

Safeguarding Policy and Procedure

Version 1.1



1. Introduction

- 1.1 Heylo Housing Group Limited (HHGL) is the immediate parent company of the Group, which includes Heylo Housing Registered Provider Limited (HHRP). Also within the Group are a number of property owning investment vehicles (Pods) which are subsidiaries of HHGL, with HH No. 7 Ltd being a direct subsidiary of HHRP. This policy covers all Group entities, (collectively referred to in this policy as 'Heylo'). The Heylo Group's purpose is to help aspiring homeowners and renters find a place to call home, provide home ownership solutions across England. Heylo currently provides three different Shared Ownership products – Home Reach, Home Reach Flex and Your Home.
- 1.2 All customer facing services to Heylo customers are provided by employees of ResiManagement, a separate, but commonly controlled company.

2. Definitions

- 2.1 **Abuse:** the violation of an individual's human and civil rights by any other person or persons.
- (a) Abuse can occur in any relationship and may result in significant harm to the person subjected to it.
 - (b) Abuse may consist of a single act or repeated acts, and it can be intentional or unintentional.
 - (c) There are many types of abuse – the categories generally recognised in Adult Safeguarding and in the Safeguarding of Children & Young People are listed below. This list is not exhaustive;
 - (i) Psychological / emotional abuse
 - (ii) Physical
 - (iii) Sexual
 - (iv) Financial or material
 - (v) Modern slavery: 'trafficking in persons' and 'human trafficking' for the act of recruiting, harbouring, transporting, providing or obtaining a person for compelled labour or commercial sex acts through use of force, fraud or coercion.
 - (vi) Domestic abuse: encompasses controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners or family members, regardless of gender or sexuality. Includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage.
 - (vii) Discriminatory abuse
 - (viii) Institutional or organisational abuse
 - (ix) Exploitation / grooming: the act of using a adult / child for profit, labour, sexual gratification or some other personal or financial advantage.

- (x) **Prevent Duty - Radicalisation / extremism:** the act or process of causing someone to adapt radical positions on political or social issues. The aim of early identification and early intervention is to divert people away from being drawn into terrorist activity.
- 2.2 **Neglect:** a failure to provide necessary care, assistance, guidance or attention that causes, or is reasonably likely to cause, physical, mental or emotional harm. Examples:
 - (a) Act of omission
 - (b) Self-neglect – neglecting to care for one’s personal hygiene, health or surroundings, including behaviour such as hoarding.
 - (c) Failing to provide proper food, suitable clothing for the weather, supervision, a home that is clean and safe and medical care
 - (d) Failing to provide emotional support, love and affection.
- 2.3 **Child:** individuals under the age of 18
- 2.4 **Company:** Refers to ResiManagement and its affiliates including but not limited to Heylo Housing Group Limited & Heylo Housing Registered Provider Limited.
- 2.5 **Employee:** Refers to all individuals who are employed by or on behalf of ResiManagement, including full-time, part-time, temporary and contracted employees ('you').
- 2.6 **Safeguarding Adults** (Care Act 2014): Protecting an adult’s right to live in safety, free from abuse and neglect
- 2.7 **Safeguarding Children** (Department of Education’s Working Together to Safeguard Children 2021):
 - (a) Protecting children from maltreatment.
 - (b) Preventing impairment of children’s health or development.
 - (c) Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
 - (d) Taking action to enable all children to have the best outcomes
- 2.8 **Vulnerable adult at risk:** anyone over 18 and over who has care and/or support needs, is experiencing or is at risk of abuse or neglect, is unable to protect themselves against significant harm or exploitation.

3. Purpose

- 3.1 This Safeguarding Policy & Procedure is an overarching policy applying across our Company. All employees, Board members and engaged customers must be aware of this policy and procedure and recognise that it is everyone’s ‘responsibility’ to act should safeguarding concerns arise.
- 3.2 This policy & procedure outlines our approach to preventing and reducing the risk of harm to our customers, who are experiencing, or are at risk from abuse or neglect.

- 3.3 The Company recognises and is committed to working in partnership with external agencies to ensure a multi-agency approach where necessary.
- 3.4 This policy supports the Company in meeting the Regulator of Social Housing Neighbourhood & Community Consumer Standard.

4. Aims and Objectives

- 4.1 The aims & objectives of this policy are to:
- (a) Outline the Company's approach to dealing with safeguarding;
 - (b) Raise awareness about the abuse and / neglect of children, young people and adults at risk;
 - (c) Develop a culture that does not tolerate such abuse and which encourages people to raise concerns of what they see, hear, are told or have a gut feeling;
 - (d) Outline how we will work with our service partners to develop partnership working with other agencies to support safeguarding;
 - (e) Ensure that staff are fully knowledgeable and trained on Heylo procedures to respond promptly and proportionately to any safeguarding concern.
- 4.2 This policy applies to all Company partners from whom we commission external services. We expect them to have appropriate safeguarding procedures in place.

5. Policy Statement

- 5.1 The Company will apply the Department of Health's six key principles which underpin safeguarding work:
- (a) **Protection** – Support and protection are key to safeguarding residents from harm, abuse and to protect those who are unable to make decisions about their own safety.
 - (b) **Prevention** – Raising awareness and supporting people to protect themselves. It is preferable to take action before harm occurs. Organisations have processes in place to protect and minimise the risk of abuse.
 - (c) **Proportionality** – The least intrusive response appropriate to the risk presented.
 - (d) **Partnership Working** – Local solutions through services with their communities. Communities have a vital role to play in preventing, detecting and reporting neglect and abuse.
 - (e) **Empowerment** – People are supported to take control of their own lives and their consent is needed for decisions and actions designed to protect them.
 - (f) **Accountability** – To demonstrate accountability and transparency in delivering safeguarding.
- 5.2 The Company will take preventative, proportionate, and appropriate proactive action to ensure all individuals experiencing harm, or at risk of harm, are safeguarded.

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- 5.3 With all safeguarding suspicions or allegations including neglect and abuse, the Company will complete a Safeguarding Concerns Report (see Appendix 1). If significant risk is identified the concerns will be forwarded to the appropriate Local Authority for further investigation (refer to 5.1 MASH).
- 5.4 It is for statutory and specialist agencies to personalise their response based on the age and capacity of the individual to make decisions for themselves. The Company's role is to ensure any concerns are reported and that person is effectively safeguarded.
- 5.5 The Company recognise that appropriate information sharing between organisations is essential to safeguard people at risk and the Company will act in accordance with agreed inter-agency information sharing protocols. Where possible, the Company will seek a person's consent to share information however the Company cannot guarantee full confidentiality when the Company's responsibility to safeguard adults or children at risk, or the public interest, is greater than the Company's responsibility to an individual. The Local Authority has a duty to receive the alert and decide whether a safeguarding enquiry is necessary or not.
- 5.6 This policy and procedure should be read in conjunction with:
- (a) Heylo's Domestic Abuse Policy which provides specific guidance in relation to action to be taken in relation to supporting those residents who are suspected or confirmed to be experiencing domestic abuse.
 - (b) ResiManagement's employee handbook which confirms the expectations upon employees to comply with Heylo's published policies and procedures including the processing of resident / customer data and the consequences of not doing so.

6. Roles and Responsibilities

- 6.1 The Company will:
- (a) Establish and maintain policies, controls and procedures to support the delivery of all safeguarding requirements in relation to its employees and activities.
 - (b) Ensure this policy and procedure is regularly reviewed and updated as may be required.
- 6.2 The officer nominated to receive disclosures about suspected or confirmed safeguarding concerns is the Safeguarding Officer. The Safeguarding Officer is:
- (a) Name / Job Title: Rachael Swales, Director of Property Management
 - (b) Email: RSwales@heylohousing.com
 - (c) Telephone: 020 8126 7667
- 6.3 The Safeguarding Officer is responsible for:
- (a) Dealing with all disclosures confidentially and make decisions on reporting the activity to the relevant authority.;
 - (b) Maintaining records relating to safeguarding reports, the reasons why a report was, or was not, submitted to the relevant authority, and any communications to or from the relevant authorities about a safeguarding concerns;

- (c) Providing support, advice and expertise to employees in safeguarding-related matters;
 - (d) Ensuring the relevant property management employees are familiar with this Safeguarding Policy & Procedures and following them where required.
- 6.4 The Human Resources Team is responsible for ensuring appropriate training and support is given centrally to all employees and the Safeguarding Officer to enable them to be able to fulfil the requirements of this policy and procedure.
- 6.5 All employees are responsible for reading and keeping up to date with this policy and procedure and following its requirements, reporting relevant concerns to the Safeguarding Officer (see 7 below)

7. Partnership Working, Data Protection & Privacy Statement

- 7.1 The Company will work closely with a number of partners and agencies responsible for Safeguarding those at risk as appropriate and as we may be invited to, in recognition that the Company does not carry out a statutory safeguarding function for relevant local authorities or other support services. This will include but are not limited to:
- (a) **Local Joint Action Groups** – Which are used to work in partnership with the police and other agencies to share information on and manage crime.
 - (b) **Local Safeguarding Children Boards** – which aim to protect children at risk
 - (c) **Multi- Agency Public Protection Arrangements** – The mechanism through which statutory agencies aim to manage risk posed by sexual and violent offenders, in a co-ordinated way in order to protect the public
 - (d) **MARAC** – Multi-Agency Risk Assessment Conference which aim to protect those affected by domestic violence
 - (e) **Multi-agency Safeguarding Hub (MASH)** – single point of contact for all professionals to report safeguarding concerns arranged by the relevant local authority and statutory support services.
 - (f) **Safeguarding Adult Review (SAR)** – Safeguarding Adult Boards must arrange a SAR when an adult dies as a result of, or has experienced serious abuse or neglect, whether known or suspected and there is concern that partner agencies could have worked more effectively together. The aim of SAR is to identify learning and improvement action.
 - (g) **Serious Case Review (SCR)** – An SCR takes place after a child dies or is seriously injured and abuse or neglect is thought to be involved. It looks at lessons that can help prevent similar incidence from happening in the future.
- 7.2 All Safeguarding is highly confidential, should be treated in a sensitive manner and on a need to know basis.
- 7.3 The Company has a professional responsibility to share information with other statutory agencies to safeguard adults and children. This includes but is not limited to:
- (a) Local Authority Safeguarding Teams and Boards

- (b) Local Authority mental health teams, crisis intervention, and community wellbeing teams
- (c) Police and Probation Services
- (d) Fire Service
- (e) Schools and child social workers
- (f) Medical professionals (GP / Community Mental Health Practitioner etc)

- 7.4 To this effect, employees will be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement unless it is unsafe or inappropriate to do so. Confidentiality cannot be guaranteed.
- 7.5 All personal data processed regarding individuals as part of a safeguarding case will be processed in line with the Company Privacy Statement (which is available on Heylo's website), Employee Information Security Policy, Data Protection Policy, Data Retention Policy & Schedule and associated policies and procedures as they may be amended or adopted over time, and the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA).

8. Monitoring and responsibilities

- 8.1 The Company will record all cases of safeguarding concerns following our procedures.
- 8.2 Cases will be reviewed and monitored at quarterly Safeguarding Meetings of the Safeguarding Officer, Director of Public Sector Engagement & Director of Governance. The meetings are used to close cases where the Company have sign posted cases to external agencies or case where it is felt that Heylo are not required to carry out any further actions.

9. Identifying a Safeguarding Concern & Procedure

- 9.1 All employees have a responsibility to report any safeguarding concerns they have, frontline employees are more likely to identify safeguarding concerns.
- 9.2 Concerns may be identified by something you see, hear, are told or simply through a 'gut feeling'. If you are in doubt, speak to the Safeguarding Officer.
- 9.3 **If anyone is in immediate danger call 999.**
- 9.4 The reporting officer will usually be the Safeguarding Officer but if they are not available, it is the person who is dealing/coordinating the safeguarding concern. The reporting officer is responsible for:
- (a) Liaising with the person at risk (where appropriate)
 - (b) Notifying their line manager (where appropriate)
 - (c) Notifying the Safeguarding Officer

- (d) Completing initial safeguarding concern form / report with the Safeguarding Officer and maintaining case notes on the safeguarding concerns form and keep as a live document (until agreed case closure with the Safeguarding Officer)
 - (e) Presenting the case at the relevant Safeguarding Meetings for review.
 - (f) Scanning and sending completed Safeguarding concerns report form to the Safeguarding Officer
 - (g) Saving documents in confidential Safeguarding folder
- 9.5 The **Safeguarding Concerns Report (see Appendix 1)** must be completed for all initial safeguarding concerns regardless of the outcome. When completing the form include historic and current information in full. This report can be used for a referral to external agencies as appropriate.
- 9.6 All cases involving Child Protection or vulnerable adults should be investigated within 48 hours.
- 9.7 Domestic Abuse is a form of safeguarding concern and so this policy and procedure should be followed to support the effective discovery and management of suspected domestic abuse also.

10. Review

- 10.1 This policy will be reviewed every 2 years, or sooner if there is a specific legislative, regulatory or service requirement or change in guidance, law or practice.

Appendix 1 - Safeguarding Concern Report

Safeguarding incident or concern: Template report form

This form is designed to report any safeguarding incidents or concerns. It should be completed by the Employee who has been disclosed to, who witnessed the incident, was most directly involved or who provided first aid if relevant. Once completed it must be submitted to the Safeguarding Officer in accordance with the Safeguarding Policy & Procedure.

Name & role of person completing this form:

Date form is completed:

Details of child, young person or adult at risk:

Name:	Address:
Contact number:	Date of Birth (if known):

Parents/carers details:

Name:	Address:
Contact number:	Email address:

Have parents/carers been notified of the incident?: Yes / No	If yes, please provide details:

Details of Reporting Officer:

Are you reporting your own concerns or responding to concerns raised by someone else?	Reporting my own concerns	
	Responding to someone else's concerns	
If responding to someone else's concerns, please provide their details below:		
Name:		
Relationship to child, young person or adult at risk:		
Email address:		
Contact number:		

Incident Details:

Date/ Time:	Group name (if applicable):
Location of incident:	
Description of the incident or concern: (continue on separate sheet if necessary & include reference number): <i>(Include relevant information such as what happened and how it happened, description of any injuries sustained, behaviour witnessed and whether the information provided is being recorded as fact, opinion or hearsay)</i> 	

Details of any previous concerns, incidents or relevant safeguarding records:

Child, young person or adult at risk account of the incident or concern: *(use their own words)*

Details of any witnesses:		
Name(s): <i>(Consider anonymising where this will not negatively impact the ability to take immediate response actions)</i>	Relationship to child, young person or adult at risk:	Contact details:

Witness account of incident or concern: *(include further accounts on separate sheets as necessary. Include reference number on each accompanying account)*

Details of any persons involved in the incident or alleged to have caused the incident, injury or presenting risk:

Name(s): <i>(Consider anonymising where this will not negatively impact the ability to take immediate response actions)</i>	Relationship to child, young person or adult at risk:	Contact details:

Outcome of incident & immediate actions taken: (tick box where relevant)		
Ambulance required? Y/N	First aid treatment provided: and by whom	Medication given:
Name of hospital / medical facility attended if applicable:		
Police/fire/rescue services attended? Y/N		
Notes:		

Any resulting change of plans or disruption to the programme, if applicable:	Disciplinary procedures enacted:	Were any immediate changes to risk management procedures made?
Signed By Author:	Name:	Date:

Reporting to the Safeguarding Officer (SO) section: (to be completed by SO)

Date & time SO notified of incident/concern:
Date & time this form passed on to SO (if different from above):
SO comments: <i>(actions taken / impact on rest of programme / external agency involvement / initial lessons learned / follow-up actions required)</i>
External agency referral:

Social services notified? Y/N	LADO notified? Y/N	Other referral made? Y/N
Date & time of referral:	Date & time of referral:	Agency:
Name of contact person:	Name of contact person:	Date & time of referral:
Contact number / email:	Contact number / email:	Name of contact person:
Agreed action or advice given:	Agreed action or advice given:	Contact number / email:
		Agreed action or advice given:
Signed By SO:	Name:	Date:

For Safeguarding Meeting Review Use Only:

Follow-up action required:		
Action:	Due date:	Whom responsible:

Version Control

Version	Date	Author	Verifier	Comments
1.0	September 2024	Director of Governance & General Counsel	HHRP, HHGL and ResiManagement Boards	Approved by the HHGL, HHRP and ResiManagement Boards
1.1	July 2025	Governance Manager	HHRP and HHGL Boards	Adoption of standard format and standard introductory wording
Next review due: September 2025				



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know and we'll do our best to
accommodate your needs.

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The Registered Office of each of the group companies is:
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HHRP is a private limited company (Companies House Number 06573772) and is a for profit Registered Provider (registration number 4668) regulated by the Regulator of Social Housing.

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