



Adult Safeguarding Policy

Bellway p.l.c.

Document Control	
Owner:	Heidi Khoshtaghaza, Group HR Director
Executive Sponsor:	Simon Scougall, Chief Commercial Officer
Date of Approval:	December 2024
Responsible for Review:	Group HR Department
Date of Next Review:	December 2025

Table of Contents

Section	Title	Page
1.0	Key Contacts	3
2.0	Introduction	3
3.0	Aims	3
4.0	Applicable Regulatory Documents	4
5.0	Safeguarding Definition	4
6.0	Types of Abuse	4
7.0	Who is most at risk	6
8.0	Signs and Indicators	6
9.0	Roles and Responsibilities	7
10.0	Lone Working	7
11.0	Appendix	9

1.0 Key Contacts

Designated Safeguarding Lead (DSL):

- Name: Charlotte Battista
- Contact: charlotte.battista@bellway.co.uk / 07779859337

Designated Safeguarding Lead (DSL):

- Name: Laura Cooper
- Contact: laura.cooper@bellway.co.uk / 07736673626

Deputy Designated Safeguarding Lead (Deputy DSL):

- Name: Matthew Fletcher
- Contact: matthew.fletcher@bellway.co.uk / 07773113632

2.0 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 responsibilities to ensure the safer recruitment practices are in place to protect new 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 and agency workers have a responsibility to ensure that the requirements of the policy are upheld.

In this policy, we refer to "the Company", which will be whichever company within the Bellway Group that employs staff affected by the policy.

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

3.0 Aims

At Bellway we are committed to ensuring employees are safe, and the risk of harm to the individual is minimised.

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 sub-contractors. We particularly recognise the need to promote a positive and supportive environment which prioritises the safety and wellbeing of our young workers and apprentices under the age of 18 (see the Children and Young People's Safeguarding Policy).

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

This guidance 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 right to work in a safe environment.
- The rights, dignity and worth of all individuals will always be respected.
- We all have a shared responsibility to ensure the safety and well-being of all adults at risk, and to act appropriately and report concerns (see appendix 1).
- All allegations will be taken seriously and responded to quickly.

4.0 Applicable Regulatory Documents

This policy is written in accordance with the relevant legislation detailed below and will be reviewed annually.

Relevant Legislation:

- Care Act 2014 – England
- Adult Support and Protection Act 2007 – Scotland
- Social Services and Well-being Act 2014 - Wales
- Equality Act 2010
- Public Interest Disclosure Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1998

5.0 Safeguarding Definition

Safeguarding can be defined as protecting and promoting people's health, wellbeing and safety, and minimising risk of harm to the individual. Harm can include but is not limited to, any form of abuse, neglect, self-harm, or harassment.

At Bellway we are committed to promoting a culture of vigilance, with the mindset of 'it could happen here.' We encourage everyone to report their concerns, no matter how small they seem (see Appendix 1).

6.0 Types of Abuse

The Care Act 2014 identifies some of the following types of abuse. This is not intended to be an exhaustive list, but gives examples of the types of abuse 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.
- **Domestic abuse and coercive control** – including psychological, physical, sexual, financial, and emotional abuse. It also includes 'honour' based violence which can occur between family members or within the community.
- **Physical abuse** – including hitting, slapping, pushing, kicking, misuse of medication or restraint.
- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual photography, subjection to pornography or witnessing sexual acts, or sexual acts to which the adult has not consented.
- **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 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 support networks.
- **Discriminatory abuse** – discrimination as abuse which centres on a difference or perceived difference particularly with respect to race, gender, or disability or any of the nine protected characteristics in the Equality Act 2010.

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

- **Cyber bullying** – bullying that takes place online via digital devices such as mobile phones, computers, gaming devices and tablets. It can occur via social media, gaming forums, emails, texting, or websites. Cyberbullying can be carried out by an individual or group, to target a victim by sending or sharing harmful and negative content directly to them or for others to see.
- **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. This is a criminal offence. It differs from an arranged marriage where both parties consent to a third party identifying a spouse for them.
- **FGM** – Female genital mutilation (FGM) is the partial or total removal of the external female genitalia for non-medical reasons. It is also known as female circumcision or cutting. FGM is often performed by someone with no medical training. Victims 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 them and in some serious cases, harm them.
- **Radicalisation and extremism** – an extremist holds views that are intolerant of people or groups of people based on things like religion and ethnicity. The individual may encourage

others to adopt their views and either support or join terrorist groups to promote violence and hatred, which is the process of radicalisation.

- **Sexual harassment** – this can be a one-off incident or an ongoing pattern of behaviours by the perpetrator/s, in person or online. It can happen to anyone of any gender and includes any unwanted sexual behaviours such as, but not limited to, comments, gestures, touching, or offering rewards in exchange for sexual favours (see Bellway's Anti-harassment Policy).

7.0 Who is most at risk

The following groups has been identified as most at risk of harm and/or abuse:

- Children and young people (see Bellway's Children and Young Peoples Safeguarding Policy).
- Young adults with additional needs (disabilities, care leavers, those with limited support networks).
- People with disabilities as defined by the Equality Act 2010, including physical disabilities, learning difficulties and mental health conditions.
- Individuals who speak English as their second language.
- LGBTQ+ individuals.
- People experiencing any type of abuse.
- Refugees and asylum seekers.
- Individuals facing financial and social challenges.

8.0 Signs and indicators

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

- Unexplained bruises or injuries.
- Belongings or money going missing.
- Behavioural changes.
- Unkept appearance.
- Self-harming (e.g. cuts, loss of hair, skin picking, burn or bite marks).
- A fear of an individual or group.
- Expressing extremist views.
- Someone unfamiliar/unknown starts consistently dropping them off and picking them up from work.
- Withdrawing socially, both in and outside of work.

What to do if you notice signs of abuse, or someone else raises concerns with you:

- Listen empathically and non-judgementally.
- Report the concern after the conversation.

- If you are concerned someone is in immediate danger, call 999. Do not try and intervene or inform the alleged perpetrator of what you are doing. Prioritise your own safety and the safety of the victim.
- If you have concerns or someone has made a disclosure to you, you must report this to the designated safeguarding leads or deputy (see contact details on page 3). You must do this as soon as possible and within 24 hours.
- It is good practice to tell the individual you suspect is a victim, that you are reporting the safeguarding concern and offer to involve them in the process, however, this might not always be possible.
- Never promise confidentiality when someone reports a concern to you, it is your duty to report your concern. However, only tell relevant people such as the safeguarding leads and the emergency services. Do not share details with other employees.

How to respond to a disclosure:

- Remain calm and listen without interrupting.
- Tell the individual that the information will be treated seriously.
- Do not start to investigate or asking detailed or probing questions.
- Do not promise to keep it a secret.
- Discuss your concerns and obtain their view on what the next steps should be.

When recording details of the concern:

- Complete an Incident Form (appendix 1) and submit it to a Safeguarding Lead or deputy via email, within 24 hours.
- Describe the circumstances in which the disclosure came about.
- Keep the information you record descriptive and factual, avoid recording your own opinion.
- Do not discuss your concerns with people irrelevant to the reporting process.

If the matter is urgent and relates to the immediate safety of an individual, then contact the emergency services and inform one of the safeguarding leads. Do not put yourself in harm's way.

9.0 Roles and responsibilities of those within Bellway

Role of all employees:

- All employees are responsible for familiarising themselves and acting in accordance with this policy.
- Employees should inform their line-manager or one of the safeguarding leads if they have a concern, including if they would like support for themselves.

Role of all People 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 to the

safeguarding leads and taking appropriate action to deal with breaches of this policy or behaviour that might lead to a breach of this policy.

- Any identified breaches of this policy 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 practices that could lead to safeguarding concerns.
- Managers/Directors must ensure that Bellway's safer recruitment process is strictly adhered to.

Role of Group HR:

- 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, worker, and subcontractors.
- A designated Safeguarding Lead and Deputy 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 information 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.

10.0 Lone working

Bellway will ensure, as 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 taken to protect anyone else affected by solitary working.

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

Appendix 1

Safeguarding Concern Report Template

1. Date of Report:

- *[Date when concern was raised]*

2. Concern Raised By:

- *[Name of the person reporting the concern]*
- *[Job Title / Role]*
- *[Contact Information]*

3. Victim(s) Involved:

- *[Name(s) of individual(s) involved, if appropriate to share]*
- *[Age(s)]*
- *[Gender, if relevant]*
- *[Any other identifying details (if necessary)]*

4. Concern Details:

- *[Detailed description of the safeguarding concern]*
- *[When did the incident occur?]*
- *[Where did the incident occur?]*
- *[Any immediate action taken?]*

5. Action Taken:

- *[Describe steps taken after the concern was raised]*
- *[Was the concern escalated to any authorities or safeguarding teams?]*