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## **SAFEGUARDING ADULT'S POLICY (SUPPORTED HOUSING)**

### **1. INTRODUCTION**

- 1.1 This Policy sets out St George Housing Association's (St George) responsibilities to comply with the relevant legislation and regulations in safeguarding adults whose independence and wellbeing is at risk due to abuse or neglect.
- 1.2 For the purposes of this Policy 'safeguarding adults' responsibilities apply in respect to any work undertaken by or on behalf of St George staff, Directors, Contractors and Service Delivery Partners, with adults (persons over the age of 18) who may:
- have care and support needs
  - and because of those needs are unable to protect themselves against abuse or neglect
  - and are experiencing or are at risk of experiencing abuse or neglect
- 1.3 In fulfilling its safeguarding duties St George aims 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 St George also recognises that as a provider of Specialist Supported Housing and Accommodation it plays a key role in assisting Local Authorities to meet their statutory obligations in relation to reporting, investigating, monitoring, and resolving safeguarding adult concerns.

### **2. POLICY STATEMENT**

- 2.1 St George is committed to its responsibility to keep Customers, Staff, Directors, Contractors and Service Delivery Partners safe from harm. There are several routes through which concerns raised in relation to safeguarding may be most appropriately handled, including:

- health and safety procedures
- tenancy management
- complaints
- whistleblowing.

2.2 This Safeguarding Policy relates to adults who are being abused or neglected by others, or who are at risk of being abused or neglected by others.

2.3 The Safeguarding Policy is rooted in the belief that living a life that is free from harm and abuse is a fundamental right of every person and that safeguarding those at risk of abuse is everyone's responsibility.

2.4 St George aims to develop a culture that:

- does not tolerate any abuse
- encourages professional curiosity amongst staff
- encourages people to raise concerns
- responds promptly and proportionately to reports of abuse, making the necessary referrals and engaging the appropriate authorities in a timely manner.

### 3. LEGAL FRAMEWORK

3.1 Government legislation has an impact on how St George implements its Safeguarding policy. Listed below are the key Acts which inform this policy approach to Safeguarding:

- The Care Act 2014
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2010
- Housing Act 1985
- Housing Act 1988
- Housing Act 2004
- Equality & Diversity Act 2010
- Localism Act 2011

- The Domestic Violence, Crime and Victims Act 2004
- The Protection from Harassment Act 1997
- The Family Law Act 1996
- The Crime and Disorder Act 1998
- Human Rights Act 1998
- Mental Capacity Act

This policy and associated procedures also comply with the Regulator of Social Housing (RSH) Tenancy Standard.

#### 4. SCOPE AND OBJECTIVES

- 4.1 This Safeguarding Policy is an over-arching policy, covering the whole business. It is important that all Staff, Directors, Contractors and Support Provider Partners are aware of their responsibility to act on any concerns of abuse or neglect.
- 4.2 The core business of St George being the provision of specialist housing for adults requiring support, this policy is aimed at safeguarding vulnerable adults. However St George recognises staff, tenants and directors may also be in contact with children and that a separate policy will be required.
- 4.3 St George services will provide a safe and secure environment for all adults and in conjunction with our Service Delivery Partners will reduce the opportunities for people to abuse by:
- Encouraging our customers to develop and maintain independence.
  - Working with customers to build positively on their esteem.
  - Assisting them in building and maintaining appropriate relationships.
  - Providing information on what constitutes abuse and how to report it.
  - Involving customers in decisions made in response to allegations of abuse.

- 4.4 St George staff are likely to be involved in safeguarding in 3 ways:
- Identifying concerns about an adult's safety and reporting these to Adult Safeguarding Teams and/or the police.
  - Adult Safeguarding Teams requesting St George provide them with information about an adult in relation to an assessment or investigation.
  - Being asked to provide specific support to an adult, as part of an agreed plan and contributing to the ongoing reviewing of the adult's needs.
- 4.5 All St George staff working with vulnerable adults will be trained to:
- Recognise the signs of abuse and behaviours which should give cause for concern
  - Assess the risk of abuse to customers and ensure measures are in place to minimise this
  - Respond to abuse in accordance with this policy
  - Follow local reporting arrangements and refer cases of abuse to the local authority Adult Safeguarding Team, Community Mental Health team safeguarding lead, commissioners as appropriate.

## 5. DEFINITIONS

- 5.1 The Human Rights Act (1998) imposes a positive duty on the state to protect individuals from serious breaches of their personal integrity such as violence and abuse. It is therefore necessary that all agencies working with adults at risk of abuse or neglect have mechanisms in place to minimise the risks of harm and abuse occurring and, where concerns exist, to ensure appropriate action is taken to address them.

Working in partnership with other agencies is also integral to Safeguarding, and a multi-agency approach must be adopted in response to all instances of abuse or suspected abuse.

- 5.2** Safeguarding adults is defined in the Care Act 2014, Care and Support Statutory Guidance as: "...protecting a person's right to live in safety, free from abuse and neglect."

The Guidance states the aims of adult safeguarding are:

- To prevent harm and reduce the risk of abuse or neglect to adults with care and support needs.
- To safeguard individuals in a way that supports them in making choices and having control in how they choose to live their lives.
- To promote an outcomes approach in safeguarding that works for people resulting in the best experience possible.
- To raise awareness around safeguarding so that staff and the wider community play their part in preventing, identifying, and responding to abuse and neglect.

## **6. ABUSE AND NEGLECT**

- 6.1** St George recognises adults can suffer abuse by a range of possible perpetrators including relatives, carers, friends, acquaintances, 'trusted adults' (for example a professional who works with them), neighbours, other customers, and strangers.
- 6.2** Furthermore, that abuse may be the result of a direct act, or omission of an act, or both. Abuse can take several forms, and it may be the case that two or more types of abuse are occurring simultaneously.
- 6.3** Types of abuse:

### **DISABILITY HATE CRIME**

is any criminal offence, which is perceived, by the victim or any other person, to be motivated by hostility or prejudice based on a person's disability or perceived disability.

### **DISCRIMINATORY ABUSE**

including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

## **DOMESTIC ABUSE**

any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over, who are intimate partners or family members regardless of gender or sexuality.

## **FEMALE GENITAL MUTILATION**

(FGM) – involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act 2003 makes it illegal to practice FGM in the UK, or to take girls who are British Nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in another country.

## **FINANCIAL OR MATERIAL ABUSE**

including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

## **FORCED MARRIAGE**

describes a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse.

## **HATE CRIME**

defined as 'any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic, or due to a person's religion, belief, gender identity or disability.

## **HONOUR-BASED VIOLENCE**

has been committed when families feel that dishonour has been brought to them. Women are predominantly (but not exclusively) the victims, and the violence is often committed with a degree of collusion from family members and/or the community.

## **HUMAN TRAFFICKING**

Traffickers exploit the social, cultural, or financial vulnerability of the victim and place huge financial and ethical obligations on them. They control almost every aspect of the victim's life, with little regards for the victim's welfare and health.

## **MATE CRIME**

is when vulnerable people are befriended by members of the community who go to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.

## **MODERN SLAVERY**

encompasses slavery, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment.

## **NEGLECT AND ACTS OF OMISSION**

including ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating and self-neglect.

## **ORGANISATIONAL ABUSE**

including neglect and poor care practice within an institution or specific care setting such as a hospital or care home for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice because of the structure, policies, processes, and practices within an organisation.

## **PHYSICAL ABUSE**

including assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions.



### **PSYCHOLOGICAL ABUSE**

including 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 of services or supportive networks.

### **RESTRAINT**

Unlawful or inappropriate use of restraint or physical interventions. Someone is using restraint if they use force, or threaten to use force, to make someone do something they are resisting, or where an adult's freedom of movement is restricted, whether they are resisting or not.

### **SEXUAL ABUSE**

including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

### **SEXUAL EXPLOITATION**

involves exploitative situations, contexts, and relationships where adults at risk (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) because of them performing, and/or another or others performing on them, sexual activities. People who are sexually exploited do not always perceive they are being exploited.

## **6.4 PATTERNS OF ABUSE VARY AND INCLUDE:**

### **SERIAL ABUSING**

in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse.

### **LONG-TERM ABUSE**

in the context of an ongoing family relationship such as domestic violence between spouses or generations, or persistent psychological abuse.

### **OPPORTUNISTIC ABUSE**

such as theft occurring because money or jewellery has been left lying around.

## **6.5 PREVENT:**

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works with individuals and communities by using voluntary early intervention to encourage them to challenge extremist and terrorist ideology and behaviour

Radicalisation is the process by which a person comes to adopt increasingly extreme political, social, or religious ideals. This can in extreme cases, result in condonation or support of terrorism. Extremism covers vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

In the UK, terrorism is defined as an action used to further an ideological aim that:

- Endangers a person's life, other than that of the person committing the action
- Involves serious violence against a person
- Causes serious damage to property
- Creates a serious risk to the public's health and safety
- Interferes with or seriously disrupts an electronic system

Radicalisers prey on the need for self-esteem, achievement, meaning or identity, competence, and control. Every case is different, but the following are possible indicators that someone might be at risk of radicalisation:

- Desire for status
- Victim of or experience of discrimination or racism
- Going through a transitional time of life
- Being influenced or controlled
- Feelings of grievance or injustice
- Experiencing a traumatic event
- A desire for political or moral change
- Struggling with a sense of identity, meaning, and belonging questioning their place in society

## 6.6 RECOGNISING ABUSE

Whilst allegations of abuse may be raised directly by the victim through them disclosing abuse to a staff member, there may be occasions where the victim is unwilling or unable to disclose the abuse.

All staff must be aware and mindful of possible indicators of abuse, such as:

- unexplained changes in mood or behaviour
- nervousness or watchfulness
- inappropriate relationships with peers
- inappropriate sexual language
- attention-seeking behaviour
- changes in appearance or hygiene
- scavenging or compulsive stealing
- persistent fatigue
- running away
- injuries inconsistent with an explanation given.

## 7. PRINCIPLES

- 7.1 St George will not tolerate or collude with any form of neglect or abuse and aims to promote and safeguard the welfare of all customers by being proactive in responding to any allegation or suspicion of abuse.

- 7.2** St George will work closely with Service Delivery Partners to ensure information about adult safeguarding and good practice is shared with customers and staff, ensuring all are fully aware of what constitutes abuse and know how to report it.
- 7.3** St George will also work closely with Local Authority Partners, Community Networks and Police to address safeguarding concerns affecting the wider communities.
- 7.4** St George will ensure that suitable and appropriate staff are appointed, and that an acceptable Enhanced Disclosure and Barring Service check (DBS) is secured before lone working is permitted. These checks will be carried out every 2 years or sooner where required.
- 7.5** St George will ensure safeguarding is monitored, through regular staff supervision, one to one support, team meetings and training, encouraging a level of professional curiosity sufficient to ensure customers at risk from abuse are identified and there is a proactive approach to reducing risk in place
- 7.6** St George will ensure staff are not constrained in their view of what constitutes abuse or neglect and consider the circumstances of each case individually.
- 7.7** St George will ensure housing officers based in the localities are fully aware of local safeguarding arrangements and understand their obligations in relation to reporting and recording concerns.
- 7.8** St George Housing officers will ensure all information relating to safeguarding concerns is shared with key agencies who need to know, including where appropriate, care-coordinators and the safeguarding authority
- 7.9** St George Housing officers will ensure victims are involved and supported appropriately and, wherever possible, their choice in the range of agencies they may wish to work with is respected

- 7.10** In cases where the perpetrator, or alleged perpetrator, is another St George customer, Staff will ensure they are provided with appropriate support to enable them to engage with the investigation and to understand and comply with the outcome and any subsequent action plan.
- 7.11** St George expects all its staff to abide by these principles, to avoid situations where their actions could be mistakenly interpreted and perhaps lead to allegations of abuse.

## **8. SAFE WORKING**

- 8.1** St George staff must always ensure their actions are sensitive to the individual needs of customers by:
- actively listening to them
  - valuing and respecting them, regardless of their gender, age, ethnicity, nationality, disability, religion, culture, sexual identity etc.
  - involving them in decisions made in response to allegations of abuse
  - providing relevant information enabling them to make informed decisions.
- 8.2** When working with customers, St George staff must avoid placing themselves in positions that may cause customers to feel uncomfortable, and which could lead to questions and/or false accusations of abuse. Though this policy cannot cover every eventuality, staff must not:
- meet with customers outside of work, or engage in non-work related activities
  - enter into personal and/or intimate relationships with customers
  - make unnecessary physical contact with customers.
  - do things of a personal nature for customers that they can do themselves,
  - engage in or tolerate any bullying
  - allow customers to use inappropriate language unchallenged
  - engage in favouritism or in singling out of "trouble-makers"

- make sexually suggestive remarks or discriminatory comments about or to customers, even in jest
- trivialise abuse
- let allegations made by a customer go unrecorded or unaddressed, including any made against themselves
- Use, buy or borrow property from customers
- loan or sell personal property to customers

## 9. RAISING A SAFEGUARDING CONCERN – PROCESS

### 9.1 What will we do if we have a safeguarding concern about you?

- If we identify an immediate risk, we will contact emergency services on 999.
- If safe to do so, we will work with our Service Delivery Partner to raise our concerns directly with you and take steps to ensure you are supported to safeguard yourself.
- If we believe a crime has been committed, we will contact 101 or support you to self-report.
- We will discuss if raising a safeguarding concern is appropriate or necessary with you and will take your views into consideration
- In some circumstances we may raise a safeguarding concern with your local council if we think it is necessary to keep you and others safe and free from harm. Depending on the circumstances, this may be with or without your consent.
- We will ensure you have support to cope with the effects of any abuse or neglect you have experienced or witnessed and put you in touch with specialist support organisations.

### 9.2 What will we do if you raise safeguarding concerns about yourself?

- If we identify an immediate risk, we will contact emergency services on 999.
- If safe to do so, we will work with our Service Delivery Partner to raise our concerns directly with you and take steps to ensure you are supported to safeguard yourself.
- If we believe a crime has been committed, we will contact 101 or support you to self-report.

- We will discuss if raising a safeguarding concern is appropriate or necessary with you and will take your views into consideration
- In some circumstances we may raise a safeguarding concern with your local council if we think it is necessary to keep you and others safe and free from harm. Depending on the circumstances, this may be with or without your consent.
- We will ensure you have support to cope with the effects of any abuse or neglect you have experienced or witnessed and put you in touch with specialist support organisations.

**9.3** What will we do if you raise safeguarding concerns about others.

- We will help you report your concerns to the right agency, such as the local council, NHS or the police.
- We may need to share details of your concerns with other agencies to enable them to investigate further.
- Where appropriate, we will carry out our own investigations.
- Where possible, we will let you know the outcome.
- As appropriate we will ensure you have support in place or put you in touch with specialist support organisations

**9.4** When an allegation of abuse is made, the Housing Officer must contact the Operations Manager, immediately to provide an update. Form IR1 must then be completed within 24 hours and sent by email to the Operations Manager.

**9.5** St George Housing officer should be aware that when they are not expected to investigate suspicions or abuse of allegations made. They should not question victims but should record information disclosed and pass on to the relevant authority.

**9.6** The Housing Officer must then follow local arrangements for Safeguarding, by notifying the appropriate Local Authority (NHS Trust and Commissioner if relevant) providing comprehensive details of the allegations

## 9.7 PARTNERSHIP WORKING AND INFORMATION SHARING

Working in partnership with statutory and other relevant agencies is a key element of investigations into suspected abuse. The wishes of the customer in relation to what information should be shared, and with whom, should be respected where possible. However, where there is a concern that the customer may be suffering or is at risk of abuse or neglect, their safety must be the over-riding priority. Information must be shared with statutory authorities where there is any indication of abuse or neglect.

The following points must be considered as part of this process:

- It should be explained openly and honestly to the customer what information will have to be
- divulged to statutory authorities and any other third parties, how it will be divulged and to whom.
- Information should not be shared with other non-statutory third parties where it would increase the risk to the victim or undermine the prevention, detection, or prosecution of a crime.
- Information shared must be accurate and up-to-date, necessary for the purpose for which it is being shared and shared only with those who need to know.

## 9.5 CONFIDENTIALITY AND MENTAL CAPACITY

Due attention must always be paid to confidentiality when working with customers. All staff must be familiar with the St George Data Protection, Confidentiality and Access to Records Policies, including the limits to confidentiality and the circumstances under which confidentiality may be breached.

St George staff must also be aware of the customer's capacity to make decisions, as governed by the Mental Capacity Act (2005). In all cases it is assumed that adults have the capacity to make informed choices and decisions, unless they have been deemed to lack capacity by a qualified health or social care professional.



Where staff have concerns about a customer's ability to make an informed decision that relates to an abuse allegation or concerns around abuse, they must work with Service Deliver Partners to ensure social services, the local CMHT or NHS Trust arrange an assessment or where the customer has an allocated social worker or care coordinator, that they are contacted for guidance in the first instance.

## 9.6 WHISTLE BLOWING

If a member of staff suspects a customer is being abused by a member of St George staff, Director, Contractor or Service Delivery Partner, either through a failure to respond appropriately to allegations of abuse, or concerns that a colleague or superior is responsible for the abuse, they must follow the Whistleblowing Policy.

Staff should initially report any concerns directly to their line manager, either by requesting a face-to-face meeting, or by putting the matter in writing.

The line-manager follow the Whistleblowing Policy and seek to agree a way of resolving the concern quickly and effectively.

Where the matter is more serious, or it is felt the line manager has not addressed the concern, or it does not feel possible to raise it with them for any reason, you should contact the Governance and Compliance Manager in the first instance.

## 10 DISINCENTIVES TO REPORTING SAFEGUARDING CONCERNS

**10.1** St George recognises that it is often difficult for victims of abuse to disclose or report instances of abuse. This may be for several possible reasons, such as:

- fear
- stigma
- not realising it is abuse
- not knowing how to report it
- thinking they will not be taken seriously
- learned Helplessness
- not being able to see any solutions
- feeling ashamed

- not wanting to get someone else into trouble
- lacking capacity or experiencing poor mental health

Overcoming these barriers is key to ensuring that no abuse goes unnoticed or unaddressed. St George aims to achieve this by:

- regularly exploring barriers to reporting abuse with staff using Team Meetings, training, and supervision to ensure staff are aware of how to recognise and respond to abuse, and know how to support customers affected
- encouraging learning from Safeguarding cases by monitoring through KPIs and reporting on incident/outcomes.
- developing clear Safeguarding Adults Policy policies, robust leadership and empowering our staff to deliver services that minimise the risk of abuse to our residents and staff; or intervene swiftly to prevent abuse continuing.
- Ensuring all aspects of Safeguarding are fully integrated into the management across the business, aligning itself to the vision and values.

## 11 EQUALITY IMPACT ASSESSMENT

**11.4** In writing this policy we have carried out assessment to ensure that we are considering, equality, diversity, and inclusion. Our assessments did not indicate that any group had been adversely impacted by our approach to allocations.

**11.5** We have also carried out a privacy impact assessment as information regarding applicants is sensitive. However, responsible information sharing plays a key role in the letting of our homes. We follow information sharing protocols with local authorities and our partner where they in place.

**11.6** To request copies of these assessments, please contact [info@stgeorgehousing.co.uk](mailto:info@stgeorgehousing.co.uk)

## 12 RELATED INTERNAL POLICIES

- 12.4 Equality and Diversity policy
- 12.5 Health and safety policy
- 12.6 Complaints policy and procedure
- 12.7 General Data Protection policy
- 12.8 Tenant Involvement policy
- 12.9 Anti-social Behaviour policy
- 12.10 Code of Conduct Policy
- 12.11 Anti-bribery and corruption policy

## 13 CONSULTATION

- 13.4 This policy will be reviewed in consultation with St George Housing residents.

## 14 REVIEW AND APPROVAL

- 14.4 This policy will be reviewed at least every two years as required to consider changes in legislation.

**Responsible officer:** Operations Manager

**Policy Author:** Chief Executive

**Policy version:** 1.0

**Date of Board Approval:** 2023

**Date the next review is due:** 2025

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