

Safeguarding

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1. Policy Statement

- 1.1 Railway Housing Association (Railway) is committed to ensuring that all residents live in safe homes and communities. We take our responsibilities to safeguard adults and children seriously and will act promptly and appropriately whenever abuse, neglect or risk of harm is identified or suspected.
- 1.2 We recognise that safeguarding is everyone's responsibility. Railway will work proactively with residents, colleagues and partner agencies to identify concerns early, prevent harm and ensure that support, protection and intervention are provided when required.
- 1.3 Our approach is person-centred, trauma-informed and grounded in dignity, respect and empowerment. We prioritise the safety and wellbeing of the person at risk, actively involve them in decision-making wherever possible and ensure that safeguarding concerns are managed sensitively, confidentially and in a non-judgemental manner.

2. Policy Aims

Railway Housing Association aims to deliver a safeguarding approach that is effective, lawful and trusted by residents.

- 2.1 We will:
 - Ensure a safe and protective environment:
 - Identify adults and children at risk of harm
 - Respond promptly to safeguarding concerns
 - Take steps to ensure immediate safety and prevent further harm
 - Meet Statutory and Regulatory Requirements:
 - Comply with all relevant safeguarding laws and guidance, including Care Act 2014, Children Act 1989 and 2004, Working Together to Safeguard Children, Domestic Abuse Act 2021, Mental Capacity Act 2005, Human Rights Act 1998 and Equality Act 2010.
 - Deliver services in line with the Regulator of Social Housing's Consumer Standards, including:
 - Neighbourhood and Community Standard
 - Tenancy Standard
 - Safety and Quality Standard

- Transparency, Influence and Accountability Standard
 - Handle complaints in accordance with the Housing Ombudsman's Complaint Handling Code
 - Use a person-centred, trauma-informed approach:
 - Listen to residents and respect their wishes
 - Empower individuals to make choices about their own safety
 - Ensure decisions are proportionate, fair and respectful
 - Work in partnership:
 - Collaborate with safeguarding boards, local authorities, police, health services and specialist organisations
 - Share information lawfully and proportionately
 - Continuously Improve Our Service:
 - Monitor outcomes, performance and learning from residents
 - Ensure that all colleagues receive regular training
 - Involve residents in shaping services
 - Review this policy at least every three years
- 2.2 Railway Housing Association recognises that language plays an important role in shaping how residents experience our services. We are committed to using neutral, person-centred terminology wherever possible to ensure fairness, avoid prejudgement and support a respectful approach to all parties involved.
- 2.3 However, we also acknowledge that some terms, such as "*victim*", "person at risk" and "*perpetrator*", hold important legal, safeguarding and sector recognised meanings. Although these words may not always feel resident friendly, they are sometimes necessary and appropriate.
- 2.4 We use these terms carefully, proportionately and only where they ensure legal clarity, safeguarding responsibilities or effective partnership working. In every case, our priority is to respect the experiences of residents, minimise harm and provide a safe, trauma-informed service. Wherever possible, we will continue to adopt language that is sensitive, neutral and person-centred while still meeting our legal, regulatory and safeguarding obligations.

3. Roles and Responsibilities

- 3.1 The Railway Board have overall responsibility to ensure an effective safeguarding policy that meets all regulatory requirements is in place. The Board will approve the safeguarding policy and ensure a review of the policy is carried out every 3-years, or sooner if there is a significant change that may impact delivery of the service.
- 3.2 The Chief Operating Officer will ensure residents of Railway have the opportunity to influence the safeguarding policy at the point of the 3-year review and throughout delivery of the policy and supporting procedure.

- 3.3 The Community Housing Manager will act as Railway's Designated Safeguarding Lead, responsible for overseeing safeguarding processes, advising colleagues, ensuring referrals are made and ensuring partnership relationships.
- 3.4 All colleagues and contractors have a duty to recognise, report and record safeguarding concerns.
- 3.5 The Resident Committee will monitor the delivery of the safeguarding policy and implementation of the policy through an annual Safer Communities deep dive.

4. Legislative Framework

- 4.1 Railway Housing Association's domestic abuse approach is influenced by legislation and guidance, including:

Legislation	Why it is Relevant	Regulatory Link
Domestic Abuse Act 2021	Recognises children as victims in their own right and sets duties for safeguarding responses.	Supports the Neighbourhood and Community Standard; safeguarding expectations; victim support obligations.
Housing Act 1996	Places duties on housing providers regarding homelessness prevention and allocations for residents in priority need.	Links to Tenancy Standard and fair access to housing.
Care Act 2014	Establishes safeguarding responsibilities for adults at risk, including those experiencing domestic abuse.	Supports Safety and Quality Standard.
Children Act 1989 / 2004	Sets out safeguarding duties to protect children at risk of harm,	Supports all consumer standards – protection of children and family wellbeing.
Anti-social Behaviour, Crime and Policing Act 2014	Provides tools for managing perpetrator behaviour, such as injunctions and closure powers.	Supports neighbourhood safety and community protection.
Human Rights Act 1998	Requires decision-making to be fair, proportionate and protective of residents' rights.	Underpins fairness and accountability expectations.
Equality Act 2010	Ensures non-discrimination and reasonable adjustments for victims with protected characteristics.	Supports the Transparency, Influence and Accountability Standard.
Data Protection Act 2018 & UK GDPR	Regulates lawful and proportionate information sharing.	Supports transparency, privacy and accountability.

5. Definitions

- 5.1 Railway adopts the statutory definitions as set out below:
- Adults at Risk – an adult (18+) who has care and support needs, is experiencing or is at risk of abuse or neglect and as a result is unable to protect themselves.
 - Child – anyone under 18 years old.
- 5.2 Railway recognises that abuse can take many forms and can include, but is not limited to:
- Physical, sexual, emotional and psychological abuse
 - Neglect or self-neglect
 - Domestic abuse
 - Financial abuse
 - Discriminatory abuse
 - Modern slavery or exploitation
 - Organisational or institutional abuse
- 5.3 Railway recognises that abuse may be carried out deliberately or unknowingly and maybe a single act or repeated acts. Railway understands that neglect can sometimes happen because a carer is struggling to care for themselves as well as others.

6. Our Standards of Service

- 6.1 Safeguarding concerns can be made to Railway Housing Association through any contact method that is most convenient and appropriate to the resident's preferences and needs.
- 6.2 We will acknowledge and assess all new safeguarding concerns within 1 working day. We will take immediate action where someone is at risk of immediate harm.
- 6.3 When a new safeguarding concern is received, it will be recorded and an appropriate referral made to the relevant local authority or police service. Where appropriate, we will work with the person at risk to agree a safety plan.
- 6.4 While the case remains open, we will continue to support the person at risk and fully engage in all safeguarding and multi-agency processes.
- 6.5 All safeguarding concerns and records will be treated as confidential. We will seek the resident's consent before sharing any information with third parties, except where disclosure is necessary to protect someone from harm.
- 6.6 Where there are safeguarding concerns, or we believe someone may be at risk, we will share information in line with data protection requirements and relevant safeguarding principles, ensuring that any action taken is lawful, proportionate and in the best interests of those involved.
- 6.7 Where there are concerns about capacity, Railway will act in accordance with the Mental Capacity Act 2005, referring to the relevant local authority for capacity assessments.

7. Identifying and Assessing Risk

7.1 Railway colleagues will:

- Recognise indicators of abuse or neglect
- Record concerns factually and sensitively
- Report concerns immediately to the Designated Safeguarding Lead
- Refer cases to local authority safeguarding teams where required
- Escalate urgent or immediate risks to emergency services

7.2 High-risk child or adult cases may be referred to:

- Multi Agency Safeguarding Hub (MASH)
- Multi Agency Risk Assessment Conference (MARAC) for domestic abuse cases
- Adult safeguarding boards
- Local authority children's services

8. Partnership Approach

8.1 Railway will work collaboratively with a range of agencies to support residents, minimise risk and proactively identify concerns. Some of these agencies include:

- Local authority safeguarding teams (adults and children)
- Health and mental health services
- Police
- Domestic abuse
- Education and youth services
- Probation and offender management teams
- Community and voluntary sector partners

8.2 This approach aligns with the Regulator of Social Housing's Shared Spaces expectations and the Neighbourhood and Community Standard.

9. Preventing and identifying potential harm

9.1 Railway Housing Association is committed to prompt, appropriate and proportionate action to prevent and identify potential harm. Our approach includes:

- Early identification and intervention
- Trauma-informed communication
- Safety planning with adults and families
- Reasonable adjustments to support victims and vulnerable residents
- Enforcement or tenancy action where appropriate
- Multi-agency responses for complex or high-risk cases

9.2 Railway also undertakes proactive prevention including:

- Awareness campaigns
- Colleague training annually
- Resident engagement and education

10. Safeguarding and Tenancy Management

- 10.1 Railway Housing Association may take tenancy-related action where safeguarding concerns involve:
- Significant risk to neighbours or colleagues
 - Criminal or harmful behaviour from a resident
 - Household members who pose a risk to children or vulnerable adults
- 10.2 Tenancy management will always be proportionate, evidence based and aligned with safeguarding processes.

11. Adapting Services to Achieve Equitable Outcomes

- 11.1 Railway Housing Association is committed to delivering services in a way that achieves equitable outcomes for all residents. We recognise that individuals have different experiences and may face barriers to accessing services or engaging with processes. Equity means providing the right level of support, in the right way, at the right time, so that all residents have a fair opportunity to feel safe and have their concerns addressed. We will adapt our approach to meet the diverse needs of residents, ensuring that no one is disadvantaged due to their circumstances.
- 11.2 Our Approach:
- Understanding Individual Needs – we will take reasonable steps to identify vulnerabilities, support needs and personal circumstances at the earliest opportunity, including those related to disability, health, language, culture, digital access or financial hardship.
 - Flexible Communication – residents can engage with us in a way that suits them, including telephone, face-to-face, digital or through an advocate. We will provide information in accessible formats (e.g. large print, translation, easy read) where required.
 - Tailored Case Management – our response will be proportionate and adapted to reflect the needs of those involved. This may include adjusting timescales, methods of evidence gathering or the way we carry out visits and interviews.
 - Supporting Victims – we will take a victim-centred approach, recognising the impact on individuals.
 - Removing Barriers – we will proactively reduce barriers that may prevent residents from engaging with us, including offering support to complete forms, providing reassurance around confidentiality and ensuring our processes are clear and transparent.
 - Partners – we will collaborate with relevant local agencies to ensure residents receive holistic support tailored to their needs.
- 11.2 Residents with additional needs may be signposted to external agencies to help keep people safe. We take proactive steps to help residents feel safe in their homes, including security lighting, timely maintenance of communal doors and measures to prevent unauthorised access.
- 11.3 The safety and wellbeing of all residents, including adults and children, is central to our approach. We follow safeguarding protocols and act where there is suspicion or

evidence of abuse. Support may include referrals to external agencies or taking the wishes of residents into account when determining actions related to domestic abuse.

12. Equality, Diversity and Inclusion

12.1 Railway Housing Association is committed to promoting equality, diversity, equity, and inclusion (EEDI) in all aspects of our work, including the prevention, management, and resolution of safeguarding concerns. We recognise that residents have diverse needs, backgrounds and experiences, and we strive to ensure everyone is treated fairly, respectfully and without discrimination.

12.2 Our Approach:

- **Equitable Access:** We recognise that providing the same service to everyone does not always achieve fairness. Residents may require different methods of support or reporting to have equal access to our services. For example, we provide translation services, advocacy support, alternative communication channels or tailored approaches to ensure everyone can report domestic abuse effectively.
- **Fair Treatment:** All reports and interventions are handled consistently and impartially, regardless of age, gender, ethnicity, religion, sexual orientation, disability, or other protected characteristics.
- **Inclusive Policies:** Our safeguarding policies, procedures, and communications are designed to be clear, accessible, and inclusive, reflecting the diverse needs of our communities.
- **Colleague Training:** All colleagues receive regular training on equality, diversity, and inclusion, as well as the impacts warning signs and indicators of abuse, to ensure awareness and competency in responding appropriately.
- **Monitoring and Learning:** We collect and analyse data on safeguarding concerns to identify trends, monitor outcomes, and ensure equitable responses. Resident feedback is used to improve services and remove barriers to reporting.

12.3 By embedding equality, diversity, equity, and inclusion principles with a focus on equity, Railway Housing Association ensures that all residents have genuine access to support, feel safe and respected, and can fully engage with support.

13. Complaints and Appeals

13.1 If a resident is not satisfied with how their safeguarding concerns have been handled, they can raise the matter through Railway Housing Association's complaints process. All complaints will be treated seriously, investigated promptly and responded to in line with our published complaints procedure.

13.2 Our approach follows the Housing Ombudsman Complaint Handling Code, ensuring that:

- Complaints are handled fairly, consistently, and transparently
- Residents are kept informed of progress and outcomes
- Appropriate remedies or actions are offered where required

13.3 Residents can submit a complaint using any of our usual contact methods, including telephone, email, website or in person. If a resident remains dissatisfied after our

internal process, they have the right to refer the matter to the Housing Ombudsman, who can independently review the case.

- 13.4 This ensures that all residents have access to a fair, transparent, and accountable process if they are unhappy with the way safeguarding concerns are handled.
- 13.5 Colleagues can and should raise concerns about safeguarding practice or organisational failures through Railway's Whistleblowing approach.