

# Portsmouth City Council

## Housing Needs, Advice & Support (HNAS) Service

### Safeguarding Policy

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## 1. Introduction & context

The principle of safeguarding is the same for both children under 18 and adults at risk (sometimes referred to as vulnerable adults): - that everyone has a duty to protect children and adults at risk from harm. We all have a role in enabling children and adults to live a life free from abuse or neglect. This cannot be achieved by any single agency. Every organisation and person who comes into contact with a child or adult has a responsibility and a role to play to help keep them safe.

As a statutory housing advice and support service working with children, young people and families, we have specific statutory duties under Section 11 of the Childrens Act 2004 to promote the welfare of children and young people, and ensure they are protected from harm. We also have statutory responsibilities for safeguarding adults, for example from the Human Rights Act (1998); the Mental Capacity Act (2005), and the Care Act (2014).

This policy applies to all staff working within Portsmouth City Council's Housing Needs, Advice and Support service (HNAS).

### Safeguarding Commitment

HNAS is committed to the safeguarding of all of its customers, both over and under the age of 18; as well as its staff members and those who work in partnership with the service, such as employees of other public agencies, providers of commissioned services and those who represent the voluntary sector.

HNAS is committed to ensuring that:

- All people, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harassment, harm, or abuse
- All members of HNAS staff are responsible for safeguarding and promoting the welfare of others and will be briefed and receive training as appropriate, on safeguarding policy and procedures
- Safeguarding is everyone's responsibility
- Responsibility for the protection of children, young people, and adults at risk is shared because people are safeguarded only when all individuals and relevant agencies accept responsibility and cooperate with one another
- Any individual who is suffering, or likely to suffer, significant harm, is identified, and appropriate action taken to see that individuals are kept safe
- The environment will be one in which all people feel valued and respected, and are encouraged and supported to raise any concerns they have about their own safety and welfare and the safety and welfare of others
- An environment is promoted in which everyone feels valued and able to communicate their wishes and feelings successfully

- Disclosures about abuse or neglect and allegations against persons in a position of trust made by individuals and employees alike will always be taken seriously and reported in line with procedures and with due regard to the privacy of the individuals and their families
- Abuse of trust. All staff should clearly understand the need to maintain appropriate boundaries in their dealings with individuals. Intimate relationships between staff or contractors and individuals will be regarded as a grave breach of trust
- Safeguarding procedures provide a clear framework for raising concerns or worries about a young person or vulnerable adult and should be read and understood by all HNAS staff

## Safeguarding Principles and policy overview

The six Safeguarding Principles as described in The Care Act 2014 are as follows, and these should underpin all safeguarding work:

- **Empowerment** People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** It is better to take action before harm occurs.
- **Proportionality** The least intrusive response appropriate to the risk presented.
- **Protection** Support and representation for those in greatest need.
- **Partnership** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** Accountability and transparency in safeguarding practice.

## Key legislation & relevant policies and procedures

We recognise the vast amount of legislation regarding the safeguarding of children and adults at risk and will continue to monitor relevant legal guidance. The list below reflects some of the existing legal framework and relevant publications:

- Working Together to Safeguard Children, July 2018
- The Data Protection Act 2018
- The Children Act 1989
- Children Act 2004
- Education Act 2002
- Safer Working Practice for Adults who Work with Children and Young People, 2015
- Information Sharing Guidance for Practitioners, 2015
- The Modern Slavery Act 2015
- The Mental Health Act 1983
- The Care Act 2014 and further statutory guidance
- Equalities Act 2010

- Deprivation of Liberty Safeguards (DoLs 2007)
- The Human Rights Act 1998
- Disclosure and Barring Service
- Family Law Act 1996
- Sexual offences Act 2003
- Female Genital Mutilation Act
- Domestic Violence Crime and Victims Act 2004
- Homelessness Act 2002
- General Data Protection Regulation 2016
- Anti-Social Behaviour, Crime and Policing Act 2014
- Care Standards Act 2000
- Domestic Abuse Act 2021
- Prevent Duty Guidance 2023

### Review of this policy

The HNAS Safeguarding Policy will be reviewed at least every two years and updated as appropriate.

The policy may be updated on an ad hoc basis following any serious case review or learning event which highlights a relevant need, or following any change to legislation, regulation, best practice or operational procedure.

## 2. The HNAS Service

HNAS is the first point of contact for people who need help and advice with housing related issues, such as:

- Notices
- Illegal eviction
- Relationship breakdown
- Domestic abuse
- Homelessness and rough sleeping
- Access to social housing
- Access to supported housing

The team provides Portsmouth City Council's statutory homelessness assessment and advice functions, including provision of temporary accommodation for qualifying individuals and families.

The team also manages the Portsmouth Housing Register and the allocations of vacant council and housing association homes in the city. More information about the Portsmouth Allocation Scheme can be found [here](#).

### Safeguarding roles & responsibilities within HNAS

All adults working with individuals have a responsibility to safeguard and promote their welfare. It is far better to report a potential issue or concern and for it to be unfounded than not to report something that could potentially lead to the death of a child or vulnerable adult.

#### The Senior Management Team

The HNAS senior management team has overall responsibility for safeguarding processes, policies and delivery of the HNAS service and functions.

The HNAS senior management team is led by Jo Bennett, Assistant Director for Housing Need & Supply, and Shane Galvin, Head of Service for HNAS.

Jo Bennett: [Jo.Bennett@portsmouthcc.gov.uk](mailto:Jo.Bennett@portsmouthcc.gov.uk)

Shane Galvin: [Shane.Galvin@portsmouthcc.gov.uk](mailto:Shane.Galvin@portsmouthcc.gov.uk)

#### Designated Safeguarding Leads

The senior management team has appointed the Commissioned Support and Safeguarding Manager, Michael Swann, as the Designated Lead for Safeguarding (DSL) for HNAS and Megan Robinson, the Commissioned Services Manager, as the deputy DSL.

**Michael Swann:** [Michael.swann@portsmouthcc.gov.uk](mailto:Michael.swann@portsmouthcc.gov.uk)

**Megan Robinson:** [Megan.Robinson@portsmouthcc.gov.uk](mailto:Megan.Robinson@portsmouthcc.gov.uk)

Responsibilities of the DSLs include:

- supporting the senior team in developing and embedding the service-wide approach to safeguarding
- playing a lead role in maintaining and reviewing the plan for safeguarding, including recommendations and actions arising from safeguarding reviews and learning events
- coordinating the distribution of policies, procedures and safeguarding resources, including new or updated guidance and learning
- advising on training needs and development
- providing safeguarding advice and support to staff
- managing safeguarding concerns, allegations or incidents reported to the organisation
- managing referrals to key safeguarding agencies (eg Social Care or Police) of any incidents or allegations of abuse and harm
- supporting the wider work of local safeguarding partnerships such as the Portsmouth Safeguarding Children Partnership (PSCP) and Portsmouth Safeguarding Adults Board (PSAB) such as by coordinating the HNAS service response to and participation in scoping exercises, learning events and serious case reviews

## **Managers**

Individual team managers within HNAS are responsible for ensuring that safeguarding matters are reported to the DSL or deputy DSL, and that safeguarding is effectively managed within their area of responsibility.

All managers must take responsibility for any concerns that come to their attention in their teams. They must never ignore, underplay, or pass on overall responsibility to another member of staff, contractor, or peer.

All managers have a key role in helping develop understanding, knowledge, and confidence to ensure procedures are followed effectively, professionally, and safely. No member of staff raising a concern, or indeed any manager, must shoulder this burden on their own.

## **Staff**

All staff will be briefed in and informed of their responsibilities in being alert to the signs of abuse. HNAS will support staff and contractors by providing an opportunity to talk through their concerns with their line manager or with the DSL or nominated deputy. Staff will be provided with relevant information, on a need-to-know basis, about individual children and adults at risk to keep them vigilant to any specific needs. They must share any concerns with the designated members of staff for safeguarding.

Anyone who feels that there is a real and immediate health risk to an individual, can refer directly to the relevant Multi Agency Safeguarding Hub (MASH) team within the local authority, or the Police, and will receive the relevant training to enable them to do so.

### **Customers of HNAS, and those who work in partnership with it**

HNAS's Safeguarding policy will be made available to access through the Portsmouth City Council website. Anybody can highlight their concerns about a child or individual they believe to be at risk

HNAS works in partnership with a range of different organisations to deliver the services and accommodation its customers need, including commissioned providers of housing-related support, third sector organisations and private housing providers.

Any individual or organisation working with HNAS to provide housing or support to its customers is expected to support and promote the service's safeguarding commitments, responsibilities and obligations through their own approach to the work.

Where appropriate and reasonable, and upon request from HNAS officers, they may be required to provide evidence of having their own safeguarding policies and procedures in place, and these may be subject to further/regular review, for instance as part of regular contract review processes for commissioned services.

### **Managing access to services, customers and information**

All HNAS staff, and those working in services commissioned by HNAS, should also take appropriate steps to monitor and manage visitors, retaining the necessary oversight and control to that no unauthorised person is able to gain unsupervised access (physical and electronically) to any children or adults at risk.

### **Recruitment, induction and training of HNAS staff**

Portsmouth City Council's Recruitment and Selection policy outlines the processes that HNAS officers will follow in respect of any recruitment to posts within the service. This includes, where relevant, full regard to the additional criteria for positions working with children or adults at risk (appendix 3 of the policy); abiding by statutory duties as set out by government legislation in respect of references and DBS checks for staff, to ensure that no disqualified person or unsuitable person works in a setting which has close access to children and adults at risk.

All recruiting officers within HNAS are required to undergo Safer Recruitment training as part of their ongoing professional development.

Contractors of services provided by HNAS such as commissioned providers of supported accommodation, who will be in close contact with children and adults at risk, should be aware of the 4LSAB and HIPS Guidance to Safer Recruitment and will

be required to carry out disclosure checks with the Disclosure and Barring Service (DBS) before relevant posts can be confirmed. These requirements should be contractual, and therefore enabling providers' compliance to be monitored through a robust and regular contract review process with relevant HNAS commissioning managers.

### **Induction and Training of staff**

All newly appointed staff take part in a formal induction process, with a probation period to ensure competence in their role. Please see Portsmouth City Council's Induction Policy and Probation Policy for further information.

To ensure individuals are protected all appropriate staff members are required to read and participate in briefings on safeguarding policies and procedures. Staff members will:

- engage in briefings as part of their induction and other activities with PCC, for example, engagement with webinars, completing e-learning, reading relevant procedure guides and attending training courses
- have access to relevant policies and procedures via PCC's website plus the shared learning provided by PSCP and PSAB
- be required to keep up date with these as part of their on-going development

All staff who will have contact with young people and adults at risk will receive periodic safeguarding briefings and will be required to confirm on an annual basis that they have

- updated their knowledge, for example, using government briefings and other relevant documentation
- participated in briefings, for example, attended webinars and other relevant activities

This will also be reviewed as part of annual professional development reviews (PDRs) or similar appraisal processes.

All staff working within the HNAS service are required to carry out the following training in relation to **children & young people's safeguarding**, as a minimum:

- Basic Safeguarding Awareness training (3 hours via PSCP website)
- Attend 1 day equivalent of additional PSCP training (every three years).

#### Other PSCP training currently available

Adverse Childhood Experiences (ACEs) - (3 hours)

Child Exploitation Risk Assessment Framework (CERAF) Toolkit - Multi Agency (1.5 hours)

Preventing Online CSE - 'ThinkUknow' (2 x 3 hours)

Understanding Childhood Neglect (1 day)

Harmful Cultural Practices (1.5 hours)

Bruising Protocol (2 hours)



## Safeguarding Children with Disabilities (2 x parts)

All DSLs & team managers within HNAS service are required to carry out the following additional children & young people's safeguarding training, as a minimum:

- Early Help - Using the FSP and Child Protection Modules (1 day each via PSCP)
- 5 x PSCP masterclasses every three years (1.5 hours each)

### Masterclasses currently available via PSCP:

Contacting MASH (getting the right help)

Decision Making (Portsmouth thresholds)

Safeguarding (national and local picture)

Escalation (having the right conversation)

Compact (developing practice in your organisation)

Exploitation (consider your language - victim blaming)

Exploitation - The National Referral Mechanism

Cyber Choices

Consent

LIVE Masterclasses for DSLs and Managers on embedding the Family Support Plan (FSP) into Policy and Practice (How we do Early Help in Portsmouth)

As a minimum all HNAS staff have to complete the following training in relation to the **safeguarding of adults**.

- Safeguarding Adults Awareness - once (half day course)
- Safeguarding Adults Annual Refresher - every year (one day course)
- Prevent training (every three years)
- Suicide Awareness training
- Domestic Abuse training
- Modern Day Slavery training
- Mental Health training such as MH First Aid

In addition, DSLs and team managers within HNAS are required to complete the following:

Developing Safeguarding Practice (one day course)

Best practice for safeguarding adults planning and review meetings (one day course)

Safeguarding in a strength-based way (half day course)

Safeguarding adults detailed (2 x half day, virtual course)

Adult Safeguarding Concerns (e-learning)

Responding to Domestic Abuse (course)

Friends against scams (e-learning)

Mental Capacity Act Refresher (course)

4LSAB Fire Safety Risk Assessment (e-learning)

Other training may be identified on a case by case basis, depending on the role being performed by a staff member. Officers with clearly defined responsibilities around working with vulnerable individuals and those in need of additional support, may require or benefit from additional and specific training to enable them to work most effectively within their role and with partner agencies.

### **Review of training needs and offer for HNAS**

It is recognised that best practice within safeguarding is a constantly evolving area and that this is reflected in the range and scope of training offered. The DSLs will work with the senior management team to frequently review and update the service-wide safeguarding training requirements and offer available, to ensure they are fit for purpose and reflect the identified needs of the service to carry out its safeguarding responsibilities, as detailed in this policy.

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### 3. The customers of the service

It is recognised that due to the nature of the work HNAS regularly carries out, the range of services it provides either directly or by commissioning organisations to provide on its behalf, and the very broad scope of its customer base, it is likely that the service may frequently engage with individuals and families that require safeguarding support of some form.

We acknowledge that some customers of the service may be at a higher or more immediate risk of experiencing harm or abuse, whereby a safeguarding response is required. This could be for instance due to their individual circumstances at the time of presentation to the service, due to underlying health issues or vulnerabilities, or perhaps as a result of having protected characteristics (as defined within the Equality Act 2010) which may place them at a potentially increased risk of harm or abuse.

However it is important to recognise that there could be situations where unconscious bias may lead staff to make assumptions about which customers may or may not need safeguarding. All staff working in the service have a responsibility therefore to challenge themselves and each other and to foster a supportive and reflective culture of professional curiosity, to ensure that safeguarding decisions are never made on a basis of forming assumptions about a particular person or situation.

#### Forms and indicators of abuse or neglect

There are many forms of abuse and neglect. Incidents of abuse may be one-off events or happen on multiple occasions and affect one person or more. HNAS staff should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of poor care may be an indication of more serious problems and of what is described as organisational abuse. In order to see these patterns, it is important that information is recorded and appropriately shared.

Patterns of abuse vary and include:

- serial abuse, in which the perpetrator seeks out and 'grooms' individuals. Cases of sexual abuse may fall into this pattern as do some forms of financial abuse
- long-term abuse, in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse
- opportunistic abuse, such as theft occurring because money or jewellery has been left lying around

We recognise that abuse and neglect can take many forms, such as the following:

### **Physical abuse**

Causing someone physical harm - for example by hitting, pushing, or kicking them, mis-using medication, causing someone to be burnt or scalded, controlling what someone eats, restraining someone inappropriately or depriving them of liberty.

### **Domestic abuse**

It is important to recognise that domestic abuse isn't always manifested in physical violence, and can include alternative or additional forms of abuse, coercion and control, such as

- psychological
- sexual
- financial
- emotional abuse
- so called 'honour' based violence

Coercive control is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten the individual at risk. This controlling behaviour is designed to make the individual dependent by isolating them from support, exploiting them, depriving them of independence and regulating their everyday behaviour.

The HNAS service is developing a Domestic Abuse policy which sets out its procedures and processes for supporting survivors of these forms of abuse. Please refer to this policy for further guidance.

### **Sexual abuse**

Sexual acts to which a person has not or cannot give their consent or which they have been pressurised into. Both adults and children can be either victims or perpetrators of sexual abuse, and which may take the form of:

- rape
- indecent exposure
- sexual harassment
- inappropriate looking or touching
- innuendo or use of sexualised language
- sexual photography
- subjection to pornography or witnessing sexual acts
- sexual assault
- sexual exploitation and/or acts to which the person has not consented, is unable to consent or has been pressurised into consenting

Sexual abuse frequently involves the misuse of authority or power of the perpetrator over the victim and can closely be related to other criminal activities.

### **Psychological abuse**

Causing someone mental and emotional distress by using threats of harm or abandonment, humiliation, coercion and control, intimidation, harassment, emotional or verbal abuse, depriving them of contact with other people, or the unreasonable and unjustified withdrawal of services or supportive networks. It can also encompass behaviours such as cyber bullying.

### **Financial or material abuse**

Taking money, goods, or property without permission. This can include theft, fraud, exploitation or putting pressure on someone to make a will, transfer the ownership of property or carry out other financial transactions, sometimes by the use of other scams such as telephone, postal, doorstep and/or distraction burglary, or internet scamming.

Financial abuse is the main form of abuse investigated by the Office of the Public Guardian both amongst adults and children at risk. Financial recorded abuse can occur in isolation, but as research has shown, where there are other forms of abuse, there is likely to be financial abuse occurring. Although this is not always the case, everyone should also be aware of this possibility.

### **Modern slavery**

A global problem that transcends age, gender, and ethnicities, including here in the UK. It can include victims who have been brought from overseas and people in the UK who are forced to illegally work against their will in many different sectors, including brothels, cannabis farms, nail bars and agriculture. The abuse can therefore be physical, emotional, psychological, financial, or sexual; traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Read Modern slavery: how the UK is leading the fight for further information.

### **Discriminatory abuse**

Treating someone in a less favourable way that causes them harm, because of their age, gender, sexuality, disability, ethnic origin, or religion; this can include (but is not limited to) harassment, verbal or physical abuse, or the unreasonable and unjustified withdrawal of services or supportive networks.

### **Organisational abuse**

Where services fail to recognise the rights of service users and offer a poor quality of care or condone ways of working which cause harm. This can include neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. It may range from one off incidents to ongoing ill-treatment. It can also be through neglect or poor professional practice as a result of the structure, policies, processes and

practices (or absence of these) within an organisation. Signs and indicators of organisation abuse can include the following:

- Discouraging visits or the involvement of family or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

Further information about managing concerns relating to organisational abuse, including the role of Large Scale Safeguarding Enquiries (LSSEs) can be found here: [4LSAB-Large-Scale-S42-Safeguarding-Enquiry-Protocol-January-2023.pdf](https://www.hampshiresab.org.uk/4LSAB-Large-Scale-S42-Safeguarding-Enquiry-Protocol-January-2023.pdf) ([hampshiresab.org.uk](https://www.hampshiresab.org.uk))

### **Neglect and acts of omission**

Failure to provide access to services to meet a person's health, social care or educational needs or withholding the necessities of life such as medication, food, clothing, and heating. This could be by (but not be limited to):

- ignoring medical, emotional or physical care needs
- failure to provide access to appropriate health, care and support or educational services
- the withholding of the necessities of life, such as medication, adequate nutrition and heating

### **Self-neglect**

Any failure of an adult to take care of themselves - A refusal or inability to cater for basic needs, including personal hygiene and appropriate clothing; Neglecting to seek assistance for medical issues; not attending to living conditions; letting rubbish accumulate in the garden; or dirt to accumulate in the house; hoarding items or animals. This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

### **Female genital mutilation (FGM)**

Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act (2003) makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

Further information on safeguarding women and girls at risk of FGM is available via this link: [Safeguarding women and girls at risk of FGM - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

### **Forced marriages**

Is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse.

### **Hate crime**

The police define 'hate crime' as 'any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person's religion, belief, gender identity or disability'. It should be noted that this definition is based on the perception of the victim or anyone else and is not reliant on evidence. In addition, it includes incidents that do not constitute a criminal offence.

The police monitor five strands of hate crime:

- disability
- race
- religion
- sexual orientation
- transgender

### **Honour-based violence**

Will usually be a criminal offence and referring to the police must always be considered. It has or may have been committed when families feel that dishonour has been brought to them. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community.

### **Human trafficking**

This problem has a global reach covering a wide number of countries. It is run like a business with the supply of people and services to a customer, all for the purpose of making a profit. Traffickers exploit the social, cultural or financial vulnerability of the victim and place huge financial and ethical obligations on them. They control almost every aspect of the victim's life, with little regard for the victim's welfare and health.

### **Mate crime**

A 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate crime is often difficult for police to investigate, due to its sometimes ambiguous nature. Mate crime is carried out by someone the adult knows and often happens in private.

### **Restraint**

Unlawful or inappropriate use of restraint or physical interventions. Someone is using restraint if they use force, or threaten to use force, to make someone do something they are resisting, or where an adult's freedom of movement is restricted, whether they are resisting or not. Restraint covers a wide range of actions. It includes the use of active or passive means to ensure that the person concerned does something, or does not do something they want to do, for example, the use of key pads to prevent people from going where they want from a closed environment.

### **Radicalisation**

Radicalisation is comparable to other forms of exploitation, such as grooming and Child Sexual Exploitation. The aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

### **Cuckooing**

A form of crime, termed by the police, in which drug dealers take over the home of a vulnerable person to use it as a base for county lines drug trafficking.

### **County Lines**

The 2018 Home Office Serious Crime Strategy states the National Society for the Prevention of Cruelty to Children's (NSPCC) definition of a County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons



## 4. Cross Authority & Partnership working

HNAS is a service within Portsmouth City Council's Housing, Neighbourhoods and Buildings (HNB) directorate, working across Portsmouth and with the neighbouring authorities of Hampshire, Southampton and Portsmouth to ensure a consistency of approach and ensure that individuals are protected. HNB is a member of both the Portsmouth Safeguarding Children Partnership and the Portsmouth Safeguarding Adults Board.

- **The Portsmouth Safeguarding Children Partnership (PSCP)**

The PSCP brings together all the main organisations who work with children and families in Portsmouth, with the aim of ensuring that they work together effectively to keep children safe. Contact information can be found at [Home - Portsmouth Safeguarding Children Board \(portsmouthscp.org.uk\)](http://portsmouthscp.org.uk)

The [Hampshire, IOW, Portsmouth and Southampton \(HIPS\) procedures](#) provide overarching guidance and procedures on safeguarding issues which have been agreed by all four local Safeguarding Children Partnerships, and which have been developed and adopted by PSCP, and in turn HNBS.

A manual has been developed to provide a set of chapters which comply with [Working Together to Safeguard Children](#). The content is intended to be accessible to a wide range of staff from organisations that have responsibilities to identify children with unmet needs and/or at risk of abuse, and to keep them safe.

Where a local approach has been developed regarding a safeguarding issue this is supported by local procedures which supplement those used across the region. These are highlighted on each of the relevant safeguarding issue pages and are referred to by HNBS when working with children and young people.

Policies and procedures are frequently updated to ensure that they meet emerging requirements and challenges.

- **The Portsmouth Safeguarding Adults Board (PSAB)**

The Portsmouth Safeguarding Adults Board is a multi-agency strategic partnership that oversees and leads adult safeguarding in Portsmouth. Contact information can be found at [Portsmouth Safeguarding Adults Board \(portsmouthsab.uk\)](http://portsmouthsab.uk).

Adult safeguarding multi-agency policy, process and guidance has been produced with contributions from partner agencies of the four local Safeguarding Adults Boards ('4LSABs') in Southampton, Hampshire, Isle of Wight and Portsmouth. The content applies to adults over the age of 18, across the geographical areas covered by the 4LSABs and is fully endorsed and supported by each of the Boards. 4LSAB policies can be found on the PSAB website at [Policies & Procedures \(portsmouthsab.uk\)](#)

The guidance supports partnership working and good practice in adult safeguarding across the whole of the 4LSAB areas, setting out the overarching values and principles HNBS should be working to, the approaches to be taken to adult safeguarding and the process that explains how agencies and individuals should work together to respond to concerns of abuse and neglect of adults with care and support needs and be able to put the policy, process and guidance into practice.

## Multi Agency Risk Management processes

There are a number of well-established frameworks for multi-agency working to share information and collaborate with key partner agencies to support effective safeguarding practice on an individual case basis. These include:

- **Multi Agency Risk Management (MARM) framework**

Processes to manage and mitigate identified risks to adults in the community, and where the s.42 (Care Act 2014) threshold for a statutory safeguarding response may not yet be met.

- **Multi Agency Risk Assessment Conference (MARAC)**

Processes to support information sharing and action planning for survivors of domestic abuse who have been assessed as being at a high risk of harm or homicide. A 'one minute guide' to MARAC, including contact details for local referral arrangements, is available here: [Multi-Agency-Risk-Assessment-Conference-MARAC.pdf \(portsmouthscp.org.uk\)](https://portsmouthscp.org.uk/Multi-Agency-Risk-Assessment-Conference-MARAC.pdf)

- **Multi Agency Public Protection Arrangements (MAPP)**

Processes to manage high risk offenders in the community. MAPP is not a statutory body in itself, but is a mechanism through which agencies can better discharge their statutory responsibilities and protect the public in a co-ordinated manner. Further information on MAPP is available here: [Multi-agency public protection arrangements \(MAPP\): Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/multi-agency-public-protection-arrangements-mappa)

- **Multi Agency Safeguarding and Support Team (MASST)**

Processes to manage and support the safe discharge and safeguarding of patients from hospital settings, specifically the Queen Alexandra Hospital

The HNAS service recognises that effective multi-agency working, including the timely sharing of information and the commitment to work in partnership with other key agencies and professionals, is indispensable to safeguarding practice.

The service is therefore committed to the support of and attendance at multi-agency frameworks and conferences, such as those listed above, when there is an identified need. Where attendance is not possible, such as due to unavoidable staff absence or resourcing issues, a written case update/report will be provided to the meeting chair or lead professional upon request.

## 5. Reporting concerns

Members of staff with a safeguarding concern for any other person should report it to the DSL and complete a safeguarding referral to the relevant Multi Agency Safeguarding Hub (MASH) or safeguarding team and, if required, the police.

Where an individual has disclosed that they have experienced abuse or neglect or where it is believed that a person is in need, is suffering from, or is at risk of significant harm the relevant procedures outlined by HIPS / 4LSAB must be followed (see below). Any criminal offences should be reported immediately to the Police.

Referrals to relevant external agencies such as Police and Children's or Adults' Social Care services, should be made by the person who has witnessed abuse, suspects abuse is taking place, or who has received a report of abuse whilst carrying out their job role, supported by their line manager or the DSL, normally within 24 hours of an incident being reported.

HNAS recognises that it does not have the responsibility or authority to investigate cases of suspected abuse. However, it will co-operate with and share information with relevant external agencies in any enquiries regarding safeguarding matters, including representation at case conferences, core groups and multi-agency planning meetings as required.

### Reporting a concern about a child

The "HIPS" safeguarding children procedures manual for Hampshire, Isle of Wight, Portsmouth and Southampton authority areas can be found here:

[Welcome | Hampshire, Isle of Wight, Portsmouth and Southampton \(hipsprocedures.org.uk\)](http://hipsprocedures.org.uk)

**If you are concerned about a child in Portsmouth or Hampshire, it is important that you talk to someone about this. Don't ignore your concerns or delay taking action.**

If you consider a child is at immediate risk of harm phone the police on 999.

- Portsmouth Children Services  
Monday to Thursday 8.30am to 5pm  
Friday 8.30am to 4.30pm  
Phone 023 9268 8793  
email [mash@portsmouthcc.gov.uk](mailto:mash@portsmouthcc.gov.uk)

At all other times, contact the out-of-hours service, phone 0300 555 1373

- Hampshire Children Services  
Monday to Thursday 8.30am to 5pm  
Friday 8.30am to 4.30pm, phone 0300 555 1384

At all other times, contact the out-of-hours service, phone 0300 555 1373

You can also contact the NSPCC on 0808 800 5000 (free service, lines open 24c hours a day). They will listen to your concerns, offer advice and support and can take action on your behalf if a child is in danger. For further information or to report your concerns online visit the [NSPCC website Keeping Children Safe](#) page.

## Reporting a concern about an adult

The "4LSAB" safeguarding adults procedures guidance for Hampshire, Isle of Wight, Portsmouth and Southampton authority areas can be found here:

[4LSAB Safeguarding Concerns \(hampshiresab.org.uk\)](http://hampshiresab.org.uk)

**If you see, hear or suspect an adult at risk is being abused or neglected in any way, you must tell someone about it.**

In an emergency, or if you suspect you or someone else is in immediate danger, phone 999.

The "4LSAB" safeguarding adults procedures guidance for Hampshire, Isle of Wight, Portsmouth and Southampton authority areas can be found here:

[4LSAB Safeguarding Concerns \(hampshiresab.org.uk\)](http://hampshiresab.org.uk)

- Portsmouth Adult Social Care  
Monday to Thursday 8.30am to 5pm  
Friday 8.30am to 4.30pm,  
Phone 023 9268 0810  
Email: [AdultSafeguarding@portsmouthcc.gov.uk](mailto:AdultSafeguarding@portsmouthcc.gov.uk)

At all other times, contact the out-of-hours service, phone 0300 555 1373

- Hampshire Adult Social Care  
Monday to Thursday 8.30am to 5pm  
Friday 8.30am to 4.30pm, phone 0300 555 1386

At all other times, contact the out-of-hours service, phone 0300 555 1373

## Recording of information

All safeguarding concerns should be recorded by staff on a secure database or log of observations, which will include as a minimum, name and address of the person at risk, name of the reporter, name of the manager or designated person, what the concern was, what actions were taken and the reasons for the decision.

## Consent/ Refusal of Consent

If a decision is made to make a MASH safeguarding referral, this will be disclosed to the subject of the referral (either the adult at risk, or the parent/carer if it is a child at

risk) and the reasons why the referral is being made and what other action is being taken.

If the person does not give consent to a referral being made, it is important to then consider what other actions can be taken to reduce the risk that has been identified. Staff are advised to discuss such situations with their line manager or DSL to seek further advice and support.

Assurances of absolute confidentiality should never be given in reports of abuse. All staff should make it clear to any child, young person or vulnerable adult disclosing information that they cannot guarantee confidentiality, but they will only pass the information on to the people that can help them.

### **Manager/ Commissioner oversight of Safeguarding Referrals**

Where a member of staff has had cause to refer a concern to either the children's or adults' local authority safeguarding teams, their line manager must be sighted on this referral, either at point of the referral being made or following discussion/supervision of the concern prior to the referral being completed.

This practice will ensure staff are appropriately supported through the process, that their concerns have been shared with service managers and that the wider HNAS service can be assured in respect of the quality and appropriateness of the safeguarding referrals it is making.

Providers of commissioned housing services have a contractual obligation to share safeguarding referrals made by them (in respect of any adults or children they support) with the HNAS commissioned services management team, and by use of the [HNAS.Safeguarding@portsmouthcc.gov.uk](mailto:HNAS.Safeguarding@portsmouthcc.gov.uk) email address.

### **Propriety, behaviour and positions of power or trust**

All adults have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children, young people and adults at risk, with whom they work or come into contact with. It is therefore expected that they will adopt high standards of personal conduct to maintain the confidence and respect of the general public and of their colleagues.

Adults who work with children, young people and adults at risk are responsible for their own actions and behaviours and should avoid any contact, which could lead to someone questioning their motives and intentions or allegations being made.

It is acknowledged that people may have concerns about the possibility of an allegation being made against them and for that reason it is important that they familiarise themselves with behaviours that may be considered as constituting misconduct or gross misconduct, and those which would be considered illegal.

Circumstances where misunderstandings may arise:

- Dress and appearance
- Gifts, rewards and favouritism
- Communication with individuals (including the use of technology and /or social media platforms)
- Social contact
- Physical contact
- Sexual contact
- Children, young people and adults at risk in distress

All HNAS staff are considered to be in a position of trust regarding the customers and users of HNAS services because of their knowledge, position and/or the authority invested in their role. This means that staff and contractors should not use their:

- position to gain access to information for their own or other's advantage.
- position to intimidate, bully, humiliate, threaten, coerce or undermine anyone
- status and standing to form or promote relationships which are of a sexual nature or may become so

This means that staff and contractors should:

- ensure that an unequal balance of power is not used for personal advantage or gratification
- maintain appropriate professional boundaries and avoid behaviour which may be misinterpreted by others
- report or record any incident where their behaviour may be misinterpreted with a senior member of staff at the earliest opportunity

HNAS advises all staff to avoid the use of personal social media platforms as a communication format with customers. Portsmouth City Council has specific, identifiable social media accounts to enable communication by this means, when deemed necessary and appropriate.

***Further information can be found in the PCC Code of conduct.***

### **Whistle blowing**

Portsmouth City Council's Whistle Blowing policy and sets out the way contractors, individuals and staff may raise any concerns they have, including safeguarding, and details how those concerns will be dealt with.

### **Allegations against staff and adults in a position of trust**

All staff and contractors should be aware of their duty to raise concerns about the attitude or actions of colleagues or individuals.

Where an allegation has been made against a member of staff or contractor which calls into question their ability to safeguard and promote the welfare of children, young people and adults at risk, and their suitability to work with these individuals which is likely to result in a breakdown of public confidence, these will be investigated.

HNAS follows the 4LSAB guidelines for managing allegations against people in a position of trust, which can be found here: [4LSAB procedure](#)

If a person makes an allegation against a member of staff within HNAS, the senior management team (ie the head of service and assistant director) must be informed immediately. The senior management team holds the responsibility of responding to, managing and investigating allegations against members of staff.

This includes making referrals to any relevant safeguarding agencies (such as local authority MASH teams, the LADO and the police) and contact/liaison with any other relevant agencies or organisations. The senior management team will also be responsible for ensuring that any actions taken in respect of an allegation and subsequent investigation are made in accordance with PCC corporate HR and disciplinary policies.

If an allegation of abuse is made against a member of staff in a service, directorate or organisation other than HNAS, the DSL must be informed, and it must be reported to the Police and the respective DSL for that service, directorate or organisation. Providers of commissioned services for HNAS have contractual obligations to promptly share details of any staff safeguarding concerns or allegations of abuse with relevant HNAS managers/commissioners.

The member of staff concerned should have no further contact with the individual concerned and must not be informed of the allegation prior to referral. Any person (including those working in commissioned services and people in work-based further education placements) who comes into contact with children, young people and adults at risk has a legal and moral duty to safeguard and promote their welfare. This duty requires any such individual to ensure the safety of a young person or vulnerable adult involved in any activity or interaction for which that person is responsible.

## LADO

The Local Authority Designated Officer (LADO) should be alerted to all cases in which it is alleged that a person who works or volunteers with children has:

- Behaved in a way that has harmed or may harm a child.
- Possibly committed a criminal offence against children, or related to a child, behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

The LADO role applies to workers who are paid, unpaid, volunteers, casual, agency or anyone self-employed and they capture concerns, allegations or offences emanating from outside work.

### **Disclosure of information**

All safeguarding records are subject to Freedom of Information Act (2000) and the Data Protection Act (2018). If there is any doubt as to the rights of any party to access information, we may seek legal advice prior to releasing any information.

Information will be shared with other agencies in accordance with statutory requirements and local information sharing agreements. If a child, young person or adult is deemed to be at risk or any other person is deemed to be at risk, referrals can still be made despite not having the consent of the person involved.

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## 6. How to contact HNAS with feedback

You can request a copy of this policy in large print, Braille, audio or in another language by contacting the Housing Needs, Advice & Support (HNAS) service on 023 9283 4989.

If you wish to make a suggestion, compliment or complaint about HNAS or anything related to this specific policy, there are a number of ways you can get in contact with us.

- You can [submit a complaint using our online form](#)
- You can visit us in person at the HNAS service, in the Civic Offices (address below)
- You can phone our complaints line on [023 9283 4702](tel:02392834702)
- You can email us at [complimentcomplaint@portsmouthcc.gov.uk](mailto:complimentcomplaint@portsmouthcc.gov.uk)
- You can write to us at:

Suggestions, compliments and complaints,  
Portsmouth City Council,  
Civic Offices,  
Guildhall Square,  
Portsmouth,  
PO1 2ZX

The corporate complaints policy can be viewed here [Corporate complaints policy - Portsmouth City Council](#) and you can request a copy of this policy in large print, Braille, audio or in another language by contacting HNAS.

If a customer with a complaint is still unhappy after following the corporate complaints policy, they can contact the Housing Ombudsman service.

The Housing Ombudsman service provides an online complaint form at [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk) and can be contacted by telephone - 0300 111 3000