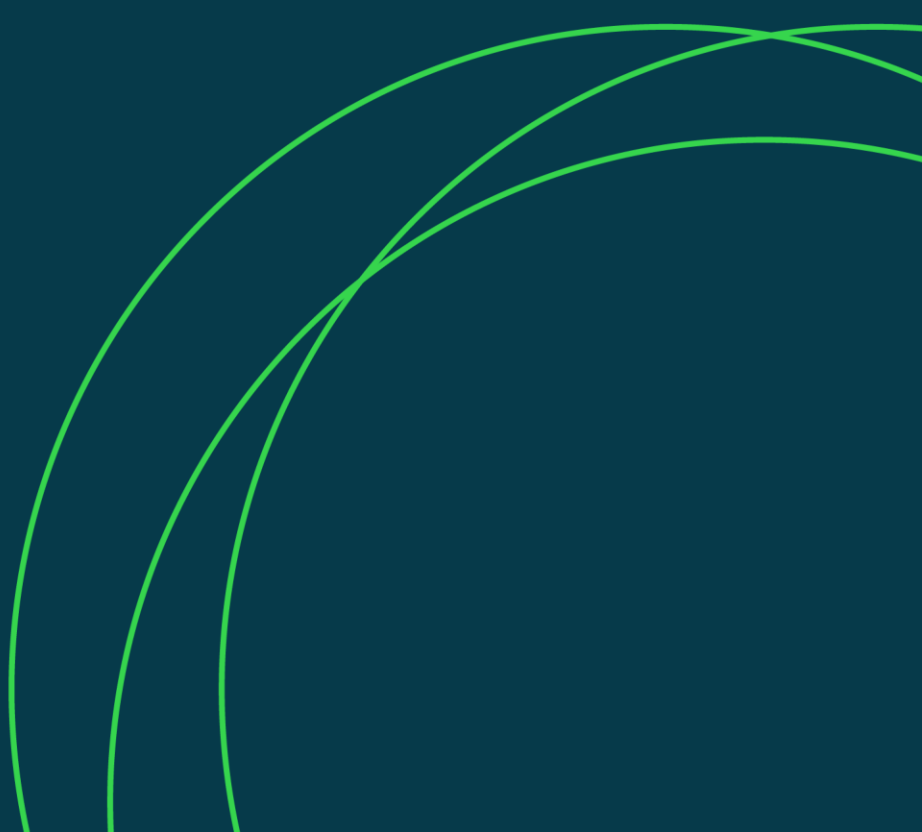




Sparrow
Shared Ownership

Safeguarding Children, Young Persons and Adults Policy

CODE: AMF 29.0
VERSION: 1.0
CREATED: November 2024
REVIEW: November 2025
AUTHOR(S): Homeowner Services Manager



Safeguarding Children, Young Persons and Adults Policy

Policy objective

Sparrow Shared Ownership Limited (Sparrow) is committed to safeguarding and promoting the safety and welfare of all children, young persons and adults who use, are engaged in or connected to our services.

This policy aims to deliver safe working practices and procedures which identify, assess and manage safeguarding concerns and ensure appropriate action is taken in order to safeguard the wellbeing of children, and adults at risk. We believe that every child and adult has the right to feel safe and be protected from any situation or practice that could result in them being significantly harmed or abused.

Safeguarding is everyone's responsibility and Sparrow is committed to safeguarding and promoting the welfare of any person at risk. Sparrow expects all colleagues, contractors and third party partners to share this commitment.

It is the responsibility of all individuals working for or on behalf of Sparrow including colleagues, contractors, agency colleagues, managing agents, volunteers, Board Members and involved customers, to understand, report and act - in accordance with this policy and associated procedures - to any concerns of actual or potential abuse of a child or adult at risk.

Policy scope

This policy applies to all Sparrow colleagues (including those on fixed term contracts), Board Members, agency workers, consultants, volunteers, contractors and third-party partners. This policy also applies to any developers, contractors and sub-contractors who are providing services to Sparrow and its customers.

Where Sparrow subcontract their housing management services, their safeguarding policies and procedures in relation to Safeguarding will compliment ours.

The purpose of our Safeguarding of Children, Young People and Adults Policy and Procedure is to:

- provide a clear statement that Sparrow will not tolerate or collude with any form of neglect or abuse

- promote and safeguard the welfare of all our customers and will be proactive in responding to any allegation or suspicion of abuse
- empower our customers by ensuring they are fully aware of what constitutes abuse and how to report it
- helping to stop abuse or neglect wherever possible, prevent harm and reduce the risk of abuse or neglect to children with care and support need
- ensure that our colleagues are clear about their individual and corporate roles and responsibilities in preventing and responding to abuse or neglect
- provide and/or signpost to relevant agencies support and protection for victims and witnesses affected by abuse
- publish our policy so that children, young persons and vulnerable adults can be made aware of Sparrow's approach to safeguarding and our responsibilities
- provide appropriate training and support for our colleagues to enable them to identify the types and causes of abuse, the role they play in prevention and how to respond to abuse and neglect
- provide a safeguarding champion who can provide support and guidance to colleagues and customers, whilst promoting safeguarding across the organisation
- work in partnership with our agents, partners, and stakeholders to promote and safeguard the welfare of all our customers and proactively work with them in responding to allegations or suspicions of abuse
- ensure procedures are in place that will adequately and promptly deal with allegations of safeguarding and that information is shared appropriately where there is potential risk to others
- ensure enquiries will be carried out promptly and with sensitivity, and appropriate action will be taken
- set out clear professional boundaries within our safeguarding procedures when working with or coming into contact with children, young people and adults at risk
- regularly review our approach and performance in safeguarding our customers, with our customers, agents and partners, and will focus on continuous improvement.

Procedure

1. Definitions

Safeguarding means protecting people's health, wellbeing, and human rights, and enabling them to live free from harm, abuse and neglect. Safeguarding children, young people and adults include:

- protecting their rights to live in safety, free from abuse and neglect
- people and organisations working together to prevent the risk of abuse or neglect, and to stop them from happening

- making sure people's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account.
- Abuse is an act, or lack of appropriate action, which causes harm or distress and occurs within a relationship where there is an expectation of trust. Abuse can be:
 - a crime
 - perpetrated by anyone
 - the result of neglect, omission, or failure to act
 - unintentional or a result of a lack of knowledge
 - consist of a single or repeated acts
 - occurring in any relationship.

At Risk includes those who are unable to take care of or protect themselves; and whose independence and well-being is at risk without support because they are vulnerable through:

- age
- having a long-term limiting illness or condition
- being in an abusive relationship
- having a physical, learning, or mental health disability
- frailty
- having been in care, prison, or other institution.

2. Safeguarding of Children

A Child is defined under the scope of this policy means anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.

The following definitions for children are taken from [Working together to safeguard children – A guide to inter-agency working to safeguard and promote the welfare of children 2019](#)

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.
- The table below sets out who can be referred to Safeguarding Children Services and what to expect.

EVERY CHILD AT RISK OF SIGNIFICANT HARM (UNDER 18 YEARS OF AGE)

Who to?	The local authority where the concern arises or the Police, both have a duty to investigate urgent and non-urgent concerns- Section 47: The Children Act 1989
Immediate action	Make sure everyone is safe and that evidence is preserved. Never interview victims or perpetrators beyond the initial disclosure. Record all facts immediately and report to the line manager. If colleagues are implicated senior managers must consider immediate action.
What to expect	Social Services/Police will investigate and determine any action
Will authorities intervene?	Agencies are guided to what is best and proportionate, possible and necessary in order to safeguard children.

Specific legislation in relation to children can be found in the Safeguarding Legislation and Policy Framework for Children (A)

3. Safeguarding of Young Persons

A Young Person under the scope of this policy means a person who is:

- a care leaver i.e. is aged 16 to 25 years but is still receiving children's services. For example, a person who has substantial and complex needs and continues to be supported to live independently
- someone aged 16 to 17 who may be homeless or at risk of becoming homeless.

4. Safeguarding of Adults

An Adult under the scope of this policy means any person who is 18 years of age or over, and who is or may be in need of community care services by reason of for example. a physical or mental disability, a learning difficulty, reduced physical or mental capacity due to old age, dependency on drugs, alcohol or medication and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or serious exploitation.

Definitions for adults are taken from [Care and Support Statutory Guidance updated March 2020 – Issued under the care Act 2014](#)

Safeguarding adults is defined as:

- protecting the rights of adults to live in safety, free from abuse and neglect
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing.

The safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Specific legislation in relation to adults can be found in the Safeguarding Legislation and Policy Framework for Adults (B)

5. Care Principles

Sparrow recognises it has legal obligations and a moral duty to enable children and adults to live life free from abuse or neglect, as defined in the legal framework contained in the Care Act 2014 for Adults and Working together to safeguard children (2019).

Sparrow uses the six principles of safeguarding enshrined in the Care Act Statutory Guidance 2020.

- **Empowerment:** presumption of person led decision and informed consent
- **Prevention:** it is better to take action before harm occurs
- **Proportionality:** proportionate and least intrusive response appropriate to the risks presented
- **Protection:** support and representation for those in greatest need
- **Partnership:** local solutions through services working with the communities
- **Accountability:** accountability and transparency in delivering safeguarding.

Housing providers have a duty to co-operate with local authorities implementing their statutory duties around safeguarding. This may include carrying out 'enquiries' into incidents; information sharing; and participating in statutory local Safeguarding Boards.

We are expected to make colleagues familiar with the principles of safeguarding, train colleagues to be vigilant, recognise signs of abuse and know what to do if they witness those signs. In addition to these obligations, housing providers must provide safe recruitment practices and maintain clear and accurate record keeping of any safeguarding concerns raised.

6. Making Safeguarding Personal

In addition to the care principles outlined in 5.0, it is also important that all safeguarding agencies and partners take a broad community approach to establishing safeguarding arrangements. It is vital that all organisations recognise that children, young people and adult safeguarding arrangements are there to protect individuals.

Making safeguarding personal means it should be person-led and outcome-focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety.

Personalised care and support is for everyone, but some people will need more support than others to make choices and manage risks. Supporting people to understand risk is crucial to empowering and safeguarding adults and in recognising people as "experts in their own lives". A person-centred approach is supported by the provision of personalised information and advice and, where needed access to advocacy support.

However, Sparrow recognises the difference between Adults at Risk and Children when it comes to the approaches used in safeguarding. Consent is a legal requirement for safeguarding adults, unless the adult either lacks capacity; is at significant risk of harm; a crime could be prevented or an employee is an alleged perpetrator of the suspected abuse.

Consent is not required when considering making a safeguarding referral for a Child, however in the appropriate circumstances, speaking with the parent/guardian prior to referrals is seen as best practice. We recognise the importance of the wishes and feelings of a child, however these may sometimes be contradicted in order to act in the child's best interests.

Whilst there are different categories of abuse, key stakeholders, legislation, and processes in place for safeguarding children compared to safeguarding adults at risk, Sparrow takes a harm centred approach to all forms of abuse and neglect and therefore believes that this Safeguarding policy caters for both children and adults at risk. Our Safeguarding procedures provides guidance for staff on the differences between children and adults at risk in the approaches used in making specific referrals to statutory agencies, spotting the signs of abuse and neglect, consent, professional boundaries etc.

7. Types of Abuse | Adults

As defined in the Care Act 2014

- physical abuse
- domestic violence
- sexual abuse
- psychological abuse
- financial or material abuse
- modern slavery
- discriminatory abuse
- organisational abuse
- neglect and acts of omission
- self-neglect.

8. Types of Abuse | Children

As defined in the Working Together Guidance

- physical abuse
- sexual abuse
- emotional or psychological abuse, or
- neglect and acts of omission.

Other categories or specific acts of abuse and neglect may be categorised differently by other organisations and as a Registered Provider, Sparrow should be aware that abuse may also include, but is not limited to,

- acts such as online abuse
- child sexual exploitation
- female genital mutilation
- bullying and cyberbullying
- domestic abuse, child trafficking
- grooming
- harmful sexual behaviour.

Definitions can be found in the Types and Definitions of Abuse Guidance Note (C).

9. Safeguarding Roles and Responsibilities

Within Sparrow there are a number of individuals who fulfil specific safeguarding roles in relation to Safeguarding and their responsibilities are listed below.

9.1. All frontline colleagues (Alerters)

- Receive, report and record (as appropriate) information relating to a concern or disclosure concerning an adult at risk, child or young person
- Assess the information promptly and carefully, clarifying or obtaining more information about the situation as appropriate
- Seek consultation from DSL, statutory agencies if uncertain as to the appropriate action to take
- If and where appropriate, represent Sparrow as a landlord at any multi- agency safeguarding meetings/case conferences involving our customers
- If and where appropriate, make safeguarding referrals to children's social care or the police without delay in accordance with the reporting procedures
- Ensure a full record is maintained of the concerns, action taken, liaison with other agencies and outcomes
- Deal with the aftermath of any safeguarding incident in terms of offering support
- Identify and alert the DSL to any safeguarding training needs
- Keep abreast of developments in safeguarding legislation, practice and local procedures
- Undertake relevant safeguarding training every two years.

9.2. Designated Safeguarding Lead(s) (DSLs)

- Maintain a strategic overview of safeguarding all services
- Provide advice, guidance and support for the front-line colleagues
- Meet quarterly with operational leads as part of Safeguarding Committee to review safeguarding activity including case closures
- Ensure the safeguarding policy and procedures are implemented
- Ensure there is compliance with safeguarding policy and procedures through quality assurance processes
- Co-ordinate the safeguarding training strategy for colleagues and volunteers.
- Own and maintain central safeguarding incident reports log
- Undertake relevant safeguarding training every two years.

9.3. Designated Director for Safeguarding

- Sparrow will ensure that one of its Director roles is a designated Director for Safeguarding.
- Present an annual report to LT and board on safeguarding activity

- Ensure that there is a review, and if necessary, a revision, of the safeguarding policy and procedures on an annual basis or sooner if there is a change in legislation, guidance or an incident that warrants it
- Provide support to the DSL
- Have a strategic overview of safeguarding
- Act as Chair of the Safeguarding Committee.
- Undertake relevant safeguarding training every two years.

9.4. Safeguarding Board Champion - Chief Executive Officer

- Understand the implications of the safeguarding policy, procedures and related policies and procedures
- Ensure that safeguarding is considered in respect of organisational risk and any strategic planning
- Be aware of, and be available to, those colleagues who have a specific responsibility for safeguarding as identified in this document
- Ensure physical and financial resources are in place to prevent and manage safeguarding issue and concerns
- Undertake safeguarding training every two years.

9.5. Safeguarding Committee

- Co-chaired by the Designated Director for Safeguarding and the Designated Safeguarding Lead
- Ensure resources are allocated to support sound safeguarding practice which will include training, supervision and IT systems
- Instigate an annual review of the safeguarding policy and procedures (relevance, compliance and outcomes) reporting this to Strategic Health and Safety Committee
- Has an overview of Safeguarding concerns raised
- Ensure that there is a coordinated approach to safeguarding across Sparrow and its third-party partners.
- Further responsibilities and deliverables can be found in the Safeguarding Committee Terms of Reference (D) and Safeguarding Governance and Accountability Structure (E).

9.6. Sparrow Safeguarding Review Working Group

- Chaired by Designated Safeguarding lead and attended by Designated Director for Safeguarding
- Meets 6 monthly
- Reviews best practice

- Review Sparrow's safeguarding cases.

9.7. Sparrow as a Specialist Registered Provider of Social Housing

- As a registered provider of social housing specialising in Shared Ownership it is acknowledged that Sparrow may have less opportunities to identify safeguarding concerns because we will naturally have less involvement with tenancy management inside the home.
- Sparrow may make adjustments to their internal roles and responsibilities if the case volume at any one time means it is not efficient or not practical to maintain the full structure described above. For example, this may include combining the roles of the Safeguarding Committee and Safeguarding Review Working Group.

10. Training

This Policy and Procedure will be available to all colleague and relevant colleagues will receive training to ensure they are aware of responsibilities around safeguarding.

Training will be delivered in accordance with a competency framework which clearly outlines the knowledge and skills required by colleagues carrying out specific identified roles in relation to safeguarding. This approach ensures that all safeguarding issues are addressed in an appropriate manner.

A variety of training methods will be provided internally as well as relevant courses available from local safeguarding boards.

Anyone working for or on behalf of Sparrow and delivering front line services to our customers will be trained appropriately to fulfil their safeguarding responsibilities. Designated Safeguarding Leads will be provided with additional specialist training in order to carry out their additional duties.

All training will be managed and recorded by Learning and Development.

11. Safe Recruitment Practices

Sparrow will ensure that recruitment and relevant organisational development procedures take account of safeguarding children and adult at risk, where relevant. All appropriate frontline employees will be subject to the relevant Disclosure and Barring Service (DBS) check and supervision and support will be used to assess and manage any risk issues relating to employees. Where relevant, DBS checks will be renewed as appropriate.

Safeguarding will feature in job descriptions (reviewed regularly), person specifications and included in interview questions, where relevant. This will extend to vetting successful applicants, for example through references.

12. Contractors, Agents and Third-Party Partners

In addition to Sparrow colleagues and committees, any contractors, agents and third party partners providing frontline services on Sparrow's behalf are properly controlled.

All contractors working for or on behalf of Sparrow must ensure, so far as is reasonably practicable, they and their employees:

- are suitable to provide frontline services
- have relevant reference and background checks (e.g. DBS where appropriate) before commencing employment with their employer
- comply with our Management and Control of Contractors procedure (F)
- are aware of who to contact with any safeguarding concerns in a Sparrow home
- notify Sparrow of any safeguarding incidents or concerns
- fully cooperate with any investigation into received allegations
- have adequate systems in place to take appropriate disciplinary action.

Third party contractors, and agents are prohibited from knowingly entering a property where the sole occupant is or appears to be under 16 years of age. If this is the case, they should withdraw from the premises and advise Sparrow immediately. Appointments must be re-arranged to a time where an appropriate adult is present.

Sparrow will support its main contractors by:

- Offering periodic Safeguarding training and toolbox talks
- Supplying Safeguarding Guidance Booklet (G) to contractors with contact details of our Designated Safeguarding Leads for information and support, reporting procedures and the direct line to raise the alert immediately
- Including Safeguarding within our contractor health and safety inspections (H).

13. Confidentiality and Information Sharing

Sparrow will share information appropriately with partners that have a statutory responsibility to investigate safeguarding concerns, including Children and Adult Social Care Departments and Police Authorities

Information can be shared lawfully within the parameters of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

Sparrow will ensure that all colleagues understand that data protection does not prevent the sharing of information where it would protect the welfare of children and promote the wellbeing

of adults. Measures are in place to ensure that data is shared in a secure method and that all partners have measures in place to protect data.

Emergency or life-threatening situations may warrant the sharing of relevant information with the relevant emergency services without consent. Where the issue relates to a child, we do not need to seek consent to make an alert. In an emergency or life-threatening situation, the legal basis for sharing of information relating to safeguarding will rarely be consent and Sparrow will not seek consent unless it is absolutely necessary.

It is very important that the risk of sharing information is also considered. In some cases, such as domestic violence or hate crime, it is possible that sharing information could increase the risk to the individual. Safeguarding partners shall work jointly to provide advice, support and protection to the individual.

14. Mental Capacity and Best Interest

People must be assumed to have capacity to make their own decisions and be given all practicable help before they are considered not to be able to do so. If there is a concern that an adult may lack capacity around making a specific decision a referral must be made to the relevant local authority Adult Social Care Department.

Where an adult is found to lack capacity, then any action taken, or any decision made for, or on their behalf, must be made in their best interests. Professionals and other stakeholders have a responsibility to ensure they understand and always work in line with the Mental Capacity Act and understand circumstances that may indicate a potential deprivation of liberty, any concerns must be referred to the relevant Local Authority.

15. Escalation and Resolution

Effective working together depends on resolving disagreements to the satisfaction of colleagues and partner agencies, and a belief in partnership and joint working to safeguard children, a young person or an adult. Whilst each Local Authority may have different processes for escalation, the focus within Sparrow will be to ensure resolution and the

continuation of good partnership working, managing disagreements at the lowest possible level. At no time must any professional disagreement undermine the safeguarding of a child, young person or adult. The welfare and safety of the individual must remain paramount throughout.

Where a Sparrow employee feels they do not have sufficient status or experience to challenge a partner agency, they must seek guidance from their Designated Safeguarding Lead.

16. Reporting and Investigating Concerns

All colleagues and third parties have the responsibility to report concerns of abuse or disclosures made to them promptly as detailed in Sparrow's Safeguarding Reporting and Investigation Procedure (I). If however there is a risk of serious or imminent danger/harm to the individual, the person witnessing the event must dial 999 and ask for the police.

Sparrow will also maximise available opportunities to provide, or signpost tenants and customers to information and advice regarding safeguarding and ensure people are supported to report any safeguarding concerns.

When managing any allegation of abuse, it is essential that information is recorded accurately and in a timely manner. In addition, Sparrow colleagues or third parties may also be called upon to complete forms or requests for information from statutory agencies which include local authority, the local Safeguarding Team the police or NHS.

17. Reporting Barriers and Challenges

It is often difficult for victims of abuse to disclose or report instances of abuse. This may be for a number of possible reasons, such as

- fear
- stigma
- not realising it is abuse
- not knowing how to report it
- thinking they won't be taken seriously
- helplessness
- not being able to see any solutions
- feeling embarrassed
- not wanting to get someone else into trouble
- lacking capacity or experiencing poor mental health.

Overcoming these barriers is key to ensuring that no abuse goes unnoticed or unaddressed. Sparrow aims to achieve this by regularly exploring barriers to reporting abuse with customers during home visits, workshops and customer focus groups.

This includes

- discussing example cases
- using team meetings, training and oversight to ensure colleagues are aware of how to recognise and respond to abuse, and how to empower and encourage customers to report it
- encouraging services to learn from each Safeguarding Concern by including the need for service improvements, including overcoming barriers, to be recorded as part of every safeguarding investigation.

18. Whistleblowing

Sparrow's whistleblowing policy (J) encourages and supports colleagues to report concerns about the conduct of colleagues and/or third parties.

Sparrow will report any safeguarding concerns raised about the conduct of colleague's members to the Designated Safeguarding Lead and act in accordance with the appropriate advice and guidance.

19. Equality and Diversity

We are aware of our public sector duty and responsibilities as outlined in the Equality Act 2010. This policy sets out how we will try to safeguard children, young persons, and adults at risk of abuse – regardless of any other protective characteristic. Our experience with (should we get feedback from) customers is that we have supported has informed this policy.

20. Support for Colleagues and Third Parties

Sparrow recognises its colleagues, and third parties may be emotionally impacted by a safeguarding issue or investigation – especially when young and vulnerable children are involved.

Support will be provided to colleagues who have reported, or are dealing with, incidents involving abuse. Colleagues should contact their line manager.

Sparrow's approach to supporting staff is one of openness and the freedom to be professionally curious. Our infrastructure in having Designated Safeguarding Leads is there not only as means to give assurance to our board that safeguarding is being appropriately addressed, but as a way of providing support to staff that need it if they are dealing with a complex situation.

21. Policy Concerns

If a colleague or third party become aware that there are problems with the effective operation of this policy or associated procedures, they should report this to their line manager who will discuss with the Designated Safeguarding Lead and/or policy owner(s). This feedback will be incorporated into the policy and procedural review process.

22. References

- (A) SGF001 Safeguarding Legislation and Policy Framework for Children
- (B) SGF002 Safeguarding Legislation and Policy Framework for Adults
- (C) SGF003 Types and Definitions of Abuse Guidance Note
- (D) SGF004 Safeguarding Committee Terms of Reference
- (E) SGF005 Safeguarding Governance and Accountability Structure
- (F) HSP 9.14 Management and Control of Contractors Procedure
- (G) SGF006 Safeguarding Guidance Booklet
- (H) HSF043 Contractors Health and Safety Inspection Form
- (I) SGP 2.0 Safeguarding Reporting and Investigation Procedure
- (J) Sparrow Whistleblowing Policy
- (K) Antisocial Behaviour (ASB) Policy
- (L) Domestic Abuse Policy
- (M) Modern Day Slavery Policy.

23. Procedure implementation, dissemination, and review

- 23.1. The implementation of this policy does not require any prescribed training other than that identified within the policy. The Homeowner Services Team will provide guidance, support and assistance to any manager, colleague or contractor in the implementation of this and other Safeguarding procedures.
- 23.2. This policy will be published on Sparrow Intranet for general access and viewing by all staff.
- 23.3. A periodic review of the procedure shall take place to ensure its relevance and accuracy. unless:
 - Legislation/regulation or sector developments require otherwise, ensuring that it continues to meet its objectives and takes account of good practice developments

- We identify deficiencies or failures in this procedure, as a result of stakeholder feedback, complaints or findings from any independent organisations.

24. Version control

VERSION	DATE	AMENDMENTS	APPROVED AT/BY	CHECKED BY	PUBLISHED BY	DATE OF REVIEW
1.0	Nov 2024	New Policy	Board	Homeowner Services Manager	Office Management	Nov 2025