

Safeguarding Policy



Lead Director: Assistant Director Housing and Communities

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1. Introduction & Aim

- 1.1 Safeguarding means protecting an individual's right to live in safety, free from abuse, harm and neglect. The key aim of this Policy is to ensure that Cobalt meets all legislative and regulatory requirements and that customers, colleagues and others we come into contact with are effectively safeguarded. Cobalt recognises that the duty for safeguarding is everyone's responsibility, with effective joint working across internal teams at Cobalt as well as a range of statutory and non-statutory agencies.
- 1.2 Although Cobalt's core purpose is the provision of affordable housing; we recognise that our colleagues and customers will be in contact with children and adults who may be at risk, and as such it is essential that we consider the safeguarding of adults and children who live in our homes and also any colleagues contractors/partners who are accessing customers' homes.

2. Policy Statement

- 2.1 Social housing providers have responsibilities for safeguarding through a range of statutory and non-statutory legislation that is in place to protect individuals from harm. This is set out in the Care Act 2014, the Children Act 1989, the Children Act 2004 (Children Acts) and Human Rights Act (1998).
- 2.2 This policy applies to any person Cobalt meets during its activities including but not exclusive to customers, household members, applicants and other residents within our communities.
- 2.3 The term abuse in relation to this policy covers a range of behaviours and actions. This is not an exhaustive list, but is a guide to some of the behaviours that could result in a safeguarding concern:
 - Physical abuse
 - Domestic abuse
 - Sexual abuse
 - Psychological abuse
 - Financial or material abuse
 - Modern slavery
 - Discriminatory abuse
 - Neglect and acts or omission
 - Self-neglect
- 2.4 We have a legal responsibility to report all concerns of safeguarding to relevant partners and share all information required.
- 2.5 Where safeguarding guidance identifies that a safeguarding referral is not required, we will provide advice, assistance and support as appropriate.

3. Policy Principles

- 3.1 Cobalt recognises that any person can become at risk at different times during their tenancy and although not an exhaustive list, that vulnerability or safeguarding concerns may arise as a result of one or more of the following circumstances:
 - Age
 - Frailty
 - Mental and Physical health problems

- Learning disabilities
- Physical disabilities
- Sensory needs/neurodiversity
- Drug & / alcohol dependencies and other additions (such as gambling)
- Threat of or actual domestic abuse
- Immigration Status
- History of homelessness / imprisonment / tenancy loss/financial hardship

3.2 Safeguarding Adults

This means protecting an adult's right to live safely, free from abuse and neglect. It is about people and organisations working together to prevent and mitigate both the risks and experience of abuse or neglect, while at the same time making sure that the adult's well-being is promoted including, where appropriate, making it personal to them having regard to their views, wishes, feelings and beliefs in deciding on any action that is to be taken.

In our interactions with customers, we will ensure we act on any concerns surrounding abuse or neglect. We will adopt the six key principles included within the Care Act 2014 statutory guidance as our framework for managing adult safeguarding concerns:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

3.3 Safeguarding Children

Cobalt are committed to acting on any concerns relating to children and young people who maybe be at risk of abuse or neglect. In accordance with the Children's Act, we will adopt the two key principles by 'making safeguarding everyone's responsibility' and adopting a 'child-centred approach'.

'Children and young people' refers to children who have not yet reached their 18th birthday. Where someone is 18 or over but is still receiving children's services and a safeguarding issue is raised, the matter should be dealt with through adult safeguarding arrangements.

In cases where we have a safeguarding concern we will always act in the best interest of the child, even if this is not in line with their wishes.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best life chances

3.4 **Mental Capacity**

The Mental Capacity Act 2005 provides a framework for managing incidences where individuals may lack capacity, particularly in respect of professional relationships.

To support customers who may lack capacity we will apply the Act's five key principles:

- A presumption of capacity – every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise
- Supporting individuals to make their own decisions – a person must be given all practicable help before anyone treats them as not being able to make their own decisions
- Unwise decisions – just because an individual makes what might be seen as an unwise decision, they should not be assumed to lack capacity to make that decision
- Best interests – an act done, or decision made under the Act for or on behalf of a person who lacks capacity must be done in their best interests
- Least restrictive option – anything done for or on behalf of a person who lacks capacity must consider whether it is possible to decide or act in a way that would interfere less with the person's rights and freedoms of actions or whether there is a need to decide or act at all

If during our interactions with customers we have a concern that an individual may lack capacity to make a specific decision (this could include at tenancy sign up, at any time during their tenancy or on termination of their tenancy), we will work with professionals in supporting the need for assessment of capacity. We will clearly document this concern and assessment of capacity and this will be securely stored.

If an individual's capacity is in doubt we will raise concerns with the relevant health professional such as GPs or Adult Social Care teams, we do not assess capacity.

If a family member raises a concern over capacity, Cobalt will signpost them to services to assist for assessment.

3.5 **Modern Slavery**

We are committed to ensuring activities of Modern Slavery, including human trafficking are prevented within our homes and communities. We will require all Cobalt employees, contractors and consultants to understand their responsibilities under the Modern Slavery Act 2015.

3.6 **Reporting Safeguarding concerns**

The Senior Management Team has responsibility for ensuring that the organisation meets the legislative and regulatory duties relating to adult safeguarding and the protection of adults and children at risk.

We recognise that all Cobalt colleagues have responsibility for reporting issues, and they must be clear regarding their roles in safeguarding adults and children at risk, as uncertainty could delay appropriate action being taken. Colleagues should refer to the safeguarding procedure on guidance to make a referral.

Assistant Director of Housing and Communities is the Strategic lead for safeguarding and has responsibility within the organisation for:

- Ensuring policies and procedures are in place relating to the safeguarding of children and adults at risk
- Representing and reporting issues relating to safeguarding to the relevant management meetings
- Maintaining a cross organisational focus and attention to matters relating to the safeguarding of children and adults
- Ensuring that strategic initiatives, policies or procedures are instigated in response to internal and external learning, and/or new legislative policy and guidance
- In partnership with HR, allocating and coordinating investigations into allegations of abuse in relation to the allegations against employees
- Allocating and coordinating any requests from the local authority to 'make enquiries' as per Section 42 of the Care Act 2014

A designated Safeguarding Lead is responsible for having oversight of all safeguarding reports, case escalation, ensuring policy and procedures are being adhered to and addressing any blockages that may impact on Cobalt's duty to protect our most vulnerable customers. The Safeguarding Lead has two deputies who will be available for any of aforementioned duties in their absence.

The Safeguarding Champions are responsible for responding to any safeguarding reports within 1 working day of it being received. They will assess the report and take any appropriate action to safeguard a vulnerable customer.

Life at risk/Emergency Cases

In cases where a colleague has a concern that a customer is at risk of immediate harm, they should contact the relevant emergency service i.e. Police or Ambulance immediately. Examples of this could include children left alone at a property or serious self harm.

Safeguarding referrals

In cases where there is a concern relating to safeguarding that is not considered an emergency situation a Safeguarding referral should be logged the same working day. The referral will be reviewed by a Safeguarding Champion and if this is agreed as a safeguarding concern will be managed proportionality within 24 hours of receiving the referral.

In cases where the Safeguarding Champion deems the case not to require urgent care by a health professional, we may provide additional support through our Tenancy Wellbeing Officers/Neighbourhood Housing Officers or signposting to additional agencies as appropriate.

We will keep a record of any decision-making process regarding the sharing of information to ensure that there is a clear audit trail for any decisions we have taken. This includes the need to include personal and sensitive data.

When appropriate we will discuss our concerns with customers and explain the need to raise concerns. If this referral could cause further harm, we will not disclose this and make a referral without the customer's prior knowledge. Cobalt have a duty of care to our customers to remain safe.

3.7 **Partnership working, information sharing and confidentiality**

Cobalt will ensure that all colleagues understand that data protection does not prevent the sharing of information where it would protect the welfare of children and promote the wellbeing of adults.

We are committed to contributing as required to multi agency working in respect of safeguarding. This includes requests for information from the local authority, Safeguarding Boards, Child Protection Conferences and Serious Case Reviews.

In managing and investigating safeguarding concerns we will adopt a multi-agency approach, and work with all statutory and non-statutory agencies who are involved.

It is important to note that in order to carry out our duty to ensure customers remain safe from harm, abuse or neglect, we may share necessary information with other professionals without consent.

3.8 **Monitoring and review**

We will hold quarterly Safeguarding meetings, which will be Chaired by our Safeguarding Lead. Membership of the meetings includes the Assistant Director of Housing and Communities, managers and officers with involvement in safeguarding and managers from across the organisation whose teams interact with customers. At these meetings, we will monitor our performance, identify trends and learnings. Through these meetings, we will ensure safeguarding is embedded across the organisation.

Regular updates on safeguarding will be provided to our Audit and Risk Committee to enable them to have reassurance that this is effectively managed.

All Cobalt colleagues will be trained annually in safeguarding procedures as part of their induction and on an ongoing basis.

Training will be delivered to all colleagues which will include basic understanding of safeguarding and how to identify and report any concerns.

Further training will be delivered to all customer facing colleagues including Neighbourhoods, Customer Services, Repairs and Compliance which will include an enhanced level of understanding.

Safeguarding Champions, Neighbourhood Managers and Tenancy Wellbeing Team will have a detailed level of understanding of safeguarding requirements.

The level of training will be reflective of their role within the organisation. Cobalt will ensure that contractors understand and are trained in identifying safeguarding concerns and how to raise a concern.

Some posts within Cobalt may require a Disclosure and Barring Service (DBS) check. Managers in conjunction with the Human Resources (HR) Department will identify posts that require DBS disclosure.

3.9 **Whistleblowing**

Any allegations of abusive behaviour between a member of Cobalt and a customer will be investigated in line with Cobalt's Whistleblowing Policy, including anonymous reporting routes and protection for

whistleblowers. If malicious allegations are believed to have been made, these will be managed in accordance with Cobalt's Unacceptable Behaviour Policy.

Cobalt will report any safeguarding concerns raised about the conduct of colleagues to the Local Authority Designated Officer (LADO) and act in accordance with the LADO's advice and guidance.

3.10 Health and Safety of Colleagues in Managing Safeguarding

Cobalt recognise that supporting our most vulnerable customers and ensuring they are safe, can at times have an impact on our colleagues. We will ensure that colleagues responsible for managing safeguarding concerns have regular support and supervision by their line manager and if required are supported by our HR team who can arrange additional support.

We are committed to providing an enhanced level of training and development for colleagues who are managing safeguarding concerns to ensure they are equipped and able to effectively respond.

We will provide adequate personal protective equipment and lone working procedures/systems to ensure our safety.

4. Regulatory & Legislative Compliance

4.1 There are a number of pieces of legislation which apply to Safeguarding; however the key ones are:-

The Care Act 2014 – This act sets out a new statutory basis for Safeguarding adults and the legal duties that local authorities will have to fulfil in their lead and coordinating roles.

Mental capacity Act 2005 - Where someone lacks capacity to make a particular decision, all actions to support them should meet the 'best interests' standards set out in the Mental Capacity Act 2005 and its Code of Practice.

Human rights Act 1998 - Article 8 (1) provides that: Everyone has the right to respect for private and family life, his home and his correspondence. However, this is a qualified right and Article 8 (2) states that: "There should be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interest of national security, public safety or the economic wellbeing of the country, for the protection of the rights and freedoms of others."

The Data Protection Act 2018 - allows for disclosure of information without the consent of the subject in certain circumstances including:

- the prevention or detection of crime;
- the apprehension or prosecution of offenders;
- where failure to disclose would be likely to prejudice those objectives in a particular case

Therefore, disclosure of personal information in circumstances where there is concern that a vulnerable adult or child may be at risk of or suffering significant harm can be permitted by the Act on the above grounds.

Disclosure and Barring Service (DBS) - DBS checking is the government's process for providing information to employers and organisations about whether an individual is suitable for particular types of work. It is carried out by the Disclosure and Barring Service, who also keep a list of 'Barred' individuals, who are forbidden from doing certain types of work with children and adults.

The Children Act 1989 - Under the terms of the Children Act 1989 the local authority has obligations towards children living in or found in the area of that local authority.

The Children Act 2004 - The Children Act 2004 aims to improve and integrate children's services, promote early intervention, provide strong leadership and bring together different professionals in multi-disciplinary teams in order to achieve positive outcomes for children and young people and their families.

Adoption and Children Act 2002 – This sets out a clear requirement for agencies concerned with children to work together.

Crime and Disorder Act 1998 – This created Child Safety Orders (a compulsory intervention available where the child is suffering or likely to suffer from significant harm) and Parenting Orders, which can be made alongside a Child safety Order. A Parenting Order provides a means of engaging and supporting parents where there are serious concerns about a child's behaviour.

The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry.

Children and Families Act 2014 (which amended section 8 Children Act 1989) – This includes provision for child arrangement orders. This is a court order which regulates arrangements relating to whom and when a child is to live, spend time with or have contact with a person.

Working Together to Safeguard Children 2018 requires social housing providers to work collaboratively with local safeguarding partners, share concerns promptly, and ensure their staff can identify and respond effectively to signs of abuse or neglect to protect children's welfare.

Domestic Abuse Act 2021 requires social housing providers to identify and respond to domestic abuse, support victims through safe housing options, and work with partner agencies to ensure protection and early intervention for those at risk.

Housing Act 1996 The Housing Act 1996 requires social housing providers to take reasonable steps to prevent homelessness, prioritise the needs of vulnerable households, and work with local authorities to ensure individuals at risk—including those facing safeguarding concerns—are offered safe and appropriate housing options.

Health and Safety at Work Act 1974 requires social housing providers to ensure safe working environments for staff and residents, identifying and managing risks that could impact wellbeing and thereby supporting wider safeguarding responsibilities.

Counter-Terrorism and Security Act 2015 (Prevent Duty) requires social housing providers to remain alert to signs of radicalisation, share concerns appropriately, and work with local partners to help safeguard individuals who may be vulnerable to extremist influences.

The **Regulator of Social Housing requires social housing providers to meet its consumer standards**, which include ensuring homes are safe, services are well-managed, tenants are treated fairly, and risks to residents’ wellbeing are effectively managed—all of which form key components of organisational safeguarding responsibilities.

Any complaints relating to safeguarding services provided by Cobalt are dealt with in accordance with the **Housing Ombudsman’s Complaints Code**.

5. Risk Management

The key risk associated with non-delivery of this Policy is:

Risk Register Ref:	Risk:
<p>Ref ST20 Failure to safeguard Cobalt customers, their families and visitors to their homes to ensure the safety of staff and customers, as part of our commitment to satisfying the requirements of the RSH's Neighbourhood and Community Standard</p>	<p>That Cobalt will fail to safeguard Cobalt customers in accordance with Cobalt’s statutory, legal and moral responsibilities.</p>
Risk Consequences:	Management and Mitigation:
<ul style="list-style-type: none"> • Risk of customer being harmed/at risk of harm • Failure to comply with our duty in respect of reporting safeguarding • Reputational damage • Illegal or criminal activity • Incurring costs from claims, accidents, litigation and compensation • Regulatory Notices or Judgements from the RSH • Enforcement action from Local Safeguarding Adults Boards/Children’s Services • Statutory investigations • Loss of stakeholder confidence • Increased scrutiny and oversight • Staff safety risks • Breakdown in multi-agency relationships • Insurance implications • Impact on organisational culture 	<ul style="list-style-type: none"> • Safeguarding Policy and procedures • Regular training for Cobalt colleagues • Toolbox talks for contractors • Designated safeguarding leads • Attendance at multiagency meetings • Clear escalation pathways to tenancy wellbeing for complex cases • Monthly safeguarding meetings • Performance reports monitoring • Safer Recruitment and DBS Controls • Information-sharing protocols • PREVENT/Radicalisation Controls • Domestic Abuse controls (MARAC participation) • Case audits • Organisational learning • Customer awareness of how to report concerns • Lone working and staff safety controls • Contract and supply chain safeguarding • Governance and oversight

6. Links to Other Key Documents

- Whistleblowing Policy
- Data Protection Policy
- Health and Safety Policy
- Unacceptable Behaviour Policy
- ASB Policy

Governance of this Policy

Equality Diversity & Inclusion (ED&I)	<p>An Equality Impact Assessment (EQIA) was completed</p> <p>Date: February 2026</p>
Financial and Links to VfM	<p>The following are circumstances where there will be cost implications:</p> <ul style="list-style-type: none"> • Costs to ensure basic needs are met such as heat, light and food • Costs incurred due to the need to offer rehousing to reduce risk • Cost implications due to referral to and involvement of another agency • Cost relating to 'Target Hardening' or 'Reassurance' measures • Any costs relating to legal action or advice (for example mediation services)
Privacy and Data Protection	<p>All safeguarding reports are dealt with in confidence and Cobalt must adhere to data protection legislation.</p>
Health and Safety	<p>This policy directly impacts on the health and safety of our customers, communities and colleagues managing the risk of safeguarding concerns.</p>
Development and Consultation	<p>Customers and stakeholders were consulted</p> <p>Date: February 2026 – colleagues Date: 4th March 2026 – customers</p> <p>A brief summary of the findings, and where consultation has influenced the policy is detailed within the policy checklist QR COB 0058</p>

