

Safeguarding Children and Adults Policy 2025 - 2027

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1 Aims

1. The aims of this policy are to:
 - Set out the commitments for safeguarding children and adults in respect of Jigsaw Homes Group. This includes boards, employees, and anyone carrying out work on behalf of Jigsaw Homes Group so we can provide appropriate protection, support, or advice to our tenants or staff.
 - Make clear the responsibilities of employees when working in the presence of children and adults who may be at risk.
 - Detail the organisational structure and procedures to support effective Safeguarding across the group

2 Scope

2. This policy applies to all staff including senior managers, Board members, paid employees, volunteers, agency staff, students, or anyone carrying out work on behalf of the Jigsaw Group.
3. Jigsaw Group has stock of circa 37,500 properties across the Northwest and Midlands. Jigsaw Group will be pro-active in the safeguarding of children and adults who live in our stock. Safeguarding underpins all aspects of the organisation's strategy and operations, as it is a priority within every aspect of our work. Jigsaw Group has a wide range of diverse operations within its structures which are broadly defined as follows:
 - General Needs Housing
 - Supported Housing
 - Older peoples housing
 - Shared ownership
 - Commercial & Partnerships
 - Asset Management and maintenance
4. For the purposes of this document, the following descriptions apply.
 - 'Children' are all young people below age 18 including unborn babies
 - 'Adult' is a person over the age of 18.
5. Children and adults can become 'vulnerable' at any time depending on their circumstances. Jigsaw Group employees may, through their duties, have direct contact with children and adults who may be at greater risk. There is no set age or disability that makes someone vulnerable.
6. Being vulnerable is defined as in need of special care, support, or protection because of age, disability, risk of abuse or neglect.

3 Policy Statement

7. The safety and welfare of children and adults with whom Jigsaw Homes Group has direct involvement will remain a priority as expected under National Legislative Frameworks. The Care Act 2014 and its related statutory guidance clearly details housing as a key partner of the Local Authority when considering a person's care and support. The Children's Act 1989 and 2004 both state that the protection of children is paramount.
8. These significant national legislative frameworks underpin Jigsaw Group activity as an organisation that will come into contact across the spectrum of all ages from birth to older people. Jigsaw Group and its contractors will strive to provide a safe environment for any children and adults at risk who are accessing its services.
9. Jigsaw Group will continue to contribute to wider safeguarding agendas with a clear focus on partnership working with statutory and voluntary sector service providers to protect and prevent harm within the various legislative frameworks applicable to the group. (These are listed below in 'legislation and regulation' and 'related policies and procedures' sections.)
10. The Jigsaw Group approach is detailed in this policy which has been developed with reference to national legislation and safeguarding guidance and good practice drawn from other agencies and social housing providers. It is everyone's responsibility to report concerns about potential abuse in line with Jigsaw Group's relevant procedures.
11. Safeguarding is seen as one of the organisations biggest risk areas and to provide accountability and responsibility for safeguarding at all levels within the Group, performance will be reported to Risk and Assurance Committee quarterly by the Groups Safeguarding Lead.
12. A Safeguarding Working Group will meet quarterly and has responsibility for monitoring effective and consistent implementation of the Safeguarding Policy and associated procedures across the Group. This will include internal audits, reviews, and continuous improvement. The group is attended by representatives from all areas of the business who act as a lead for their area. This is supported via the meeting **structure outline in Appendix 1.**

3.1. Policy Principles

13. Jigsaw Group accepts that children and adults have rights as individuals and should be treated with dignity and respect. The welfare of children and adults is an organisational priority.
14. All incidents of alleged poor practice (including failure to act/act appropriately on safeguarding concerns), misconduct or abuse will be taken seriously and responded to swiftly, in line with Jigsaw Group Policies and Procedures (which are listed under 'related policies and procedures below).
15. Where serious allegations are made and following any immediate internal process considerations, contact may be made with the Police if any criminal activity is suspected. This will be in the interest of due process and public protection.

3.2. Definitions of Abuse

16. Abuse can be defined as any behaviour towards a person that deliberately or unknowingly causes them harm or endangers their life or violates their human or civil rights.
17. Types of abuse are (but not limited to):
 - Physical - hitting, slapping, pushing, kicking, misuse of medication, inappropriate use of restraint, burning/scalding, cutting/wounding.
 - Sexual - including any sexual acts to which the person at risk has not consented or is not able to consent to or is undertaken in the context of exploitative relationships e.g., Child Sexual Exploitation, forced marriage, inappropriate access to images (whether moving or still) depicting acts from the span of sexual behaviour).
 - Psychological/Emotional (for example being repeatedly made to feel unhappy, humiliated, afraid, or devalued by others) - threats of harm or abandonment, isolation or withdrawal from support networks, withdrawal of affection, love and care and supporting a child's proper emotional development.
 - Financial or material (stealing from or denying access to money or possessions)- fraud, exploitation, coercion into lending money, misuse, or misappropriation of property.
 - Neglect and acts of omission - ignoring medical or physical care needs, access to social care or education.
 - Self-Neglect - A wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
 - Discriminatory abuse - usually motivated by discriminatory and oppressive attitudes towards race, gender, culture background, religion, physical and/or sensory impairment, sexual orientation, and age.
 - Domestic abuse - any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Details of our approach can be found in the Jigsaw Homes Group Domestic Abuse Policy.
 - Institutional abuse - mistreatment of children or vulnerable adults by any system of power. Examples are (but not limited to) schools, hospitals, care homes, sports clubs, religious communities, and community groups.
 - Organisational abuse - including 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. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice because of the structure, policies, processes, and practices within an organisation.

- Modern slavery - encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.

3.3. Responsibilities

18. In Jigsaw Group the ultimate responsibility for safeguarding lies with the Chief Executive to ensure the safeguarding policy, practice and standards fulfil the Group's aspirations to be outstanding in this area of work.
19. The Group has appointed a Safeguarding Lead who is responsible for strategic and structural processes that will in turn support effective operational actions in respect of Safeguarding practices. The structure shown in Appendix 1 is the mechanism that demonstrates the organisational commitment to safeguarding.
20. The Safeguarding Working Group will report to the Risk & Audit Committee on Safeguarding issues quarterly and in line with the Governance and Risk Management Team direction.
21. All Jigsaw Group staff, agency staff, volunteers and contractors are responsible for understanding their role, recognising the signs of abuse and for reporting and sharing information they have collected within their task/functions regarding the safeguarding of children and/or adults.
22. Managers at all levels have a responsibility to ensure staff undertake relevant role-related training and are encouraged and supported through their role within safeguarding processes. In addition, managers are responsible for ensuring that safeguarding standards are adhered to in the delivery of those services they have a responsibility for.
23. All necessary steps must be taken at a team level by managers to ensure that they, their staff, agency staff, volunteers and contractors are compliant with the requirements of this policy.
24. When organising and holding an event or activity the person organising the event is expected to:
 - Ensure the activity is planned organized and delivered to safeguard children and adults by reducing or eliminating all known potential risks
 - Verify that safeguarding arrangement are effective when using third party organisations to supply people to undertake the activity
25. It is recognised that all employees, agency staff, volunteers and contractors are in a position of trust, particularly those who are employed in specialist roles which have specific interaction with children or adults.
26. Safer recruitment practices, including Disclosure and Barring Service (DBS) checking, will be proportionate to employee role with a particular emphasis on working with children and adults at risk. (A register of these posts will be maintained by the People Team and will be in line with DBS guidance about regulated or non-regulated activity).

27. In accordance with the Group Disciplinary Policy, any employee who receives a conviction for any serious criminal offence relating to safeguarding, whilst in our employment or is suspected of committing an allegation relating to any type of safeguarding concern will usually be suspended pending an investigation, which could lead to disciplinary action up to and including dismissal.
28. It is important that any employee who is spoken to by the police as a potential perpetrator discloses the information to Jigsaw Homes Group on a confidential basis as soon as they are notified, so the necessary risk assessment and support can be provided. Failure to notify the organisation can lead to disciplinary action.
29. Any employee disclosing that they are aware of or are the victim of any safeguarding concern perpetrated by an employee, will be fully supported to disclose all information. Proactive support arrangements will be put in place by the Jigsaw Group for staff who may be affected by working within events or episodes where the abuse of children or adults is evident.
30. We will ensure that anyone working on behalf of Jigsaw Homes Group have a safeguarding Policy, are trained by their own company, and know how to raise their concerns with the Group.
31. As part of the Jigsaw Group's responsibility to work collaboratively, we commit to support wider public sector reform activity in respect of Early Help and family intervention to support the broader whole system approaches to safeguarding people in communities.
32. **Data Sharing**
33. Jigsaw employees will share information around concerns when it is likely to support the safeguarding of a child or adult, and in the absence of consent from the individual, where there is a lawful reason to share.
34. The GDPR and Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purpose of keeping children and young people safe. The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child or adult.

3.4. Training

35. Jigsaw Group has a clear and ongoing commitment to the training and development of its employees. Jigsaw Group induction processes include a safeguarding awareness e-learning course (children and adults) that every employee must complete within 1 month of commencement. Jigsaw Group also commits to a programme of safeguarding awareness raising, utilising external specialists.
36. All Jigsaw Group staff are briefed on Safeguarding awareness during their induction process.
37. Jigsaw Group will commit to a tiered approach to training in line with the varied types of roles that exist across the group. This structure will help line managers to identify what level of training is appropriate and necessary alongside the main job function being undertaken by the employee. This structure will also support the organisation with strategic responses to any emerging themes that require focus.

38. Staff with specific responsibilities in primary roles working directly with children or adults with already recognised support needs, will receive detailed training on safeguarding principles and responsibilities, which shall include Resilience and Well Being focused courses.
39. Safeguarding will be discussed regularly through supervision/one to one's and at annual Performance Reviews for customer facing roles. Refresher training will be undertaken annually or sooner, if required due to changes to legislation, local arrangements, or procedures.
40. Employee Safeguarding Training consists of:
41. **Safeguarding Standard e-learning awareness** - minimum for all employees.
42. **Safeguarding Enhanced** - Instructor led training for customer facing roles who have on-going interactions with those who may be at risk.
43. **Safeguarding Advanced** - Specialist Instructor-led training - for staff involved in specialist services such as contracted services. Bespoke training will be procured when needed based on the specific requirements of the role.
44. The training frequency can be seen in the diagram below;

Level	Training	Frequency
Standard	E-Learning	18 Months
Enhanced	51. E-Learning Instructor led	52. As part of induction 3 Years
Advanced	53. E- Learning Instructor led 54. Specialist	55. As part of induction 3 years 56. As Required

3.5. Procedures

57. Respective Safeguarding Adults and Safeguarding Children procedures have been developed with the Safeguarding Working Group, to reflect the varied operational activities across the Group. Each procedure includes information on how to obtain advice through internal structures, escalation of concerns, and how to make onward referral to statutory safeguarding agencies, and detail on how documentation is to be recorded and stored.

3.6. Publicity and Promotion

58. Jigsaw Homes will promote this policy via our website and communicate the Groups approach to Safeguarding as part of online awareness campaigns.
59. To complement training delivery across the organisation, internal awareness raising campaigns will be conducted annually, reminding staff how to raise concerns.

4 Monitoring and Delivery

60. The Safeguarding Lead will be responsible for monitoring effective and consistent implementation of the Safeguarding Policy and associated procedures across the Group. This can include internal audits and will foster principles of continuous improvement. The safeguarding lead will produce a quarterly Report to Risk and Assurance Committee, reporting on all safeguarding activity across the Jigsaw Group.
61. All Managers will be responsible for ensuring all staff within their area receive the appropriate level of safeguarding training.
62. The relevant team leading the investigation of the concern will be responsible for making, logging, and tracking referrals to statutory safeguarding services and maintaining in-house safeguarding monitoring systems.
63. Our Safeguarding Lead will share learning from training, serious case reviews and legislation amongst themselves and more widely across the organisation.
64. The Safeguarding Lead will assess progress against this policy, and this will form part of the annual report to the Board.

5 Legislation and Regulation

- Domestic Abuse Act (2021)
- Human Rights Act (1998)
- Sex Offenders Act (1997) & Sexual Offences Act (2003)
- The Children Act (1989) & (2004)
- The Children and Families Act (2014)
- Youth Justice & Criminal Evidence Act (1999)
- The Care Act (2014)
- Health & Social Care Act (2008)
- National Care Standards (CQC)
- Safeguarding Vulnerable Groups Act (2006)
- The Care Standards Act (2000)
- No Secrets: guidance on protecting adults at risk in care
- Working Together to Safeguard Children (2023)
- Mental Capacity Act (2005) & The Lasting Powers of Attorney, Enduring Powers of Attorney and Public Guardian Regulations (2007)
- Mental Health Act (1983)
- Equality Act (2010)

- Corporate Manslaughter & Corporate Homicide Act (2007)
- Domestic Violence, Crime and Victims Act (2004)
- Protection from Harassment Act (1997)
- Modern Slavery Act (2015)
- NHS & Community Care Act (1990)
- The Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK GDPR)
- The Care Programme Approach (CPA)

6 Related Policies and Procedures

- Anti-Social Behaviour Policy and Procedure
- Equality, Diversity & Inclusion Policy
- Customer Contact Strategy
- Data Protection Policy
- Unreasonable Behaviour Policy
- Service Adjustment Policy
- Recruitment Policy
- Disciplinary Policy
- Staff Code of Conduct
- Suicide Prevention Policy
- Risk Management Policy
- Domestic abuse policy

7 Glossary

- Early Help - Early Help is intervening early and as soon as possible to tackle problems emerging for children, young people and their families or a population most at risk of developing problems. Effective intervention may occur at any one point in a child or young person's life."

8 Document Control

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Approved by:	Executive Management Team
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Appendices

Appendix 1—Safeguarding Assurance



Figure .1

Creating homes. Building lives.

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