



Aenon Housing CIC

Homes with Purpose

Policy Name	Safeguarding Policy
Version	1.0
Approved By	Board of Directors -Aenon Housing CIC
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Date of next Review	01/02/2027

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Safeguarding Policy

1. PURPOSE AND STATEMENT OF INTENT

1.1 Aenon Housing CIC is committed to the protection, dignity, rights, autonomy, safety, and wellbeing of adults, particularly those who may be:

- Vulnerable due to age, disability, mental ill-health, substance misuse, trauma, exploitation, or social exclusion;
- At increased risk due to homelessness, insecure housing, domestic abuse, or dependency relationships;
- Living with a mix of challenges that makes them more exposed to harm or neglect.

1.2 This Policy establishes a clear, enforceable framework through which Aenon Housing CIC:

- Prevents abuse and neglect wherever reasonably possible;
- Acts proportionately, defensibly, and lawfully when concerns arise;
- Meets its legal responsibilities and wider duties to the people we support, our partners, and the communities we work in.
- Treats safeguarding as a core part of how we work every day, not something we only think about after something goes wrong.

1.3 Safeguarding within Aenon is mandatory and cannot be treated as optional or delegated. It is a shared, non-delegable responsibility held by all.

2. LEGAL, STATUTORY, AND REGULATORY FRAMEWORK

This Policy is informed by and must be interpreted in line with the following authorities, which are not an exhaustive list:

2.1 Primary Legislation

- Care Act 2014 (sections 1, 6, 9–13, 42–46)
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- Mental Capacity Act 2005 (including Deprivation of Liberty Safeguards and Liberty Protection Safeguards transition)
- Human Rights Act 1998
- Equality Act 2010
- Health and Safety at Work etc. Act 1974
- Protection from Harassment Act 1997
- Domestic Abuse Act 2021
- Sexual Offences Act 2003
- Fraud Act 2006

2.2 Statutory Guidance

- Care and Support Statutory Guidance (updated editions)
- Working Together to Safeguard Children (where adults and children intersect)
- Domestic Abuse Statutory Guidance

2.3 Regulatory and Oversight Context

- Local Authority Safeguarding Adults Boards (SABs)
- Regulator of Social Housing consumer standards
- Information Commissioner's Office (ICO) guidance
- Coroner's Prevention of Future Deaths expectations

2.4 Common Law and Case Law Principles

- Duty of care
- Foreseeability of harm
- Proportionality
- Reasonableness
- Record-keeping as evidence

3. SCOPE AND APPLICATION

3.1 This Policy applies to:

- All adults accessing housing, accommodation, or support connected to Aenon Housing CIC;
 - All staff, directors, agency workers, contractors, volunteers, and partners;
 - All activities, whether on Aenon premises, in service users' homes, remotely, digitally, or via third-party delivery.
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3.2 No role within Aenon is exempt. Seniority increases responsibility; it does not dilute accountability.

4. DEFINITIONS

4.1 Adult at Risk

An adult who:

- Has needs for care and/or support (whether or not those needs are being met);
- Is experiencing, or is at risk of, abuse or neglect; and
- Is unable to protect themselves because of those needs.

4.2 Safeguarding

The process of:

- Protecting adults' right to live in safety;
- Preventing harm;
- Promoting choice, control, and wellbeing;
- Responding appropriately when risks materialise.

4.3 Abuse and Neglect

Includes but is not limited to:

- Physical abuse
- Psychological or emotional abuse
- Sexual abuse
- Financial or material abuse
- Modern slavery
- Domestic abuse
- Discriminatory abuse
- Organisational abuse
- Neglect and acts of omission
- Self-neglect

5. CORE SAFEGUARDING PRINCIPLES

Aenon Housing CIC adopts, without dilution, the **six statutory safeguarding principles**:

- 5.1 **Empowerment** – Presumption of person-led decisions
- 5.2 **Prevention** – Action before harm occurs
- 5.3 **Proportionality** – Least intrusive response consistent with risk
- 5.4 **Protection** – Support for those at greatest risk
- 5.5 **Partnership** – Multi-agency cooperation
- 5.6 **Accountability** – Clear ownership and auditability

6. GOVERNANCE AND ACCOUNTABILITY

6.1 The **Board of Directors** holds ultimate accountability for safeguarding effectiveness.

6.2 A **Designated Safeguarding Lead (DSL)** shall be formally appointed, trained, resourced, and authorised.

6.3 The DSL is responsible for:

- Strategic oversight;
- Decision-making in complex cases;
- Liaison with Local Authority Safeguarding Teams;
- Reporting to the Board;
- Oversight of learning and continuous improvement.

6.4 Safeguarding failures may constitute:

- Gross misconduct;
- Regulatory breach;
- Contractual default;
- Legal liability.

7. RECOGNISING SAFEGUARDING CONCERNS

7.1 Indicators may be:

- Physical (injuries, malnutrition, neglect)
 - Behavioural (withdrawal, fear, distress)
 - Financial (missing funds, coercion)
 - Environmental (unsafe conditions)
 - Relational (control, intimidation)
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7.2 Absence of evidence does not equal absence of risk.
Professional curiosity **must be exercised**.

8. SAFEGUARDING RESPONSE PROCEDURE

8.1 Immediate Risk

- Call emergency services where there is immediate danger.
- Ensure safety first. Documentation follows action.

8.2 Internal Reporting

- All concerns must be reported to the DSL **without delay**.
- No staff member may investigate independently.

8.3 External Referral

- Section 42 referral to the Local Authority where threshold is met.
- Police involvement where criminality is suspected.
- MARAC, housing enforcement, or specialist referrals as appropriate.

8.4 Consent and Capacity

- Consent sought wherever possible.
- Mental Capacity Act fully applied.
- Override of consent only where lawful and necessary.

9. RECORD-KEEPING AND INFORMATION SHARING

9.1 Records must be:

- Accurate
- Timely
- Factual
- Defensible
- Secure

9.2 Information sharing will comply with:

- GDPR
- Data Protection Act 2018
- Public interest and safeguarding exemptions

9.3 Poor records will be treated as poor safeguarding.

10. WHISTLEBLOWING

10.1 Any person may raise concerns about:

- Poor practice
- Cover-ups
- Abuse by staff or partners

10.2 No detriment will result from good-faith disclosures.

11. SAFEGUARDING AND HOUSING PRACTICE

11.1 Aenon recognises that:

- Housing conditions can constitute neglect;
- Failure to act can amount to organisational abuse;
- Safeguarding is inseparable from housing management.

11.2 Safeguarding considerations must underpin:

- Allocations
- Evictions
- Enforcement
- Repairs
- Anti-social behaviour responses

12. TRAINING AND COMPETENCE

12.1 Mandatory safeguarding training is required for all personnel.

12.2 Training must be:

- Role-appropriate
- Refreshed regularly
- Recorded and auditable

13. CONTINUOUS IMPROVEMENT AND LEARNING

13.1 Aenon Housing CIC commits to:

- Learning from incidents
- Responding to SAR(Safeguarding Adults Review) findings
- Updating policy and practice proactively

13.2 Defensive silence is prohibited. Learning culture is mandatory.

14. POLICY ENFORCEMENT

14.1 Failure to comply may result in:

- Disciplinary action
- Suspension or dismissal
- Contract termination
- Referral to regulators or authorities

15. FINAL STATEMENT

Safeguarding within Aenon Housing CIC is **not a compliance exercise**.
It is an expression of **law, ethics, care, professionalism, and humanity**.

Every adult is entitled to safety.

Every concern is entitled to action.

Every failure is preventable if courage replaces complacency.
