



Safeguarding vulnerable adults' policy

1. Purpose and scope

This policy aims to protect vulnerable adults with care and support needs who are at risk of or experiencing abuse and/or neglect. It ensures compliance with relevant legislation and safeguarding guidance.

This policy applies 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 regulations, the principles and good practices within the regulations should be applied where possible.

2. Responsibilities

- **Group Chief Executive:** Statutory duty holder.
- **Group Operations Director:** Strategic safeguarding lead with overall accountability. Ensures competency of responsibility holders through suitable ability, experience, training, and resources.
- **Head of Housing, Customer Support, and Responsive Repairs:** Responsible for initial risk review and providing direction, support, and guidance.
- **Neighbourhoods Team Manager:** Operational safeguarding lead.
- **Line Managers:** Report concerns and issues raised by their teams to the appropriate neighbourhood manager or safeguarding lead.
- **Employees:** Report concerns to their line manager for further action by relevant authorities.

3. Policy details

Introduction

Selwood Housing provides housing and support services to a wide range of people, some of whom may have care or support needs and are at risk of abuse and neglect. This policy outlines the actions Selwood Housing staff will take if suspected abuse or neglect is reported or identified. It covers all service users and tenants. Children are covered by a separate policy and procedure.



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Failure to comply with this policy may risk residents' health and safety and negatively impact the organisation's reputation and finances. Selwood Housing is committed to treating everyone fairly and meeting their needs in safeguarding situations, including potential abusers.

Definitions of Abuse

- **Vulnerable Adults at Risk:** Individuals with care and support needs who are at risk of or experiencing abuse and neglect and are unable to protect themselves.
- **Abuse and Neglect:** Can be caused by single or repeated acts or a failure to act by others or self-neglect. Types include physical abuse, domestic violence, sexual abuse, psychological abuse, financial or material abuse, modern slavery, discriminatory abuse, organisational abuse, neglect, and self-neglect.

4. Legal Framework: The Care Act 2014 outlines safeguarding adults, defining adults at risk and detailing organisational roles and responsibilities. Selwood Housing, as a registered provider, must:

- Have a safeguarding lead.
- Participate in Local Safeguarding Adult Boards and relevant reviews.
- Cooperate with local authorities in safeguarding enquiries.
- Maintain a safeguarding policy and procedure.
- Keep accurate records of safeguarding allegations and actions.
- Implement safe recruitment practices and relevant training.

5. Differences and Similarities Between Safeguarding Adults and Children: Selwood Housing has separate policies for safeguarding adults and children, recognising the essential differences. Adults have rights and responsibilities, including legal consent and participation in safeguarding concerns, except in cases of mental incapacity, significant harm risk, crime prevention, or staff involvement as alleged abusers. Children's wishes and feelings are considered, but authorities act in their best interests.



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6. Principles of Safeguarding

Selwood Housing is committed to protecting and maintaining the safety and wellbeing of customers, particularly adults with care and support needs. Our approach aligns with the six principles defined in the Care Act 2014 Statutory Guidance:

1. **Empowerment:** Personalisation and presumption of person-led decisions and informed consent.
 - We ensure customers know how to report safeguarding concerns and the support available.
 - Our safeguarding response prioritises the adult at risk, listening to and respecting their needs and views.
 - We follow the 'Making Safeguarding Personal' guidance.
2. **Prevention:** Acting before harm occurs.
 - We maintain up-to-date information on customers' support needs and vulnerabilities to inform our safeguarding approach.
 - Relevant checks are conducted on employees working with vulnerable adults.
3. **Proportionality:** Providing a proportionate and least intrusive response appropriate to the risk presented.
 - We act swiftly on safeguarding concerns and treat all reports in good faith.
 - We notify the local authority Safeguarding Team if abuse is identified or suspected.
 - Appropriate actions are taken against perpetrators of abuse, including reporting crimes to the police.
4. **Protection:** Offering support and representation for those in greatest need.
 - We take reasonable steps to ensure the safety and well-being of residents.
 - Safeguarding is everyone's responsibility, and we remain vigilant to concerns and indicators of abuse and neglect.
 - Mental capacity and consent are crucial in safeguarding cases, with every adult having the right to make their own decisions. It is presumed that a person has mental capacity unless proven



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otherwise. If we suspect that an individual being abused lacks mental capacity, we will refer the case to the local Adult Social Care team for a mental capacity assessment.

- We ensure disclosures are compliant with safeguarding needs and share information with relevant agencies.
- We will continuously learn from incidents and case reviews, making necessary revisions and improvements to our work practices, induction processes, training programs, policies, and procedures.

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

- We will aim to develop strong relationships with local authorities and safeguarding partners, formalised through agreements.
- We cooperate with safeguarding partners to investigate allegations of harm, abuse, and neglect, and take actions to safeguard individuals.

6. **Accountability:** Ensuring transparency in delivering safeguarding.

- Our safeguarding policy and procedures are kept up-to-date and disseminated to all staff.
- A 'Safeguarding Lead' is appointed within Selwood Housing to ensure policies and procedures are current and effective.
- Designated Safeguarding Officers in each customer facing department to coordinate responses to safeguarding concerns.
- Regular Safeguarding Panels are convened to coordinate investigations and share best practices.
- All relevant staff and agents receive suitable safeguarding training and understand their roles and responsibilities.

7. **Key responsibilities of all staff**

Selwood Housing expects all staff to:

- Be alert to welfare concerns and indicators of abuse and neglect.
- Report all suspected abuse or neglect cases to the appropriate individual within the organisation. Designated Safeguarding Officers (DSOs) will monitor incidents, report concerns, and liaise with relevant local safeguarding teams as necessary.



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- Maintain vigilance in their actions to avoid misinterpretation and adhere to appropriate behaviour standards when working with residents (e.g., maintaining appropriate boundaries of personal contact).
- Attend safeguarding training and refresher courses as required.
- Be aware of and manage situations that may present risks (e.g., considering the location when allocating a property to a registered offender).

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 operations 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 neighbourhoods team manager 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.



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- 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.
- 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 Officers (DSOs)

Each customer-facing department will have Designated Safeguarding Officers (DSOs) to support the operational lead.

Responsibilities of DSOs:

- Ensure staff record and report safeguarding cases for vulnerable adults in accordance with procedures.



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- Provide appropriate supervision for staff.
- Regularly discuss safeguarding in team meetings and one-to-one sessions.
- Set staff objectives related to safeguarding vulnerable adults.
- Attend quarterly safety panel meetings to discuss safeguarding issues.
- Represent Selwood Housing at external multi-agency meetings.
- Promote safeguarding within the organisation.

8. 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.

9. Recruitment of staff

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.

10. 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.

11. 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



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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.

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.

12. Whistleblowing

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



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whistle blow can remain anonymous, however, this cannot necessarily be guaranteed if it results in a criminal investigation.

13. Confidentiality

We will always respect confidentiality 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 the respond or resolve a safeguarding issue.

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

15. Training

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.

16. Consent and information sharing

All sensitive and personal information provided to us confidentially will be handled in accordance with the Data Protection Act 2018 and UK-GDPR.

Information will only be shared with third parties if required by law for:



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- Prevention or detection of crime, or the apprehension or prosecution of offenders.
- Compliance with an information-sharing protocol, contract, or confidentiality agreement.
- Situations where the individual has consented to share the information.
- The reasonable pursuit of our activities.

In some cases, consent is not needed to share information if there is a risk that:

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

17. Collaboration with other agencies

Safeguarding vulnerable adults from abuse is a complex process that requires cooperation with other agencies such as social services, police, doctors, and the multi-agency safeguarding hub (MASH).

Contact details for collaborating agencies should be regularly checked to ensure they are up to date and that strong relationships are maintained.

The Wiltshire Council Safeguarding Adults Board (SAB), mandated by the Care Act 2014, includes the NHS and police. They liaise with relevant housing organisations and other agencies during investigations.

Selwood Housing aligns with the policies and procedures of its partnering local authorities. Staff must cooperate with statutory agencies involved in safeguarding cases, which may include:

- Assisting with communication difficulties.
- Providing verbal or written clarification of initial referral details.
- Responding to requests for further monitoring.
- Attending case conferences.
- Engaging in discussions with police.
- Acting as a key worker when requested.



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If a staff member believes social services are not taking appropriate action, they must raise the issue with their line manager and safeguarding lead to determine if the case should be escalated to a senior member of the social services team.



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Signpost

- The Care Act 2014.
- Data Protection Act 2018
- UK-GDPR
- Modern Slavery Act 2015.
- Equalities Act 2010.

- Mental Capacity Act 2005 & Deprivation of Liberties Safeguards 2007
- Safeguarding Vulnerable Groups Act 2006.
- Prevent Duty (Counter-Terrorism and Security Act 2015).
- The Public Interest Disclosure Act (1998).
- The Crime and Disorder Act 1998.
- Protection of Freedoms Act 2012.
- Health & Social Care Act 2008 (Regulated activities) Regulations 2014.
- The Children Act 1989 & 2004 including section 11 duties.
- Children and Families Act 2014.



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Decision making record

Date	Meeting / Minute Reference	Version / Amendment
10.10.2012	Executive team meeting	2
14.03.2013	Amended to reflect structure changes	3
05.07.2016	Addition of WSAB guide to documents	4
21.02.2019	Rename the document to safeguarding adults' policy and procedure	5
23.01.2020	Desktop review – no changes	
10.06.2021	Alignment with audit recommendations from Capsticks	6
06.01.2022	Updated to the refreshed branding template.	7
17.08.2023	Desktop review – no changes	7
23.09.2024	Updated role and responsibilities, moved to Housing Directorate from Health & Safety. Neighbourhood team manager as the operational lead for safeguarding. Remove Safeguarding vulnerable adults' procedure (now a standalone document). Approved at Board meeting 2/10/24	8



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