

Title	SAFEGUARDING AND DOMESTIC ABUSE POLICY		
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This policy applies to:

- Cairn Housing Association

1. Policy Statement

Cairn Housing Association is committed to providing safe homes and services for tenants, household members, including children and others. We are dedicated to safeguarding and promoting the welfare and rights of vulnerable children, young people, and adults.

We acknowledge our responsibility—as an organisation and as individual employees—to take all reasonable steps to protect people from abuse, neglect, exploitation, and harm, including domestic abuse and suicide.

With reference to the United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024 we are taking a child rights' approach and embedding their rights within the decision making processes to support a fair and transparent practice.

We will work with relevant agencies to support safety and effective housing outcomes. This may include Police Scotland, local authority homelessness teams, social work, child protection, adult support and protection, health services, specialist domestic abuse services, legal advisers, advocacy organisations, money advice services and other registered social landlords.

Where a case presents serious risk, we will consider referral to appropriate local risk management arrangements in accordance with local protocols and the victim-survivor's safety needs.

2. Policy Scope

This policy outlines our commitment to safeguarding and provides a framework for identifying, reporting, and managing all welfare concerns. It applies to all employees, board members, contractors, volunteers, and anyone working on behalf of Cairn Housing Association. It describes a clear focus on safeguarding within a Scottish legal and policy context.

This policy also applies to all tenants, joint tenants, household members, applicants, service users and others who may be affected by domestic abuse in connection with our housing services. It applies to Scottish secure tenancies, short Scottish secure tenancies and wider housing management functions, including allocations, transfers, rent arrears, repairs, anti-social behaviour and complaints.

Definitions

- **Abuse:** Can be physical, emotional, sexual, financial, institutional, neglect, or domestic abuse.
- **Adults at Risk:** Individuals aged 18 and over who may be unable to protect themselves from harm due to factors such as disability, age, illness, or mental or physical impairment. This includes those who may be experiencing exploitation, coercion, domestic abuse, or suicidal thoughts.
- **Children:** Individuals under the age of 18.
- **Cuckooing:** a crime where criminals, often drug dealers, exploit vulnerable people by taking over their homes for illegal activities. The practice involves manipulating the vulnerabilities of the victim to use their home as a base for criminal operations.
- **Disclosure (Direct):** A direct disclosure is when a person explicitly states that they have been abused, harmed, or are at risk of harm, often verbally.
- **Disclosure (Indirect):** An indirect disclosure is when a person might hint at abuse without directly stating it.
- **Domestic Abuse:** includes behaviour which is abusive and is likely to cause physical or psychological harm. Abuse may include physical violence, threats, intimidation, coercive or controlling behaviour, isolation from family or support, monitoring day-to-day activities, restricting freedom, financial abuse, emotional abuse, harassment, damage to property, abuse

through children or third parties, and behaviour intended to frighten, humiliate, degrade or punish. Domestic abuse may be a single incident or a course of conduct. It may occur regardless of gender, age, disability, race, religion or belief, sexual orientation, gender identity, immigration status, income or tenure. We recognise, however, that domestic abuse disproportionately affects women and children, and that children who see, hear or experience the effects of domestic abuse may be victims in their own right.

- **MARAC:** Multi-agency risk assessment conferences is a meeting where information is shared on the highest risk domestic abuse cases. They are attended by representatives from police, health, child protection, housing, independent domestic violence advisors (Idvas), probation and other specialists from the statutory or voluntary sectors.
- **Safeguarding:** Protecting a person's right to live in safety, free from abuse and neglect, exploitation and coercion.

3. Legal & Regulatory Compliance

This policy is underpinned by the following legislation and guidance:

Legal Compliance

Adults With Incapacity (Scotland) Act 2000
Adult Support and Protection (Scotland) Act 2007
Children (Scotland) Act 1995
Children and Young People (Scotland) Act 2014
Data Protection Act 2018
Domestic Abuse (Scotland) Act 2018
Domestic Abuse (Protection) (Scotland) Act 2021
The Equality Act (2010)
Human Rights Act 1998
Protection of Vulnerable Groups (Scotland) Act 2007
Housing (Scotland) Act 2001
Housing (Scotland) Act 1987
Housing (Scotland) Act 2010
Housing (Scotland) Act 2025
United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024

Regulatory and Other Guidance

Getting it Right for Every Child (GIRFEC)
National Guidance for Child Protection in Scotland 2021
SFHA – Domestic Abuse Toolkit
United Nations Convention on the Rights of the Child (UNCRC)
UN Convention on the Rights of Persons with Disabilities

4. Roles and Responsibilities

All individuals (employees, Board members and contractors) associated with Cairn Housing Association have a duty to:

- Be vigilant and aware of the warning signs and potential risks of harm
- Handle direct and indirect disclosures sensitively, compassionately and escalate with urgency
- Report concerns or disclosures promptly to the Designated Safeguarding Lead (DSL), see below for a definition of this role) and, if a Cairn employee their direct line manager

All Cairn Employees, in addition to the above, have a duty to:

- Keep vulnerable adults informed of actions and next steps
- Cooperate with safeguarding investigations (keeping a note of dates and times).
- Undertake training in safeguarding appropriate to their role.

Designated Safeguarding Leads (DSLs) will:

- Coordinate safeguarding responses.
- Maintain a timeline and log of concerns raised
- Liaise with statutory agencies such as Police Scotland and local Health and Social Care Partnerships.
- Ensure learning from safeguarding concerns is captured and shared internally where appropriate. This will include the coordination of debrief meetings following incidents

Managers will:

- Ensure staff are supported and trained.

- Promote a culture of openness and safety

The below table outline primary responsibilities for Safeguarding:

Role Title	Responsibilities	Training Requirements
The Board	• Obtain assurance from the Executive that Safeguarding is being managed effectively at Cairn • Report safeguarding concerns	Awareness
Executive	• Evaluation of case reviews, actions and outcomes • Promote a culture which encourages and supports employees to effectively address and manage Safeguarding duties • Instruct internal audits on safeguarding as required	Statutory, legal and legislative requirements.
Designated Safeguarding Leads (DSL)	• Primary point of contact and subject expert for Safeguarding at Cairn • Coordinate investigations and oversee appropriate interventions • Engaging with multi-agency risk assessment conferences (Marac)	In depth knowledge of identifying risk, intervention measures, support and interagency working.
Managers	• Guide and advise direct reports on necessary Safeguarding actions and escalations • Ensure awareness of this policy amongst their teams and contractors	Awareness and practical understanding.
Employees	• Report all safeguarding concerns immediately	Awareness and practical understanding
Housing Officer (Tenancy)	• To lead on all domestic abuse cases	In depth knowledge of identifying risk, intervention measures, support

		and interagency working.
Organisational Development	• Training on Safeguarding	
Contractors	• Report all safeguarding concerns immediately	Awareness and practical understanding

5. Identifying Causes for Concern

Causes for concern may include abuse, neglect, poor living environment evidence of mental and physical distress.

At Cairn we operate on the principle that ‘every contact counts’, which means that when we interact with our customers we take a holistic view of their circumstances and act appropriately on any concerns that we identify.

Concerning factors can present in many forms, including but not limited to:

- Unexplained injuries or behavioural changes
- Children: injuries, neglect signs, domestic abuse, unexplained absences
- Withdrawal, fearfulness, or distress
- Personal hygiene
- Evidence of hoarding
- Financial irregularities
- Coercive control or threats within domestic settings
- Evidence of cuckooing (see definition above)
- Reluctance to speak in front of others or signs of fear
- Evidence of disengagement from Cairn and a general failure to respond when contacted
- Any behaviour suggesting, or any expression of intent by any person to take their own life or self-harm
- Lifestyle factors e.g. substance abuse
- Poor living conditions, including properties affected by damp, mould and condensation.
- Failure to report repairs

6. Reporting Procedures

Concerns must be reported immediately to the Designated Safeguarding Lead. In cases of immediate danger or harm, emergency services must be contacted. The DSL will assess the concern and, if necessary, refer to the appropriate statutory agency.

A written record of the concern, decision, and action taken must be made.

The vulnerable person involved should be kept informed of actions and next steps.

For adults lacking capacity, care should be taken to ensure they understand any actions that affect them and, that the adult's attorney is kept informed of any actions being taken.

7. Domestic Abuse

Cairn Housing Association recognises the significant impact domestic abuse can have on adults and children. We commit to:

- Taking disclosures seriously and responding sensitively.
- Listen to victim-survivors, without requiring them to prove abuse before we offer support
- Ensuring staff are trained to recognise possible indicators of domestic abuse, including unexplained arrears, repeated damage to doors or windows, frequent emergency repairs, a tenant appearing unable to speak freely, withdrawal from services, threats from a partner or ex-partner, repeated complaints linked to the household, or a sudden request to leave or remain in the home
- Offering appropriate support and referral to specialist services and statutory partners where this is safe, lawful and appropriate.
- Maintaining confidentiality while ensuring safety.
- Recognising domestic abuse as a safeguarding issue and not solely a housing or tenancy management matter.
- Carry out additional works as recommended in safe at home referrals
- consider the use of legal and other remedies available to us in a manner that is proportionate, including tenancy action against perpetrators where the statutory tests are met.
- discuss housing options with the victim-survivor, including whether they wish to remain in the home, move temporarily, move permanently, and/or access other support. We will consider emergency accommodation, management transfers, mutual exchanges, allocations, homelessness duties and partnership working with other landlords or local authorities.
- consider the impact of domestic abuse when dealing with arrears, property damage, complaints, anti-social behaviour and other tenancy issues. We will consider reasonable adjustments to our usual debt collection/rent arrear procedure including pausing or tailoring arrears action, agreeing safe and affordable repayment plans, sign posting to money advice and/or welfare benefit advisers, reviewing any rechargeable repairs decisions taking into account whether the damage

is abuse-related, and, avoiding correspondence or visits that may increase the risk.

- Where court action for rent arrears is being considered and domestic abuse may be a factor, we will follow all applicable pre-action requirements, including any additional requirements introduced by the Housing (Scotland) Act 2025 and any related guidance. We will ensure the court is provided with accurate information about compliance where required. We will not treat a victim-survivor as responsible for the perpetrator's behaviour without first fully considering the circumstances, evidence, safety risks and legal duties.
- We will balance support for the victim-survivor with our responsibility to manage tenancies, recover the rent and any outstanding debt lawfully, maintain our housing stock, and protect neighbours
- consider the needs and wishes of children and take safeguarding action where required.
- avoid actions that increase risk or place responsibility on the victim-survivor for the perpetrator's behaviour
- Where proceedings for recovery of possession are raised using the abusive behaviour ground, we will provide advice and assistance to the tenant / joint tenant and any relevant qualifying occupier(s)(perpetrator/s) about finding alternative accommodation, in line with statutory requirements and guidance. In doing so, we will ensure such advice and assistance is provided in a manner that does not compromise the safety, confidentiality or support needs of the victim-survivor and any children or others who may be adversely impacted.

8. Suicide prevention

Cairn Housing Association is committed to safeguarding the wellbeing of all tenants, staff, and community members by recognising and responding to the risks of suicide.

We acknowledge that suicide is a complex issue influenced by a range of personal, social, and environmental factors.

As part of our safeguarding responsibilities, we aim to identify individuals who may be at risk and ensure they are supported with compassion, dignity, and timely intervention.

Employees will receive appropriate training to recognise warning signs and respond effectively, including signposting to specialist mental health services and crisis support.

If a vulnerable person is assessed to be at immediate risk the case should be escalated immediately to a DSL.

9. Safe Recruitment

Cairn Housing Association ensures all relevant employees and volunteers undergo appropriate Disclosure Scotland checks as part of the recruitment process. Roles involving regulated work will require PVG scheme membership.

10. Training and Awareness

All staff and volunteers will receive safeguarding training appropriate to their role (mandatory for customer facing employees). Regular updates and refreshers will ensure continued awareness and compliance. Induction will include mandatory safeguarding training.

11. Confidentiality and Record Keeping

Relevant information will be handled sensitively and in line with data protection principles.

Accurate and secure records of concerns and actions will be maintained on appropriate systems (eg HomeMaster).

Information about domestic abuse will be shared only where there is a lawful basis and it is necessary, proportionate and safe to do so. Information may require to be shared for a number of reasons, including ensuring appropriate safety measures are in place, obtaining updates regarding ongoing issues, and ingathering evidence from third parties such as Police Scotland, Social Work or other supporting agencies (e.g. Women's Aid) We will agree safe contact arrangements with the victim-survivor and take care not to disclose a victim-survivor's location or any personal information to the perpetrator.

All records will be retained in accordance with Cairn Housing Association's Data Protection and Record Management Policies.

12. Monitoring and Review

This policy will be reviewed annually by the Director of Customer Services or in response to significant legislative or organisational change. Implementation will be monitored through internal audits, reporting, and staff feedback.

13. Reporting Requirements

Annual reporting for the Executive Team will be undertaken on the number and type of cases raised and how they were addressed.

14. Equality, Human Rights and Accessibility

We will deliver this policy fairly and without discrimination. We will make reasonable adjustments for disabled people, provide interpretation or translation where needed, and consider barriers linked to language, culture, disability, age, immigration status, digital exclusion, geographical location or isolation.

We will act compatibly with human rights and equality duties, including the right to respect for home and family life, the right to peaceful enjoyment of possessions where relevant, protection from discrimination, and the need to protect life and prevent inhuman or degrading treatment where serious risk is present.

15. Associated Policies and Procedures

- Corporate Social Responsibility Policy
- Lettings/Allocations Policy
- Tenancy Change Policy
- Disclosure Policy
- Domestic Abuse Procedure
- Hoarding Procedure
- SAMH Guidance on Suicide Prevention
- Suicide Prevention Guidance
- Anti-Social Behaviour Policy
- Debt recovery Policy
- Cairn UK GDPR Privacy notice