



Safeguarding vulnerable adults' policy and procedure

1. Purpose and scope

To protect vulnerable adults with care and support needs who are at risk of or experiencing abuse and/or neglect. In addition, this policy will ensure that legislation and relevant safeguarding guidance is complied with.

The arrangements detailed within this policy and procedure apply to all Selwood Housing residents and properties including communal areas, domestic properties, sheltered schemes, care homes, supported housing, shops and Selwood Housing's offices.

In exceptional circumstances where work is not covered by the regulations, the principles and good practices contained within the regulations should be applied where possible.

The procedure to make a referral can be found in section 16, with a quick reference flow chart on page 19 of this document.

2. Reference

The Care Act 2014

This act contains replacement and mandatory requirements specifically around adult safeguarding and guidance now issued has statutory force and effect.

General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)

Modern Slavery Act 2015

3. Responsibilities

Group Chief executive – shall be the statutory duty holder

Group head of health, safety, and facilities – responsible for the initial risk review. The role will also provide appropriate direction, support, and



Safeguarding vulnerable adults' policy and procedure

guidance. This role is also the operational safeguarding lead for the group.

Group transformation and people director – strategic safeguarding lead with overall accountability for safeguarding to the group. Will appoint and ensure the competency of the identified responsibility holders, by ensuring they have suitable ability, experience, training, and resources to enable them to carry out their roles.

Line managers – responsible for reporting concerns and issues raised by their teams to the safeguarding lead for the group.

Employees – responsible for reporting concerns to their line manager in order that reporting can be made to the relevant authorities for next actions to be taken.

4. Policy details

1. Introduction

Selwood Housing Group provides housing and support services to a wide range of people, some of whom may have a care or support need and are experiencing or at risk of abuse and neglect.

This policy will advise what Selwood Housing staff will do if suspected abuse or neglect is reported or identified. It covers all users of our services and tenants in our homes. Children are covered by a separate policy and procedure. We have a duty to inform social services if we have any safeguarding concerns about any of our tenants whether they are identified by staff or it has been reported to them.

Failure to comply with this policy may result in a risk to the health and safety of residents as well as a negative reputational and financial impact to the organisation.

It will be our best intention to treat everyone fairly and will ensure their needs are met should a safeguarding situation arise. This will include those we support who may be potential abusers.

2. Definitions of abuse

Selwood Housing will adopt the following definitions:



Safeguarding vulnerable adults' policy and procedure

Vulnerable adults at risk

A vulnerable adult at risk may become at risk of abuse because of their needs for care and support (whether or not the local authority is meeting those needs) and is experiencing or at risk of abuse and neglect. As a result of those needs, they are unable to protect themselves from either the risk of, or the experience of abuse and neglect. This may include their ability to communicate or making known their wishes and needs.

Examples of adults who may become at risk of abuse may be because they have a high degree of dependency on others, in need of community care or specialist services due to mental health problems, physical or learning disability, age or illness and may include their ability to communicate or making known their wishes and needs.

Abuse and neglect

Abuse and neglect take many forms and can be caused by single or repeated acts or a failure to act by any other person or persons, or in the case of self-neglect, the victim themselves. The circumstances of each individual case will be considered as to not limit what constitutes abuse or neglect.

Guidance on the types of abuse and neglect is detailed in the safeguarding procedure appendix. Selwood Housing will treat as a safeguarding concern where a vulnerable adult at risk is suspected to be involved in either.

- Physical abuse
- Domestic violence
- Sexual abuse
- Psychological abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Neglect and acts of omission or
- Self-neglect

Self-neglect is when someone neglects to attend to their basic needs such as personal hygiene, appropriate clothing, feeding, or tending



Safeguarding vulnerable adults' policy and procedure

appropriately to any medical condition they have. Hoarding can also result in self-neglect.

3. Legal framework

The Care Act 2014

Sections 42-47 and 68 of the Care Act defines safeguarding adults, provides a definition of adults at risk, details the roles and responsibilities of a range of organisations and how they must work together to respond to adult safeguarding concerns. This includes registered providers.

The Act sets out a statutory basis for safeguarding adults and the legal duties that local authorities will have to fulfil in their lead and coordination roles. The supporting statutory guidance on adult safeguarding replaces the previous 'No Secrets' official guidance.

As a registered provider, Selwood Housing is not a statutory partner under this act but is obliged to:

- Have a safeguarding lead
- Attend and provide information for Local Safeguarding Adult Bords if necessary. Housing providers will also be asked to participate in relevant safeguarding adult reviews.
- Cooperate with local authorities in enquiries of suspected adult safeguarding concerns – these may result in us taking action to protect the adult from any actual or risk of abuse or neglect as part of a safeguarding plan.
- Have a safeguarding policy and procedure
- Keep clear and accurate records of adult safeguarding allegations, responses, and actions, then share these with appropriate organisations when in the best interest of the vulnerable adult; and
- Have safe recruitment practices and training relevant to safeguarding.

The statutory guidance requires all housing providers to have 'clear operational policies and procedures that reflect the framework set out by the SABs in consultation with them'. Selwood Housing works across



Safeguarding vulnerable adults' policy and procedure

several local authority areas and will therefore reflect good safeguarding practices when developing its safeguarding policy and procedures.

4. Differences and similarities between safeguarding adults and safeguarding children

Selwood Housing has separate policies and procedures for safeguarding adults at risk and safeguarding children. Selwood will remain conscious of the essential differences that exist between safeguarding children and safeguarding adults. One of the key differences is that adults have their own rights and responsibilities and can make their own decisions and live independent lives.

This means that they have a legal right of consent and participation in progressing safeguarding concerns. The exception to this is if they do not have the mental capacity to make informed decisions about their safety, there is a significant risk of harm to the individual or other users, a crime has taken place or could be prevented, or a member of staff is an alleged abuser.

For children, consideration must be given to the wishes and feelings of a child, if reasonable, before making decisions on what services to provide or action to take. However, authorities will always have a duty to act in the best interests of the child which may mean contradicting their wishes.

Adult safeguarding concerns may also involve children and vice versa. If concerns arise about a child these must also be reported to the local Children's Services team within Social Services and/or police to investigate. See Selwood Housing's Safeguarding Children policy and procedure.

5. Principles of Safeguarding

Selwood Housing will aim to protect and maintain customers' safety and wellbeing through their approach to safeguarding adults with care and support needs. We will achieve this by working with our partners and apply our policy standards to the six principles as defined in the Care Act 2014 Statutory Guidance (empowerment, prevention, proportionality, protection, partnership, and accountability) which underpin safeguarding work:



Safeguarding vulnerable adults' policy and procedure

1. Empowerment: personalisation and presumptions of person-led decisions and informed consent

- We will ensure our customers are aware of how to report safeguarding concerns, and the support we can provide
- Our response to safeguarding places the adult at risk at its heart, which means listening and understanding what we are told, and respecting their needs and views in how we respond to safeguarding concerns
- We adopt the 'Making Safeguarding Personal' guidance

2. Prevention: better to take action before harm occurs

- We will aim to hold up-to-date information on customers' support needs and vulnerabilities. We will use this data to inform our approach to safeguarding.
- We will undertake relevant disclosure and barring checks on employees that have access to or work with vulnerable adults.

3. Proportionality: proportionate and least intrusive response appropriate to risk presented

- We will act swiftly upon our safeguarding concerns and treat all reported concerns in good faith.
- We will notify the local authority Safeguarding Team if abuse is identified or suspected.
- We will take appropriate action against perpetrators of abuse. Where a crime has been committed, we will report this to the police.

4. Protection: support and representation for those in greatest need

- We will take reasonable steps, within our power to do so, to ensure the safety and well-being of residents, including re-housing victims if appropriate.



Safeguarding vulnerable adults' policy and procedure

- We recognise that safeguarding is the responsibility of everyone who works for us or on our behalf. We will be vigilant to concerns for our customers' welfare, and indicators of abuse and neglect.
- We will recognise that mental capacity and consent are key issues in safeguarding cases, and every adult has the right to make their own decisions. A person is assumed to have mental capacity unless it is proved that they do not and will make a referral to the local Adult Social Care Team where we have concerns that a person being abused lacks mental capacity. This will ensure a Mental Capacity Assessment can be made.
- We will ensure that our disclosures are compliant with the need for safeguarding and share information about concerns with agencies that need to know such as multi-agency public protection arrangements.
- We will learn from incidents and case reviews, revising and improving work practices, induction, training, policy, and procedure as appropriate.

5. Partnership: local solutions through services working with their communities

- We will aim to develop strong relationships with local authorities and other safeguarding partners at a senior and operational level, which we will formalise through inter-agency and information sharing agreements.
- We will co-operate with relevant safeguarding partners to investigate allegations of harm, abuse, and neglect to a vulnerable adult, and take actions to safeguard that person. This includes:
 - referring our safeguarding concerns to the relevant local authority, or if necessary, the police
 - participating in Local Safeguarding Adults Boards
 - making enquiries to support Safeguarding Adult Reviews or Serious Case Reviews
 - keep accurate, confidential and secure records of all safeguarding concerns and associated actions; and



Safeguarding vulnerable adults' policy and procedure

- sharing information with relevant safeguarding partners.

6. Accountability: transparency in delivering safeguarding

- We will ensure this policy and our safeguarding procedure is kept up-to-date and disseminated to all staff.
- We will appoint a 'Safeguarding Lead' within Selwood Housing, who is responsible for ensuring that our safeguarding policies and procedures are up-to-date and delivered in an effective and timely manner.
- We will have Designated Safeguarding Officers within each of our departments such as Customer Services, Human Resources, Maintenance, Housing Management, Sheltered Housing and our Housing Support Service which are appropriately trained specialists to co-ordinate our response to safeguarding concerns.
- We will convene regular (or as required) Safeguarding Panels, which will co-ordinate investigations, and share best practice and improvement.
- We will ensure that all relevant staff and agents receive suitable safeguarding training and understand their roles and responsibilities in safeguarding vulnerable adults at risk.

6. Key responsibilities of all staff

Selwood Housing will expect that all their staff

- Are alert to concerns for welfare, and indicators of abuse and neglect
- Report all cases of suspected abuse or neglect to the appropriate individual in the organisation. DSO's will monitor the incidents, report concerns to and liaise with the relevant local safeguarding teams as necessary.
- Are vigilant about their actions so they cannot be misinterpreted, and are aware of appropriate behaviour when working with residents (for example, appropriate boundaries of personal contact)
- Attend safeguarding training and refresher training where relevant



Safeguarding vulnerable adults' policy and procedure

- Are aware of all situations which may present risks and manage these (for example, if allocating a property to a registered offender, that consideration is given to the location)

Whilst safeguarding responsibilities sit with all staff, the responsibility structure at Selwood Housing is as follows:

Strategic Lead

The organisation is not required by law to have a safeguarding lead at executive team level, but Selwood Housing want to ensure safeguarding is given appropriate levels of consideration at all levels.

The strategic lead is the group transformation and people director and ensures safeguarding is considered independently of operations.

The strategic lead is responsible for:

- Ensuring that safeguarding is appropriately considered by the Board during relevant meetings, and that members are aware of the governance and reputational risks of failing to safeguard children and vulnerable adults.
- Presenting an annual report to the Board on Selwood Housing's management of safeguarding during the year, including the number of referrals made to relevant agencies.

Operational Lead

The group head of health, safety, and facilities is the operational safeguarding lead.

The role of the operational lead is to:

- Ensure that any changes to legislation or good practice lead to corresponding policy and procedure updates.
- Ensure that Selwood Housing provides appropriate resource each year to adequately train and supervise staff managing and/or reporting safeguarding concerns.
- Set the terms of reference and chair Selwood Housing's safety panel meetings, which will be used as the platform for discussing issues, monitoring incidents and performance in relation to safeguarding.



Safeguarding vulnerable adults' policy and procedure

- Notify the strategic lead in the event of a serious safeguarding incident and/or pending serious case review for report to the Board on an annual basis. Assisting the operational lead in learning lessons following serious case reviews
- Report to the group board of directors on a regular basis.
- Review the safeguarding vulnerable adults' policy and procedure on an annual basis and ensure other policies have regard to safeguarding as appropriate.
- Ensure processes are in place to see that training is undertaken for new staff within their probation period and refreshed every three years or earlier if there are significant changes to legislation or good practice which result in changes to Selwood Housing's policies and procedures.
- Report to the board in relation to any issues of note, as part of health and safety papers.
- Ensure systems are in place to accurately and appropriately record and monitor safeguarding cases.
- Measure Selwood Housing's performance in relation to safeguarding vulnerable adults.
- Promote awareness and understanding of safeguarding within the organisation.
- Work with external organisations as appropriate in relation to safeguarding of vulnerable adults.

Designated Safeguarding Officer's

There will be DSO's within each customer-facing department to support the work of the operational lead.

The role of the DSO is to:

- Ensure relevant staff record and report safeguarding cases for vulnerable adults in accordance with procedures.
- Ensure that staff are appropriately supervised.
- Ensure that safeguarding is regularly discussed at team meetings and in one-to-one meetings.
- Set staff objectives in relation to safeguarding vulnerable adults.
- Attend quarterly safety panel meetings which will discuss safeguarding.
- Attend external multi agency meetings representing Selwood Housing.
- Promote safeguarding within the organisation.



Safeguarding vulnerable adults' policy and procedure

7. Recording and reporting

Full details on recording and reporting allegations of abuse are in Selwood Safeguarding adult's procedure.

When managing any allegations of abuse, it is essential that information is recorded accurately and in a timely manner. In addition, staff may also be called upon to complete relevant forms for the local authority, the local safeguarding team and/or the police.

8. Specific services within Selwood Housing

This policy applies to all staff. The following services are highlighted as they may be potentially more exposed to safeguarding issues and have specific requirements:

Housing management and frontline services will come into contact with adults at risk during their housing management day to day functions, including at sign-up, during a settling in visit, when investigating allegations of anti-social behaviour or when a customer requests a service.

Tenancy support services – the profile of customers receiving specialist support services may be more susceptible to certain types of abuse or exploitation, such as financial exploitation.

Community investment activities such as hoarding projects, employment projects and community activities, due to the client group, require particular vigilance to safeguarding issues. Additionally, agents providing these services will be expected to have increased verification and disclosure checks.

Maintenance and caretaking staff – due to the nature of their role, maintenance staff carry out their duties within Selwood Housing's properties and therefore may witness abuse or spot indicators that abuse may be taking place within the home.

Customer Services Centre – whilst not visiting tenants in their properties, staff will be providing telephone advice and are likely to pick up on areas of concern as a result of the phone conversation. Staff must be vigilant to the indicators of abuse in the context of being on the phone to residents.



Safeguarding vulnerable adults' policy and procedure

During the recruitment and selection of staff, recruitment managers and human resources must apply safe recruitment practices and determine the appropriate level of check new staff and volunteers require, for example, through Disclosure and Barring Service (DBS) checks.

9. Agency managed properties

Agencies providing support services will be expected to have their own equivalent safeguarding policies in place. Their responsibilities in this regard will be managed through Selwood Housing's contractual relationship with them. Agencies are required to report safeguarding concerns to the police, their service regulator if a registered activity (e.g. Care Quality Commission) and to Selwood Housing.

10. Contractors and agents

Contractors working on behalf of Selwood Housing and visiting homes may encounter evidence of abuse and neglect within the property. Residents may also choose to disclose incidents directly to contractors, so awareness in sensitively preserving or taking evidence and handling reports will be necessary. Contractor organisations will be expected to ensure they comply with Selwood Housing's safeguarding practices by signing up to the sub-contractor or sole trader agreements. This will also require them to:

- Ensure staff are DBS checked
- Ensure staff are suitable for the capacity employed
- Ensure staff receive suitable training on how to deal with residents, including how to report any concerns they have
- Cooperating with Selwood Housing and their statutory partners regarding any concerns and allegations received
- Having systems in place that enable disciplinary action to be taken where appropriate

Contractors should ensure that their employees are able to raise concerns where they see that a child has suffered, is suffering or potentially could suffer harm. Selwood Housing will support all contractors that report a concern in good faith, where there is the belief that a child has been abused, is at risk of abuse or believe that a colleague may pose a risk to children.



Safeguarding vulnerable adults' policy and procedure

Contractors are not to knowingly enter a property alone where the sole occupant(s) is or appears to be, under 18 years of age. An appointment will be rearranged at a time where an appropriate adult is present.

Selwood Housing will monitor the performance of their contractors, compliance with the policies and procedures shared with them through regular contract meetings.

11. Whistle blowing

If a member of staff suspects that an adult is being abused by another member of Selwood Housing staff, they should immediately speak to their Designated Safeguarding Lead, the head of service or the human resources department. Where there is a failure to respond appropriately to allegations of abuse, or where staff have concerns that a colleague or superior is responsible for the abuse, staff must follow Selwood's whistleblowing policy.

The Public Interest Disclosure Act (1998) protects workers from detrimental treatment or victimisation from their employer if they blow the whistle on wrongdoing, such as the abuse of customers. Staff who whistle blow can remain anonymous, however, this cannot necessarily be guaranteed if it results in a criminal investigation.

12. Confidentiality

We will respect confidentiality at all times and will not share any information given in confidence unless justified by the assessed risk to the vulnerable adult at risk or required by law.

We will discuss our approach to confidentiality with the customer where there are safeguarding concerns. We will be honest and explain that information might need to be shared with other organisations in order to respond or resolve a safeguarding issue.

13. Complaints

Residents that do not feel satisfied with our service in relation to Safeguarding may wish to make a formal complaint. Selwood Housing has a complaints policy providing information about how to complain about our services. Alternatively, a resident may also wish to contact the



Safeguarding vulnerable adults' policy and procedure

relevant Local Authority Safeguarding Adults Board if they feel that we have not provided an adequate service.

14. Training and safe recruitment

Selwood Housing will ensure that staff across the organisation receive training to give them an understanding of adult safeguarding and enable them to fulfil the requirements of our policy and relevant procedures.

Training will be appropriate to individual roles and the requirements of these roles in relation to adult safeguarding. Training will be refreshed every three years or earlier if there is a significant change to legislation or good practice which result in changes to Selwood's policy and procedures.

We will also provide training to board members, volunteers and contractors as appropriate.

15. Staffing

Selwood Housing will ensure that staff are appropriately recruited to roles and will ensure relevant role recruitment procedure include a DBS check. This check will be repeated at three yearly intervals.

Support will be provided to staff dealing with safeguarding cases where necessary, including confidential counselling if appropriate through the use of our employee assistance programme and through supervisory support from the safeguarding leads.

Staff will be given guidance around professional boundaries when working with adults with care support needs, and this will be made clear within our safeguarding procedures.

Where we receive an allegation about a member of staff that constitutes an adult safeguarding issue, an investigation will be conducted in accordance with the disciplinary policy and procedure and a safeguarding referral made to the appropriate local authority. When allegations of this nature are received the member of staff may be suspended pending the outcome of the investigation.



Safeguarding vulnerable adults' policy and procedure

16. Procedure in the event of a safeguarding incident

In the event of a potential safeguarding incident talk to the individual sufficiently to get the facts about the situation to enable you to raise your concern correctly, without asking probing questions that could be seen as 'interviewing' the affected person.

Consent should be obtained to share information with Wiltshire Council or the police. If consent is refused this must be respected unless there is an imminent risk of the individual coming to further harm because of that information not being shared. If the individual is at immediate risk take the most appropriate steps to eliminate the risk.

Contact your line manager as soon as possible and explain to them what situation is and what you have done so far.

If the individual has a social worker, an informal call with them will be required to identify anything which may have a bearing on the situation. The conversation must be recorded and shared with your line manager.

Your line manager will decide if a formal safeguarding concern needs to be raised to Wiltshire Council. Once a decision has been made your manager will support you to make a referral.

Accurate record keeping and communication are vital throughout the process. All records must be dated and contain factual information only, not an opinion or assumption. Inter-agency meetings may be required and you may well have tasks assigned to you as a result of these meetings.

Regular meetings with your line manager will be required during the investigation to update them on developments.

Once the investigation has been completed the individual will require regular reviews of the risk assessments put in place and any other changes.

17. Consent and sharing

All sensitive and personal information given to us confidentially will be treated in accordance with the Data Protection Act 1988 and the GDPR (enforceable from 25th May 2018).



Safeguarding vulnerable adults' policy and procedure

Information will only be shared with third parties if we are required by law to do so for:

- Prevention or detection of crime or the apprehension or prosecution of offenders.
- Compliance with an information sharing protocol, contract, or confidentiality agreement in place.
- Situations where the person who has given the information has consented for it to be shared.
- The purpose of reasonable pursuance of our activities.

In some cases, consent will not be needed to pass on information if there is a risk of the following:

- An adult would be at increased risk of significant harm.
- Failure to share will impede the prevention, detection or prosecution of a serious crime, or
- Failure to share may lead to unnecessary delay in making enquiries about allegations of significant harm or serious injury.

18. Collaboration with other agencies

Safeguarding vulnerable adults from abuse is complex process. Any assessments and actions undertaken by our staff must be in cooperation with other agencies such as social services, police, doctors, and the multi-agency safeguarding hub (MASH), etc.

Contact details should be checked for agencies who be collaborated with to ensure all links with these agencies are up to date and a good relationship is established.

Within Wiltshire Council is the Safeguarding Adults Board (SAB), mandatory under the Care Act 2014, which consists of themselves, the NHS and the police. They have responsibility to liaise with relevant housing organisations and other agencies during investigations.

Selwood Housing works in line with relevant policies and procedures of its partnering local authorities. Staff must cooperate with statutory agencies involved in safeguarding cases. This may include:

- Assistance with communication difficulties



Safeguarding vulnerable adults' policy and procedure

- Verbal or written clarification of initial referral details
- Requests for further monitoring
- Attendance at case conferences
- Discussions with police
- Requests to be a key worker

If a staff member has concern that social services are not taking appropriate action, they must raise the matter with their line manager and safeguarding lead to decide whether the case should be discussed with a senior member of the social services team.

19. Wiltshire Adult Safeguarding Board referral flow chart

Follow the flow chart on the next page to make a referral

Reporting to Bath and North East Somerset

Follow the flow chart on the next page but telephone: 01225 396000

Reporting to Mendip

Follow the flow chart on the next page but telephone:

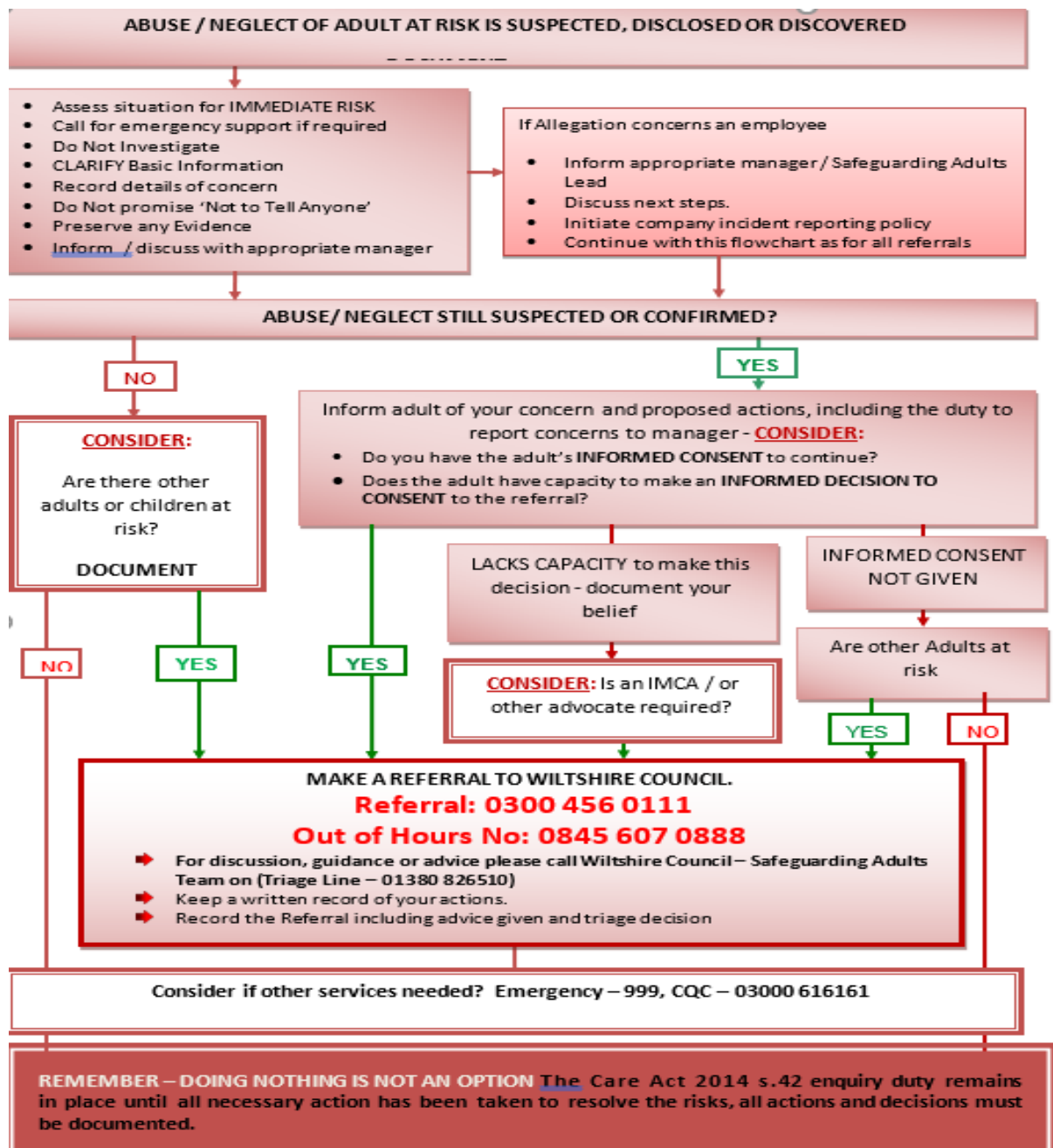
Adult social care on: 0300 123 2224

Out of hours – adult social care and adult mental health team: 01823 368244

Or email: adults@somerset.gov.uk



Safeguarding vulnerable adults' policy and procedure



20. Ongoing actions

When working with individuals who have been identified as being at risk under safeguarding or who have the potential to be at risk for other reasons staff should agree a framework for working with them with their line manager.



Safeguarding vulnerable adults' policy and procedure

This framework should ensure that support is maintained with additional consideration made to ensure the safety of the individual, Selwood Housing staff and external agencies who may be working with that individual.

The framework should always follow the completion of a risk assessment review, undertaken where possible, with the individual. If there is deemed to be a risk to working with the individual this must be recorded on the organisational high-risk register. Details of this process are within the high-risk registration procedure which can be found on OurPlace.

Regular reviews of the case should continue to take place with your line manager alongside regular reviews of the risk assessment until the opportunity for risk has been eliminated or reduced to an acceptably low level.

5. Signposting

Related documents

- High risk registration procedure
- Risk assessment form
- [WSAB Staff Guide 1.2 July 2016 \(Word version\)](#)
- <https://www.adass.org.uk/making-safeguarding-personal-publicaitons>

Other useful contacts

Age UK	Telephone: 01380 871 800	Web: www.ageuk.org.uk
Bobby Van	Telephone: 01225 794 652	Web: www.wiltshirebobbyvan.org.uk
Care Quality Commission	Telephone: 03000 616 161	Web: www.cqc.org.uk



Safeguarding vulnerable adults' policy and procedure

Independent safeguarding authority	Telephone: 01325 953 795	Web: www.isa-gov.org.uk
Practitioner alliance for safeguarding vulnerable adults		Web: www.pavauk.org
Public concern at work	Telephone: 020 7404 6609	Web: www.pcaw.org.uk



Decision-making record

Policy owner: Fee Nunn
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