



Safeguarding Policy

**Clear governance.
Strong practice.
Safe services.**



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1. Purpose

Safeguarding is a fundamental part of D2 PropCo's mission and governance framework. D2 PropCo is committed to safeguarding the wellbeing, rights, and safety of all people who use our services, including adults, families, children, and young people aged 16–17.

D2 will prevent abuse, neglect, and exploitation wherever possible, and respond quickly, proportionately, and in partnership when concerns arise. Safeguarding is embedded across all areas of service delivery and is central to our governance, risk, and assurance framework.

2. Our Approach

Our safeguarding approach is shaped by the values, principles, and organisational culture that guide how we understand and respond to concerns. It sets out the foundations of our trauma informed, proportionate, and learning focused practice.

Trauma Informed Practice

We understand that trauma shapes behaviour, engagement, and decision making. We avoid punitive or exclusionary responses wherever possible and prioritise safety, trust, and empowerment.

Professional Curiosity

We expect staff to look beyond the obvious, ask questions sensitively, and recognise when a person's circumstances may mask risk.

Proportionate, Person Centred Action

We balance autonomy with duty of care, recognising that children cannot consent to abuse or neglect, and that adults may be limited by coercion, fear, or capacity.

Learning Culture

We promote reflective practice, near miss reporting, and non blaming learning reviews to strengthen safeguarding across the organisation.

Strong Governance

Safeguarding is overseen by the Board, led operationally by the Designated Safeguarding Lead (DSL), and supported by external specialist advice.

3. Scope

This part of the policy clarifies who is covered by our safeguarding expectations and the environments in which those responsibilities apply. It ensures everyone connected to D2 understands their role in keeping people safe.

This policy applies to all D2 PropCo employees, House Managers, maintenance staff, board members, agency workers, and contractors acting on behalf of the organisation.



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It covers all settings, including:

- residents' accommodation
- dispersed properties
- outreach activities
- homeless accommodation
- community based support

4. Legal and Regulatory Framework

Safeguarding practice must be grounded in law and statutory guidance. The following frameworks shape our duties, decision making, and partnership responsibilities across England and Wales. Our approach aligns with:

- Care Act 2014
- Children Act 1989 & 2004
- Working Together to Safeguard Children (2018)
- Domestic Abuse Act 2021
- Social Services and Well being (Wales) Act 2014
- Wales Safeguarding Procedures (2019)
- Working Together to Safeguard People – Welsh Government
- Local Safeguarding Adults and Children Board procedures

5. Understanding Safeguarding in a Homelessness Context

Safeguarding risks may present differently in homelessness settings. This section highlights the unique vulnerabilities, barriers, and contextual factors that shape risk for people experiencing homelessness, helping staff recognise indicators that may otherwise be missed.

People experiencing homelessness may face:

- exploitation, coercion, violence, and abuse
- trauma, mental ill health, substance use, and self neglect
- barriers to accessing statutory services
- assumptions of “lifestyle choice” masking unmet needs



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For families and young people, homelessness may indicate:

- family breakdown
- domestic abuse
- neglect or unmet basic needs

As a provider of homeless accommodation, D2 recognises that experiencing homelessness can itself be a safeguarding indicator, and that the experience of homelessness often contributes to trauma, vulnerability and increased risk for both adults and children.

6. Definitions and Key Terms

Clear and consistent terminology supports confident decision making. The definitions below explain key safeguarding terms used throughout this policy.

- Child: Anyone under 18.
- Young Person (16–17): A child in law with specific entitlements under the Children Act.
- Adult at Risk: A person aged 18+ with care and support needs who may be unable to protect themselves.
- Family: Any household with dependent children or pregnant individuals.
- Self Neglect: Includes hoarding, rough sleeping in unsafe conditions, or declining essential care.
- Contextual Safeguarding: Harm occurring outside the home, including street settings, temporary accommodation, or exploitative networks.

7. Types of Abuse

Abuse and neglect can present in many forms, and early recognition is essential. D2 staff may identify a wide range of harm affecting people who use our services. The categories below outline the types of abuse and risk that individuals may be exposed to.

These include: physical, emotional, sexual, financial, discriminatory, organisational abuse, domestic abuse, modern slavery, cuckooing, self-neglect, neglect by others, and child-specific risks such as Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE).



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8. Our Commitments

D2 PropCo is committed to creating safe environments where concerns are recognised, acted upon, and learned from. The commitments below set out the standards people can expect from us. D2 will:

- promote a culture where safeguarding is everyone's responsibility
- recognise the impact of trauma and avoid punitive responses
- identify and report concerns promptly
- work in partnership with statutory and voluntary agencies
- share information lawfully and proportionately
- ensure staff receive role appropriate safeguarding training
- support people to make informed choices while recognising limits to autonomy
- ensure governance, assurance, and learning are embedded in safeguarding practice

9. Safeguarding Children and Families

Children's welfare is paramount. This part of the policy explains how safeguarding concerns may present within families, particularly in the context of homelessness, and outlines our responsibilities when working with households that include children.

Children may be harmed directly or indirectly through:

- domestic abuse
- parental substance use or mental ill health
- neglect, including unsafe or unsuitable accommodation
- exploitation or exposure to unsafe adults
- homelessness or repeated moves disrupting education

When working with families, we:

- prioritise the welfare of the child as paramount
- ensure children's voices are heard
- work closely with children's services and early help teams
- escalate concerns promptly where thresholds are met
- support parents to access services that reduce risk



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10. Safeguarding 16–17-Year-Olds

Young people aged 16–17 occupy a unique legal and developmental space. This section clarifies their rights, the heightened risks they may face, and our duty to treat all concerns involving them as child safeguarding matters.

Young people aged 16–17 may face:

- exploitation
- county lines involvement
- survival strategies that increase harm
- disengagement from education
- hidden homelessness

Our responsibilities include:

- treating all concerns as child safeguarding issues
- making immediate referrals to children’s services
- ensuring young people understand their rights
- working with youth services, education, and specialist agencies
- avoiding responses that criminalise survival behaviours

11. Safer Recruitment and Staff Conduct

Safe practice begins with safe people. This part of the policy outlines how D2 ensures staff, contractors, and volunteers are suitable to work with vulnerable individuals, and the conduct expected of them once in role.

We maintain safe systems of recruitment and conduct, including:

- enhanced Disclosure and Barring Service (DBS) checks for House Manager
- verification of identity, employment history, and references
- clear expectations of professional boundaries
- a Code of Conduct outlining safe working practices
- a Whistleblowing Policy and routes for staff to raise concerns safely

Contractors and agency workers must meet equivalent standards.



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12. Roles and Responsibilities

Safeguarding is a shared responsibility, but certain roles carry specific duties. This section clarifies who does what (from frontline staff to the Designated Safeguarding Lead (DSL) and the Board), ensuring accountability and clarity across the organisation.

Designated Safeguarding Lead (DSL)

The DSL:

- leads operational safeguarding
- provides advice and decision making support
- oversees referrals to statutory services
- ensures training compliance
- reports safeguarding activity to the Board
- leads learning reviews and audits
- liaises with external agencies

Deputy DSLs

Deputies support the DSL and ensure cover during absence or out of hours situations.

All Staff. All staff must:

- remain alert to signs of abuse or neglect
- report concerns immediately
- record information clearly and factually
- maintain professional boundaries
- attend required training



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13. Training and Competency

Effective safeguarding relies on confident, well trained staff. This part of the policy sets out our expectations for induction, refresher training, specialist learning, and how we monitor compliance.

All staff receive safeguarding training appropriate to their role.

Induction

All new staff receive safeguarding training before working independently.

Refresher Training

- Core safeguarding: every 2 years
- Specialist training for House Managers and DSLs: annually

Recording and Monitoring

Training compliance is monitored through D2's governance framework and external audit support.

14. Reporting Concerns

Timely reporting saves lives. This section explains how staff should raise concerns, what happens next, and the standards for recording and escalation. Staff must report concerns immediately to the DSL.

The DSL will:

- assess the concern
- consult with partners
- make referrals to the local authority where required

Concerns involving children or 16–17 year olds must be referred to children's services without delay.

In emergencies or where a person is at immediate risk, staff must contact emergency services.

All concerns must be recorded clearly, factually, and promptly.



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15. Working With People Who Decline Support

Some individuals may be unable or unwilling to engage with services. This part of the policy outlines how we continue to safeguard people who decline support, balancing autonomy with duty of care. D2 will:

- continue proactive engagement
- monitor risk
- escalate concerns when thresholds are met
- support multi agency risk management approaches such as
 - o Multi Agency Risk Assessment Conference (MARAC)
 - o Multi Agency Public Protection Arrangements (MAPPA)
 - o Multi Agency Risk Management (MARM)
- balance autonomy with duty of care

Children cannot consent to abuse or neglect.

16. Information Sharing

Effective safeguarding relies on appropriate information sharing. This section explains when and how information should be shared, ensuring decisions are lawful, proportionate, and focused on preventing harm.

We share information in line with statutory guidance, ensuring it is:

- necessary
- proportionate
- relevant
- accurate
- timely

Concerns about confidentiality must not prevent information sharing where there is risk of harm.

17. Digital Safeguarding

Digital communication is now part of everyday practice. This part of the policy sets out how D2 ensures safe, secure, and professional digital interactions, and how we mitigate online risks. D2 ensure safe digital practice by:

- using secure communication channels
- maintaining professional boundaries in digital contact
- recognising risks of online exploitation
- ensuring safe storage and transfer of digital information



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18. Governance, Assurance, and Learning

Strong governance ensures safeguarding is embedded, monitored, and continuously improved. Safeguarding is overseen by the Board, which receives regular assurance reports.

19. Review of Policy

This policy is reviewed annually, or sooner if legislation or best practice changes.

20. Policy Approval & Version Control

Policy Owner:	Operations Manager (Designated Safeguarding Lead)
Approval:	Board
Date:	09/04/2026
Tier:	1 – Core Governance Policy
Review Cycle:	Annual

Lets Talk

CARDIFF: 02920 024429 / **CAERPHILLY:** 07816 897244

EMAIL: info@d2propco.com

CARDIFF (SOUTH)

Millgrove House,
Parc Ty Glas,
Llanishen, Cardiff
CF14 5DU

FLINTSHIRE (NORTH)

11 Chester Road
West Shotton
Deeside
CH5 1B

WAREHOUSE

Unit 22, Dyffryn Court
Dyffryn Ind.Est.
Caerphilly
CF82 7TT