



Safeguarding Policy

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Safeguarding Policy

1. INTRODUCTION

EnviroVent Ltd have a key safeguarding role to play, alongside colleagues in social care, health and the police, in keeping people safe. As a front-line Contractor, EnviroVent Ltd are well placed to identify people with care and support needs, share information and work in partnership to coordinate responses.

EnviroVent Ltd are committed to help identify those people within the community who may be at risk of abuse and to know how to respond in an appropriate and compassionate way. A critical component of this process is robust communication and joint working between housing and contracted employees and their safeguarding partners, particularly local authority social services employees with safeguarding responsibilities.

Children and vulnerable adults have a right to live in their homes free from abuse. Safeguarding and promoting the welfare of children and vulnerable adults, particularly in protecting them from harm, depends upon effective joint working between all relevant stakeholders.

EnviroVent Ltd employees have many opportunities to identify potential cases of neglect and abuse whilst undertaking their day to day duties and will ensure that employees are aware of what constitutes abuse or neglect and are sufficiently trained to report anything they see that makes them uncomfortable or suspicious.

2. AIMS & OBJECTIVES

The purpose of this policy is to enable EnviroVent Ltd to demonstrate its commitment to keeping safe vulnerable adults and children with whom it works or comes into contact with. It also aims to ensure employees are aware of the Safeguarding Policy which formalises and builds on the corporate values and principles of the organisation. It is important to have policies and procedures in place:

- To provide protection for children and vulnerable adults are resident in or are receiving housing services in locations visited by EnviroVent Ltd.
- To provide clear guidance to all EnviroVent Ltd employees / contractors on the procedures that they should adopt in the event that they suspect a child or vulnerable adult may be experiencing or be at risk of harm.
- To ensure that recruitment processes require full checks of suitability to work in and around children and vulnerable adults where appropriate.
- To ensure that any allegation or suspicion of abuse is dealt with swiftly and appropriately and that the person(s) experiencing abuse is supported.
- To promote good practice and work in a way that can prevent harm, abuse and coercion occurring.

In order to meet its safeguarding duties and responsibilities, EnviroVent Ltd will have clear operational policies and procedures in place for adult safeguarding and will ensure that employees:

- Are familiar with the six principles underpinning adult safeguarding
- Are trained in recognising the symptoms of abuse / neglect
- Are vigilant and able to respond to adult safeguarding concerns, including where to go locally to get help and advice

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2. AIMS & OBJECTIVES

- Understand the need for clear and accurate record keeping
- Stress the need for preventing abuse and neglect wherever possible
- Support the local authority in its responsibility to carry out enquiries e.g. By providing relevant information. Although the local authority is the lead agency for making enquiries, it may also require other organisations to undertake them
- Have a senior manager taking a lead role in organisational and inter-agency safeguarding arrangements.

3. SCOPE OF THE POLICY

This policy applies to all situations involving safeguarding arising in connection with duties and activities of EnviroVent Ltd employees. From April 2015, all housing providers must have adult safeguarding policies and procedures in place, and employees that are familiar with the following:

- The six principles underpinning adult safeguarding
- Trained in recognising the symptoms of abuse
- Vigilant and able to respond to adult safeguarding concerns.

EnviroVent Ltd have a key safeguarding role to play, as a front-line Contractor, alongside colleagues in social care, health and the police, in keeping people safe.

4. DEFINITIONS

4.1 Safeguarding

This includes all forms of activity that aims to protect or promote the welfare of individuals and/or groups of people, which ensures prevention of harm, such as safe recruitment, employees training, awareness raising, provision of activities designed to promote inclusion, personalised risk management and risk assessments, confidential data storage, information sharing and referral.

4.2 Abuse

Abuse is the violation of an individual's human and civil rights by any other person or persons. Abuse can occur in any relationship and may result in significant harm to the person subjected to it. Abuse may consist of a single act or repeated acts, and it can be intentional or unintentional.

There are many types of abuse – the categories generally recognised in Safeguarding Adults and in the Safeguarding of Children & Young People are listed below.

The 10 main types of abuse are;

- Physical abuse – including hitting, slapping, pushing, misuse of medication, inappropriate restraint
- Sexual abuse – including rape and sexual assault acts that an adult has not (or cannot) consent to or the sexual exploitation of a child
- Psychological or emotional abuse – including threats of harm or abandonment, harassment, verbal abuse and isolation
- Financial or material abuse – including theft, fraud, exploitation, misuse of misappropriation of property or wills

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- Neglect and acts of omission – including withholding the necessities of life such as medication, food, warmth, ignoring medical or physical care needs

4.2 Abuse

- Discriminatory abuse – including discrimination on grounds of race, gender, gender identity, disability, sexual orientation, religion and other forms of harassment, slurs or similar treatment
- Domestic abuse – any of the above abuse types between adults who are or have been intimate partners or family members
- Modern slavery – includes very little or no pay, excessively long and/or unusual working hours, poor physical health, not in control of their own money, no financial records or ID documents
- Self-neglect – wide range of behaviour neglecting to care for one's own personal hygiene, health or surroundings and includes behaviour such as hoarding

4.3 Children and Young People

The legal definition of a child according to the Children Act 1989 is 'a person under the age of 18', including pre-birth.

4.4 Adult Safeguarding

This means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's well-being is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

This definition recognises that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.

The Care Act 2014 established a new statutory framework for care and support including adult safeguarding, which is designed to prevent harm and reduce the risk of abuse or neglect to adults with care and support needs. The Care Act definition largely replaces the term 'Vulnerable Adults'.

4.5 Significant Harm

This is any physical, sexual or emotional abuse, neglect, accident or injury that is sufficiently serious to adversely affect health, development or quality of life. This includes any impairment suffered from seeing or hearing the ill treatment of another person.

4.6 Alerting

This is the process of reporting concerns of actual or suspected abuse or neglect to the local authority. The local authority has a duty to receive the alert and to decide whether a safeguarding enquiry / investigation is necessary or not. Any immediate protection needs will be identified and addressed.

4.7 Disclosure

This is when a person tells someone else of abuse that has happened to them.

5. PRINCIPLES FOR SAFEGUARDING

The Care Act 2014 set out the above which provides a statutory legal framework for adult safeguarding that is to be followed by all organisations that has responsibility for any vulnerable persons to ensure they are kept safe. The 6 principles are listed below.

Empowerment

To give individuals relevant information about recognising abuse and the choices available to them to ensure their safety. To provide clear information about how to report abuse and crime and any necessary support in doing so. Consulting persons before taking any action. Where someone lacks capacity to make a decision, to always act in his or her best interests and ensure they have access to an advocate where appropriate.

Protection

Reporting arrangements for abuse and suspected criminal offences and risk assessments work effectively and are linked into local Safeguarding processes. Governance arrangements are open and transparent and communicated to tenants and those using appropriate services.

Prevention

To effectively identify and appropriately respond to signs of abuse and suspected criminal offences. Key employees are aware, through provision of appropriate training and guidance, of how to recognise signs and take any appropriate action to prevent abuse occurring.

Proportionality

To discuss with the individual and, where appropriate with partner agencies, the proportionality of possible responses to the risk of significant harm before taking critical decisions. Organisational arrangements support the use of professional judgement and the management of risk.

Partnership

To have effective local information-sharing and multi-agency partnership arrangements in place and ensure employees understand these. The intent is to create a “one” team approach that places the welfare of individuals above organisational boundaries.

Accountability

The roles of all agencies are clear, together with the lines of accountability. Key Employees understand what is expected of them and others. Agencies recognise their responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.

EnviroVent Ltd’s role in relation to this is to co-operate with our clients and report any problems noticed when attending client properties to carry out our work.

6. DUTIES AND RESPONSIBILITIES

Senior Directors are responsible for:

- Ensuring that there are arrangements for identifying, evaluating and managing risk associated with safeguarding concerns
- Providing resources for putting this policy into practice
- Ensuring that there are arrangements for monitoring incidents linked to safeguarding concerns and that the effectiveness of this policy is regularly reviewed

Line Managers and Representatives of Health and Safety are responsible for:

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- Ensuring that all relevant employees are aware of the policy
- Taking all possible steps to ensure that all employees contribute to developing a culture that does not tolerate abuse and which encourages people to raise concerns

Line Managers and Representatives of Health and Safety

- Supporting employees in terms of raising concerns and liaising with local authority / social housing procedures accordingly
- Putting procedures and safe systems of work into practice which are designed to embed safeguarding practice across the organisation
- Managing the effectiveness of preventative measures through an effective system of reporting, investigating and recording incidents - including overseeing training on safeguarding
- Overall monitoring of Duty of Care concerns, with a view to identifying trends and lessons to be learnt for the future, including recommendations for changes to policy, procedure or service delivery

Employees are responsible for:

- Taking reasonable care of themselves and others affected by their actions - ensuring that they maintain clear professional boundaries at all times
- Following guidance and procedures designed for safeguarding
- Taking part in training designed to meet the requirements of the policy
- Be vigilant as to what is happening around them – with both customers and colleagues – and be aware of the different types and indicators of abuse.
- Raise any concerns they may have
- Keep factual records of any incident / concern.

7. LEGISLATION & GUIDANCE

The following legislation and guidance applies:

Public Interest Disclosure Act (1998) – places a duty on everyone to report something that leaves someone at risk.

Mental Capacity Act (2005) – the **Mental Capacity Act (2005)**, and supporting Code of Practice (2016), provide a framework to empower and protect people who may lack capacity to make decisions for themselves.

Protection of Freedoms Act (2012) – this Act established the Disclosure and Barring Service (DBS). The primary aim of the DBS is to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

Data Protection Act (1998, as amended) – governs the protection of personal data. It is not a barrier to sharing information but provides a framework to ensure that personal information about a person is shared appropriately.

Human Rights Act (1998) - includes a duty on public bodies to intervene proportionately to protect the rights of citizens.

The Care Act 2014 – introduces a legal framework for adult safeguarding for the first time (Implementation date - April 2015)

Children Act (1989 and 2004) – legislation regarding the safeguarding of children, places duties on a range of organisations, including housing providers, to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

8. PROCEDURES

a. Training

Line Managers and Representatives of Health and Safety will ensure that all employees are trained on Safeguarding from general awareness to more serious issues depending on their level of contact with children and young people, vulnerable adults or carers.

Training will include:

- Understanding EnviroVent Ltd's policies and procedures
- Recognising signs of abuse or neglect
- Recognising when a child or adult may require protection and what to do
- Reporting mechanisms.

The training that EnviroVent Ltd employees receive inhouse will be sufficient for them to carry out their day to day roles. EnviroVent Lt can also access additional, more specialist courses, should any review of incident data suggest that this would be an appropriate escalation of the minimum training requirement for relevant managers or individuals.

b. Procedure for Action (Immediate Danger)

Immediate danger of physical or psychological harm calls for immediate action or intervention. (Employees may have witnessed the incident themselves, had a vulnerable person disclosure directly to them or they are given information from a third party).

In these situations, employees should:

1. CALL 999 and report what they've seen or heard to the relevant emergency service.
2. If employees are able, they should ensure that they have all relevant details to hand before contacting the emergency services e.g. any relevant addresses, telephone numbers etc.
3. Record all details immediately in order to give as much information as possible to the emergency services and/or investigating agency. (These details will also form the basis of the (Safeguarding) Incident Report Form which will have to be completed after the incident).
4. Stay until the Police and/or the ambulance crew arrive if they've witnessed an incident themselves.
5. Ask any other witnesses if they can stay and provide support to the victim if possible, but only if it's safe to do so without compromising the situation.
6. Talk to the victim and record whatever is said in writing as soon as possible, but only if the perpetrator is not at the scene.
7. Inform their Line Manager as soon as possible after the situation has been resolved and submit the Incident Report Form to the Health & Safety Team within one working day of the incident occurring.

Employees should be as accurate as possible when recording information as it could be used in court.

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Relevant company reporting times are set out which includes the investigation of any incident or accident to ensure full details are obtained in order to put in place further controls to eliminate or reduce the same accident or incident happening again to other employees.

c. Procedure for Action (Immediate Danger)

Where employees have their own concerns about a vulnerable person or if a third party has told a member of staff about their concerns. Also if a child, young person or adult with needs for care and support has disclosed something directly to the member of staff, which may be considered a safeguarding concern, or may involve a crime.

These concerns are of a serious nature, which employees believe could lead to harm, but where the victim is not in any immediate danger of harm and immediate action is not required.

Employees should:

1. Record what is said as accurately as possible.
2. Reassure the vulnerable person and explain that information will be passed on – that employees are unable to keep the information a secret and that they will be seeking help for them.
3. Submit the Incident Report Form to the Health & Safety Team within one working day of the concern being raised/established.

If employees are unsure whether their concern is a safeguarding issue, they should contact their line manager to discuss.

d. Responsibilities For Making A Referral

Safeguarding is everyone's responsibility and anyone can raise a safeguarding concern. If a member of staff sees something that worries them, they have a responsibility to report it. Employees are not however, responsible for deciding whether or not someone is being abused, or for carrying out investigations.

All safeguarding concerns should be sent to the Health & Safety Team in the first instance, although, out of hours, employees will need to make their own referrals as directed in the procedures.

e. Confidentiality & Consent

Employees must not discuss any allegations of abuse, substantiated or not, with:

- anyone from EnviroVent Ltd other than their line manager and other designated members of staff as outlined in the relevant safeguarding procedure;
- any member of an external agency other than as part of a formal investigation; or with,
- any other interested party, including parents, carers and relatives of the child, young person or adult without the express permission of the person with overall responsibility for the investigation.

Employees must consider whether seeking consent from a victim might increase the risk to them, cause an unjustified delay or if it could prejudice the prevention, detection or prosecution of a serious crime.

Consent is not required where:

- other people or children could be at risk from the person causing harm
- it is necessary to prevent crime, or if a serious crime may have been committed
- there is a high risk to the health and safety of the adult at risk
- the person lacks capacity to consent*
- where the alleged perpetrator may go on to abuse others
- there is a statutory requirement

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- the public interest overrides the interest of the individual
- when an employee is the person accused of abuse, malpractice or poor professional standards.

* Mental capacity

e. Confidentiality & Consent

The Mental Capacity Act (MCA) 2005 requires an assumption that an adult has full capacity to make decisions unless it can be shown that they lack capacity to make a decision for themselves, at the time the decision needs to be made. Any decision made, or action taken, on behalf of someone who lacks the capacity to make the decision or act for themselves, must be made in their best interests.

Issues of mental capacity and the ability to give informed consent are central to decisions and actions surrounding safeguarding adults. All interventions need to take into account the ability of adults to make informed choices about the way they want to live and the risks they want to take. This includes their ability:

- to understand the implications of their situation.
- to take action themselves to prevent abuse.
- to participate to the fullest extent possible in decision-making about interventions.

f. Data Protection

All copies of the Safeguarding Report Form are retained on EnviroVent Ltd secure database, in accordance with data protection and as per the Retention of Records Policy.

g. Information Sharing

Information sharing is a vital part of early intervention and preventative work, to promote welfare, for wider public protection and in improving outcomes for all. However, people want to be confident that their personal information is kept safe and secure, and that employees maintain their privacy.

Decisions about what information is shared and with whom will therefore be taken on a case-by-case basis. Information should be:

- necessary for the purpose for which it is being shared.
- shared only with those who have a need for it.
- be up to date and shared in a timely fashion.
- be shared accurately and securely.

In all cases where information is shared, the following information should be recorded:

- date and time.
- an accurate summary of information shared.
- who the information was shared with.
- whether it was shared with or without consent (if without consent, whether the child or family or employee were informed).
- how the information was shared and any receipt of it having been received.

h. Evidence Gathering & Preserving

The Police are always responsible for the gathering and preservation of evidence to pursue criminal allegations against people causing harm. Employees should contact them immediately if they feel a crime has taken place. However, the first concern must be to ensure the safety and wellbeing of the alleged victim.

Employees can play an important part in ensuring that evidence is not contaminated or lost.

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. **Evidence Gathering & Preserving**

Employees should:

- try not to disturb the scene, clothing or victim if at all possible.
- try to discourage the vulnerable person from washing, showering or bathing, or from washing their clothes if the allegation or disclosure concerns a possible rape or sexual assault.
- secure the scene (e.g. lock the door if possible).
- ensure nothing is removed from the scene and it is left exactly as it was found.
- contact the Police and ask for advice if in doubt.

i. **Allegations**

EnviroVent Ltd takes seriously any complaints made about the conduct of employees in respect of their contact with children, young people, families and adults with care and support needs.

All allegations received by EnviroVent Ltd will be investigated fully, and, where applicable, action will be taken against the member of staff via the disciplinary procedure. If deemed necessary, the member of staff will be re-deployed or suspended whilst the investigation takes place. The decision to suspend lies with the appropriate Line Manager / Director.

j. **Reporting Forms**

The EnviroVent Ltd Incident Report Form is to be used for all concerns regarding children, young people and adults with needs for care and support. As a result, not all fields will be relevant, but all relevant fields must be completed. The individual completing the form is responsible for its content and for its delivery to the Health & Safety Team within the timescales given.

The EnviroVent Ltd Incident Report Form is available on the intranet and should be downloaded each time it is needed. Forms must be completed electronically and emailed to the address given. Any employee not having access to the intranet must contact their line manager to complete the form on their behalf. On receipt of the form a member of the Health & Safety Team will start the assessment process.

As the Health & Safety Team may need to cut and paste information from the Incident Report Form onto external forms, it should be completed as accurately and carefully as possible. Employees should also reduce the amount of additional documents that are attached e.g. amalgamate and/or edit information rather than sending lots of emails to provide background information.

9. **OTHER SAFEGUARDING PROCEDURES**

It may be necessary to contact specialist agencies regarding some forms of abuse. There may also be extra forms to complete. Employees should always refer concerns to their Line Manager / Health & Safety Team, in the first instance.

- Modern Slavery (including Human Trafficking)
- PREVENT (radicalisation)
- Threats of suicide and self-harm
- Domestic Abuse

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9. FURTHER SAFEGUARDING PROCEDURES

If you believe someone is in immediate danger or risk, call the Police on 999. If it's not an emergency, call the Police on 101.

This policy will be reviewed every three years or in the event of any safeguarding incidents are raised. Checks will be carried out on the supporting documents. We will look to see if the procedures have been followed, if not why not and where improvements can be made. Feedback from employees and managers who are covered by this policy and it's supporting documents will also be sought as part of the review process.

A handwritten signature in black ink, appearing to read 'Andy Makin', with a stylized flourish at the end.

Andy Makin
Managing Director

Date: 06 12 24

10. RECORD OF AMENDMENT TO DOCUMENT

Rev No	Date	Changes	Document Owner	Approved by
1	25/07/2018	Initial issue of policy to relevant employees	S Webster	Sam Moss
2	23/07/2022	Review no changes required	A. Campey	Rachael Tranter
3	06/12/2023	Review no changes necessary	Rob Evans	Rachael Tranter
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