

# Safeguarding Policy

Bellway p.l.c.

## Document Control

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Date of Approval:	July 2022
Date of Next Review:	July 2023

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## 1.0 Introduction

Bellway plc. and its group companies ('Bellway Group') recognises its responsibilities to protect and safeguard the welfare of all individuals involved in activities conducted by the Company or at Bellway Group premises in accordance with the Care Act 2014.

The Company also recognises its responsibility to ensure safer recruitment practices are in place to protect colleagues and prevent harm and abuse through rigorous and robust recruitment and interview processes for new staff, contractors and volunteers.

While the implementation and upholding of this policy is the duty of the Bellway Group's Board, Directors and Managers; all employees including sub-contractors/agency workers have a responsibility to ensure that the requirements of the policy are upheld.

This policy does not form any part of an employee's contract of employment, and it may be amended from time to time.

## 2.0 Purpose and Scope

At Bellway we are committed to ensuring that people who work for us are not abused and that our working practices minimise the risk of such abuse.

Bellway will do its utmost to ensure the safety and protection of all employees involved in Company activities whilst under the supervision of our employees and subcontractors. We particularly recognise the need to promote an environment of wellbeing, support and safety for our young workers and apprentices under the age of 18.

All employees, consultants, casual workers, agency workers, work placement/interns and contractors must be made aware of this policy and become familiar with its content.

The guidance given in this policy and associated procedures is based on the following key aims:

- All individuals, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to work in a safe environment. This is in line with the Company Equality, Diversity & Inclusion Policy.
- The rights, dignity and worth of all individuals will always be respected.
- We recognise that ability and disability can change over time, such that some adults at risk and children may be additionally vulnerable to abuse, in particular those with care and support needs.
- We all have a shared responsibility to ensure the safety and well-being of all adults at risk and children, and to act appropriately and report concerns whether these concerns arise within Bellway, for example, inappropriate behaviour of an employee or a worker, or in the wider community.
- All allegations will be taken seriously and responded to quickly in line with the Company Safeguarding Policy and Procedures.
- Bellway recognises the role and responsibilities of the statutory agencies in safeguarding adults at risk and children and is committed to complying with the procedures of the Local Safeguarding Boards.

### 3.0 Applicable Regulatory Documents

This policy is written in accordance with the relevant legislation detailed in Appendix 2 of this policy and will be reviewed annually, with external advice being sought from legal experts.

### 4.0 Principles of Safeguarding

#### 4.1 Six Principles of Safeguarding

The Care Act 2014 sets out the following principles that should underpin safeguarding:

- **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 delivering safeguarding.

#### 4.2 Making Safeguarding Personal

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

Wherever possible discuss safeguarding concerns with the individual to get their view of what they would like to happen and keep them involved in the safeguarding process, seeking their consent to share information outside of the organisation where necessary.

### 5.0 Types of Abuse

There are different types and patterns of abuse and neglect, and different circumstances in which they may take place. The Care Act 2014 identifies the following as an illustrative guide and is not intended to be an exhaustive list as to the sort of behaviour which could give rise to a safeguarding concern:

- **Self-Neglect** – this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- **Modern Slavery** – encompasses slavery, human trafficking, 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.
- **Domestic Abuse and Coercive Control** – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence which can occur between any family members.
- **Discriminatory Abuse** – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the nine protected characteristics of the Equality Act.

- **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 as a result of the structure, policies, processes and practices within an organisation.
- **Physical Abuse** – including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- **Sexual Abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.
- **Financial or Material Abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection to wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Neglect** – 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.
- **Emotional or Psychological Abuse** – including threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

**The following are not included in the Care Act 2014 but are also relevant:**

- **Cyber Bullying** – this can occur when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.
- **Forced Marriage** – this 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. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry. The forced marriage of adults with learning disabilities occurs when the adult does not have the capacity to consent to the marriage.
- **FGM** - Female genital mutilation (FGM) is the partial or total removal of the external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. FGM is often performed by someone with no medical training who uses instruments such as a knife, scalpel, scissors, glass or razor blade. Children are rarely given anaesthetic or antiseptic treatment and are often forcibly restrained.

- **Mate Crime** – a ‘mate crime’ is defined by the Safety Net Project as ‘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 carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.
- **Radicalisation** – 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.

## 6.0 Signs & Indicators

There are many signs and indicators that may suggest someone is being abused or neglected. These include but are in no way limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present
- Belongings or money going missing
- Behavioural changes
- An unkempt appearance
- Self - harming
- A fear of a particular group or individual
- Expressing of extreme political or religious views
- They may tell you / another person they are being abused – i.e., a disclosure. This could include a range of different abuses. For example, fear of a partner, forced marriage, slavery etc.

### 6.1 What to do if you have a concern, or if someone raises concerns with you

- It is not your responsibility to decide whether or not an individual has been abused. It is, however, everyone’s responsibility to respond to and report all concerns.
- If you are concerned someone is in immediate danger, you must contact the police on 999 straight away whilst keeping yourself safe. Where you suspect that a crime is being committed, you must involve the police.
- If you have concerns and/or you are told about possible or alleged abuse, poor practice or wider welfare issues you must report this to the Safeguarding Lead or Deputy at Group Head Office. You should do this as soon as possible **and within 24 hours.**
- When raising your concern, remember the “Making Safeguarding Personal” principles. It is good practice to seek the individual’s views on what they would like to happen next and to inform them that you will be passing on your concern.
- People can feel embarrassed and humiliated by what has happened and may ask that their circumstances are not shared with anyone else. For both adults and children, we cannot agree to keep it a secret, once we are aware we must report. This means we need to be open and honest with the adult or child who has disclosed and tell them that we cannot keep it a secret and need to share this with people who can help.

## 6.2 How to respond to a concern

- Reassure the person concerned, listen to what they are saying and remain calm
  - Do not show shock or disbelief
  - Tell the individual that the information will be treated seriously
  - Don't start to investigate or ask detailed or probing questions
  - Don't promise to keep it a secret
  - Remember to "Make Safeguarding Personal". Discuss your safeguarding concerns, obtain their view of what they would like to happen, but inform them it's your duty to pass on your concerns.
  
- Make a note of what the person has said using his or her own words as soon as practicable
  - Complete an Incident Form (Appendix 1) and submit to the Safeguarding Lead or Deputy immediately or within 24 hours if this is not possible.
  - Describe the circumstances in which the disclosure came about.
  - Take care to distinguish between fact, observation, allegation and opinion. It is extremely important that the information you have is accurate.
  - Be mindful of the need to maintain confidentiality at all times.

Further information and advice can be found in the associated Bellway Safeguarding guidelines.

**If the matter is urgent and relates to the immediate safety of an individual, then contact the emergency services if necessary and inform one of the Group Safeguarding Officers immediately. Do not put yourself in harm's way.**

## 7.0 Roles and Responsibilities of those within Bellway

### 7.1 Role of all employees

- All employees are responsible for familiarising themselves with and acting in accordance with this policy.
- Employees should inform their line-manager or a named Safeguarding Officer if they know or suspect that themselves or someone else is subject to abuse.

### 7.2 Role of all Directors/Managers

- Managers/Directors will ensure that this policy is communicated to employees during their induction and will provide advice and guidance to employees where appropriate.
- Managers/Directors are required to exercise leadership by encouraging safe and inclusive working practices. This also includes being vigilant and reporting any concerns promptly to a named Safeguarding Officer and taking appropriate action to deal with breaches of this policy or behaviour that could lead to a breach of the policy.
- Any identified breaches by employees should be dealt with using the Disciplinary Policy.
- Managers/Directors are responsible for applying employment practices, policies and procedures fairly and consistently, and for highlighting and addressing any practices that could lead to safeguarding concerns.

- Managers/Directors must ensure that the Bellway's safer recruitment process is strictly adhered to.

### 7.3 Role of the Group HR department

- Group HR will liaise with and support the Divisions to ensure that the policy is implemented and operated in a reasonable and fair manner, provide advice and guidance to employees and line-managers when dealing with allegations of abuse or poor practice against employees, workers and subcontractors.
- An overall Safeguarding Lead and Deputies are in place at Bellway Head Office to oversee safeguarding issues and escalations, liaising effectively with other organisations to safeguard and promote the welfare of adults and children, including arrangements for sharing information as required.
- Promoting appropriate whistleblowing procedures and an open and inclusive culture that enables safeguarding and diversity and inclusion issues to be addressed.

## 8.0 Safeguarding Officers

Role	Name and Contact information
Deputy Safeguarding Officer(s)	Cath Goodfellow, L&D Advisor – Early Careers <a href="mailto:Cath.goodfellow@bellway.co.uk">Cath.goodfellow@bellway.co.uk</a> 0191 217 0717  Rachel Harker, Early Careers Talent Co-ordinator <a href="mailto:Rachel.harker@bellway.co.uk">Rachel.harker@bellway.co.uk</a> 0191 217 01717
Safeguarding Lead	Laura Bell, Group HR & OD Manager <a href="mailto:Laura.bell@bellway.co.uk">Laura.bell@bellway.co.uk</a> 0191 217 0717

These contact details must be displayed on noticeboards on site and are also available on SharePoint as well as being included in the Safeguarding Training which all staff and agency workers must complete.

### Lone Working

Bellway will ensure, so far as is reasonably practicable, that employees and workers required to work alone or unsupervised are protected from risks to their health and safety. Measures will also be adopted to protect anyone else affected by solitary working.

Full details are available in the **Lone Working Procedure & Guidance documents**.



## Appendix 1

<b>Safeguarding: Incident Report Form</b>		
<b>Name of person reporting a concern:</b>	<b>Date:</b>	<b>Location:</b>
<b>Name of individual at risk:</b>	<b>Address:</b>	<b>Telephone Number:</b>
<b>Date of Birth:</b>		
<b>Has the individual given consent to report this allegation of abuse?</b>		<b>Yes/No</b>
<b>Has this person been informed of the action that will be taken?</b>		<b>Yes/No/NA</b>
<b>Has this person any particular wishes relating to the reporting process?</b>		
<b>Are there any outcomes that this person wishes to achieve from this process?</b>		
<b>Details of the allegation of abuse</b>		

Please provide as much detail as possible about the allegation including:

- The circumstances in which the disclosure came about
- As much detail as possible, ideally in the individual's own words
- Note any relevant concerns regarding individual capacity

<b>Signature of the author</b>	
<b>Name and signature of the Safeguarding Officer this incident was reported to</b>	
<b>Next steps and actions (including dates)</b>	

## Appendix 2

### Relevant Legislation

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and adults at risk in England, Scotland and Wales.

A summary of the key legislation relating to the safeguarding of children and young people is available from [www.nspcc.org.uk/learning](http://www.nspcc.org.uk/learning).

The practices and procedures within this policy are also based on the principles contained within the UK legislation and Government Guidance and take the following into consideration:

- England - The Care Act 2014
- Wales - Social Services and Well Being Act 2014
- Scotland - Adult Support and Protection Act 2007
- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- England and Wales - Mental Capacity Act 2005
- Scotland - Adults with Incapacity Act 2000
- Sexual Offences Act 1956 & 2003
- The Human Rights Act 1998
- The Data Protection Act 1998
- The General Data Protection Regulation 2016

Please note that further information on the differences between the home nations in regard to abuse or neglect definition, types of abuse and neglect and the principles of Safeguarding can be found in the Safeguarding guidance document. This policy draws from across the legislation outlined above and is designed for all Bellway employees, workers and subcontractors across the UK.