The Whiteley Homes Trust

Safeguarding Policy and Procedure

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Review Tracker

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April 2026	Jane Major, Registered Manager/LT/HODs	New Template Updated policy	RECC	12/05/2026	1.0
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Introduction

At The Whiteley Homes Trust, known throughout this policy as the Trust, we're committed to fostering a safe, inclusive, and transparent environment for everyone who lives, works and is associated with us. This policy sets out the standards, procedures, and responsibilities relevant to safeguarding and is designed to ensure clarity, consistency, and confidence across all interactions and practices.

We believe that transparency builds trust. That's why this document uses language that reflects the many roles and relationships within our community. Whether you are an employee, resident, volunteer, contractor, supplier, or third-party partner, this policy aims to guide and inform you in a way that's accessible, respectful, and representative.

Through clarity and openness, we aim to foster understanding, accountability, and confidence across our workforce and wider community.

Scope of Applicability

This policy applies to all individuals engaged with The Trust, including employees, agency workers, bank workers and volunteers. Throughout this policy, these groups are referred to collectively as *"employees"* for clarity and ease of reference.

It also covers residents including beneficiaries, tenants in our private let homes and their households. Throughout this policy, these groups are referred to collectively as "residents" for clarity and ease of reference.

In addition, this policy extends to third-party stakeholders, including contractors, suppliers, and external individuals or organisations that provide services on behalf of the Trust.

The Trust is committed to communicating with openness and transparency. By clearly outlining who is covered by our policies, we aim to foster understanding, accountability, and trust within our diverse community.

1. Policy Statement

The Trust is committed to safeguarding adults at risk, ensuring their safety, wellbeing, dignity, and human rights are upheld at all times. The organisation operates a **zero-tolerance approach** to abuse, neglect, and exploitation and recognises that safeguarding is **everyone's responsibility**. This zero-tolerance approach is supported by robust reporting, investigation, and disciplinary processes, ensuring that all concerns are acted upon promptly and proportionately

This policy ensures compliance with the **Care Act 2014**, associated statutory guidance, and relevant legislation, and aligns with **Elmbridge multi-agency safeguarding procedures**.

2. Purpose

The purpose of this policy is to:

- Protect adults from abuse, neglect, and exploitation
- Promote the wellbeing, independence, and rights of residents
- Provide clear guidance on recognising and responding to safeguarding concerns
- Ensure employees understand their roles and responsibilities
- Establish robust reporting, recording, and escalation processes

Support partnership working with local authorities, police, health services and other agencies.

3. Legal and Regulatory Framework

The Trust ensures that safeguarding practice is informed by and complies with current UK legislation, statutory guidance, and best practice frameworks.

This policy is underpinned by the following key legislation:

3.1 Primary Safeguarding Legislation

- **The Care Act 2014**
  The primary legislation governing adult safeguarding, setting out duties for preventing abuse and neglect and establishing Safeguarding Adults Boards.
- **Care and Support Statutory Guidance (updated regularly)**
  Provides detailed guidance on safeguarding responsibilities, including Section 42 enquiries and Making Safeguarding Personal.

3.2 Mental Capacity and Deprivation of Liberty

- **Mental Capacity Act 2005 (MCA)**
  Provides the legal framework for decision-making on behalf of individuals who lack capacity.
- **Mental Capacity (Amendment) Act 2019 / Liberty Protection Safeguards (LPS)**
  Introduces Liberty Protection Safeguards, replacing Deprivation of Liberty Safeguards (DoLS), to ensure lawful authorisation of restrictions on a person's liberty.

3.3 Human Rights and Equality

- **Human Rights Act 1998**
  Protects fundamental rights such as dignity, safety, and freedom from degrading treatment.

- **Equality Act 2010**
  Ensures protection from discrimination and promotes equality across protected characteristics.

3.4 Health and Social Care Regulation

- **Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**
  Particularly:
  - Regulation 12 (Safe Care and Treatment)
  - Regulation 13 (Safeguarding Service Users from Abuse and Improper Treatment)
  - Regulation 17 (Good Governance)

- **Care Quality Commission (CQC) Guidance and Quality Statements (2023 onwards) – Huntley House only**
  Ensures services meet expectations under the Single Assessment Framework, including safeguarding, safe systems, and person-centred care.

3.5 Abuse, Exploitation and Crime

- **Domestic Abuse Act 2021**
  Provides a statutory definition of domestic abuse, including coercive and controlling behaviour, and strengthens protections for victims.
- **Modern Slavery Act 2015**
  Addresses human trafficking and exploitation.
- **Serious Crime Act 2015 (Section 76)**
  Criminalises coercive and controlling behaviour in relationships.
- **Sexual Offences Act 2003**
  Defines and protects against sexual abuse.
- **Criminal Justice and Courts Act 2015**
  Includes offences of ill-treatment or wilful neglect.

3.6 Preventing Radicalisation and Exploitation

- **Counter-Terrorism and Security Act 2015 (Prevent Duty)**
  Requires organisations to have due regard to preventing individuals from being drawn into terrorism.

3.7 Information Sharing and Confidentiality

- **Data Protection Act 2018 and UK GDPR**
  Governs lawful processing and sharing of CQC information.
- **Care Act 2014 – Information Sharing Duties**
  Supports appropriate information sharing to protect individuals at risk.

3.8 Workforce and Accountability

- **Safeguarding Vulnerable Groups Act 2006**
  Establishes the Disclosure and Barring Service (DBS) and safer recruitment practices.
- **Public Interest Disclosure Act 1998 (Whistleblowing)**
  Protects employees who raise concerns about poor practice or wrongdoing.

3.9 Multi-Agency and Local Governance

- **Care Act 2014 – Section 43**
  Requires local authorities to establish Safeguarding Adults Boards (SABs), bringing agencies together to prevent abuse and neglect.
- **Local Safeguarding Adults Board (Elmbridge) Procedures**
  The Trust will follow the local multi-agency safeguarding procedures, which take precedence in safeguarding investigations.

3.10 Best Practice Guidance

This policy is also informed by:

- **Making Safeguarding Personal (Local Government Association)**
  Promotes person-centred safeguarding outcomes.
- **NHS Safeguarding Competency Framework (latest edition)**
  Defines required knowledge and skills for employees at all levels.
- **SCIE (Social Care Institute for Excellence) Safeguarding Guidance**

3.11 Policy Statement on Compliance

The Trust will:

- Ensure compliance with all relevant legislation and statutory guidance
- Align Huntley House practice with CQC expectations and quality statements
- Work collaboratively with local safeguarding partners
- Regularly review legal updates and reflect them within this policy

4. Definitions

4.1 Adult at Risk

An adult who:

- Has care and support needs
- Is experiencing, or at risk of, abuse or neglect
- Is unable to protect themselves due to those needs

4.2 Safeguarding

Actions taken to:

- Protect a person's right to live safely and free from abuse
- Prevent and respond to harm
- Promote wellbeing and dignity

5. Types of Abuse

Employees must be able to recognise, understand, and respond to all forms of abuse and neglect. Abuse may be **deliberate or unintentional**, occur **once or repeatedly**, and may be **carried out by anyone**, including employees, family members, other residents, or individuals in the community.

Please see **Appendix One.**

6. Principles of Safeguarding

All safeguarding activity within The Trust must be guided by the six key principles set out in the **Care Act 2014**. These principles underpin all safeguarding decisions, ensuring that practice is **lawful, person-centred, proportionate, and outcome focused**.

Safeguarding is not solely about protecting individuals from harm; it is about **promoting wellbeing, independence, and choice while managing risk safely**.

Empowerment – Person-Led Safeguarding - Individuals are encouraged and supported to make their own decisions and give informed consent wherever possible.

Prevention – Early Intervention and Risk Reduction It is better to take action before harm occurs.

Proportionality – Least Restrictive Response - Responses to safeguarding concerns must be appropriate to the level of risk.

Protection – Supporting Those at Greatest Risk - Support and representation must be provided to individuals in greatest need.

Partnership – Multi-Agency Working - Safeguarding is a shared responsibility, requiring effective collaboration.

Accountability – Transparency and Responsibility - There must be clear accountability for safeguarding actions and decisions.

7. Organisational Responsibilities

7.1 Governance

- The Registered Manager has overall responsibility for safeguarding
- The Director of Operations holds executive accountability for safeguarding governance across the Trust, ensuring oversight, assurance, and reporting to senior leadership and the Board
- A named **Safeguarding Lead** is appointed

7.2 Leadership Team

- Ensure that safeguarding is embedded into organisational culture
- Promote openness, accountability, and learning
- Ensure compliance with multi-agency procedures

8. Roles and Responsibilities

8.1 All Employees Must

- Recognise signs of abuse and neglect
- Respond promptly to concerns
- Report concerns immediately
- Maintain accurate records
- Attend safeguarding training
- Follow whistleblowing procedures where required
- Respect, dignity, rights, and confidentiality

8.2 Registered Manager / Head of Housing

- Lead safeguarding practice and decision-making
- Assess risks and establish facts
- Ensure timely reporting to Local Authority
- Contact emergency services where required
- Notify CQC of safeguarding incidents if applicable (Huntley House only)
- Support employees and investigations
- Ensure training compliance
- Maintain safeguarding records and audits
- Liaise with multi-agency partners

8.3 Safeguarding Lead

- Provide expert advice and guidance
- Monitor safeguarding practices
- Support investigations and learning
- Ensure policy compliance and updates

9. Safeguarding Procedures

9.1 Responding to Concerns

If abuse is suspected:

1. **Ensure immediate safety**
    - Call emergency services if there is immediate danger
2. **Listen and reassure**
    - Take disclosures seriously
    - Do not promise confidentiality
3. **Preserve evidence**
    - Avoid disturbing evidence where possible
4. **Report immediately**
    - Inform line manager or safeguarding lead without delay - within the same working day where possible and within 24 hours in all cases
5. **Escalate**
    - If a concern is not acted upon, employees must escalate to a senior manager or use the whistleblowing process

9.2 Reporting

- Report to Local Authority Safeguarding Team (Elmbridge)
- Inform the CQC when required (Huntley House only)
- Contact Police for criminal matters
- Escalate concerns if internal reporting is not appropriate

9.3 Recording

All concerns must be recorded:

- Clearly, factually and promptly
- In the resident's records
- Using body maps where applicable
- Including dates, times and actions taken

9.4 Safeguarding Enquiries

- The Local Authority decides if a formal enquiry is required
- The Trust will cooperate fully
- Employees must support investigations and provide information

10. Whistleblowing (Freedom to Speak Up)

The Trust is committed to fostering a **transparent, open, and learning culture**, where employees feel confident and supported to raise concerns about practice, safety, or wrongdoing.

Whistleblowing is a critical safeguarding mechanism and plays a key role in protecting adults at risk and is covered in the Trust's **Whistleblowing Policy**.

11. Training and Development

The **Training Policy** outlines the Trust's commitment to ensuring that all employees have the **knowledge, skills, and confidence** to safeguard adults effectively. Safeguarding training is not treated as a one-off requirement, but as a **continuous process of learning, reflection and improvement.** All employees will receive safeguarding training appropriate to their role, level of responsibility and type of contact with residents.

12. Information Sharing

The Trust recognises that **effective information sharing is essential to safeguarding**. Timely and appropriate sharing of information enables agencies to work together to **protect individuals, prevent harm, and respond to risk**.

Employees must balance the need to maintain confidentiality with the duty to protect individuals from abuse, neglect, or exploitation as outlined in the **Data Security and Protection Policy.**

13. Partnership Working

The Trust recognises that safeguarding is a **shared responsibility** and cannot be effectively delivered by one organisation alone. Effective **multi-agency partnership working** is essential to ensure that adults at risk are protected, supported, and empowered.

The organisation is committed to working collaboratively with partner agencies to **prevent abuse, respond to concerns, and promote positive safeguarding outcomes**.

13.1 Key Partner Agencies

The Trust works proactively with:

- Local Authority Safeguarding Teams (Elmbridge)
- Police and Emergency Services
- Health Professionals (NHS, GPs, community services, mental health teams)
- Safeguarding Adults Board (SAB)

13.2 Principles of Partnership Working

All partnership activity will be guided by:

- Shared responsibility for safeguarding outcomes

- Open and transparent communication
- Timely information sharing
- Respect for professional roles and expertise
- Person-centred and outcome-focused approaches

13.3 Working with the Local Authority

The Local Authority holds the **lead responsibility for safeguarding enquiries (Section 42 Care Act)**.

The Trust will:

- Report safeguarding concerns promptly
- Provide accurate and timely information
- Fully cooperate with safeguarding enquiries
- Follow all local safeguarding procedures and guidance

In Practice

- Submitting safeguarding referrals without delay
- Attending strategy discussions and case conferences
- Implementing agreed safeguarding plans

13.4 Working with Police and Emergency Services

Where a safeguarding concern involves:

- Criminal activity
- Immediate risk or danger
- Serious harm

The Trust will:

- Contact emergency services without delay
- Preserve evidence where appropriate
- Cooperate with police investigations

Examples

- Physical or sexual abuse
- Financial exploitation or fraud
- Serious neglect or wilful harm

13.5 Working with Health Professionals

The Trust will work closely with healthcare partners to:

- Ensure holistic care and safeguarding support
- Share relevant health information
- Identify risks related to physical or mental health

- Support safeguarding assessments and interventions

Partners include:

- General Practitioners (GPs)
- District nurses
- Mental health teams
- Hospital services
- Allied health professionals

13.6 Safeguarding Adults Board (SAB)

The Trust recognises the role of the **Safeguarding Adults Board** in:

- Coordinating local safeguarding activity
- Developing policies and procedures
- Reviewing safeguarding practice
- Conducting safeguarding adult reviews (SARs)

The Trust will:

- Follow SAB policies and procedures
- Participate in learning and improvement initiatives
- Contribute to safeguarding reviews where required
- Implement recommendations from SARs

13.7 Multi-Agency Meetings and Communication

Employees and managers will actively participate in:

- Strategy meetings
- Case conferences
- Safeguarding reviews
- Multi-disciplinary team (MDT) meetings

Employees must:

- Attend relevant meetings when required
- Share accurate, factual information
- Contribute to safeguarding planning
- Follow agreed actions and outcomes

13.8 Information Sharing Within Partnerships

The Trust will:

- Share information appropriately and in line with legal requirements
- Ensure information is:

  - Relevant
  - Accurate
  - Timely
- Balance confidentiality with the need to protect individuals

13.9 Managing Professional Differences and Escalation

The Trust acknowledges that differences in professional opinion may arise.

Where this occurs:

- Concerns will be raised respectfully
- Escalation processes will be followed
- The **safety and wellbeing of the individual will remain the priority**

In Practice

- Challenging decisions where risk is not adequately addressed
- Using formal escalation routes if necessary
- Recording disagreements and actions taken

13.10 Supporting Individuals Through Safeguarding Processes

The Trust will:

- Ensure individuals understand safeguarding processes
- Involve them in decisions wherever possible
- Provide reassurance and support
- Facilitate access to advocacy services

13.11 Governance and Oversight of Partnerships

The Trust will:

- Monitor effectiveness of multi-agency working
- Review outcomes of safeguarding referrals
- Identify any gaps in communication or collaboration
- Incorporate partnership feedback into service improvement

Evidence may include:

- Meeting minutes
- Safeguarding outcomes
- Audit results
- Feedback from partner agencies

13.12 Building Effective Partnerships

The Trust promotes:

- Positive working relationships
- Professional trust and respect
- Clear communication channels
- Continuous improvement across agencies

Employees are expected to:

- Be professional and collaborative
- Communicate clearly and respectfully
- Value contributions from other agencies
- Maintain a focus on safeguarding outcomes

14. Monitoring, Governance and Review

The Trust is committed to ensuring that safeguarding practice is **effectively monitored, continuously improved, and aligned with regulatory expectations**. Safeguarding is overseen through robust governance systems that promote **accountability, transparency, and learning**.

14.1 Monitoring Safeguarding Activity

All safeguarding concerns, incidents, and referrals will be:

- **Recorded, tracked, and reviewed** systematically
- Monitored for **patterns, trends, and recurring risks**
- Analysed to identify **themes or service improvements**

In Practice
Monitoring includes:

- Safeguarding logs and incident reports
- Trend analysis (e.g., repeat incidents, types of abuse)
- Review of response times and outcomes
- Tracking referrals to Local Authority and outcomes

14.2 Auditing and Quality Assurance

The Trust will carry out regular safeguarding audits to ensure:

- Policies and procedures are being followed
- Records are complete, accurate, and timely
- Employees demonstrate safe and effective practice
- Safeguarding responses are appropriate and proportionate

Audit Methods

- Case file audits
- Observation of practice
- Supervision reviews

Management Responsibility

Managers will:

- Review audit findings
- Address identified risks or gaps
- Implement action plans

14.3 Learning from Safeguarding Incidents

All safeguarding incidents will be reviewed to ensure **learning and improvement**.
The organisation will:

- Identify **root causes of incidents**
- Share lessons learned with employees
- Update support plans and risk assessments
- Adapt training and procedures where needed

In Practice

- Reflective discussions in team meetings
- Learning embedded into training sessions
- Changes made to practice following incidents

14.4 Continuous Improvement

The Trust is committed to a culture of **ongoing learning and improvement**.
This includes:

- Using safeguarding data to inform service development
- Reviewing practices against current legislation and guidance
- Engaging employees in reflective practice
- Incorporating feedback from residents and families

14.5 Policy Review

This policy will be:

- **Formally reviewed at least annually**, or sooner if required
- Updated in response to:
    - Changes in legislation or guidance
    - Safeguarding incidents or reviews

- CQC feedback or inspection findings
- Changes in organisational practice

Version Control

- All updates will be documented
- Employees will be informed of changes
- Updated policies will be readily accessible

14.6 Accountability and Leadership Oversight

Senior management will:

- Maintain oversight of safeguarding performance
- Receive regular safeguarding reports
- Ensure compliance with regulatory standards
- Hold managers accountable for safeguarding delivery

Governance Evidence Includes

- Safeguarding dashboards or reports
- Audit outcomes and action plans
- Meeting minutes (e.g., governance or quality meetings)

15. Equality, Diversity and Inclusion

The Trust is committed to promoting **equality, diversity, and inclusion**, ensuring that all individuals are treated with **dignity, fairness, and respect**, and that safeguarding practices are free from discrimination.

Safeguarding must recognise and respond to **diverse needs, experiences, and vulnerabilities**, ensuring that no individual is disadvantaged.

16. Key Contacts

- **Local Authority (Elmbridge):** 0300 470 9100
- **Emergency Services:** 999
- **CQC:** As per regulatory reporting requirements (Huntley House only)

17. Conclusion

Safeguarding is fundamental to high-quality housing and support services. The Trust ensures that all individuals are supported to live safely, with dignity and respect, in an environment free from abuse.

Appendix One: Types of Abuse

Type of abuse	Examples	Indicators
Physical	Hitting, slapping, pushing, kicking, shaking, inappropriate use of restraint or force, misuse of medication, force feeding or withholding food, water or medication	Unexplained injuries (bruises, fractures, burns) injuries in different stages of healing, fear of certain people or environments, sudden changes in behaviour, delay in seeking medical attention.
Sexual	Rape, or sexual assault, inappropriate touching or fondling, sexual harassment or exploitation, exposure to sexual acts or materials, sexual activity involving individuals who lack capacity	Bruising or injuries to intimate areas, torn or stained clothing, withdrawal, anxiety, fearfulness
Psychological/Emotional	Threats, intimidation, coercion, humiliation, bullying, name calling, isolation from family, friends or activities, controlling behaviour, cyberbullying or harassment	Low mood, anxiety, depression, withdrawal or social isolation, changes in appetite, loss of confidence or self-esteem, unusual behaviour such as rocking or agitation.
Financial or Material	Theft, fraud, scams, misuse of bank accounts or benefits, pressure to change wills or financial arrangements, unauthorised use of property	Missing money or possessions, unexplained withdrawals or financial transactions, sudden inability to pay bills, anxiety about finances, others taking control of finances without clear consent
Neglect and Acts of Omission	Not providing adequate food, clothing or shelter, failure to administer medication, ignoring medical or care needs, poor personal hygiene or living conditions, failure to support cultural or religious needs	Malnutrition, dehydration, poor personal hygiene, pressure sores or untreated injuries, unsanitary living conditions, withdrawal or signs of distress
Domestic	Physical, emotional, sexual or	Social isolation, low self-esteem

	financial abuse, coercive control or intimidation, honour-based abuse, forced marriage, female genital mutilation (FGM)	or fear of a partner, controlling behaviours from another person, physical injuries, frequent unexplained absences
Discriminatory	Racist, sexist or homophobic remarks, harassment based on disability, religion, age or gender, exclusion or unequal treatment	Withdrawal, anger or distress, reduced self-worth, reluctance to engage with services, lack of culturally appropriate care
Organisation/Institutional	Rigid routines that ignore individual needs, lack of employees training or supervision, poor care standards, failure to respond to complaints or concerns, overuse of restraint or medication	Lack of choice or dignity, poor hygiene or unmet care needs, high levels of complaints, unsafe or neglectful environment
Modern Slavery and Human Trafficking	Human trafficking, forced labour or domestic servitude, exploitation for financial or criminal gain	Signs of physical abuse or malnourishment, fear of authorities, lack of personal identification, restricted movement or isolation, poor living conditions
Self-Neglect	Hoarding, poor personal hygiene, refusal of care or treatment, unsafe living conditions	Deterioration in health, unclean or unsafe accommodation, isolation or withdrawal, repeated refusal of support