

Safeguarding Children & Adults At Risk Policy

1.	Policy objectives
1.1	To protect children and adults at risk of abuse or neglect through appropriate awareness and application of this Policy and its associated Procedure by all staff (including temporary staff), Group Board and Committee members, volunteers and contractors who come into contact with Watford Community Housing tenants, residents and service users in the course of their work and children who live in, visit our properties or use our services.
1.2	<p>The Director of Operations is our Executive Safeguarding Champion. They have overall responsibility for maintaining an appropriate safeguarding approach across the organisation. Specifically their role is to: -</p> <ul style="list-style-type: none"> - maintain our commitment to safeguarding as a key corporate concern; - ensure we commit appropriate resources to recognising and responding to safeguarding concerns and risks; - oversee the induction and training of staff; - act as a source of support, advice and expertise to staff on complex cases; - ensure all members of staff understand the Safeguarding Policy and Procedure and the requirements and expectations they impose; - ensure all contractors working for or on our behalf are aware of the Safeguarding Policy and Procedure and the requirements and expectations they impose; - address and implement any lessons learned through internal case reviews at the conclusion of all safeguarding cases; and - ensure the Safeguarding Policy and Procedure is reviewed annually and earlier where specific issues require.
1.3	We also have specific Safeguarding Leads in the form of: the Neighbourhood Services Manager (NSM), Neighbourhood Services Team Leader (NTL), the Senior Neighbourhood Officer, Senior Scheme Officer, Senior AB & Fraud Officer, Senior Intensive Housing Management Officer and the Gateway Repairs Manager. Their role is to support individual staff members in evaluating their concerns and reporting cases for external referral.
2.	Legislative & regulatory requirements
2.1	<p><u>Legislative</u></p> <p>Care Act 2014 (and Statutory Guidance) Children Acts 1989 & 2004 Domestic Violence, Crime & Victims Act 2004</p>

	<p>Female Genital Mutilation Act 2003 Forced Marriage (Civil Protection) Act 2007 General Data Protection Regulation 2016 and Data Protection Act 2018 Human Rights Act 1998 Mental Capacity Act 2005 Modern Slavery Act 2015 Public Interest Disclosure Act 1998 Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012) Serious Crime Act 2015 Working Together to Safeguard Children (statutory) Guidance 2015</p>
2.2	<p><u>Regulatory</u></p> <p>RSH Tenant Involvement & Empowerment Standard (Para 1.3)</p> <p>‘1.3 Understanding and responding to the diverse needs of tenants 1.3.1 Registered providers shall: a. treat all tenants with fairness and respect b. demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.’</p>
3.	Scope
3.1	All Children and Adults At Risk have the right to protection from abuse and neglect whatever their age, gender/gender identity, racial/ethnic origin, language, sexual orientation, religion or health status.
3.2	This Policy and its associated Procedure cover all tenants, residents and users of our services and all children who live in or visit our properties.
3.3	The Policy and Procedure must be adhered to by all staff (including temporary staff), Group Board members, volunteers and contractors working for us.
3.4	Staff and contractors are expected to behave towards our tenants, residents & service users in a way which maintains strong professional boundaries and demonstrates their commitment to this Policy and Procedure. All our contractors will be required to read and sign the Policy and the Procedure in agreement with and commitment to our approach and ensure that all members of their staff carrying out work for us do the same, with additional training on its practical application as necessary. The WCH Category Manager relevant to the contract in question will be responsible for working with contractors on these matters.
3.5	Failure to adhere to the Safeguarding Policy and Procedure could result in disciplinary action being taken, a statutory bar from working with children or Adults At Risk and/or the termination of relevant contracts.
3.6	The Safeguarding Policy and Procedure aims to provide comprehensive guidance where it is known or suspected that abuse or neglect of a Child or Adult At Risk is taking place or is likely to do so.
4.	Definitions

4.1	Adult At Risk (Care Act 2014)
4.1.1	An individual aged 18/above with care & support needs who's experiencing, or at risk of experiencing, abuse or neglect which, due to their care & support needs, means they're unable to protect themselves from that abuse or neglect ie they lack the capacity to protect themselves from abuse. 'Care & support needs' in this context are needs arising from or related to a physical or mental impairment/illness.
4.1.2	The extent to which a person is at risk will be determined by a range of factors including their personal characteristics (mental capacity, ability to communicate, degree of physical dependence etc) and their situation (the extent of any support network around them, their access to help and information etc).
4.2	Child/Children
4.2.1	Anyone who has not yet reached their 18 th birthday (including unborn children) and children who may be living independently, in further education, in the armed forces, in hospital or in custody. Children can be abused in a family, institutional or community setting by a person or another child, a person known to them or (more rarely) a stranger.
4.3	Female Genital Mutilation (FGM)
4.3.1	A procedure (other than an operation) involving the partial or total removal of the external female genitalia or injury to the female genital organs whether for cultural or other non-therapeutic reasons. FGM and the taking by a UK resident / national of a girl abroad (or assisting others to do so) are criminal offences under the Female Genital Mutilation Act 2003.
4.4	Forced Marriage
4.4.1	The arrangement of a marriage without the consent of one or both parties. Some element of (physical or psychological) duress is also involved. Forced Marriage is distinct from arranged marriage where both parties are free to choose whether to accept the arrangement.
4.5	"Honour-Based" Violence
4.5.1	An incident/crime that may have been committed to protect or defend the "honour" of a family or community. It's often linked to family members or acquaintances mistakenly believing someone has brought "shame" on their family or community by offending their traditional cultural beliefs.
4.6	Abuse
4.6.1	The violation of a person's civil or human rights by another person. Abuse may be just one act / omission or a series of them. It can occur in any relationship and can lead to significant harm to/exploitation of the victim. It can take any one of the following forms, or a combination of them : -

4.7	<u>Types of Abuse (with non-exhaustive examples)</u>
4.7.1	<u>Physical abuse</u> : includes hitting, slapping, shaking, throwing, kicking, poisoning, burning, drowning/suffocation, rough or inappropriate handling, medical mistreatment and physical confinement. It also includes Female Genital Mutilation and “Honour-Based” Violence.
4.7.2	<u>Domestic abuse</u> : includes any incident/pattern of incidents of controlling, coercive, threatening behaviour or violence or other form of abuse between people aged 16/above who are//have been intimate partners or are family members.
4.7.2.1	A new criminal offence of coercive and controlling behaviour in intimate and familial relationships was introduced under the Serious Crime Act 2015. “Honour-Based” Violence can also manifest itself as domestic abuse.
4.7.2.2	Our Domestic Abuse Policy & Procedure should be referred to in any case of domestic abuse coming to our attention.
4.7.3	<u>Sexual abuse</u> : includes inappropriate touching (including over clothing) or sexual acts to which the person has not consented or could not understand; rape and sexual assault; indecent exposure, voyeurism and exposure to pornography.
4.7.4	<u>Psychological/emotional abuse</u> : includes threats of harm, intimidation, harassment, verbal abuse, cyber abuse, enforced isolation/deprivation of contact, control/coercion and denial of basic human rights such as the right to privacy and dignity. Psychological/emotional abuse can accompany Forced Marriage and “Honour-Based” Violence.
4.7.4.1	In the case of a child, psychological/emotional abuse can manifest in making a child feel worthless, inadequate or unloved, threatening their abandonment, setting unreasonable standards/demands, deliberating silencing and ridiculing them. It can cause severe and enduring negative effects on their emotional development.
4.7.5	<u>Discriminatory abuse/hate crime</u> : verbal harassment, prejudice towards a person’s age, gender, gender identity, disability, race/ethnicity, colour, sexual or religious orientation. Discrimination can also be behind other forms of abuse.
4.7.6	<u>Financial or material abuse</u> : including: theft, fraud, internet scamming, coercion over a person’s property, inheritance, financial transactions, possessions & benefits. Can occur in isolation but often combines with other forms of abuse. This may include an individual who has been ‘cuckooed’. Cuckooing involves gangs which use violence and abuse to target the homes of vulnerable people and use them as bases for drug dealing.
4.7.7	<u>Neglect</u> : includes ignoring medical, emotional or physical care needs; denying access to health, care, support or educational services; withholding key necessities such as medication, heating and nutrition.
4.7.8	<u>Self-neglect</u> : covers a wide range of behaviour including neglect for one’s personal hygiene, health or surroundings. Hoarding is a specific example (and dealt with under our Hoarding Policy). Self-neglect will become a safeguarding issue when the person is unable to protect themselves by controlling their behaviour, necessitating additional support.

4.7.9	<u>Modern Slavery</u> : includes slavery, human trafficking, forced labour and domestic servitude.
4.7.10	<u>Child Sexual Exploitation (CSE)</u> : involves exploitative situations, contexts & relationships where a Child (or possibly other person) receives “something” (eg food, accommodation, drugs/alcohol, cigarettes, affection, money or gifts) for performing (or others performing on them) sexual activity.
4.7.10.1	CSE can occur through the use of technology without the Child’s immediate awareness. The exploiter has power over the Child by virtue of their age, gender, intellect, mental capacity, physical strength, economic or other resources.
5.	Safeguarding Principles
5.1	We recognise that, in providing our services, those working for or on our behalf may come into contact with Children or Adults At Risk of abuse or neglect. An increasing number of tenants in general needs housing are, for instance, older, disabled, with long-term limiting health conditions or dependencies that increase their vulnerability. People can however become vulnerable at any point in their life for any reason.
5.2	The responsibility to be aware of & vigilant about the risk of harm to Children and Adults At Risk lies with everyone (including our contractors) coming into contact with Children or Adults At Risk through their work for us. This is a statutory duty upon us as a housing provider under the Care Act 2014.
5.3	Swift and appropriate action must be taken to act on concerns in all cases where abuse or neglect is known or suspected, irrespective of who the perpetrator(s) may be in order to protect the individual concerned from harm or further harm. See the Safeguarding Procedure at Appendix 1.
5.4	We will ensure that publications or communications containing photos or videos of Children or Adults At Risk will only be produced with the express written consent of the Child’s responsible adult or, in the case of an Adult At Risk, them or their advocate. Children and Adults At Risk will never be portrayed in an inappropriate way. Personal information will not be displayed which identifies their whereabouts.
6.	Customer Profiling
6.1	We will use a ‘VULNBL’ UDC marker to identify to our staff/contractors a tenant, resident, service user or Child considered to be vulnerable e.g on account of their age, mental and/or physical health, care or support needs, history (including in relation to domestic abuse/ASB) community or family situation.
6.2	The marker will be applied as soon as the person is considered to be vulnerable, whether at the initial sign-up stage or thereafter. See also section 4.3.7 of the Safeguarding Procedure at Appendix 1.
6.3	The use of UDC markers such as this is governed by the Person UDC Policy and Procedure, which should be followed whenever Person UDCs are used. See Appendix 2 of our Data Protection Policy for further guidance.
7.	Recruitment
7.1	All members of staff and volunteers having regular contact with Children or Adults At Risk will undergo an enhanced Disclosure & Barring Service check on their

	recruitment and every 3 years thereafter. The Human Resources team retains a list of affected roles which should be consulted where necessary.
8.	Staff Training
8.1	We will provide all staff with mandatory role-appropriate training in good safeguarding practice and prevention including the six principles of: empowerment, prevention, proportionality, protection, partnership, accountability & transparency. Training will take place every two years as a minimum. This will be documented in the organisation's Training Plan overseen by the HR team.
8.2	Managers will be alerted as to when their staff need to attend introductory or refresher training for their role.
8.3	On occasions E-learning topics around safeguarding will be compulsory for all staff e.g. Modern Slavery e-learning.
9.	Wider Partnership With Agencies
9.1	Alongside our duty to refer safeguarding concerns, we also have a duty to share information and generally co-operate with the Local Authority in assisting the Local Authority to meet its own safeguarding duties. This may involve sharing information about a Child or Adult At Risk with the Local Authority.
9.2	In all cases an applicable information sharing protocol will be followed and where possible the consent of the individual (or their responsible adult/advocate) will be obtained in accordance with the General Data Protection Regulation 2018 and Data Protection Act 2018. Information may need to be shared without consent where it is necessary to protect a person's vital interests or those of a third party or where it is necessary for the prevention or detection of a crime. Our Data Protection Policy gives further information & guidance in this area.
10.	Supporting Staff
10.1	We offer access to an Employee Assistance Programme (EAP) for staff members affected by a safeguarding (or any other) issue to receive confidential, specialist (telephone or face to face) counselling as a means of support. The service is available 24 hours a day year-round. Individuals can access this directly themselves or through their line manager.
11.	Internal Case Review
11.1	At the end of any safeguarding case we deal with, the Head of Customer Relationships will review the case with the NSM and all staff members involved to assess whether lessons can be adopted to ensure our methods could be improved on future safeguarding cases. This process will also be followed when an external serious case review involving the group has been completed by the local authority or Hertfordshire County Council.
11.2	Where additional training is required this will be arranged in early course and outcomes monitored by the Director of Operations as part of the Operations risk map to ensure all relevant objectives are met.
12.	Equality & Diversity
12.1	We are committed to fairness & equality for all and will not discriminate against any person in its application of this Policy & Procedure by reason of their age, gender/gender identity, racial/ethnic origin, language, sexual orientation, religion or health status.

13.	Person Responsible
	Director of Operations Head of Customer Relationships
14.	Related documents
	Watford Community Housing Safeguarding Register Person UDC Policy & Procedure Anti-Social Behaviour Policy & Procedure Harassment & Hate Crime Policy & Procedure Domestic Abuse Policy & Procedure Whistleblowing Policy Recruitment & Selection Policy Equality & Diversity Policy DBS & Recruitment of Ex-Offenders Policy Hoarding Policy & Procedure Subject Access Request Policy & Procedure Data Protection Policy & Person UDC Policy and Procedure Talent Management Policy
15.	Policy Monitoring
15.1	Concerns recorded under the Safeguarding Policy & Procedure, and their progress/outcome, will be reported on quarterly to the ARC. The Director of Operations will consider any necessary changes or improvements to this Procedure or the Safeguarding Policy accordingly.
16.	Appendices
	Appendix 1 – Safeguarding Procedure
17.	Approval
	Approved by : EMT February 2017
	GMT Reviewed : 27 March 2019
	Review date : March 2021
	Policy owner : Director of Operations

Safeguarding Children & Adults At Risk Procedure

1.	Purpose of Procedure
1.1	This Procedure forms part of our Safeguarding Children and Adults At Risk Policy (“the Safeguarding Policy”) and should be considered in conjunction with that Policy.
1.2	This Procedure aims to provide comprehensive guidance where it is known or suspected that abuse or neglect of a Child or Adult At Risk is taking place or is likely to do so.
1.3	Swift and appropriate action must be taken in all cases where abuse or neglect is known or suspected, irrespective of who the perpetrator(s) may be in order to protect the individual concerned from harm or further harm.
1.4	Like the Policy, the Procedure must be read, understood and followed, by all staff (including temporary staff), Group Board members, volunteers and contractors who come into contact in the course of their work with our tenants, residents and service users and children who live in, visit our properties or use our services. Obligations upon contractors are further detailed at section 3 below.
1.5	Failure to adhere to the Safeguarding Policy or this Procedure could result in disciplinary action being taken, a statutory bar from working with children or Adults At Risk and/or the termination of relevant contracts.
2.	Scope
	<u>Scope</u>
2.1	All Children and Adults At Risk have the right to protection from abuse and neglect whatever their age, gender/gender identity, racial/ethnic origin, language, sexual orientation, religion or health status.
2.2	Like the Safeguarding Policy this Procedure covers all tenants, residents and users of our services and all children who live in or visit our properties.
3.	Contractors’ Responsibilities
3.1	Like all our staff, contractors working for or on our behalf are expected to behave towards our tenants, residents & service users in a way which maintains strong professional boundaries and demonstrates their commitment to the Safeguarding Policy and this Procedure.
3.2	All our contractors will be required to read and sign the Policy and Procedure in agreement with and commitment to our approach and ensure that all members of their staff carrying out work for us do the same, with additional training on its practical application as necessary. The WCH Category Manager relevant to the contract in question will be responsible for working with contractors on these matters.

4.	Reporting and Recording Incidents
4.1	Recognising abuse can be difficult; it's not the responsibility of those working for us to <i>investigate or evidence</i> abuse or neglect of a Child or Adult At Risk. The responsibility is to <i>act on</i> concerns by reporting them to the appropriate lead agencies and to then work in partnership with those agencies in safeguarding the individual concerned under a specific action plan. A list of the relevant lead agencies is at Appendix 1 of this Procedure.
4.2	We will take seriously any matter raised in good faith by a member of staff and take steps to protect those making a report from any form of reprisal in accordance with our Whistleblowing Policy. An isolated concern may appear insignificant but fit into a wider pattern of behaviour, so should still be properly addressed under the Procedure.
4.3	<p>Reporting Procedure</p> <p>The following steps should be taken as soon as a safeguarding concern is reported. <u>Steps 1 – 7</u> should be completed the same day.</p>
4.3.1	<p><u>Step 1 – Initial Report</u></p> <p>4.3.1.1 ➤ Any safeguarding concern should be reported to <u>specific key members of staff</u> as soon as possible and in all cases within one working day of the concern coming to light.</p> <p>4.3.1.2 ➤ The concern(s) should be reported by email to the Concern Inbox ("Concern@wcht.org.uk"). The Concern email group consists of : -</p> <ul style="list-style-type: none"> - the Director of Operations; - Head of Customer Relationships; and - the Safeguarding Leads referred to at section 1.3 of the Safeguarding Policy; <p>4.3.1.3 The email should contain details of the tenant(s), alleged perpetrator(s) and anyone else concerned, the property, the nature of the concern(s) and reasons for it/them, any apparent awareness on the part of the victim(s) or alleged perpetrator(s) of our concerns, and any knowledge of any action so far taken by the organisation or another agency in respect of the concerns.</p>
4.3.2	<p><u>Step 2 – Deciding Next Steps</u></p> <p>➤ The Safeguarding Lead most relevant to the reporting staff member/contractor ("the Service Safeguarding Lead") will 'phone or meet with the reporting member of staff to discuss the concern(s) in person and obtain the wider context to help decide next steps S/he will then discuss the situation with the Head of Customer Relationships and in cases where they are not already the Service Safeguarding Lead the Neighbourhood Services Manager to agree appropriate next steps.</p> <p>➤ Where there is evidence to suggest that the alleged perpetrator of abuse/harm is a member of our staff, a Group Board Member or a contractor, the concern should be discussed in addition with the HR team without delay. Relevant witness statements and other evidence will be collated as part of an initial fact find investigation and action taken to suspend the member of staff pending further investigation if appropriate.</p>

	<ul style="list-style-type: none"> ➤ The HR team will advise on the organisation's duties under the Safeguarding Vulnerable Groups Act 2006 to refer any member of staff involved in abuse of a Child or Adult at Risk to the Disclosure and Barring Service. ➤ Where the concern is in relation to a tenant, the Service Safeguarding Lead will review the case and decide whom the case will be assigned to. The case may be assigned to NO/ASB officer or another of the Safeguarding leads depending on the severity and sensitivity of the matter.
4.3.3	<p><u>Step 3 – Internal Recording</u></p> <ul style="list-style-type: none"> ➤ The concern should be recorded by the Service Safeguarding Lead on one of the following forms :- <ul style="list-style-type: none"> ○ A Safeguarding Adults Concern Form (at Appendix 2) in relation to an Adult at Risk; ○ A Child Protection Referral Form (at Appendix 3) in relation to a Child. ➤ Where the alleged perpetrator is a member of our staff, Board Member or a contractor and the matter concerns a Child: <ul style="list-style-type: none"> ○ a LADO Referral Form (at Appendix 4) should be completed as well as the Child Protection Referral Form. This form must be submitted before the alleged perpetrator is informed of the concern/allegation. ➤ All completed forms should be stored by the Service Safeguarding Lead in N/Safeguarding/[<i>street/block name, flat/house number and Child/Adult at Risk's initials</i>]. <u>Access to the N/Safeguarding folder is restricted to the Director of Operations and Safeguarding Leads to keep information appropriately secure and confidential.</u> <p>Information recorded on referral forms and otherwise should be clear, comprehensive and factual. It is likely to be disclosable to those it concerns under our Subject Access Request Policy & Procedure.</p> ➤ The matter should also be logged in full on our Safeguarding Register in N/Safeguarding/Register by the Service Safeguarding Lead.
4.3.4	<p><u>Step 4 – Considering Consent</u></p> <p>4.3.4.1 The issue of the victim's consent to us making an external referral should be considered and a decision taken by the Service Safeguarding Lead and/or the Neighbourhood Services Manager with the Director of Operations whether consent should or should not be sought.</p> <p>4.3.4.2 Where the concern relates to an <u>Adult At Risk</u> their consent should be obtained before making a referral unless: <ul style="list-style-type: none"> ➤ they're considered to lack mental capacity – see section 6 for further guidance; ➤ their refusal presents risk to others; ➤ the alleged perpetrator has care or support needs themselves; ➤ sharing the information could prevent a crime; or ➤ coercion is involved. </p>

4.3.4.3	They should always be informed why we are making an external referral, to whom and what information will be shared.
4.3.4.4	Where the concern relates to a <u>Child</u> who lacks capacity to consent, we should obtain the consent of the person with parental responsibility (“PR”) (or the main parental responsibility) for them, taking the Child’s views into account where possible. We may decide to share information without consent of either the Child or person with PR where seeking or obtaining it would cause an unreasonable delay or prejudice the Child’s safety or wellbeing.
4.3.4.5	If consent has been sought, that fact and the outcome should be recorded by the Service Safeguarding Lead on the Safeguarding Register.
4.3.4.6	If consent has not been sought that fact and the reason(s) why should also be recorded by the Service Safeguarding Lead on the form(s) completed under Step 3 above.
4.3.5	<p><u>Step 5 - External Reporting</u></p> <ul style="list-style-type: none"> ➤ Concerns should be reported by the Service Safeguarding Lead to the relevant lead agency (e.g. Hertfordshire Adult or Children’s Care Services) initially by telephone. The relevant contact details are provided at Appendix 1 of this Procedure. ➤ The form(s) completed under Step 3 above should then be sent by the Service Safeguarding Lead to the relevant lead agency. ➤ A response should be given by the lead agency <u>within 48 hours</u>; if we do not receive a response within this timescale the Service Safeguarding Lead must follow up the referral, recording action taken on the Safeguarding Register, ➤ Where there is an immediate risk to a Child or Adult At Risk or there’s an urgent medical requirement, the emergency services should be contacted on 999, recording action taken on the Safeguarding Register. ➤ If a concern arises which suggests a criminal offence has/may have been committed, the police should be informed (see Appendix 1) and action taken recorded on the Safeguarding Register.
4.3.6	<p><u>Step 7 – Updating the Notes</u></p> <p>4.3.6.1 The Service Safeguarding Lead should record the following restricted information about the concern(s) in the customer’s Notes on Orchard:</p> <p style="text-align: center;"><u>“CONCERN – Adult”</u> <u>“CONCERN – Child”</u></p> <p>4.3.6.2 The purpose is to make staff/contractors visiting the customer/property broadly aware of the basis of a pre-existing issue concerning the household so that they remain vigilant in identifying any further concern(s) without having “unnecessary” information about those involved under data protection law. Any further concern(s) coming to light would be reported in the same way under Steps 1 – 6 above.</p> <p>4.3.6.3 Further information about all concerns and reports is held by the Safeguarding Leads and Director of Operations in the <i>N/Safeguarding</i> restricted folder who will share this with our staff/contractors only on a ‘need to know’ basis.</p>

4.3.7	<u>Step 8 – Adding a UDC Marker</u>
4.3.7.1	The Service Safeguarding Lead must add a ‘VULNBL’ Person UDC to the victim’s Person ID on Orchard following an external safeguarding referral, by following section 8 of the Person UDC Policy and Procedure. This Safeguarding Procedure has not been fully complied with unless and until this happens. The purpose is to enable us to take the customer’s needs into account appropriately when in our subsequent dealings with them or in managing the tenancy.
4.3.7.2	The Service Safeguarding Lead must consider adding a ‘VULNBL’ Person UDC to the person’s Person ID on Orchard following a concern being raised which, by exception, does <u>not</u> result in an external safeguarding referral being made. A decision should be taken based on the nature of the concern(s) and the particular needs and circumstances of the individual concerned.
4.3.7.3	A ‘VULNBL’ UDC must be added within two working days of the initial safeguarding concerns being reported at Step 1 above (section 4.3.1).
4.3.8	<u>Step 8 - Case Monitoring</u>
4.3.8.1	The Director of Operations will meet with the Safeguarding Leads to monitor the status and progress of all cases on the Safeguarding Register on a quarterly basis. A case will not be removed before <u>three</u> years from the end of the tenancy of the Child/Adult at Risk concerned.
5.	Internal Case Review
5.1	Every month the NSM will hold a review of the cases on the Safeguarding Register with the Safeguarding Leads and all staff members involved in the cases concerned in order to assess whether future approaches could be improved.
5.2	Where additional training is required this will be triggered by Safeguarding Leads and approval sought from the Director of Operations to ensure all relevant objectives are met.
5.3	If a case is closed then it will be reviewed by the Service Safeguarding Leads as to whether the UDC can be removed.
6.	Mental Capacity
6.1	Assessing a person’s capacity must be undertaken in accordance with the Mental Capacity Act 2005 and its associated Code of Practice (Mental Capacity Act 2005 Code of Practice). The Act identifies that a person will lack capacity when they lack the ability to make a particular decision or take a particular action for themselves when it needs to be taken. The Act and Code of Practice assumes that a person has capacity to make a decision unless it is established otherwise and that they are supported to help make decisions which are in their “best interests”.
7.	Monitoring
7.1	Concerns recorded under the Safeguarding Policy & Procedure, and their progress/outcome, will be reported on quarterly by the Director of Operations to ARC. S/he will consider any necessary changes or improvements to this Procedure or the Safeguarding Policy accordingly.
8.	Appendices

	<p>Appendix 1.1 - Referral Contacts & Sources of Further Support</p> <p>Appendix 1.2 – Hertfordshire Safeguarding Adults Concern Form http://www.hertfordshire.gov.uk/your-council/hcc/healthcomservices/acspolicies/safeadults/</p> <p>Appendix 1.3 – Hertfordshire Child Protection Referral Form http://www.hertfordshire.gov.uk/docs/pdf/c/childprotectionform.pdf</p> <p>Appendix 1. 4 – Local Authority Designated Officer (LADO) Form</p>
8.	Approval
	Approved by : Director of Operations and GMT
	Date of approval : February 2019
	Date of review : February 2021
	Procedure owner :Neighbourhood Services Manager