

## Clearsprings Group CRH Safeguarding and Reporting Protocol

### THE PURPOSE OF THE POLICY:

The purpose of this Safeguarding and Reporting Protocol is to give all CRH staff members an understanding of the means by which any Safeguarding concerns a staff member has can be Reported, Actioned, Referred and Investigated within Clearsprings Ready Homes and our statutory partners.

This policy represents best practice guidelines but does not, however, provide an exhaustive list of all Identification and Reporting situations. This Policy should be read in conjunction with other Policies and Procedures such as;

- CRH Child Protection Policy
- Group Protection of Vulnerable Adults Policy
- Group Domestic Violence Policy and Procedures
- CRH Professional Boundaries Policy
- CRH Female Genital Mutilation Policy

This list is not exhaustive and Incident dependent.

### Safeguarding Is Everyone's Responsibility

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### 1.0 DEFINITIONS AND TERMINOLOGY USED

Safeguarding	'Safeguarding' can be defined as a means of protecting a person's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. Safeguarding in this sense is to take adequate and proportionate steps to protect a Service User from 'harm'.
Primary Categories of Safeguarding (not Exhaustive)	Child Safeguarding <ul style="list-style-type: none"> <li>• Child in Need</li> <li>• Child Protection</li> <li>• Child Health and Disability</li> </ul> Adult Safeguarding <ul style="list-style-type: none"> <li>• Protection of Vulnerable Adults</li> <li>• Adult Health and Disability</li> </ul>
Staff	Any member of Clearsprings' staff or associate who provides a direct support service to Service Users. This includes Agents and Contractors.
Company	Any organisation operating under Clearsprings Ready Homes Ltd.
Property	Accommodation provided for Service Users by Clearsprings Ready Homes.
Child	Any person not yet attain the age of 18 years.
Adult	Any person over the age of 18 years.

## 2.0 STAFF CONCERNS AND REQUIRED ACTIONS

Clearsprings Ready Homes Ltd employs Staff in various roles within the company and across our property estate, and as such they will interact with our Service Users in different ways. The Service Users accommodated by Ready Homes on behalf of the Home Office may present with a number of vulnerabilities and issues that will require careful and planned management.

Staff may, in performing their role, witness or be informed of an issue or incident that raises a concern about the welfare of a Service User. In any such case, the Staff member should make contact with the Ready Homes Designated Safeguarding Officer to discuss their concerns.

It may be the case that the concerns noted by the Staff member are already subject to a referral by either Ready Homes or a partner agency, and that no further action may be necessary.

The Designated Safeguarding Officer will assess the concerns Staff have, and will advise on what action, if any, is required to escalate the concern.

## 3.0 REPORTING

After raising the initial concern with the Designated Safeguarding Officer, the Staff member may be instructed submit a Safeguarding Incident Form (SIR) (see Appendix A).

The Staff member should complete the SIR as soon as practicably possible, and in all cases within 24 hours of the Initial Contact with the Designated Safeguarding Officer. Once the SIR has been submitted to the Designated Safeguarding Officer, and a reply received by the Staff member, the Staff member will be deemed to have complied with their initial duty of care in identifying and reporting the safeguarding concern.

During this time, the Designated Safeguarding Officer will make initial enquiries with Statutory Agencies, Partners and other relevant organisations.

## 4.0 ACTION

During this phase of the Safeguarding process, a review of Ready Homes involvement with the Service user will be undertaken. This will include;

- UKVI Safeguarding Leads will be informed of a concern raised, and information will be shared.
- Accommodation History
- Known Safeguarding or other markers.
  - If no previous information has been shared, a Safeguarding Marker will be placed on IA Trans and/or CCMS.
- Immediate Actions will be identified and actioned if appropriate.
  - Service User Relocations.
  - Immediate Staff involvement required.
  - Other Agency involvement required.

## 5.0 REFER

During this phase of the Safeguarding process, a referral may be made to other Agencies if appropriate such as;

- Children's Services (including Child Disability)
- Adult Services
- Health and Mental Health Services (including CAMHS)
- Partners within the Multi-Agency Working Groups (see Section 7.0)
- External Support Agencies
- Police
- Probation

## 6.0 INVESTIGATE

Once a Safeguarding referral has been made to external agencies, it is for each agency to investigate the concerns raised in line their operational capacity and duty to the Service User, this includes Ready Homes. Depending on the concerns raised, the Investigation phase may take some days or weeks, and may involve Agencies from various disciplines working together in the 'best interest' of the Service User.

At the conclusion of the investigation of the Referral, the findings will be shared by the Investigating agency to other partners involved with the Service User. Operational and Strategy decisions will then take place with partner agencies. to best support and protect the Service User from harm.

## 7.0 MULTI-AGENCY WORKING PARTNERSHIPS

Ready Homes are an approved accommodation provider for the Home Office, and are tasked to provide individuals and families temporary accommodation whilst their claim for Asylum is being determined. The provision of support and other ancillary services to Service Users will be met by partner and non-governmental organisations.

Ready Homes is committed to working with partner organisations and other agencies in the best interest of the Service Users. This requires that all relevant information is shared in a Multi-Agency format in compliance with Data Protection and Confidentiality procedures.

Safeguarding Information will be shared only under the following principles;

- **Necessary and Proportionate** – When taking decisions about what information to share, it should be considered how much information needs to be released. The data Protection Act 1988 requires that the impact of disclosing information on the Information Subject and any third parties is considered. Any information shared must be proportionate to the need and level of risk.
- **Relevant** – Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make sound decisions.
- **Adequate** – Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- **Accurate** – Information should be accurate and up to date and should clearly distinguish between **Fact** and **Opinion**. If the information is historical this should be clearly explained and identified.
- **Timely** – Information should be shared in a timely fashion to reduce the risk of harm. Timeliness is key in emergency situations and it may not be appropriate to seek consent to share information if it could cause a delay and therefore result in harm to a Service User. It should be ensured that sufficient information is shared as well as considering the urgency with which to share it.
- **Secure** – Wherever possible, information should be shared in an appropriate, secure way. Professionals must always follow their organisation's policy on security for handling sensitive and personal information.
- **Record** – Information Sharing decision should be recorded whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester.

## 8.0 STAFF DUTY OF CARE

Safeguarding can be defined as to take 'adequate' and 'proportionate' steps to protect a Service User from 'harm'.

All Ready Homes Staff have a '**duty of care**' to the Service Users accommodated by the Company. This Safeguarding and Reporting Protocol confers a contractual duty on all Ready Homes Staff to raise any Safeguarding concerns they have regarding a Service User, and to co-operate in any subsequent referral and/or investigation. Failure to report a Safeguarding concern appropriately may constitute a '**breach of duty**'. If a Service User is later deemed to have been disadvantaged or harmed as a result of a Staff member failing to share Safeguarding information, or failing to react to a Safeguarding Incident, the harm may be seen to be '**caused**' by the omission of the Staff member.

In such cases where a Service User has been identified as disadvantaged or harmed but to a breach of a duty of care, a referral will be made to the Group Human Resources Department.

## 9.0 GOOD PRACTICE GUIDELINES

If in doubt, contact the Designated Safeguarding Officer to seek advice.  
The Service user may have already been identified as at risk,  
or made a disclosure within the Asylum application process.

## ANNEXE A

<b>CONFIDENTIAL – SAFEGUARDING INCIDENT REPORT</b>	
<b>Property ASYS No.</b>	<i>To Be Completed in All Reports</i>
<b>Address</b>	<i>To Be Completed in All Reports</i>
<b>NASS No of Subject</b>	<i>To Be Completed in All Reports</i>
<b>Name of Subject</b>	<i>To Be Completed in All Reports</i>
<b>NASS No of Parent(s)</b>	<i>To Be Completed in All Reports involving Children</i>
<b>SU's Parent(s) Name</b>	<i>To Be Completed in All Reports involving Children</i>
<b>Incident</b>	<p><i>Required Information;</i></p> <p><b>FACT</b></p> <ul style="list-style-type: none"> <li>• <i>Date and Time of Incident/Event or date Concern passed to Staff Member</i></li> <li>• <i>Location of Incident or Concern (if not in Ready Homes Property)</i></li> <li>• <i>Nature of Concern, e.g.;</i> <ul style="list-style-type: none"> <li>○ <i>Child Protection</i></li> <li>○ <i>Injury</i></li> <li>○ <i>Disability</i></li> <li>○ <i>Domestic Violence</i></li> <li>○ <i>Mental Health</i></li> </ul> </li> <li style="margin-left: 40px;">▪ <i>This list is not exhaustive</i></li> <li>• <i>Source of information</i> <ul style="list-style-type: none"> <li>○ <i>Service User</i></li> <li>○ <i>Parent</i></li> <li>○ <i>Other Agency (Detail)</i></li> <li>○ <i>Other Source (Detail)</i></li> </ul> </li> <li style="margin-left: 40px;">▪ <i>This list is not exhaustive</i></li> <li>• <i>Other Service Users involved (if applicable)</i></li> <li>• <i>Facts of the Concern raised.</i> <ul style="list-style-type: none"> <li>○ <i>Give as much detail as possible</i></li> <li>○ <i>If Police involved, give Officer Collar Numbers, Incident or Crime Ref Numbers</i></li> <li>○ <i>Attach any pictures or documentary evidence to the SIR</i></li> </ul> </li> <li>• <i>Actions Taken</i></li> </ul> <p><b>OPINION</b></p> <ul style="list-style-type: none"> <li>• <i>The Opinion of Staff working with Service Users is as important as the facts in the case, but MUST be clearly identified as Opinion based information</i></li> </ul>
<b>Reported By</b>	<i>Name and Role of Staff Member Reporting the Safeguarding Concern</i>
<b>Date</b>	<i>Date of Report</i>