



# Safeguarding Adults Policy

Originator:	Policy and Strategy Team
Approval Date:	October 2022
Review date:	October 2025

1	Introduction
1.1	In operating this Policy, Pine Court Housing Association (PCHA) will comply with all relevant legislation that impacts on adult safeguarding issues including those that define forms of abuse as a crime, those concerned with the provision of health and social care services and any other relevant statutes and statutory instruments.
1.2	For the purposes of this Policy 'safeguarding adults' means work undertaken by all PCHA staff with adults (persons over the age of 18) who may: <ul style="list-style-type: none"> <li>• Have care and support needs</li> <li>• As a result of those needs is unable to protect themselves against abuse or neglect or the risk of it</li> <li>• Is experiencing or is at risk of abuse or neglect</li> </ul>
1.3	In fulfilling safeguarding duties PCHA aim to assist adults to retain independence, wellbeing, choice and to access their human right to live a life that is free from abuse and neglect (National Framework Safeguarding Adults 2005).
1.4	The application of this Policy assists PCHA to meet the outcomes of the Regulatory Framework for Social Housing in England adopted by the Regulator for Social Housing, as outlined below: <ul style="list-style-type: none"> <li>• <b>Local area co-operation</b> Registered providers shall co-operate with relevant partners to help promote social, environmental and economic wellbeing in the areas where they own properties.</li> </ul>
1.5	<b>Access and Communication</b>
1.5.1	PCHA is committed to ensuring that its services are accessible to everyone. PCHA will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for PCHA or use its services.
1.5.2	Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers' needs in our service delivery and ensure this information is kept up to date.

<p>1.6</p> <p>1.6.1</p> <p>1.6.2</p> <p>1.6.3</p> <p>1.7</p>	<p><b>Equality, Diversity and Human Rights</b></p> <p>PCHA is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Expression / Gender Identity, Sexual Orientation and Religion and / or Belief.</p> <p>PCHA also recognise that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p> <p>PCHA will also ensure that all services and actions are delivered within the context of current Human Rights legislation. PCHA will endeavour to ensure its staff and others with whom it works, will adhere to the central principles of the Human Rights Act (1998).</p> <p>This Policy should be read in conjunction with the following:</p> <ul style="list-style-type: none"> <li>● PCHA Safeguarding Children Policy</li> <li>● PCHA Recruitment and Selection Policy</li> <li>● PCHA Confidential Reporting (Whistleblowing) Policy</li> <li>● PCHA Data Protection Policy</li> <li>● PCHA Work Placement Policy</li> <li>● PCHA Domestic Abuse Policy</li> </ul>
<p><b>2</b></p>	<p><b>Statement of Intent</b></p>
<p>2.1</p> <p>2.2</p> <p>2.3</p> <p>2.4</p> <p>2.5</p>	<p>PCHA will comply with all relevant legislation, regulations and contractual obligations in all areas of work in regard to safeguarding adults.</p> <p>PCHA will take all reasonable and practical steps to protect adults at risk from being exploited, neglected or abused and that their wellbeing is promoted including carrying out appropriate risk assessments.</p> <p>In all safeguarding work that PCHA undertakes it will adhere to the six key principles (as outlined in the Care Act 2014 guidance) of:</p> <ul style="list-style-type: none"> <li>● Empowerment</li> <li>● Prevention</li> <li>● Proportionality</li> <li>● Protection</li> <li>● Partnership</li> <li>● Accountability</li> </ul> <p>PCHA will also adhere to the principles outlined in local safeguarding arrangements adopted by each Local Authority.</p> <p>PCHA recognise the specific focus of this Policy is adults who are ‘at risk’ of experiencing abuse, neglect or exploitation. PCHA also aim to protect the rights of ‘all’ adults that the organisation’s staff come into contact with whilst carrying out their duties.</p>

2.6	This will include those who are the subject of concern but are not classed as 'vulnerable' or are not the focus of the initial concern. This may also include those that provide a caring role to adults at risk.
2.7	PCHA encourage all customers to keep their profile information up-to-date (this includes communication needs where English is not spoken as a first language). PCHA will use this information to identify adults who may be vulnerable and will provide services specific to their needs.
2.8	PCHA will respond promptly, sensitively, proportionately and consistently in line with its procedures to all reported incidents of neglect (including self-neglect), exploitation or abuse.
2.9	PCHA will maintain confidentiality in all information relating to safeguarding adult concerns and will only share information with partner agencies according to the protocols developed in the local Safeguarding Adults Procedural Frameworks.
2.10	However, where there are concerns that a person is in immediate danger, or is at risk of being abused or neglected, personal information may be shared with appropriate external agencies (e.g. Emergency Services or Social Services in line with the exemptions outlined in the UK Data Protection Act 2018 and the UK General Data Protection regulation 2018).
2.11	PCHA will respect the rights of individuals to make their own decisions. In all situations there will be an assumption of capacity and individuals will be supported to make choices even where this may seem eccentric or unwise or carry an element of risk.
2.12	Where issues of concern are raised, adults that choose to do so will be kept informed at all stages of any investigation process that is initiated.
2.13	Where adults appear to lack capacity (as defined by the Mental Capacity Act 2005) as being unable to make a decision for him / herself because of an impairment of or a functioning of the mind or brain) the use of advocates will be considered, in line with the provisions and responsibilities outlined for Local Authorities in the Care Act 2014.
2.14	Advocates may also be used where capacity exists, but the individuals have substantial difficulties or lack support.
2.15	Where it is suspected that adult customers that are subject of a safeguarding concern lack capacity, PCHA will make referrals to professional bodies (normally the customers General Practitioner, or Adult Social Services) for an assessment.
2.16	Where PCHA is involved with investigating agencies in the on-going management of safeguarding adult cases, it will endeavour to adopt the principles outlined in the 'Making Safeguarding Personal' guidance.
2.17	PCHA will have in place clearly understood and widely accessible procedures for reporting issues of concern to make referrals to the relevant Safeguarding Authorities in accordance with their Frameworks for Action.
2.18	Where concerns are raised, that on investigation by the Local Authority Safeguarding Teams are found to have no ongoing safeguarding implications but highlight other support needs for

	the individuals concerned, PCHA will provide additional support services and make referrals to external agencies as required.
2.19	PCHA will provide all frontline staff with comprehensive guidance on spotting the signs of abuse or neglect and specialist training on dealing with challenging behaviour to staff whose roles are mostly concerned with safeguarding adults.
2.20	PCHA will have in place a Service Level Agreement (SLA) with its Sovini Group Partner, One Vision Housing (OVH) to provide a 'Designated Person' role for PCHA as a central point of contact for any investigations into alerts raised and to provide advice and guidance to PCHA staff who have any safeguarding concerns.
2.21	Through internal training, PCHA will also encourage frontline staff to develop 'professional curiosity' (staff to avoid making assumptions and to look beyond face value information) to ensure any safeguarding alerts capture an individual's lived experience and environment.
2.22	The OVH Independent Living Manager and the Independent Living Team Leaders acting as designated persons will receive additional inter-agency training.
2.23	PCHA has clear procedures in place for dealing with allegations made against staff members where safeguarding adult concerns are raised.
2.24	The procedures will include provision for precautionary suspensions of staff members whilst any investigation takes place and subsequent disciplinary action that may result. In the event of any such allegations, PCHA will work in close liaison with the Local Authority Designated Officer.
2.25	There are clear procedures in place for dealing with malicious or unfounded allegations including close liaison with the relevant Safeguarding authority. This may involve a change of duties or work location to protect the individual from further allegations and will involve the input of line managers and the central People and Learning Team.
2.26	PCHA will enforce a zero-tolerance approach to all forms of abuse and will take appropriate disciplinary action for any member of staff that is found to be responsible for neglect, abusive or exploitative behaviour.
2.27	PCHA will ensure it contributes to continuous improvement of local safeguarding provisions by regularly attending multi-agency meetings where cases involving its customers are reviewed and by taking part in strategic reviews with local Safeguarding Boards.

<b>3</b>	<b>Policy</b>
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3.1	<p>In regard to safeguarding adults, the national framework identifies a duty of care to all adults 'whose independence and wellbeing is at risk due to abuse or neglect'. In operating this Policy PCHA will define abuse or neglect in any of the following categories:</p> <ul style="list-style-type: none"> <li>Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:</li> </ul>
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- **Physical:** assault, hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate physical sanctions
- **Psychological:** emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse cyber bullying, isolation or unreasonable and unjustified withdrawal from services or supportive networks
- **Sexual:** rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts and sexual assaults or sexual acts to which adult has not consented, or was pressured into consenting
- **Financial or Material:** theft, fraud, internet scamming, coercion in relation to adult's financial affairs or arrangement, including connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- **Neglect and acts of omission:** ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others particularly when the person lacks the mental capacity to assess risk
- **Discriminatory:** Discrimination on the grounds of race, faith or region, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes or comments based on a person's disability or any other form of harassment, slurs or similar treatment. Excluding a person from activities on the basis that they are 'not liked' is also discriminatory abuse, for example - hate crime.
- **Organisational abuse:** is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where an adult lives or that they use. Such abuse violates the person's dignity and represents a lack of respect for their human rights
- **Domestic abuse:** cross-government definition of domestic violence and abuse is, any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but it is not limited to:
  - psychological
  - sexual (including Female Genital Mutilation)
  - financial
  - emotional
  - forced marriage
  - honour- based violence
- **Self-neglect:** covers a wide range of behaviour to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding

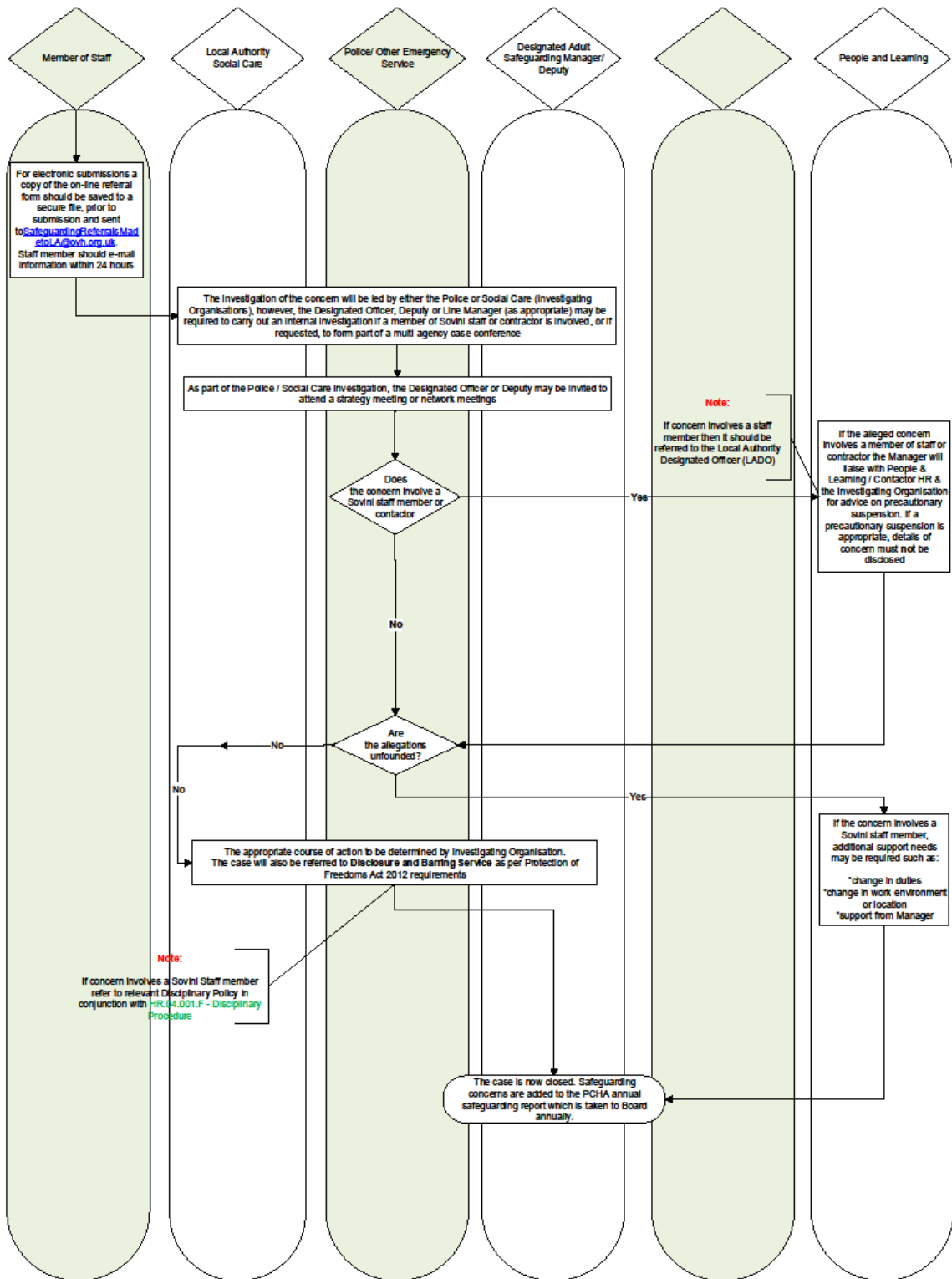
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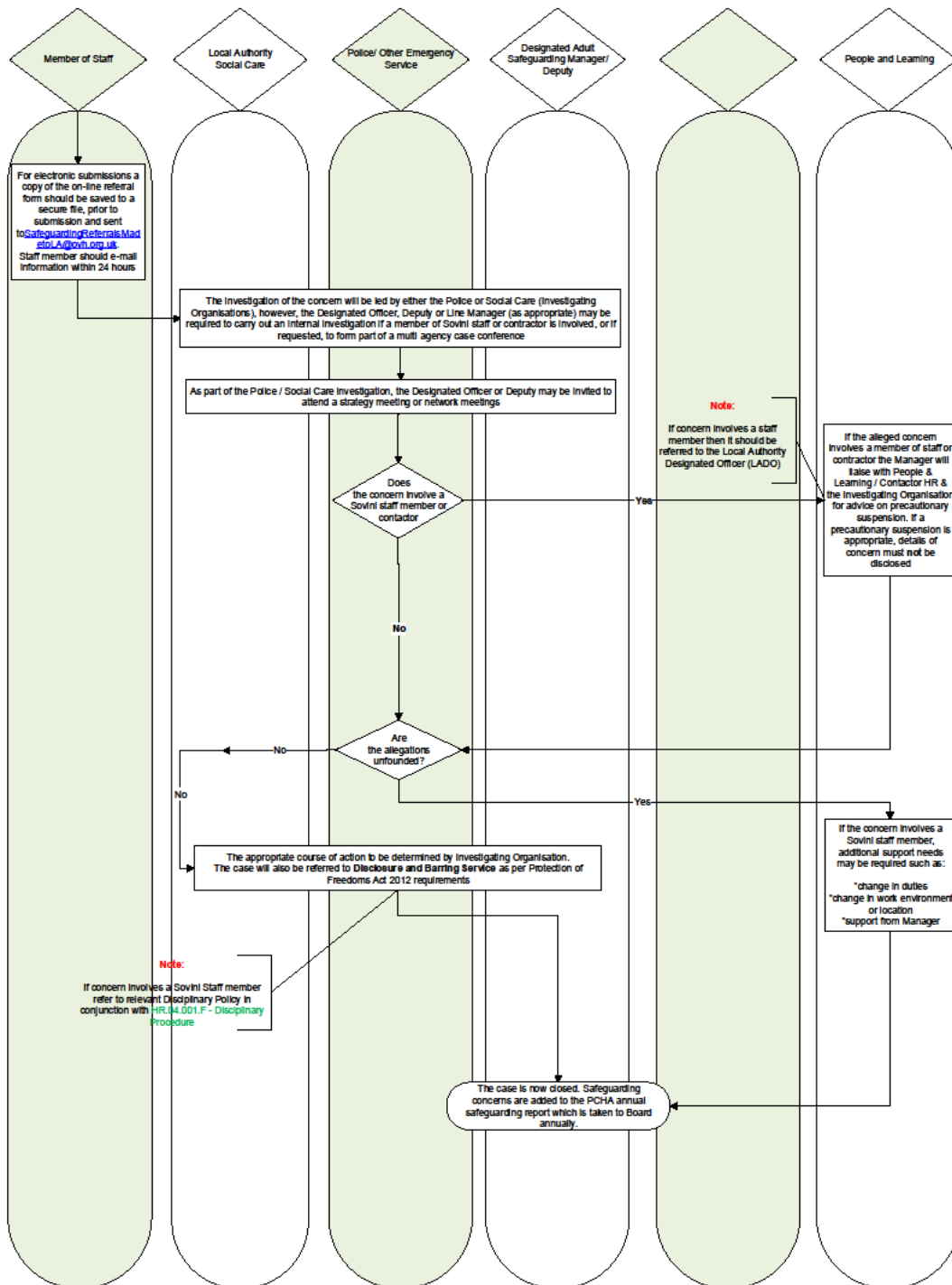
PCHA will also include in its definitions of abuse, issues of Modern Slavery which encompasses human trafficking, slavery, servitude and forced or compulsory labour. Where PCHA suspects modern slavery is taking place it will make a referral to one of the Government's 'First Responder' organisations e.g. Police or Local Authority as part of its alert raising process

In dealing with safeguarding adult concerns PCHA will adhere to the Procedural Flowchart outlined below:

DEPARTMENT PROCEDURE REFERENCE TITLE	PINE COURT HOUSING ASSOCIATION PC.04.003.F Reporting Safeguarding <b>Adult</b> Concerns	PINE COURT HOUSING ASSOCIATION 
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THE MOST UP TO DATE VERSION OF THIS DOCUMENT IS MAINTAINED ON THE FLOW KNOWLEDGE DATABASE





- 3.4 If PCHA staff become aware of a safeguarding concern whilst working on non PCHA contacts they should follow local reporting requirements, as advised by commissioning companies.
- 3.5 PCHA will provide up-to-date contact details for the designated persons and local safeguarding agencies in the areas they may be operating in.
- 3.6 PCHA will promote awareness amongst customers on what constitutes abuse and the methods of how to report issues of concern when they sign-up for an PCHA tenancy, including confidential reporting to independent agencies.

<p>3.7</p> <p>3.8</p> <p>3.9</p> <p>3.10</p>	<p>Awareness of safeguarding adults' issues will also be promoted by various communication channels including tenants' newsletter, leaflets available in a variety of formats, website updates and informal information sessions held for residents of purpose-built independent living accommodation.</p> <p>Customers will be encouraged to monitor performance of the Safeguarding Adults' Policy and procedures through the PCHA complaints, compliments and suggestions scheme, through regular surveys and via feedback to staff members during the conduct of their duties.</p> <p>Customers will also have the opportunity to be involved in future revisions of the Policy and procedures based on performance information, in response to risk assessment information or changes in regulation / legislation, by participation in the PCHA Customer Empowerment Panel.</p> <p>Through staff training and regular one-to-one supervision sessions with line-managers, all PCHA staff that are likely to have to deal with safeguarding adult concerns, will be informed of their responsibilities and good practice in maintaining professional boundaries with service users.</p>
<p><b>4</b></p>	<p><b>Implementation</b></p>
<p>4.1</p> <p>4.2</p> <p>4.3</p> <p>4.4</p> <p>4.5</p> <p>4.6</p>	<p>PCHA will inform all staff of their responsibilities and duties to recognise safeguarding adults' concerns via the staff induction programme, on-going training on a rolling three-year basis and management supervision sessions.</p> <p>Any staff member that has to raise safeguarding adults' concerns will be supported through the process via information and advice available via the designated persons.</p> <p>The OVH Independent Living Manager and the Independent Living Team Leaders will be the designated person(s) within PCHA for safeguarding adults concerns and will be the main point of contact for Case Conferences and development of Safeguarding Plans if required. PCHA staff wishing to contact the designated persons with safeguarding concerns will take priority over any other business.</p> <p>In line with PCHA's Confidential Reporting (whistleblowing) Policy staff will be made aware of how to access confidential and independent advice via Protect (formerly the Public Concern at Work Agency) for any concerns about fellow staff members or by reporting safeguarding adult concerns direct to the relevant Safeguarding authority.</p> <p>The Confidential Reporting (Whistleblowing) Policy is compliant with the Public Interest Disclosure Act 1998 and staff that raise 'whistle-blowing' concerns will receive appropriate support and guidance.</p> <p>PCHA will have in place recruitment and selection policies that identify which positions are likely to involve 'regulated activity' and will ensure appropriate security checks and clearances are obtained before employees commence work with the organisation. Regulated activities are defined by the Protection of Freedoms Act 2012 as:</p> <ul style="list-style-type: none"> <li>● Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children;</li> </ul>



<p>4.7</p> <p>4.8</p> <p>4.9</p> <p>4.10</p>	<ul style="list-style-type: none"> <li>• Work for a limited range of establishments ('specified places'), with opportunity for contact: for example, schools, children's homes, childcare premises. Not work by supervised volunteers</li> <li>• The full definitions of regulated activities can be found at <a href="https://www.gov.uk/government/organisations/disclosure-and-barring-service">https://www.gov.uk/government/organisations/disclosure-and-barring-service</a></li> </ul> <p>PCHA will comply with the duty (effective from 1st December 2012) to refer information on any member of staff (after appropriate investigation process) to the Disclosure and Barring Service (DBS) where an employee has:</p> <ul style="list-style-type: none"> <li>• Been cautioned or convicted for a relevant offence; or</li> <li>• Engaged in relevant conduct in relation to children and / or vulnerable adults (i.e. an action or inaction [neglect] that has harmed a child or vulnerable adult or put them at risk of harm); or</li> <li>• Satisfied the harm test in relation to children and / or vulnerable adults (i.e. there has been no relevant conduct [i.e. no action or inaction] but a risk of harm to a child or vulnerable adult still exists)</li> </ul> <p>PCHA will adhere to strict procedures for recording safeguarding adults' information that ensures client confidentiality and Data Protection responsibilities are met.</p> <p>PCHA will complete a Housing Action Plan for every PCHA tenant in receipt of Independent Living services within four weeks of their moving in. Each Housing Action Plan will be tailored to the individual and will include a risk assessment to address the potential abuse from others.</p> <p>Each support plan will be reviewed after 6 months from start of tenancy and every twelve months thereafter, unless a change in circumstances requires a review to be undertaken earlier.</p>
<p><b>5</b></p>	<p><b>Performance</b></p>
<p>5.1</p> <p>5.2</p> <p>5.3</p>	<p>The Board of PCHA will receive an annual assurance report on all safeguarding provisions including the number of cases referred to relevant investigation agencies.</p> <p>Safeguarding provisions are also included on the PCHA Risk Register which is reviewed quarterly by the Risk Assurance Committee.</p> <p>On an annual basis PCHA will undertake an audit of all referrals made in regard to safeguarding alerts raised, the results of which will feed into the policy and procedural review mechanisms outlined below in section 7.</p>
<p><b>6</b></p>	<p><b>Consultation</b></p>
<p>6.1</p>	<p>All PCHA staff have been consulted in the development of the Policy. The Customer Empowerment Panel has also been consulted on this Policy.</p>

<b>7</b>	<b>Review</b>	
7.1	The Policy and all supporting procedures will be reviewed every three years (from the date of Departmental Management Team (DMT) approval).	
7.2	The review process will ensure continuing suitability, adequacy, and effectiveness of the Policy and may be prompted by the introduction of new legislation or regulations or in the light of findings from system audits.	
7.3	The Policy and procedural review will show the impact of stakeholder and other agency feedback and involvement (where required). The Policy and procedural review will seek to identify and address any disincentives that may exist to reporting concerns.	
<b>8</b>	<b>Equality Impact Assessment</b>	
8.1	Was a full Equality Impact Assessment (EIA) required?	No
8.2	When was EIA conducted and by who?	An Equality Impact Assessment Relevance Test was conducted by the Policy and Strategy Manager and the Independent Living Manager on 26-05-22.
8.3	Results of EIA	No differential or adverse impacts were identified for any group with protected characteristics as a result of the operation of this Policy (there is a positive impact for the protections offered by the Policy to all groups of people, regardless of characteristics). As the area of operation of the business grows, the local contact details of reporting agencies will be included in the procedures that support operation of the Policy.
<b>9</b>	<b>Scheme of Delegation</b>	
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	Departmental Management Team
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Director of Operations
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Director of Operations

Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
5th May 2020	Reviewed in line with annual review schedule	See Section 6 above	<ul style="list-style-type: none"> <li>• The process has been amended to include revised details for the Designated Officer Role under Service Level Agreement</li> </ul>
11 May 2021	Reviewed in line with annual review schedule	See Section 6 above	<ul style="list-style-type: none"> <li>• Inclusion of new clause re: professional curiosity at 2.20</li> <li>• Revised definitions of what constitutes abuse included at 3.1</li> </ul>
3 <sup>rd</sup> Oct 2022	In line with the review schedule	See Section 6	<ul style="list-style-type: none"> <li>• Inclusion at 3.2 of Modern Slavery within definitions of abuse or neglect</li> <li>• Updated procedure flow at 3.3</li> <li>• Updated EIA at Section 8</li> </ul>