care extends to proactively identifying risks, responding appropriately to concerns, and fostering a culture where safety, respect, and wellbeing are prioritised. This includes:

- Creating a safe and inclusive environment in all HYELM premises and services.
- Responding appropriately to disclosures or concerns, even if they fall outside the legal definition of abuse or neglect.
- Encouraging early intervention to reduce the likelihood of escalation or harm.
- Supporting staff to raise concerns without fear of reprisal and ensuring they have access to training and guidance to understand their responsibilities.

1.5 We recognise that by virtue of the nature of the housing we provide we do not routinely work with children or vulnerable adults. We do, however, have a responsibility to provide a safe and supported environment and protect those who are vulnerable. All allegations, disclosures or concerns must be regarded as serious and should not be ignored.

1.6 We recognise the additional vulnerability of some people caused by their protected characteristic such as gender and gender identity, ethnicity, sexual orientation, religious beliefs, special education needs and disabilities. This policy, and others, if requested, are available in different formats, such as languages, large print and recorded form.

2.0 Legal and Regulatory Framework

2.1 This policy takes into consideration and should be read in conjunction with the provisions of:

- London Multi-Agency Adult Safeguarding Policy and Procedures.
- Care Act 2014.
- Children's Act 1989, 2004.
- Safeguarding Vulnerable Groups Act 2006.
- Multi-agency Statutory Guidance on Female Genital Mutilation.
- Female Genital Mutilation Act 2003.
- Mental Capacity Act 2005.
- Human Rights Act 1998.
- Modern Slavery Act 2015.
- Domestic Abuse Act 2021.
- Mental Capacity Act 2005
- Equality Act 2010.
- Counter Terrorism and Security Act Prevent Duty 2015.
- The Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

2.2 We are committed to challenging discrimination and promoting equality of opportunity in every area of our work. This policy is written from an equal opportunities perspective.

3.0 Related Documents

3.1 This policy should be read in conjunction with:

- Safeguarding & Protection Procedure.
- Data Protection Policy.
- Equality & Diversity Policy.
- Code of Conduct

4.0 Key Terms and Definitions

5.1 A **child** is a person who is under 18 years of age.

5.2 An **adult at risk** is a person aged 18 or over who is in need of care and support, (regardless of whether they are receiving them) and because of those needs are unable to protect themselves against abuse or neglect.

5.3 **Care and support needs**, in relation to this policy, are defined as: Mental Ill Health, Physical Ill Health, Disability, Learning Disability, Cognitive Disability, Substance Dependency.

5.4 **Statutory agencies** include local authorities and district councils, Police and NHS. In Hackney, safeguarding referrals will be made for Children to the Multi Agency Safeguarding Hub (MASH) or Adult Social Care (ASC).

5.5 **Abuse** and neglect can take many forms. Abuse is typically defined an action that intentionally causes harm or injury to another person. Neglect is typically defined as a failure to meet someone's basic needs.

Types of abuse include:

- **Physical:** includes hitting, slapping, pushing, misuse of medication or inappropriate sanctions or restraint.
- **Sexual:** includes grooming, rape and sexual assault or sexual acts with a child; or to which the vulnerable adult has not consented, could not consent, or was pressured into consenting.
- **Psychological:** includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, cyber bullying or withdrawal from services or supportive networks.
- **Exploitation:** either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain; Child Criminal Exploitation (CCE) will now be a standalone

offence to target those adults who groom and exploit children into criminal activity, such as county lines drug running or organised robbery.

- **“Mate” Crime or Cuckooing:** exploitative practice where criminals seize control of a vulnerable person’s home without consent to conduct illegal activities like drug dealing.
- **Financial or Material:** including theft, fraud, exploitation, coercion in relation to financial affairs or arrangements, including in connection with bank accounts, wages, wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Neglect & Acts of Omission:** including ignoring medical 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:** refers to a person's inability or unwillingness to care for their own essential needs, encompassing personal hygiene, health, and surroundings, potentially leading to a threat to their safety and well-being. This would also include self-harming and hoarding.
- **Discriminatory:** including discrimination on grounds of race, gender and gender identity, disability, sexual orientation, religion, and other forms of harassment, slurs or similar treatment.
- **Organisational:** including neglect and poor care practice within an organisation or specific care setting like a hospital or care home, for example. This may range from isolated incidents to continuing ill-treatment.
- **Female Genital Mutilation:** Is a form of abuse and violence against women and girls, involving the cutting or removal of some or all of the vulva for non-medical reasons.
- **Domestic Abuse:** an incident or pattern of incidents of controlling, coercive, threatening, degrading and/or violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer.
- **Modern Slavery:** when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage, descent-based slavery, so-called ‘county lines’ and early/forced marriage.
- **Hate Crime:** Is defined as 'Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person's race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or perceived disability and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender.
- **Digital or Online Abuse:** Digital abuse is when someone monitors, stalks, harasses, threatens, controls or impersonates another person using technology. This could involve stalking through social media, harassment by text message or humiliation by posting pictures or videos, for example.
- **Radicalisation:** Is the *process* of causing someone to adopt radical positions on political or social issues, and is, in itself, recognised as harm.

5.6 A ‘**person alleged to cause harm**’ replaces the term alleged perpetrator. Adults who are alleged to have abused a child or an adult at risk have the right to be assumed innocent

until allegations against them are substantiated. Whether they are members of staff, a volunteer, a relative or a carer they also have the right to be treated fairly and their confidentiality respected.

- 5.7 It is best practice to seek **informed consent** before making a Safeguarding referral for an adult at risk. This refers to providing the person with as much as information as possible about the *consequences* of consenting, or not consenting to a referral.
- 5.8 **Contextual safeguarding** is a recognition that young people may be at significant risk of harm due to factors within the context of their environment. This approach recognises that the different relationships that young people form in their neighborhoods, schools and online can feature violence and abuse.
- 5.9 Contextually, tenants at HYELM may be at increased risk of abuse such as self-neglect, domestic abuse, isolation and mental health issues. Staff should remain vigilant and look out for any signs that might indicate these types of abuse are occurring.

6.0 Our Policy

- 6.1 We have a duty to act upon and report actual suspected or allegations of abuse (including non-recent abuse) in line with this policy, associated procedures and following the six key principles which underpin all safeguarding approaches:
 - **Empowerment**- people being supported and encouraged to make their own decisions and informed consent
 - **Prevention**- where possible it is better to take action before harm occurs
 - **Proportionality**- take action which is proportionate to the level of risk presented
 - **Protection**- support and guidance once harm has already been identified
 - **Partnership**- working collaboratively with appropriate agencies
 - **Accountability**- recognising that safeguarding is everybody's responsibility and taking action accordingly.
- 6.2 We are not expected to be experts in identifying abuse or investigating allegations. Instead, and in line with statutory guidance, we will:
 - Follow safer recruitment practices.
 - Recognise, record, report and refer concerns, suspicions or allegations of abuse or neglect to the lead agencies responsible for carrying out safeguarding assessments and enquiries, specifically the Local Authority.
- 6.3 We will co-operate with the Local Authority, lead agencies and relevant partners, supporting them in implementing their statutory duties around safeguarding in line with statutory procedures.
- 6.4 We will report any incidents of abuse that we suspect are a criminal offence to the Police. We will treat any disclosures of actual historical abuse in the same way as an allegation, disclosure or suspicion of current abuse.

- 6.5 We will share information for the purposes of safeguarding and will comply with the statutory duty to provide information where requested. We will handle data in accordance with the Data Protection Act, GDPR and our Data Protection Policy and associated documents.
- 6.6 We will consistently apply fair practice and objective methods of selecting employees who may be required to work with children or adults at risk. Pre-employment screening checks will be undertaken, as appropriate.
- 6.7 We will ensure that this policy is communicated to all employees at induction and that role appropriate training is provided so that staff understand their roles and responsibilities in relation to safeguarding and are enabled to identify and report signs of abuse in accordance with our safeguarding procedures.
- 6.8 We will address any allegations or suspected abuse by our employees through formal statutory investigative procedures and our own internal disciplinary procedures.

7.0 Key Responsibilities

- 7.1 HYELM is committed to a whole-organisation approach to safeguarding. All individuals have a role to play in ensuring a safe environment. The following outlines the specific responsibilities of key roles within the organisation:

7.2 The Board

- The Board has overall accountability for safeguarding across HYELM.
- It must ensure that the Safeguarding Policy and Procedures are compliant with legal and regulatory requirements and are reviewed regularly.
- The Chair of the Board acts as the Safeguarding Lead for the Board and should be informed of any safeguarding concerns involving the CEO or Designated Safeguarding Lead (DSL).
- The Board supports a culture of safeguarding awareness and continuous improvement.

7.3 The Chief Executive (CEO)

- The CEO has operational responsibility for the implementation of this policy and procedure across the organisation.
- They provide leadership and oversight, ensuring safeguarding concerns are responded to appropriately and in a timely manner.
- In the absence of the DSL, the CEO will receive safeguarding reports and coordinate necessary actions.
- The CEO is also responsible for managing allegations made against staff, in line with section 10 of the safeguarding procedure, and consulting legal advisors where required.

7.4 The Designated Safeguarding Lead (DSL)

- The DSL leads on safeguarding matters within HYELM.
- Responsibilities include:
 - Receiving and reviewing safeguarding reports submitted by staff.
 - Making decisions about whether concerns meet the threshold for referral to statutory agencies.
 - Coordinating appropriate responses to safeguarding concerns, ensuring the safety and wellbeing of individuals at risk.
 - Keeping detailed, secure records of all safeguarding concerns and actions taken.
 - Liaising with external agencies such as local authority safeguarding teams, the police, and other professionals as appropriate.
 - Providing advice, support, and guidance to staff on safeguarding issues.
 - Ensuring safeguarding training and awareness are maintained across the organisation.

All Staff

- Every member of staff, volunteer, and contractor has a duty to:
 - Be familiar with HYELM's Safeguarding Policy and Procedures.
 - Remain alert to signs of abuse, neglect, or other forms of harm.
 - Respond appropriately to concerns or disclosures, following the "Recognise, Respond, Record, Report, Refer" process.
 - Complete a safeguarding report form immediately if a concern arises, and submit it to the DSL (or CEO in their absence).
 - Maintain confidentiality and handle sensitive information in line with data protection requirements.
 - Cooperate fully with safeguarding investigations and act in the best interest of those at

Approval

Version Number:	V4
Approval Date:	June 2025
Approved By:	Board
Review Due:	March 2027
Responsibility:	Housing Manager

Version Control

Date	Amendment	Version
May 2020	To include some best practice guidelines as defined by the City & Hackney Safeguarding Partnership.	3.01
March 2023	Update to Safeguarding Leads.	3.02
April 2025	Complete re-write of policy and procedure	4