

Safeguarding Policy

Policy Statement & Purpose

Bromford is committed to ensuring that we keep our customers safe from harm. This policy outlines our approach to safeguarding children and adults who may be at risk of abuse, harm or neglect.

This policy is based upon the following guiding principles:

- Everyone has a right to live their lives with dignity, respect and freedom from abuse, violence, fear and exploitation.
 - Safeguarding is everybody's responsibility - #dontdoanything
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1. Scope

This policy applies to all customers that Bromford, its contractors, and third-party organisations work with.

Everyone who works for Bromford has a duty to safeguard and promote the welfare of children and vulnerable adults.

This is a high-level policy statement and should be read in conjunction with the Safeguarding Procedure, Domestic Abuse Procedure, and other associated policy statements, policy guidance documents and procedures.

2. Reference Materials

List of Referenced Documents
Safeguarding Procedure
Domestic Abuse Policy
Domestic Abuse Procedure
Mental Capacity Procedure
Code of Conduct Policy
Data Protection Policy
Disciplinary Procedure FAQs
DBS [Disclosure and Barring Service]
Data and Document Retention Policy
Safeguarding & Domestic Abuse Statement for Contractors & third-party organisations

3. Responsibilities

The overall responsibility for Safeguarding is overseen by the **Director of Place**.

Heads of are responsible for the day-to-day operation of the policy and ensuring it is adhered to.

All **colleagues** are responsible for acting in line with the principles of this policy and associated methodology, tools and systems.

4. Legislative or Regulatory Requirements

[Children's Act 1989](#) and [2004](#)
[Family Law Act 1996](#)
[Housing Act 1996 and 1998](#)
[Protection from Harassment 1997](#)
[Human Rights Act 1998](#)
[Crime and Disorder Act 1998 – Section 115](#)
[Every Child Matters Framework \(2003\)](#)
[Anti-Social Behaviour Act 2003 S145/S149](#)
[Domestic Violence, Crime & Victims Act 2004](#)
[Mental Capacity Act 2005](#)
[Safeguarding Vulnerable Group Act 2006](#)
[The Health & Social Care Act 2008](#)
[Anti-social Behaviour Crime and Policing Act 2014](#)
[Care Act 2014](#)
[Modern Slavery Act 2015](#)
[Data Protection Act 2018](#)
[General Data Protection Regulation \(GDPR\)](#)
[Working Together to Safeguard Children 2018](#)
[Prevent duty guidance](#)
[Domestic Abuse Act 2021](#)

5. Principles

5.1 Aims and objectives

Raise awareness – Bromford will raise awareness of Safeguarding with all colleagues, contractors, third party organisations, and customers. See the [Safeguarding & Domestic Abuse Statement for Contractors & third-party organisations](#).

Compliance and best practice – Bromford will ensure all colleagues, contractors, and third-party organisations are vigilant and alert to Safeguarding, their own conduct, and how to respond to any concerns or suspicions they may have.

Practice safe recruitment – Bromford will check suitability of all colleagues, contractors, and third-party organisations, using full references and DBS, or through our procurement process.

Make Safeguarding Personal (MSP) – Bromford will harness a person-centred approach to empower and engage the customer in any decisions to determine how best they can be protected from abuse, harm, or neglect, if it is appropriate and safe to do so.

Training – Bromford will ensure all colleagues, contractors, and third-party organisations, have access to effective, role specific training, during their induction, and will deliver refresher training as required. Bromford will ensure colleagues, contractors, and third-party organisations understand relevant processes to enable them to be confident and competent at safeguarding children and vulnerable adults. Designated Safeguarding Leads are in place across the business to provide additional support to colleagues, promote awareness and share best practice.

Partnership Working – Bromford will work in partnership with local authorities and agencies who are protecting children and vulnerable adults from abuse, harm, or neglect.

5.2 Definitions

Safeguarding: means protecting the health, wellbeing and human rights of children and adults to enable them to live free from, abuse, harm, and neglect. Safeguarding is everyone's responsibility.

#dontdoanything

Categories of harm and abuse:

- **Physical;** includes assault, hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate sanctions or force-feeding, inappropriate methods of restraint, and unlawfully depriving a person of their liberty.
 - **Psychological or emotional;** threats of harm or abandonment, deprivation of contact, humiliation, rejection, blaming, controlling, intimidation, coercion, indifference, harassment, verbal abuse (including shouting or swearing), cyber bullying, isolation or withdrawal from services or support networks.
 - **Financial or economic;** theft, fraud, internet scamming, coercion in relation to financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits. Acquire, use, or maintain money, obtain goods or services.
 - **Sexual;** rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, sexual exploitation, sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.
 - **Neglect/Acts of omission;** ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition, and heating.
 - **Organisational;** neglect or poor professional practice by taking advantage, ill treatment, or overstepping professional boundaries, which can deny, restrict, or curtail the dignity, privacy, choice, independence, or fulfilment of adults.
 - **Self-neglect:** neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It is also defined as the inability (intentional or unintentional) to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and wellbeing of the individual and sometimes to their community.
 - **Domestic abuse:** An incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse, by someone who is personally connected. Includes psychological, physical, sexual, financial, economic, emotional abuse; so-called 'honour-based' violence; Female Genital Mutilation; forced marriage.
 - **Modern slavery:** slavery, human trafficking, forced and compulsory 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;** discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation, and political views, along with racist, sexist, homophobic or ageist comments or jokes, or
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comments and jokes based on a person's disability or any other form of harassment, slur, or similar treatment, which could be viewed as Hate crime.

- **Radicalisation, terrorism, and extremism** – Bromford has a duty to support the government's strategy 'Prevent' to deter terrorism by reducing the possibility of radicalisation by working in partnership with the police and other specialist agencies, ensure appropriate training is available to frontline colleagues, and sharing information in line with the Data Protection Act 2018 and the Human Rights Act 1998.

5.3 Children's safeguarding

A child's welfare is paramount; this is one of the key principles of the Children's Act 1989. The Children's Act 2004 introduced the duty to safeguard and promote welfare.

Children are defined by the 1989 Children Act as any person under the age of 18 years.

Any safeguarding concerns relating to children must be referred to the Local Authority safeguarding team. If you are concerned about the immediate safety of a child, call the Police on 101 or in an emergency 999.

Consent to make a Children's safeguarding referral: Consent to refer a child to the social care safeguarding team should ideally be agreed by the parents/guardians, as it can aid the process and support trusting relationships. However, if consent is not agreed, or it is not safe to do so, the referral must still be made to the safeguarding team regardless.

5.4 Adult's safeguarding

The Care Act 2014 statutory guidance defines adult safeguarding as 'protecting an adult's right to live in safety, free from abuse and neglect'. This is usually relating to 'vulnerable' adults as defined by the Care Act 2014:

- Has needs for care and support (whether or not the Local Authority is meeting any of those needs),
- is experiencing, or at risk of, abuse or neglect, and
- as a result of those needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. (Care Act 2014, section 42)

Some customers may not entirely meet this definition but could still be at risk and therefore colleagues will make a judgement dependent on individual circumstances.

Consent to make an Adult's safeguarding referral: All safeguarding concerns relating to vulnerable adults must be referred to the local authority if consent has been agreed.

Vulnerable adults may not give us permission to share their information or make referrals and their wishes should be respected. However, there are some circumstances where consent is not required, and a safeguarding referral should be made to the local authority:

- the person lacks the mental capacity to make that decision – this must be properly explored and recorded in line with the Mental Capacity Act
- other people are, or may be, at risk, including children
- sharing the information could prevent a crime
- the alleged abuser has care and support needs and may also be at risk
- a serious crime has been committed
- colleagues are implicated
- the person has the mental capacity to make that decision, but they may be under duress or being coerced
- the risk is unreasonably high and meets the criteria for a MARAC [multi-agency risk assessment conference referral](#)
- a court order or other legal authority has requested the information.

If you are concerned about the immediate safety of a vulnerable adult, call the Police on 101 or in an emergency 999.

When dealing with Adult safeguarding, we will follow 6 key principles:

1. **EMPOWERMENT** - Supporting adults to make decisions and give informed consent.
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2. **PREVENTION** - Taking action before harm occurs.
 3. **PROPORTIONALITY** - Taking the least intrusive /restrictive response.
 4. **PROTECTION** - Support and representation for those in the greatest need.
 5. **PARTNERSHIP** - Local solutions from services working within the community.
 6. **ACCOUNTABILITY** - Safeguarding practice should be accountable.

Bromford upholds the principle of making safeguarding personal, understanding it should be a person-led approach.

We fully recognise the 5 key principles of the Mental Capacity Act 2005 in all aspects of our work by:

- Presuming each adult at risk has capacity
- Supporting individuals to make their own decisions
- Recognising the right for individuals to make their own decisions, even if they may seem unwise
- Making sure what we do for adults at risk (without capacity) is in their best interests
- Making sure that anything we do is the least restrictive action for the individual

5.5 Our responsibility to our customers

All colleagues, contractors, and third-party organisations, share the responsibility for safeguarding and promoting the welfare of children and vulnerable adults.

Where a colleague or contractor observes or has concerns about an adult or child's welfare or receives a safeguarding disclosure from a third party, the incident must be treated seriously and immediately responded to in accordance with Bromford's Safeguarding Procedure.

Bromford is committed to ensuring colleagues and contractors act appropriately, promptly, and proportionately, and work in partnership with our customers and other organisations to ensure safety for all.

5.6 Supporting those experiencing abuse

Bromford puts its customers first to safeguard the welfare of those experiencing, or at risk of, abuse, harm, or neglect.

We promote the Make Safeguarding Personal (MSP) initiative to empower and engage the customer in any decisions to determine how best they can be protected, if it is appropriate and safe to do so.

We will treat our customers with respect and dignity, without judgement.

The Safeguarding Procedure sets the process a colleague should follow when managing a suspected safeguarding case, this includes making a referral to the statutory agency where appropriate.

5.7 Data protection

Bromford, its contractors, and other organisations we work with, can rely on paragraph 18 of Schedule 1 of the Data Protection Act 2018 (Safeguarding of children and individuals at risk). This sets out conditions for processing data (e.g. sharing information or making a referral) where necessary for the purposes of protecting an individual from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual.

The data we use and share is to fulfil our duties to safeguard children and individuals at risk. Colleagues recording information about safeguarding concerns and making referrals must ensure that this information is accurate.

We will dispose of data in line with Bromford's Data & Document Retention Policy.

[Bromford Privacy Notice](#)

5.8 Taking action against perpetrators

We will work with those experiencing abuse or harm and make full use of the range of civil and legal remedies available to us to safeguard the victim(s) against the perpetrator.

We will work with the Police, as appropriate, to support criminal proceedings.

5.9 Joint working with stakeholders

Bromford will work in partnership with local authorities and agencies who are protecting children and vulnerable adults from abuse, harm, or neglect.

Each Local Authority has in place different reporting arrangements and procedures which colleagues will adhere to.

Bromford will also work closely with stakeholders such as Social Services, Health, Voluntary agencies, and the Police.

5.10 Escalation process

Where colleagues or contractors are not satisfied with the response received from any other agency or stakeholder regarding a Safeguarding concern:

- Colleagues should discuss the concern with their leader and agree an action plan (within 1 working day). Contractors should share their concerns with a Bromford colleague who will escalate to a leader where appropriate.
- The leader at Bromford will liaise with the equivalent manager within the agency concerned (within 2 working days).

If the leader remains unsatisfied with the outcome, the case should be referred to a Bromford senior leader and be raised with an equivalent senior leader within the agency concerned (within 2 working days).

5.11 Risk management

- Safeguarding will be an integral part of day-to-day activity and leaders will review cases and learning in 1:1's/Team meetings/Team talks.
- Leaders will act in line with our Disciplinary Procedure if a colleague fails to report allegations of suspected or actual abuse and does not act in accordance with our Safeguarding and Domestic Abuse Policies and Procedures.
- We will keep a record of all safeguarding concerns, referrals and outcomes
- Customer Experience will produce quarterly and annual safeguarding reports
- If a contractor fails to report a safeguarding or domestic abuse concern, they could be held accountable, liable, and may be required to evidence the rationale for failing to report.
- Bromford will conduct an annual review of safeguarding which will assess the effectiveness of our approach to Safeguarding including a review of our contractors reporting, interagency working, as well as incorporating internal and external learning, such as from Serious Case Reviews and wider good practice.
- Performance updates will be recorded against Key Strategic Risk Indicators.
- Bromford will ensure our approach to safeguarding is current, proportionate, and relates to up-to-date legislation.

Assurance Framework

Bromford has adopted the 'three lines of assurance' model. It is built upon Bromford's strong control culture and organisational delegation of responsibility. It is the responsibility of managerial and supervisory colleagues within business units who use the policy to ensure that the policy is communicated and effectively implemented, and to ensure colleagues are aware of their responsibilities. Adhering to policy and underpinning procedures ensures we continue to operate within our overall risk appetite as a business.

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