

# Connexus Safeguarding Policy

## Safeguarding is Everyone's Responsibility

Safeguarding is a key priority for the Care Quality Commission (CQC) and Ofsted who are the key regulators responsible for ensuring that all providers, including housing providers, have appropriate systems in place to ensure the safety of children, young people and adults with care and support needs whose circumstances make them at risk of abuse and or neglect. The Care Act 2014 and Child sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect.

<b>Approved by SMT</b>	19 December 2024
<b>Approved by Committee/ Board</b>	N/A
<b>Effective date</b>	1 March 2024
<b>Review date</b>	30 June 2027
<b>Policy developed by</b>	Head of Support Services
<b>Consultations</b>	Connexus Safeguarding Advisory Group
<b>Associated procedure</b>	Safeguarding Adults Procedure, Safeguarding Children's Procedure, Whistleblowing Policy, Domestic Abuse Policy, Suicide and Self Harm Procedure DBS Policy, Dignity at Work Policy

# Version Control

Version	Author	Date Published	Next Review	Comments
1.0	Head of Support Services – [REDACTED] [REDACTED]	01 Mar 24	30 Jun 27	Policy changed to update links to Local Authority Safeguarding teams and update internal Safeguarding Leads links. Also updated to reflect revised access arrangements to register.

## Introduction

### 1. Purpose

Connexus Homes Limited and all associated subsidiaries are committed to ensuring that both children and adults are safeguarded, in order to comply with current legislation and our service standards. As part of their role, colleagues should be able to clearly recognise, identify and report abuse appropriately.

- 1.1 The aim of this policy is to give clear guidelines to all colleagues, volunteers and Board members, with regard to their safeguarding responsibilities for children and adults who come into contact with all Connexus services and operations.
- 1.2 **Connexus is committed to safeguarding and ensuring the welfare of children, young people and vulnerable adults and expects all our colleagues to share this commitment.** Connexus has a statutory duty to ensure that all new colleagues who regularly work alone with Children and Adults at Risk in the context of their role are vetted via the Disclosures and Barring Scheme (DBS) and that all colleague certificates are reviewed every 3 years.
- 1.3 There is a statutory requirement for the nominated Designated Safeguarding Lead for each Local Authority in which Connexus and its subsidiaries operate to maintain a Safeguarding register which documents all known and reported risk or concern for both adults living in our properties or being supported within the community or potentially the children of our tenants or support clients.
- 1.4 The Local Authorities in which Connexus currently operates include:
  - Herefordshire
  - Shropshire
- 1.5 Scope: This policy applies to the whole of the Group. This means Connexus Homes Limited (ultimate parent) and all of its subsidiaries.

### 2. Ensuring Statutory Compliance as Housing and Support Providers

- 2.1 Each Local Authority's Safeguarding Directorate takes lead responsibility for coordinating Safeguarding work through their Safeguarding Adult's Board and Safeguarding Children's Board. Other agencies, including housing and support agencies are responsible for contributing fully and effectively to work in partnership with their own Local Authority Adult's Safeguarding Board and Children's Board.
- 2.2 Where appropriate, the relevant Connexus **Designated Safeguarding Lead (i.e. for each local authority area)** will attend their Local Authority Safeguarding Boards meetings as Connexus representatives.

### 3. The Legal Framework

- 3.1 Child Protection Act and The Care Act 2014;
- 3.2 The Mental Capacity Act (including deprivation of Liberty Safeguards DOLs) 2005;
- 3.3 Human Rights Act 1998;
- 3.4 Safeguarding Vulnerable People Act 2006; The 2006 Act essentially provides a system for employers to check the suitability of employees or volunteers, to work with children or vulnerable adults.
- 3.5 Working together to Safeguard Children 2023: A guide to inter-agency working to safeguard and promote the welfare of children. The guidance outlines what organisations and agencies must and should do to help, protect and promote the welfare of all children and young people under the age of 18 in England
- 3.6 Data Protection Act 2018 (as amended) – governs the protection of personal data. It is not a barrier to sharing information but provides a framework to ensure that personal information about a person is shared appropriately.
- 3.7 The Children Act 1989 updated 2023; and
- 3.8 Section 11 of Children Act 2004 which specifically places duties on a range of organizations, including landlords, it imposes a duty on specified agencies to make arrangements to ensure that their functions are discharged having regard to the need to safeguard and promote the welfare of children.
- 3.9 Counter Terrorism and Security Act 2015. The PREVENT Duty is a component of the Counter-Terrorism and Security Act 2015. It requires healthcare providers to train their staff about the signs of radicalisation and how to report patients/staff to safeguarding teams. The inclusion of counterterrorism safeguarding within healthcare in Britain is novel, worldwide. Preventing a child, young person or a vulnerable adult from being engaged in violent extremism is no different in terms of our response as for any other safeguarding concern that NSPCC staff or volunteers may identify. The same reporting and referral processes apply as for all other safeguarding/child protection concerns where a child may be at risk of, or suffering significant harm. In these circumstances, a referral to the local authority using our safeguarding and child protection procedures must be used if anyone becomes aware of extremist, radicalised behaviour in children or adults.

### 3.10 **Safeguarding Adults**

To ensure we comply with current legislation and practice the Group links this policy to the separate Shropshire and Herefordshire Councils' Adult Safeguarding Policies and Operating Procedures.

- Shropshire Council [shropshire.gov.uk](http://shropshire.gov.uk)
- Herefordshire Council [www.herefordshire.gov.uk](http://www.herefordshire.gov.uk)

### 3.11 **Safeguarding Children**

To ensure we comply with current legislation and practice the Group links this policy to the separate Shropshire, Herefordshire, Children's Safeguarding Operating Procedures.

- The Shropshire Safeguarding Children's Board [Safeguarding | Shropshire Council](#)
- The Herefordshire Safeguarding Children's Board [Safeguarding Children Partnership - Herefordshire Safeguarding Boards and Partnerships](#)

## 4. **Methods of Delivery**

### 4.1 **Key Roles:**

- **Designated Safeguarding Strategic Lead**  
The DSL with specific responsibility to ensure that Connexus keep pace with changes and good practice within the Safeguarding scene. Present at Safeguarding Advisory Group.
- **Designated Safeguarding Lead (DSL)**  
The colleague who ensures that Connexus complies with the relevant Local Authority directives and procedures. It is imperative that a deputy is in place should the DSL be unable to be present at meetings etc.
- **Deputy Safeguarding Leads (Deputy)**  
Alongside DSLs; is a contact in Connexus with appropriate training to offer safeguarding advice and deputise for DSLs in their absence at meetings, reviews, escalation meetings etc.

### 4.2 **Connexus takes its social responsibilities seriously and will:**

#### 4.2.1 **Ensure accountability to each Local Authority where we provide services by:**

Nominating a named colleague to be the **Designated Safeguarding Lead** for each local authority area where Connexus provides services.

#### 4.2.2 **Demonstrate Leadership in Safeguarding by:**

We have a Safeguarding Advisory Group led by an independent Chair/Advisor. Quarterly meetings take place, with an associated ToR and Action Plan. General aim of this group is to ensure we are meeting our statutory duties; but also to

ensure that referral levels relate to the local and national 'picture'. Ensuring that the named Head of Service for each of the following named departments (due to the frequency of their contact with customers and households) understands the organisational importance of their role in promoting safeguarding within their team and commits to attend Safeguarding Advisory Group meetings or to nominate an appropriate Named Senior Officer from their team who will act on their behalf. The following is the membership of the Safeguarding Advisory Group minimum:

- **Housing**
- **Repairs and Assets**
- **Human Resources (in view of their responsibilities to safeguard, recruit and train employees)**
- **Support Services**
- **Customer Experience Director**

#### 4.2.3 **Ensure Safe Recruitment by:**

Ensuring that all new colleagues who come into regular contact and work alone with Children and Adults at Risk in the context of their role are vetted via the Disclosures and Barring Scheme (DBS) and that these certificates are reviewed every 3 years. Ensuring that two satisfactory references are given for the successful candidate; one must be from their current employer.

#### 4.2.4 **Ensure appropriate training by:**

Ensuring that all colleagues, including Board members and volunteers, receive induction training in safeguarding and that this is refreshed every three years as a minimum, unless a need for additional training is identified for an individual as described in the Safeguarding Training Strategy.

Ensuring that front facing colleagues receive face to face training.

Ensuring that key managers in the group to those front facing teams receive a higher level of training.

Maintaining an up-to-date training matrix for all colleagues to track compliance.

Ensuring that all colleagues are trained to promote identification of, recognise and record abuse and maltreatment appropriately.

#### 4.2.5 **Ensure appropriate reporting by:**

As detailed within the West Midlands Adults Safeguarding procedural overview, the Multi-Agency policy and procedure for the protection of adults with care and support needs and Working Together to Safeguard Children: March 2018, ensuring that all colleagues act to address any safeguarding concerns, including:

- Holding a Safeguarding Register, specific to each local authority.
- Reporting the specific concern to the Local Authority, if appropriate. It is important to remember that the information known by Connexus about a particular adult, child or family and the actions we have taken could be examined in the event of a serious case review.
- Notifying their **line manager** of their actions and interventions in order that the concern is recorded, that progress is updated, and that the concern is monitored within the relevant Safeguarding register.

Ensuring the **Designated Safeguarding Lead** register and record all concerns on the appropriate Safeguarding Register.

Ensuring the Safeguarding registers are regularly updated by the Designated Safeguarding Leads.

That each Connexus Register is reviewed regularly to ensure that cases are moving forward appropriately and escalated where needed by the relevant Local Authority **Designated Safeguarding Lead** and reports this to the quarterly Safeguarding Advisory Group.

#### 4.2.7 **Governance, oversight and control by:**

Ensuring that regular Safeguarding Advisory Group meetings take place with representation from the Executive Team, to oversee development of policies and procedures, and oversee practice implementation and development across Connexus.

Ensuring that the Customer Experience Committee periodically reviews the Safeguarding Policy.

Ensuring that the Chair/Advisor of the Safeguarding Advisory Group keeps the Customer Experience Committee apprised about the contents of the registers, the application of policies and procedures and overall compliance.




Ensuring that Safeguarding is a mandatory agenda item at individual 121 meetings, team meetings and Executive meetings.

## 5. Monitoring and Compliance

### 5.1 **The Connexus safeguarding registers**

- 5.1.1 The purpose of maintaining safeguarding risk registers is to ensure that the Connexus Homes Board is made aware of the numbers of vulnerable adults or children who have come into contact with our, services, together with the specific nature of the risk. Also to advise any plans responding to risk areas
- 5.1.2 The information which is added and stored on the register is confidential to the Safeguarding Register Administrators, the Named Senior Officers from each department, the Designated Safeguarding Lead and DSL Deputies for the particular Local Authority. The register is password protected.
- 5.1.3 The specific details of the individual will not be disclosed outside of the register, but the numbers of families, children and adults who reside as tenants or who receive support from our services, non identifying details such as category of support and outcome are collated in general terms as part of reporting against the risk registers. Children known to be on their Local Authority Child Protection Register will also be included on a password protected specific page.

- 5.1.4 The information retained on each Local Authority Safeguarding register will be current and specific and either updated on a monthly basis or closed down when the risk is removed.
- 5.1.5 Each departmental Designated Safeguarding Lead is required to liaise with the originating case-reporting officer on a monthly basis in order to update the safeguarding register and record all actions taken, including specific investigation and escalation arrangements from each Local Authority Children’s Services or Adults First point of Contact following an intervention or a case management meeting.
- 5.1.6 The Customer Experience Committee will oversee the routine operation of the Safeguarding Advisory Group meeting and the effective operation of this Policy on behalf of the Connexus Home Board.
- 5.1.7 The Designated Safeguarding Leads will report to the Safeguarding Advisory Group meeting on the operation of this policy and the completion and oversight of the Connexus Registers.
- 5.1.8 The Safeguarding Advisory Group will report to the Connexus Customer Services Committee who will ensure that this information is passed to the Connexus Audit and Risk Committee; via the Risk dashboard, in line with the following definitions. However, if more serious concerns are uncovered regarding the implementation of the Policy and associated procedures, these will also be reported to the Connexus Audit and Risk Committee.

	Policy in date & safeguarding register entries have all got evidence of a review and update that month
	Policy out of date &/or safeguarding register not updated and monitored in the last <b>one</b> month &/or Nhds manager and Community Service Manager identify <b>one</b> case that has not been correctly recorded on the Register
	Policy out of date &/or Safeguarding register not updated and monitored in the last <b>two</b> months &/or Failure to report on safeguarding concerns has led to a serious case review &/or Failure to follow Safeguarding procedure has resulted in a Death/Case Review &/or Nhds manager and Community Service Manager identify <b>more than one cases</b> that have not been correctly recorded on the Register this month

## 6. Roles, Responsibilities and Duties

### The Connexus safeguarding registers

- 6.1 Connexus will adopt the principles of openness and transparency throughout the Group. Responsibility for implementing the policy is as follows:
- 6.2 **Board of Management, Chief Executive, Deputy Chief Executive, Directors**
  - To be aware of the Connexus Safeguarding policy and procedures for both adults

and children.

- To ensure the Board and Executive Management Team are represented on the Safeguarding Advisory Group Meeting.
- To receive regular reports confirming that all cases recorded on the register have been reviewed every month
- To undertake Safeguarding training in order to demonstrate and champion a culture of safeguarding awareness within Connexus. Also to ensure that the Prevent (counter-terrorism) is specifically covered within any training syllabus.

### 6.3 **Heads of Service including particularly:**

- Housing
  - Repairs and Assets
  - Property
  - HR
  - Support Services
  - Learning and Development
- To be aware of the Connexus Safeguarding policy and procedures for adults and children.
  - To produce regular reports that go to the Safeguarding Advisory Group Meeting confirming that all concerns have been recorded on the register and have been reviewed every month.
  - To attend Safeguarding meetings or to designate a deputy to represent their service at such meetings.
  - To undertake Safeguarding training in order to demonstrate and champion a culture of safeguarding awareness within Connexus.

### 6.4 **Managers (Including Supervisors and Team Leaders)**

- To be aware of the Connexus Safeguarding policy and procedures for adults and children.
- To champion a culture of safeguarding awareness within their team.
- To ensure Safeguarding Policy and procedures are implemented within their team and that team members are aware of their responsibilities.
- To monitor and notify the DSL all new and emerging cases on the Group's confidential Safeguarding register. (This will be tested by periodic audits).

Appendix 1 – Equality Impact Assessment Form



## Equality Impact Assessment Form

<b>Strategy / policy / procedure / service / function / project being assessed</b>	Safeguarding Policy	
<b>Stage 1 Lead officer</b>	[REDACTED]	
<b>Date of assessment</b>	17/10/24	
<b>Date for next review</b>	October 2027	
<b>Reason for assessment</b>	<p>Safeguarding is a key priority for the Care Quality Commission as the regulator responsible for ensuring that housing providers have appropriate systems in place to ensure the safety of children, young people and adults with care and support needs whose circumstances make them at risk of abuse or neglect.</p> <p>The purpose of the Connexus Safeguarding policy and associated procedures is to protect and promote the welfare of children and vulnerable adults who come into contact with all Connexus services and operations</p>	
<b>Agreed and signed off by lead officer's line manager</b>	Manager's signature [REDACTED]	Date 17/10/24
<b>Stage 2  Aims of the service / function / policy/project under assessment</b>	<p>The aim of the Safeguarding Policy is to ensure colleagues are aware of their individual responsibility for their necessary levels of training and awareness. In the belief that greater knowledge will mean better and increased and more skilful and successful referrals. This will mean our customers and colleagues are better protected.</p> <p>The policy is a corporate document which together with associated procedures is available to the Connexus Homes Board, all Connexus colleagues, our stakeholders, commissioners and customers.</p>	
<b>Main stakeholders / beneficiaries</b>	Connexus Homes Limited Board Customer Experience Committee. Connexus Safeguarding Advisory Group Herefordshire Local Authority Shropshire Local Authority Connexus colleagues Connexus customers	
<b>Who is likely to be affected by the service/ function/ policy/project?</b>	Customers, colleagues, Board members	
<b>What are the arrangements for monitoring and reviewing the actual impact of the service/function/policy/project?</b>	Safeguarding Advisory Group via quarterly meetings. Customer Experience Committee (CEC) via quarterly Safeguarding reports. Board oversight via reporting from CEC	

<b>Stage 3 Collect and evaluate the evidence</b>				
<b>Key questions</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>No specific impact on any one group</b>	<b>Evidence</b>
Does the policy or service have a positive or negative impact on any racial groups? Describe how and which.	Cultural and language awareness issues will be recognized and improved as a result of this policy.	None identified or affected by the application of this policy.	No	The policy seeks to protect racial groups and address discrimination, harassment and victimisation and provide a safe environment for adults and children.  Connexus can evidence that translator services are utilised as and when required.
Does the policy or service have a positive or negative impact on individuals where English is not their first language? Describe how and which.	Cultural and language awareness issues will be recognized and improved as a result of this policy.	None identified or affected by the application of this policy.	No	The policy seeks to protect racial groups and address discrimination, harassment and victimisation and provide a safe environment for adults and children.
Does the policy or service have a positive or negative impact on women or men? This includes Transgender people / Trans people. Describe how and which	The policy will ensure equality of service accessibility. Raising awareness training is gender neutral. Our training is bound by legal and statutory guidance.	None identified or affected by the application of this policy.	No	Improve information sharing and to recognise the additional needs of vulnerable adults such as financial abuse of the elderly.  There is a positive regard to the request for a male or female officer.

Key questions	Positive impact	Negative impact	No specific impact on any one group	Evidence
Does the policy or service have a positive or negative impact on people with disabilities? Describe how and which	The heart of this policy is bound by a legal and statutory guidance and a culture of Safeguarding is Everyone's Responsibility	None identified by the application of this policy	No	<ul style="list-style-type: none"> <li>• Safeguarding Vulnerable People Act 2006</li> <li>• Working Together to Safeguard Children: 2024</li> <li>• West Midlands Adult Safeguarding Policy and Procedures</li> <li>• The Children Act 1989 &amp; 2024 and Section 11 of Children Act 2004 in relation to landlords.</li> <li>• Disclosure and Barring Scheme</li> </ul>
Does the policy or service have a positive or negative impact on people of a particular age? (e.g. children, young people, older people). Describe how and which	The heart of this policy is bound by a legal and statutory guidance and a culture of Safeguarding is Everyone's Responsibility	None identified by the application of this policy	No	<ul style="list-style-type: none"> <li>• Safeguarding Vulnerable People Act 2006</li> <li>• Working Together to Safeguard Children: 2024</li> <li>• West Midlands Adult Safeguarding Policy and Procedures</li> <li>• The Children Act 1989 &amp; 2024 and Section 11 of Children Act 2004 in relation to landlords.</li> <li>• Disclosure and Barring Scheme</li> </ul>
Does the policy or service have a positive or negative impact on people with particular sexuality / sexual orientation? Describe how and which	The heart of this policy is bound by a legal and statutory guidance and a culture of Safeguarding is Everyone's Responsibility	None identified by the application of this policy	No	This policy aims to promote positive attitudes towards intended beneficiaries and protected characteristics.

Does the policy or service have a positive or negative impact on people in terms of marriage/civil partnership status? Describe how and which	This policy ensures common practice and awareness for staff so does not discriminate	None	No	This policy aims to promote positive attitudes towards intended beneficiaries and protected characteristics.
Does the policy or service have a positive or negative impact on people with a particular religion or belief? Describe how and which	The heart of this policy is bound by a legal and statutory guidance and a culture of Safeguarding is Everyone's Responsibility	None identified by the application of this policy.	No	This policy aims to promote positive attitudes towards intended beneficiaries and protected characteristics.
Does the policy or service have a positive or negative impact on people in terms of pregnancy/maternity? Describe how and which	This policy ensures common practice and awareness for staff so does not discriminate		NO	This policy aims to promote positive attitudes towards intended beneficiaries and protected characteristics.
Is it possible that the service/function/policy could discriminate or unfairly disadvantage those that do not have access to digital equipment?	This policy ensures common practice and awareness for staff so does not discriminate	None	No	This policy aims to promote positive attitudes towards intended beneficiaries and protected characteristics.
Is it possible that the service/function/policy could discriminate or unfairly disadvantage or cause an individual/community financial hardship?	This policy ensures common practice and awareness for staff so does not discriminate	As a result of safeguarding actions there may be financial hardship but this would have deemed to be necessary to protect the victim	No	This policy aims to promote positive attitudes towards intended beneficiaries and protected characteristics. The Care Act is explicit in that to protect the victim we must report suspected abuse.

<b>Outsourced services</b>	
If delivery of your strategy, policy, project or service is partly or wholly provided by external organisations / agencies, please list any arrangements you plan, to ensure that they promote equality and diversity.	No outsourced services identified.
<b>Relations between different equality groups</b>	
Does your assessment show that a policy, project or service may have a differential impact between any discrete groups? If yes, please explain how this issue is going to be tackled	No differential impact identified.

<b>Stage 4 – Summary of replies from individuals and stakeholders consulted, including any previous complaints on equality and diversity issues about the policy or service</b>
<p>We have no recorded complaints with regard to Safeguarding or Equality/Diversity issues and how issues are handled by the organisation.</p> <p>Copies of our relevant policies are sent to Commissioners when as part of the tendering for new business process. The feedback is that they cover everything that they would want to see for a commissioned service to be delivered within safeguarding procedures. They also are happy with the way in which we offer services based on individual need therefore taking into account Equality and diversity not only in delivery but also access to our services.</p>

**Stage 5 – Options resulting from this equality impact assessment, including measures necessary to minimise or remove any adverse impact and better promotion of equality and diversity. Consider any alternative solutions**

Monitoring and reporting of all cases of anti social behaviour  
Tenancy management  
Toolbox Talks

- Monitoring and recording of any complaints and process followed to conclusion
- Mandatory Training as follows:
  1. Equality and Diversity Training
  2. Safeguarding Adult and Children (Level appropriate to role)
  3. GDPR
  4. Risk assessment
  5. De-escalation training – role based per service
  6. Confidentiality and Professional Boundaries
  7. Team meeting reviews of complaints/issues raised

**Stage 6 – Arrangements for regular monitoring of the impact of the policy, project or service**

Safeguarding Advisory Group meetings  
Named Senior Officers with Safeguarding Responsibility  
Designated Safeguarding Leads  
Triennial review of Policy  
Lessons learnt and findings from serious case reviews  
Information sharing  
Themed briefings

**Stage 8 – Any actions & outcomes, including how these are to be communicated both internally & externally as required**

Through monthly reporting of Connexus safeguarding registers via the risk dashboard to Safeguarding Advisory Group and Customer Experience Committee.

To the Local Authority Safeguarding Board for Adults and Children.

In monthly supervision with line manager.

As a regular agenda item ( safeguarding) in internal meetings.

Information sharing /themed briefings

Safeguarding training matrix

Connexus Intranet (Viva Engage)