

Housing Management

# Safeguarding Policy

2025



THE ROYAL BOROUGH OF  
KENSINGTON  
AND CHELSEA

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## 1 Introduction

- 1.1 The Royal Borough of Kensington and Chelsea (RBKC) recognises that the welfare of at-risk children and adults is the most important consideration in all our work and decisions. Everyone, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, has an equal right to protection from all forms of harm and abuse.
- 1.2 The Care Act 2014, Children Act 1989, and Children Act 2004 make it clear that safeguarding is everyone's responsibility and professionals, organisations and local authorities must work in partnership when carrying out their duties under this legislation.
- 1.3 RBKC is committed to safeguarding and promoting the safety and welfare of adults and children who live in a RBKC property, who use, are engaged in, or are connected to our services.
- 1.4 It is the responsibility of all individuals working for, or on behalf of RBKC, including colleagues, contractors, agency colleagues, managing agents, volunteers 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 an adult, child, or young person.
- 1.5 Safeguarding is everyone's business. Making safeguarding personal means the safeguarding process should be person led and outcome focused. It should engage 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.

## 2 Related Documents

- 2.1 This policy should be read in conjunction with the following Council's policies, procedures, and documents:

- RBKC Housing Management Safeguarding Procedure
- RBKC Joint Working Protocol
- RBKC Housing and Social Investment Domestic Abuse Policy  
<https://www.rbkc.gov.uk/housing/consultations-publications-and-policy/additional-housing-policies/housing-and-social-investment-domestic-abuse-policy>
- RBKC Housing Management Domestic Abuse Procedure
- RBKC Violence Against Women and Girls (VAWG) Strategy
- RBKC Housing Management Antisocial Behaviour Policy & Procedure
- RBKC Housing Management Transfer Procedure
- RBKC Housing Management Decants Procedure
- RBKC Employee Domestic Abuse and Gender Based Violence Policy
- London Multi-Agency Adult Safeguarding Policy and Procedures
- Whistleblowing Policy

- Managing Vulnerabilities around Repairs and Major Works Procedure
- RBKC Housing Management Hoarding Procedure/Policy
- RBKC Housing Management Annual Home Visit Procedure

### 3 Policy aims

3.1 This policy aims to complement and work in tandem with the relevant statutory safeguarding policy and guidance. It draws on and reflects the relevant legislation and guidance on safeguarding for both children and adults at risk and sets out housing management's aims and responsibilities for ensuring effective safeguarding in partnership with other agencies. It includes:

- Definitions of safeguarding and those who may be at risk.
- Types of abuse and neglect.
- How the RBKC housing management service may be involved in the prevention of abuse.
- How we will respond and report.
- How we will share information and work with others.

### 4 Definitions of child at risk and adult at risk

#### 4.1 Child who may be at risk

4.1.1 Government guidance in [Working Together to Safeguard Children 2023](https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf) [https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working\\_together\\_to\\_safeguard\\_children\\_2023.pdf](https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf), defines a child as being anyone who has not yet reached their 18th birthday. It indicates that providing early help is crucial in safeguarding children and requires all staff to understand their role in identifying emerging problems and sharing information with other professionals. We will ensure housing staff are alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs
- is a young carer
- is showing signs of engaging in anti-social or criminal behaviour
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence
- has returned home to their family from care
- is showing early signs of abuse or neglect.

#### 4.2 Adults who may be at risk

An **adult at risk** is a person aged 18 years or over who has needs for care and support (whether the local authority is meeting any of those) and/or is at risk of and unable to protect themselves from abuse or neglect. These care and support needs may include for example a person who:

- is elderly or frail due to ill health

- has a physical disability, sensory impairment or a long-term illness/condition
- has a mental health need including dementia or a personality disorder
- has a learning disability
- is unable to demonstrate capacity to make a decision and needs care and support
- has a dependency on alcohol, illegal drugs or medication
- is unable to take care of themselves and safeguard themselves against significant harm or exploitation.

## 5 Types of abuse

There are four main categories of child abuse: physical, emotional, sexual, and neglect. The signs of abuse are well illustrated by the NSPCC here:

[www.nspcc.org.uk/what-is-child-abuse/types-of-abuse](http://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse)

### 5.1 The Care and Support Statutory Guidance

[www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance](http://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance) identifies the following types of abuse that can be experienced by adults and the signs of abuse:

- **physical abuse** – including hitting, slapping, pushing, kicking, misuse of medication, restraint, inappropriate sanctions.
- **domestic abuse or abuse** – including sexual, physical, financial and emotional abuse.
- **sexual abuse** – including rape, sexual assault, sexual acts to which a person has not consented, could not consent, or was pressurised into consenting.
- **psychological/emotional abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, withdrawal from services or supportive networks.
- **financial or material abuse** – including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **modern slavery** – including human trafficking, forced labour, domestic exploitation.
- **neglect and acts of omission** – including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life such as medication, adequate nutrition, and heating.
- **self-neglect** – including lack of self-care, failure to seek help or access to services to meet health and social care needs.
- **discriminatory abuse** – including racism, sexism, based on a person's disability and other forms of harassment, slurs or similar treatment.

- **institutional abuse and poor professional practice** - this may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other.

## 6 Recognising signs of abuse

6.1 RBKC recognises that abuse, neglect, or harm can arise in a range of settings and may be perpetrated by a wide range of people including relatives and family members, professional staff, volunteers, other service users, neighbours, friends, associates, or strangers.

For example:

- children or adults at risk whose care needs appear to be neglected or who appear to be subject to deliberate mistreatment.
- children or adults who say they are being abused.
- signs of self-neglect in adults living alone such as hoarding, unsanitary conditions, or alcohol or substance misuse.
- neglect of a person's needs because those around them are unable to be responsible for their care, for example, if a carer has difficulties caused by debt, alcohol or mental health problems.
- difficulties in maintaining tenancy such as arrears or neighbour problems or harassment which may be linked to a learning difficulty or mental health problems and giving rise to exploitation, financial abuse or harassment.
- where there is known or suspected domestic abuse.
- the child is a young carer/or an adult carer for a vulnerable adult.

6.2 RBKC will ensure that housing management staff are trained to identify the wide range of circumstances in which potential victims of neglect or abuse may present and how to respond to the same in accordance with this policy. See section 12 below.

## 7 Safeguarding children

7.1 In the Government's guidance 'Working Together to Safeguard Children 2023' <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2> safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether that is within or outside the home, including online.
- preventing impairment of children's mental and physical health or development.
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

- promoting the upbringing of children with their birth parents, or otherwise their family network, through a kinship care network, whenever possible and where this is in the best interests of the child(ren).
- taking action to enable all children to have the best outcomes.

## 8 How to raise a safeguarding concern (Children)

8.1 The following contact details should be used to seek advice or to refer any cause for concern regarding a child or young person:

Call 0207 361 3013 on weekdays 9am–5pm weekdays.

Or outside these times the Emergency Duty Team on 0207 373 2227

Email: [SocialServicesLine@rbkc.gov.uk](mailto:SocialServicesLine@rbkc.gov.uk)

8.2 For more information, please refer to the Kensington and Chelsea family information hub:

<https://www.rbkc.gov.uk/kb5/rbkc/fis/advice.page?id=MHZBZrsEgtM>

<https://www.rbkc.gov.uk/lscp/>

## 9 Safeguarding adults

9.1 The Care Act 2014 defines safeguarding as protecting an adult's right to live in safety, free from abuse and neglect and promoting the adult's wellbeing. It is aimed at people with care and support needs who may be in vulnerable circumstances and at risk of harm, abuse, neglect or exploitation. The S42(1) criteria are applicable where there is **reasonable cause** to suspect:

- a) the adult has needs for care and support (whether or not the authority is meeting any of those needs)
- b) the adult is experiencing or is at risk of abuse or neglect
- c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

9.2 The guidance also states that local authorities should not limit their view of what constitutes abuse or neglect, as they can take many forms, and the circumstances of the individual case should always be considered.

9.3 Incidents of abuse may also be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm.

## 10 How to raise a safeguarding concern (Adults)

- 10.1 Any concerns that an adult may be at risk of abuse, harm or neglect from either themselves, an individual or an organisation, should be reported by:

Phone: Safeguarding helpline 020 7361 3013 (office hours) / 020 7361 3013 (out-of-hours)

Email: [SocialServicesLine@rbkc.gov.uk](mailto:SocialServicesLine@rbkc.gov.uk)

For more information, please go to:

[Safeguarding adults | Royal Borough of Kensington and Chelsea \(rbkc.gov.uk\)](https://www.rbkc.gov.uk/health-and-social-care/adult-social-care-0/safeguarding-adults)  
<https://www.rbkc.gov.uk/health-and-social-care/adult-social-care-0/safeguarding-adults>

[What to do if you think someone is at risk of abuse | People First \(peoplefirstinfo.org.uk\)](https://www.peoplefirstinfo.org.uk)  
<https://www.peoplefirstinfo.org.uk/staying-safe/abuse-and-neglect-safeguarding-adults/what-to-do-if-you-think-someone-is-at-risk-of-abuse>

## 11 Reporting and recording (staff and contractors)

- 11.1 All colleagues and third parties have the responsibility to report concerns of abuse or disclosures made to them promptly as detailed in RBKC's HM Safeguarding Procedure. **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 appropriate emergency service.**
- 11.2 RBKC will also maximise available opportunities to provide, or signpost tenants and customers with information and advice regarding safeguarding and ensure people are supported to report any safeguarding concerns.
- 11.3 When managing any allegation of abuse, we encourage our staff to be 'professionally curious' in spotting the signs. Information must be recorded accurately and promptly. In addition, HM colleagues or third parties may also be called upon to complete forms or requests for information from statutory agencies which include local authorities, the local Safeguarding Team, police or the NHS.
- 11.4 Safeguarding issues may be brought to the attention of staff directly by residents, neighbours, contractors or other agencies in contact with residents or their families. In addition, housing management staff working with residents or entering residents' homes to carry out visits, repairs, inspections, or interviews may encounter situations causing concerns for someone's welfare.

For Example:



- Adults at risk whose care needs appear to be neglected or appear to be subjected to deliberate mistreatment
- Adults at risk of financial abuse which may be indicated by a lack of heating, clothing or food, inability to pay bills / unexplained shortage of money, unexplained withdrawals from an account, unexplained loss/misplacement of financial documents, the recent addition of authorised account holders/signatories or unexplained changes in a will or other financial documents.
- Signs of self-neglect such as hoarding, unsanitary conditions or alcohol or substance misuse
- Repeated instances of poor health or neglectful care by health and social professionals or workers
- Neglect of a person's needs because those around them are unable to be responsible for their care, for example, signs a carer may have difficulties caused by poor health, debt, alcohol, or mental health problems
- Difficulties in maintaining tenancy such as arrears or neighbour problems or harassment which may be linked to a learning difficulty or mental health problems and give rise to exploitation, financial abuse or harassment
- Where there is known or suspected domestic abuse
- Adults who say they are being abused.

11.5 The housing management safeguarding procedure provides details of where staff are required to log information relating to safeguarding concerns.

## **12 The Safeguarding Adults Executive Board**

The Safeguarding Adults Executive Board (SAEB) protects and promotes adults' rights to live independent lives, in safety and free from abuse and neglect. The board covers both the City of Westminster and the Royal Borough of Kensington and Chelsea. Housing Management is a part of the Safeguarding Adults Board – Assistant Director of Residents Services attends on Housing Management's behalf.

## **13 The recruitment, induction and training of staff and contractors**

13.1 RBKC will ensure the selection and recruitment of staff, contractors and agencies considers the need to promote the safeguarding of children and adults at risk. This will include the following:

13.1.1 All members of frontline staff who have regular contact with adults at risk or children will be subject to employment checks and Disclosure and Barring Service (DBS) checks, where appropriate.

13.1.2 As part of their induction in the housing management service, all relevant staff will be sent a link to SharePoint where all housing management

policies and related guidance and procedures can be found, including Safeguarding Policy.

13.1.3 Housing Management staff will receive safeguarding children and adults at risk training on the best practices in relation to safeguarding, how to identify signs of abuse and neglect, recognise harm and make appropriate referrals. This will be mandatory for all housing management staff and will be monitored by senior managers.

13.1.4 Safeguarding will be discussed at contract meetings with contractors and suppliers. RBKC HM Safeguarding policy and procedure will be shared with contractors.

13.2 Guidance for front line staff working with adults is also set out in the handbook 'Safeguarding adults from neglect or abuse' which describes what abuse is, the legal context and the responsibilities of front-line staff who may encounter possible cases of abuse and neglect in adults.

13.3 Guidance for staff working with children is set out in 'Neglect Matters' and Thresholds of Need Guide, which help staff to identify possible cases of neglect and officer guidance on how to respond.

## **14 Management and supervision**

14.1 RBKC will provide direction about the service's responsibilities and the promotion of effective practice in relation to safeguarding through regular management and supervision of staff and contractors, the monitoring of performance, reporting, complaints and annual review of policy and notable practice.

14.2 RBKC managers will ensure through regular supervision that the policy and procedure is adhered to and that adequate arrangements with other parts of the Council and other agencies are in place to ensure effective safeguarding and communication.

14.3 Safeguarding will be a regular item on team meeting agendas.

14.4 RBKC will ensure all staff are enabled to challenge inappropriate behaviour in others and can access whistleblowing procedures.

## **15 Working in partnership with others**

15.1 Organisations that RBKC contracts to provide a service and work with children and adults at risk, will be asked to familiarise themselves with the Housing Management Safeguarding Policy and the Procedure.

15.2 RBKC housing management holds monthly neighbourhood meetings and sits on the adult social care complex cases panel where any issues with partnership working is also discussed.

15.3 RBKC will co-operate with partner organisations to deliver effective safeguarding, both at a strategic level and in individual cases, where they may need to ask one another to take specific action in that case.

15.4 The Care Act 2014 identifies five areas of cooperation between partners which are relevant to an individual's care and support, although it should be noted that the purpose of cooperation is not limited to the following alone:

- Promoting the wellbeing of adults needing care and support and of carers
- Improving the quality of care and support for adults and support for carers (including the outcomes from such provision)
- Smoothing the transition from Childrens' to Adult services
- Protecting adults with care and support needs who are currently experiencing or at risk of abuse or neglect
- Identifying lessons to be learned from cases where adults with needs for care and support have experienced serious abuse or neglect.

## 16 Suicide prevention

16.1 On 11 September 2023 The Department of Health and Social Care published 'Suicide prevention in England: 5-year cross-sector' <https://www.gov.uk/government/publications/suicide-prevention-strategy-for-england-2023-to-2028/suicide-prevention-in-england-5-year-cross-sector-strategy>

16.2 Suicide prevention is everyone's business. Every person, organisation and service up and down the country has a role to play.

16.3 If someone is in immediate danger, the quickest way to get help is to call emergency services on **999**.

16.4 For more information, please go to:

[Suicide prevention | Royal Borough of Kensington and Chelsea \(rbkc.gov.uk\)](https://www.rbkc.gov.uk/suicide-prevention)  
[Stay with us: preventing suicide together | Westminster City Council](https://www.westminster.gov.uk/health-and-social-care/stay-with-us)  
<https://www.westminster.gov.uk/health-and-social-care/stay-with-us>

## 17 Legal context

17.1 The key principles of safeguarding are outlined in the Care Act 2014 and include six principles:

- **Empowerment** - People being supported and encouraged to make their own decisions and give informed consent.
- **Prevention** - It is better to act 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.

The **Mental Capacity Act 2005** (applies to young people 16 years old and over) provides a statutory framework to empower and protect people who may lack the capacity to make decisions for themselves and establishes a framework for making decisions on their behalf. This applies whether the decisions are life-changing events or everyday matters. All decisions taken in the adult safeguarding process must comply with the Act.

The Mental Capacity Act outlines five statutory principles that underpin the work with adults who may lack mental capacity:

- I. A person must be assumed to have capacity unless it is established that they lack capacity.
- II. A person is not to be treated as unable to make a decision unless all practicable steps to help them to do so have been taken without success.
- III. A person is not to be treated as unable to make a decision merely because they make an unwise decision.
- IV. An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in their best interests.
- V. Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.

The following are the key policies, procedures and codes of practice that will inform our practice:

- Pan London Safeguarding Adult Procedures
- Mental Capacity Act Code of Practice
- Deprivation of Liberty Safeguards Code of Practice
- Bi-Borough Safeguarding Adults Handbook
- Safeguarding adults from neglect or abuse
- Neglect Matters
- Threshold of Needs Guide
- Children Act 1989 / 2004
- Working Together to Safeguard Children 2023
- Local LSCB guidance
- London Child Protection Procedures
- Care Act 2014
- Crime and Disorder Act 1998
- Human Rights Act 1998
- Domestic Abuse Act 2021

## **18 Equalities statement**

The Council is committed to promoting fair and equal access to services and equal opportunities in employment, the procurement of goods and as a community leader. The Council's policies, procedures and day to day practices have been established to promote an environment which is free from unlawful and unfair discrimination while valuing the diversity of all people.

Discrimination on the grounds of race, nationality, ethnic origin, religion or belief, gender, marital status, sexuality, disability, and age is not acceptable: RBKC will take action to ensure no person using the Council's premises or services receives less favourable treatment or is disadvantaged by requirements or conditions that cannot be justified. RBKC will tackle inequality, treat all people with dignity and respect and continue to work to improve services for all service users.

The legal framework for the Council's approach is provided by the Equality Act 2010 and specifically by the Public Sector Equality Duty, under which a public authority must work consciously to eliminate discrimination, harassment, and victimisation and to advance equality of opportunity and foster good relations between people with differing characteristics.

Further detail on the Duty, and the Council's approach to fulfilling its requirements, can be found at [www.rbkc.gov.uk](http://www.rbkc.gov.uk).

## **19 GDPR and data protection**

As a directorate of RBKC, housing management shares the commitment to ensure that all data is:

- processed lawfully, fairly and in a transparent manner
- collected for a specific and legitimate purpose and not used for anything other than this stated purpose, or as provided for in our privacy and fair processing notices
- relevant and limited to whatever the requirements are for which the data is processed
- accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay
- stored for as long as required, as specified within RBKC's Records Retention policy
- secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and accidental loss, destruction or damage.

For further information about the Council's commitment to the General Data Protection Regulations (GDPR), visit the Council's website at [www.rbkc.gov.uk](http://www.rbkc.gov.uk).

## **20 Information sharing**

- 20.1 All housing management staff working with residents with care and support needs or who may be at risk must understand that information about suspected or actual abuse/neglect cannot be kept confidential. The needs of at-risk residents and the potential risk to others require that information be shared as soon as possible with line manager.
- 20.2 When possible, at risk residents should be informed about whom the information will be shared with. Even if the at risk resident does not want you to share the information, it must be done. When possible, officers will try to engage with the adult at risk and try to gain consent before making a safeguarding referral. (It is unlikely that a safeguarding referral will be accepted unless the points in s.19.4 are articulated).
- 20.3 Consent to share information, including in relation to raising adult safeguarding concerns and making referrals to MARAC (multi-agency risk assessment conference) will always be sought from the adult at risk whenever possible in the first instance. A good practice is to seek the adult's views and what they would like to happen unless doing so is likely to increase the risk to the adult and/or put others at risk.
- 20.4 However, there are circumstances in which consent may need to be overridden and information shared, on a need-to-know basis, to manage risks. This can be in situations in which:
- The adult lacks mental capacity and is unable to give consent
  - The adult and/or others are identified to be at risk of significant harm
  - The adult's decision appears to be affected by undue influence or coercion
  - When a criminal offence has taken place.
- 20.5 Any views or wishes expressed by at risk residents should be recorded and reported/included in the safeguarding referral at the earliest possible opportunity. Ensuring the safety of at risk residents and any other people at risk is the primary responsibility of RBKC housing management staff.
- 20.6 Where safeguarding concerns relate to an adult with the mental capacity to make decisions in this area of their life and declines assistance, this may limit the intervention that can be made. However, this does not mean that the information cannot be shared.

## **21 Compliance, monitoring and review**

- 21.1 This policy will be reviewed every 5 years, or when legislative or regulatory changes take place that could affect it. The next review will take place by:

January 2030