



## **Safeguarding policy**

Valid from September 2026

## **1. Purpose of the Policy**

1.1 This policy outlines the approach Futures Housing Group (Futures/We) will take in identifying, recording and reporting safeguarding issues.

1.2 This policy applies to all customers who come into contact with or receive a service from Futures Housing Group.

## **2. Policy Statement**

2.1 We recognise that Futures has a vital role to play to keep our customers, and people who live with them, safe so they may live free from abuse and neglect.

“Safeguarding” describes the action taken to ensure the safety and wellbeing of people and to protect them from harm, abuse or neglect. It is everyone’s responsibility; however, customer-facing employees are more likely to witness or receive safeguarding concerns.

2.2 We will work in partnership to safeguard children and adults at risk of abuse and neglect living in our homes and within our communities.

2.3 Futures is committed to ensuring adults and children are safeguarded from abuse and/or neglect. We will:

- Comply with legal and regulatory requirements
- Aim to have robust safeguarding arrangements in place
- Work in partnership with other agencies to reduce the risk of harm and abuse for our customers
- Always act in the customer’s best interests by making safeguarding personal for the customer, and the responsibility of all Futures employees.

2.4 Futures will ensure that all representatives, including staff and contractors, responsible for visiting customers in their homes are:

- Aware of our safeguarding responsibilities for recording and reporting
- Able to identify the different types of abuse
- Aware where abuse can occur
- Aware of who may be a perpetrator of abuse
- Aware of how to report any concerns, including whistleblowing if they have concerns relating to work colleagues or institutional abuse.

## **3. Statutory Obligations**

3.1 Registered Providers are expected to have appropriate arrangements in place to provide for the safeguarding of adults, children and young people.

This is set out in the Children Act 1989, the Children Act 2004 (supported by Working Together to Safeguard Children 2018; inter-agency guidance to promote the welfare of children), (Children Acts), and the Care Act 2014 including supporting guidance.

3.2 Section 11 of the Children Act 2004 places a duty on housing for the need to safeguard and promote the welfare of children, with clear processes for sharing information, with other practitioners and safeguarding partners.

The Care Act 2014 provides statutory guidance for housing associations / registered providers to ensure:

- They have clear operational policies and procedures for adult safeguarding that reflect the framework set out by Safeguarding Adult Boards
- They provide adequate training for staff to help them recognise symptoms of abuse and how they can respond to those concerns
- They have a robust information sharing protocol in place with the local authorities
- They have a duty to cooperate and report safeguarding issues, both adult and children

## **4. Definitions**

Safeguarding refers to the wellbeing of adults and welfare of children, abuse is regarded as a single or repeated act or lack of appropriate action where there is an expectation of trust which can cause harm or distress, clear definitions for each are as follows:

### **4.1 Safeguarding Adults**

According to the Care Act 2014 the definition for safeguarding adults means

An adult's right to live in safety, free from harm, abuse and neglect.

A person who may be at risk of abuse may:

- Be elderly, with poor health, a physical disability or cognitive impairment
- Have a learning disability
- Have a physical disability and/or sensory impairment
- Have mental health needs including dementia or a personality disorder
- Have a long-term illness/condition
- Misuse substances or alcohol
- Be a carer, providing unpaid care to a family member or friend
- Be unable to demonstrate the capacity to make decisions as defined by the Mental Capacity Act and is in need of care and support.

Safeguarding duties apply to an adult who meets the following three criteria:

- Has needs for care and support (whether or not the council is meeting those needs)
- Is experiencing, or at risk of, abuse or neglect
- As a result of their care and support needs is unable to protect themselves from either the risk, or the experience of abuse or neglect.

#### 4.2 The Care Act 2014

The Care Act 2014 sets out the six key principles that underpin adult safeguarding, which housing providers are required to be familiar with, these are:

- Empowerment – personalisation and the presumption of person-led decision and informed consent
- Prevention – it is better to take action before harm occurs
- Proportionality – proportionate and 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 Neighbourhoods. Neighbourhoods have a part to play in prevention, detecting and reporting neglect and abuse.
- Accountability – accountability and transparency in delivery safeguarding.

#### 4.3 Safeguarding Children

Safeguarding Children, anyone under the age of 18, is defined within the Working Together to Safeguard Children Guidance (updated 2018) for the purposes of:

- Protecting children from maltreatment
- Preventing impairment of children health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

### 5. Abuse: Adults and Children

5.1 The definition of abuse is “a violation of an individual’s human and civil rights by another person or persons and may result in significant harm, or the exploitation of the person subjected to it”, abuse may:

- be physical, verbal, psychological or emotional
- be an act of neglect or an omission to act
- occur when a person is persuaded to enter into a financial or sexual transaction to which they had not consented, or cannot consent
- be deliberate or unintentional or result from lack of knowledge

5.2 There are 10 main categories and definitions of abuse as detailed below (this list is not exhaustive):

- Physical abuse - including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- Domestic Abuse - is an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member. It includes psychological, physical, sexual, financial, emotional abuse, so called “honour” based violence, Female Genital Mutilation and forced marriage.
- Sexual abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or sexual acts to which the adult has not consented or was pressured into consenting.
- Psychological or emotional abuse – Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, unreasonable and unjustified withdrawal of services or supportive networks.
- Financial or material abuse – 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, the misuse or misappropriation of property, possessions or benefits.
- Neglect and acts of omission – Ignoring medical, emotional or physical care needs; failure to provide access to appropriate health care and support or educational services; and the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- Discriminatory abuse – Harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation; and religion.
- Organisational abuse – 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.
- Modern Slavery - Slavery, human trafficking, forced labour and domestic servitude, traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- 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 should be noted that self-neglect may not prompt a section 42 enquiry. An assessment should be made on a case-by-case basis. A decision on whether a response is required under safeguarding will depend on the adult’s ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

## **6. Dealing with Safeguarding**

6.1 Futures will have clear procedures outlining the accountability for identifying, recording and reporting safeguarding concerns.

6.2 Futures will have a separate policy that specifies our response to reports of Domestic Abuse.

6.3 Futures will ensure adequate training is available to all customer facing staff and contractors on:

- The different types of abuse
- Where abuse occurs and who the perpetrator may be
- Identifying the signs of abuse
- How to manage a situation where a victim reports abuse to them
- Reporting safeguarding concerns internally and externally
- Positive intervention

6.4 Futures will ensure positive promotion of all its customers' wellbeing. The Care Act 2014 outlines individuals' wellbeing as:

- Personal wellbeing and dignity
- Emotional wellbeing
- Physical and mental health wellbeing
- Social and economic wellbeing
- Suitable living environments
- Opportunity to work, train, be educated and enjoy recreational time
- Positive contribution to society

6.5 We will take action to prevent and minimise the risk of harm. This includes being alert to concerns about welfare and using indicators of abuse so that we are able to identify, assess and report concerns early.

We will train our employees to do this (see "employee training" below). We will use a "Harm" model to assess the risk of harm and inform our response to the customer's safeguarding needs when we receive new reports of anti-social behaviour.

6.6 We will produce annual modern slavery and human trafficking statements as required by the Modern Slavery Act 2015. Futures is fundamentally opposed to slavery and human trafficking, and we will do what we can to ensure it is not taking place in our business or supply chains.

There is more information on our Modern Slavery Statement, which can be found on our website.

6.7 Futures will have clear lines of responsibility established and these will be as follows:

- Strategic responsibility will be designated to the Group Director of Housing & Communities
- Operational and compliance responsibility will be led by the Director of Housing as the Safeguarding Lead and supported by the Housing Operations Manager as the Deputy Safeguarding Lead.
- Operational lead for the day-to-day management will be led by the Communities Manager, deputised by the Communities Team Leader/s and overseen by the Housing Operations Manager.
- The Communities Team Leader will be responsible for ensuring all safeguarding concerns are recorded internally and reported to the statutory authorities.

## **7. Mental Capacity**

We will comply with the requirements set out in the Mental Capacity Act 2005. This includes assuming that customers have capacity to make their own decisions in the first instance. Where a customer is found to lack capacity to make a decision then any action taken, or any decision made for or on their behalf, will be made in their best interests.

## **8. Confidentiality and Information Sharing**

8.1 Futures will share information appropriately with statutory partners who have a duty to investigate safeguarding concerns.

These will include Children and Adults Social Care, Safeguarding teams across but not restricted to, Derbyshire County Council, Nottinghamshire County Council, West Northamptonshire Council, Leicestershire County Council, North Northamptonshire Council, Cambridgeshire County Council, Peterborough City Council and the Police.

8.2 Clause 45 of the Care Act 2014 focuses on 'supply of information'. This relates to the responsibilities of others to comply with requests for information from the Safeguarding Adults Board (SAB).

The statutory guidance to the Care Act 2014 emphasises the need to share information about safeguarding concerns at an early stage; information-sharing agreements or protocols should be in place.

Confidentiality is an important principle that enables people to feel safe in sharing their concerns and to ask for help. However, the right to confidentiality is not absolute. Sharing relevant information with the right people at the right time is vital to good safeguarding practice. The sharing of information in health and social care is guided by the Caldicott principles. These principles are reflected in the Data Protection Act 2018.

8.3 We will only share data in compliance with the above legislation. We will seek consent from adults unless:

- There is a public interest consideration
- An immediate risk of harm
- The adult requires urgent medical attention, or
- Where there is clear evidence of lack of capacity.

8.4 We will seek permission from the parent if the concern is about a child, unless to do so may place the child at risk of harm, or if we believe a crime has been, or will be, committed.

## **9. Procedures and Guidance**

Futures will make sure this policy is accompanied by a clear procedural guidance for all its employees and contractors.

## **10. Monitoring, Reporting and Continuous Improvement**

10.1 Futures' Executive Team will receive an annual report which will include details of mandatory safeguarding training compliance, reported safeguarding incidents and action taken. Safeguarding performance and compliance will be assessed and reported to the safeguarding lead/s monthly.

10.2 We will complete section 11 reviews and comply with requests for information in support of Serious Case Reviews as required by local authorities to demonstrate the extent to which we meet safeguarding requirements and standards.

10.3 We are committed to continuous improvement and learning from safeguarding reviews to improve our safeguarding practices. All Futures' safeguarding activity will be assessed against a quality assessment framework and peer reviews to identify and implement improvement opportunities.

## **11. Whistleblowing**

Where there is a concern relating to a conduct of any Futures employees or contractors, Futures will support employees who report such behaviours and act in accordance with internal policies.

## **12. Training**

12.1 Training will be provided in line with the policy and procedural guidance to all employees and contractors.

12.2 Refresher training will be available as and when required should there be a change in legislation and procedural arrangements.

12.3 There will be at least 1 safeguarding champion for each customer-facing business area to support and embed safeguarding practices departmentally.

### **13. Contractors, suppliers and consultants**

All our new contractors, suppliers and agents will be expected to understand and discharge their safeguarding responsibilities.

We require new contractors, suppliers and consultants to understand their responsibilities under the Modern Slavery Act 2015.

### **14. Review of Policy**

This policy will be reviewed at least every 3 years or as required when there are any changes in legislation, guidance or continuous improvement initiatives.

| Safeguarding Policy Document Control |           |         |        |                                       |                         |                           |                                                                                                                                                                        |
|--------------------------------------|-----------|---------|--------|---------------------------------------|-------------------------|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Valid from                           | Valid to  | Version | Status | Author                                | Owner                   | Approval                  | Description of Change                                                                                                                                                  |
|                                      |           |         |        |                                       |                         |                           | No policy change.                                                                                                                                                      |
| Sept 2020                            | Sept 2023 | 3       | Ended  | Reviewed by HON                       | Head of Neighbourhoods  | Co-Exec Meeting Sept 2020 | Neighbourhood Manager responsibilities replaced by Neighbourhood Team Leader.                                                                                          |
| Sept 2023                            | Sept 2026 | 4       | FINAL  | Housing Operations Manager            | Director of Housing     | Co-Exec Meeting Sept 2023 | Change to detection, categories & definitions. Reporting and recording responsibilities and contractor responsibilities. Addition of MC Act & Modern Slavery Act 2015. |
| Sept 2026                            | Sept 2027 | 4       | FINAL  | Director of Communities               | Director of Communities | Cust Exp group 15-9-26    | 1 year extension<br>No changes                                                                                                                                         |
| Distribution/ Confidentiality:       |           |         |        | Customers and team members at Futures |                         |                           |                                                                                                                                                                        |

**Other relevant documents:**

- Antisocial Behaviour Policy
- Domestic Abuse Policy
- Hate Crime and Hate Incidents Policy
- Equality and Diversity Policy
- Whistleblowing Policy
- Disciplinary Policy
- Code of Conduct

- Data Protection Policy