
Sanctuary Group

Title: Safeguarding - Group Policy

Business Function: All Functions across Sanctuary Group in England
All Functions across Cornwall Care

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Authorised by: Executive Committee

Sanctuary Group:
Sanctuary Group is a trading name of Sanctuary Housing Association,
an exempt charity, and all its subsidiaries.

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1. Purpose

- 1.1 The purpose of this policy is to protect people, particularly children and adults who may be at risk of abuse and/or neglect due to their care and support needs or young age. The policy outlines the commitments made by Sanctuary Group (the Group) and informs staff of their responsibilities regarding safeguarding, including the legal framework within which abuse, and neglect is addressed.
- 1.2 This is an overarching policy that applies across all directorates within England, for both children, young people, and adults at risk. A separate policy and procedure exist for Sanctuary Scotland.

2. Policy statement

- 2.1 The Group believes living a life free from harm and abuse is a fundamental right of every person and recognises safeguarding those at-risk is everyone's responsibility. All staff play a part in preventing, being alert to and responding appropriately to abuse and/or neglect related customer concerns.

3. Safeguarding adults

- 3.1 The Group is committed to the following principles derived from the Care Act 2014 in all aspects of safeguarding adults, these are:
 - 1) **Empowerment** - supporting and encouraging people to make their own decisions, including supporting those who lack capacity to get involved and helping them remain informed where possible.
 - 2) **Prevention** - acting before harm occurs and responding quickly to suspected cases of abuse.
 - 3) **Proportionality** - making sure that what we do is appropriate and the least intrusive for the person and to the situation.
 - 4) **Protection** - support and representation for those in greatest need.
 - 5) **Partnership** - sharing the right information in the right way and involving appropriate agencies.
 - 6) **Accountability** - making our processes transparent and ensuring everybody understands their role in safeguarding.

4. Safeguarding children

- 4.1 The Group is committed to safeguarding children and young people who use or are connected to our services. We will act in accordance with the two key principles of the Children Acts by 'making safeguarding everyone's responsibility' and adopting a 'child-centred approach'. We will always act in the best interests of the child when there is a safeguarding concern, which may mean contradicting their wishes.

5. Mental Capacity

- 5.1 In terms of making safeguarding personal an assessment of capacity is required and where appropriate a best interest decision made.
- 5.2 The Mental Capacity Act applies to everybody who has dealings with people who may lack capacity, particularly if they have a professional relationship with the person.
- 5.3 The Group will comply with the requirements set out in the Mental Capacity Act 2005 and will consider the Act's five key principles during interactions with customers:

Presumption of capacity	Every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise.
Support to make a decision	A person must be given all practicable help before anyone treats them as not being able to make their own decisions.
Unwise decisions	Just because an individual makes what might be seen as an unwise decision, they should not be assumed to lack capacity to make that decision.
Best Interests	An act done, or decision made under the Act for or on behalf of a person who lacks capacity must be done in their best interests.
Least restrictive	Anything done for or on behalf of a person who lacks capacity must consider whether it is possible to decide or act in a way that would interfere less with the person's rights and freedoms of action, or whether there is a need to decide or act at all.

- 5.4 We will take the opportunity to confirm capacity when appropriate.
- 5.5 We will carry out an assessment when a person's capacity is in doubt, either because their behaviour causes concern about lack of capacity or because they have been diagnosed with an impairment or disturbance that affects the way their mind or brain works. We will securely store any mental capacity assessment (in line with the mental capacity procedure).

6. Modern Slavery

- 6.1 We produce an annual modern slavery and human trafficking statement as required by the Modern Slavery Act 2015, which is published on the Group website. The Group is fundamentally opposed to slavery and human trafficking and will do what we can to ensure it is not taking place in our business or supply chains.

7. Prevention

7.1 The Group is committed to ensuring that thorough data analysis is an integral part of our proactive safeguarding activities. This commitment is an essential component of our safeguarding responsibilities. We will utilise data-driven insights to assess the effectiveness of our safeguarding measures, identify potential risks and interventions, and to inform our safeguarding action plan, policies and procedures. Undertaking data analysis allows us to undertake preventative measures to ensure the safety, protection, and well-being of all customers. The Group will:

- Ensure all staff know their safeguarding responsibilities.
- Raise awareness about abuse and/or neglect of children, young people, and adults at risk; including that of radicalisation and online safety.
- Ensure safeguarding is a fundamental part of staff induction and ongoing training programmes for all staff at a level appropriate for their role.
- Develop a culture that does not tolerate such abuse and neglect, and which encourages people to raise concerns.
- Recruit and employ staff working with children, young people and adults at risk who are competent and safe to do so. Undertaking the necessary DBS (Disclosure and Barring Service) checks and share information on staff found to be unsuitable to work with people at risk, by referring their details to the DBS. We will ensure via our procurement processes that contractors and sub-contractors also comply with these requirements.
- Respond promptly and proportionately when abuse and neglect does happen.
- Ensure there is easy to understand customer facing information on what abuse is and how to report suspected abuse.
- Comply with all accessible information standards.

8. Reporting

8.1 The Group will ensure:

- Safe, appropriate, accessible means of reporting safeguarding concerns are available to staff and the people we work with.
- That it supports people to raise concerns.
- Where abuse and/or neglect may be committed by a member of staff, agent or by others who are in a trusting relationship with a person at risk, there is an appropriate reporting process.
- Any staff reporting concerns or complaints by a staff member will be protected by the [Whistleblowing - Group Policy and Procedure](#), where appropriate.
- All safeguarding concerns are reported on the Radar system allowing for appropriate oversight.
- That it supports and protects all staff and volunteers who report safeguarding concerns in good faith (i.e., without malicious intent).
- We will work in line with Local Authority Safeguarding Policies and Procedures

9. Response

9.1 The Group will:

- Follow up safeguarding concerns and, where appropriate, make the necessary referrals to engage the relevant authorities, to take measures to prevent the abuse continuing.
- Ensure the person affected and the person responsible (where care and support needs are present) receive effective support.
- Respond in an open manner, be non-judgemental and be culturally sensitive.
- Follow a multi-agency approach with effective joint working. The Group recognises the lead responsibility of local authorities in co-ordinating safeguarding, and the role of staff in alerting children/adult services and/or the police of any concerns regarding safety. Any suspected or actual crime will be referred to the police.
- Ensure, where a customer or potential customer is a known risk to others, a risk assessment is undertaken regarding the appropriateness of any proposed letting and to agree how risks will be managed in a proportionate and feasible way. We will work in partnership with the relevant Multi Agency Risk Assessment Conference (MARAC) or Multi Agency Public Protection Arrangements (MAPPA) in this respect.
- Ensure appropriate information sharing between organisations to safeguard people at risk and act in accordance with agreed inter-agency information sharing protocols.
- Where possible, seek a person's consent to share information, however we cannot guarantee full confidentiality when our responsibility to safeguard adults or children at risk, or the public interest, is greater than our responsibility to an individual.
- Following serious cases, conduct an internal review identifying improvements to working practices and processes where required.
- Share lessons learnt across the organisation

10. Roles and responsibilities

10.1 It is important staff, managers, directors, board members and customers are aware safeguarding is 'everyone's responsibility' and we all have a responsibility to act on concerns of abuse or neglect. This policy applies:

- to the protection of children, young people, and adults at risk across all tenures; and
- to staff, contractors, sub-contractors, and agents working for or on behalf of the Group.

10.2 Everyone has a responsibility to maintain awareness of safeguarding as-well-as identifying and reporting, abuse, neglect, and poor practice.

10.3 Front Line Managers must ensure staff follow safeguarding processes and provide guidance on safeguarding concerns, escalating as necessary to Senior Management or the Group Safeguarding Manager.

- 10.4 Senior Managers work strategically alongside the Group Safeguarding Manager and Quality team to ensure the right policies and procedures are in place to safeguard effectively. They must have oversight of safeguarding incidents within their area and ensure appropriate support and guidance is provided to their teams.
- 10.5 The Group Safeguarding Manager provides advice and support to managers and champions across the business, overseeing complex cases as-well-as providing updates to Senior Management. The Group Safeguarding Manager provides strategic direction undertaking research and benchmarking to ensure the Group deliver on its objectives.
- 10.6 The Operational Director (or equivalent) is responsible for ensuring adoption of and adherence to this policy and associated procedures.

11. Impact on diversity

- 11.1 The Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the [Equality Act 2010](#) and in accordance with the '[Sanctuary Inclusion for All Strategy 2024-2026](#)'.
- 11.2 We empower our staff, those working on behalf of the Group and our customers to play a part in promoting their own welfare and that of others. Every person has the right to be safe and live life free from abuse and neglect.

12. Customer consultation

- 12.1 Where appropriate, key stakeholders and interested parties will be consulted as part of any review of this policy.

13. Monitoring and compliance

- 13.1 The Group will evaluate safeguarding incidents to identify outcomes trends and any required changes to policy and procedure.
- 13.2 On a monthly basis relevant Senior Management teams analyse safeguarding data and trends to identify key areas for improvement.
- 13.3 On a quarterly basis, the Group Safeguarding Manager reports safeguarding findings to the Sanctuary Group Safeguarding Steering Group (SGSSG) to identify trends, outcomes and agree strategic priorities.

14. Period of review

- 14.1 This policy will be reviewed in accordance with the policy review programme agreed by Executive Committee.

14.2 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, because of complaints or findings from any independent organisations, the Chief Customer Officer/Chief Operating Officer - Commercial will initiate an immediate review

14.3 Until a new policy is formally adopted, this document will remain in force and operational.

15. Approval

15.1 This policy is approved by the Group's Executive Committee.

16. Operational arrangements

16.1 This policy must be read in conjunction with the following procedures each business area may have additional procedures and guidance:

- [Safeguarding Adults - Group Procedure \(England\)](#)
- [Safeguarding Children - Group Procedure \(England\)](#)

17. References and sources

- [Children and Social Work Act 2017](#)
- [Children \(Leaving Care\) Act 2000](#)
- [Children Act 1989](#)
- [Children Act 2004](#)
- [Crime and Disorder Act 1998](#)
- [Counter-Terrorism and Security Act 2015](#) and the [Revised Prevention duty guidance: for England and Wales](#)
- [Data Protection Act 2018](#)
- [Domestic Abuse Act 2021](#)
- [Equality Act 2010](#)
- [Forced Marriage \(Civil Protection\) Act 2007](#)
- [Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2014](#)
- [Human Rights Act 1998](#)
- [Mental Capacity Act 2005](#)
- [Mental Health Act 2007](#)
- [Modern Slavery Act 2015](#)
- [Police and Criminal Evidence Act 1984](#)
- [Protection of Children Act 1999](#)
- [Public Interest Disclosure Act 1998](#)
- [Registered Homes \(Amendment\) Act 1991](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Serious Crime Act 2015](#)
- [Sexual Offences Act 2003](#)
- [Children and Families Act 2014](#)
- [Children and Young Persons Act 2008](#)
- [Protection of Freedoms Act 2012](#)
- [The Care Act 2014](#)
- [The Local Safeguarding Children Boards Regulations 2006](#)

- [The Mental Capacity Act 2005 - Deprivation of liberty protection safeguards](#)
- [Disciplinary - Group Procedure](#)
- [Professional Boundaries - Care and Support Policy and Procedure](#)
- [Recruitment and Selection - Group Procedure](#)
- [Risk Assessment - Group Procedure](#)
- [Positive Risk Management - Care Policy and Procedure](#)
- [Whistleblowing - Group Policy and Procedure](#)