

Policy Title	<b>Safeguarding Vulnerable Adults at Risk Policy and Procedure</b>
Date Adopted	2017
Approved by Operations Committee	November 2024
Date of Next Review	May 2026

**This Policy relates to safeguarding issues in respect of tenants at risk.**

**1. Policy Statement**

- 1.1. Nehemiah’s mission statement is to build successful, sustainable, and diverse communities by providing housing and well-being services in a culturally sensitive way to our current and future customers.
- 1.2. We ensure this commitment is understood and embedded into our operational practices to help protect our tenants , and volunteers from abuse/harm. We will fulfil our responsibilities as a key partner, given the crucial importance of multi-agency working, by working with our communities, stakeholders, and customers to prevent those at risk from being harmed.
- 1.3. **Compliance and best practice** –Nehemiah Housing will ensure all colleagues, contractors, and third-party organisations are vigilant and alert to Safeguarding their own conduct, and how to respond to any concerns or suspicions they may have.
- 1.4. **Safe Recruitment** -Nehemiah Housing will check suitability of all colleagues, contractors, and third-party organisations, using full references and DBS, or through our procurement process. All Nehemiah are DBS (Disclosure and Barring Service) checked on a 3 yearly cycle.

**1.5. Legislative Requirements**

Our safeguarding policy is committed to protecting the welfare of vulnerable adults at risk in accordance with all relevant legislation, including the Care Act 2014, the Domestic Abuse Act 2021, and the Health and Care Act 2022. These laws establish our duty to prevent and respond to abuse, neglect, and exploitation, ensuring that individuals' rights to live safely and with dignity are upheld. All staff are required to be familiar with and adhere to these legal frameworks, alongside any additional local and national guidance. Regular training and reviews of safeguarding practices will ensure compliance and the continuous improvement of our safeguarding measures.

Other associated acts:

- Domestic Violence, Crime & Victims Act 2004
- Mental Capacity Act 2005 updated 2007
- Safeguarding Vulnerable Group Act 2006
- The Health & Social Care Act 2008
- Equalities act 2010 (reasonable adjustments)
- Anti-social Behaviour Crime and Policing Act 2014
- Care Act 2014
- Modern Slavery Act 2015
- Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Working Together to Safeguard Children 2023 Prevent duty guidance
- Domestic Abuse Act 2021
- Children's Act 1989 and 2004 Family Law Act 1996 Housing Act 1996 and 1998 :
- Protection from Harassment 1997
- Human Rights Act 1998
- Crime and Disorder Act 1998 – Section 115 Every Child Matters Framework (2003) Anti-Social Behaviour Act 2003 S145/S149
- The Online Safety Act 2023 (the Act is a new set of laws that protects children and adults online).  
<https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer>
- Radicalisation and terrorism

1.6. Nehemiah expect all staff, those in direct support roles as well as housing staff and contractors to understand their individual and collective responsibilities. This requires us to:

- Listen to, value, encourage and support those we work with
- Provide clear internal procedures for identifying and dealing with concerns about possible abuse and ensure their implementation.
- Provide effective line management for staff through supervision, support, and training.
- Include continuous risk assessment within our work with young people, families, and vulnerable adults at risk.
- Develop and maintain effective information sharing with statutory services, and other agencies, involved with tenants at risk as appropriate.
- Work collaboratively with Safeguarding Adults Board (SAB).
- Recruit safely, ensuring all necessary checks are made.

## **2. Policy Purpose and Aims**

2.1 This policy aims to deliver a customer focused approach that incorporates the ethos of our values, by listening to our customers both internal and external.

Our approach is to be honest and open with customer relationships based on mutual trust, which ensures our tenants, staff and volunteers can live and work in a safe and secure environment.

- 2.2 As a Registered Provider, we are expected to have our own Safeguarding Policy and associated procedures.
- 2.3 Nehemiah's procedure aims to provide straightforward guidance for staff, managers, and contractors about what to do, how and when, if any concerns are identified about harm/abuse, including where a member of staff may be implicated.
- 2.4 This policy ensures we respond promptly and effectively when there are concerns of abuse/harm. Our focus is on the outcomes, of the person at risk not driven by the process.
- 2.5 The approach of this policy is based on and reflects the principals of both UK legislation and guidance. Nehemiah will abide by existing regulatory requirements and legislation.
- 2.6 We will work in line with the Charter for Social Housing Residents which sets out commitments residents should expect from their landlord:
  - To be safe in your home.
  - To be treated with respect, backed by a strong consumer regulator, and improved consumer standards for tenants.
  - To have your voice heard by your landlord.

This charter echoes many of the commitments housing associations are making in the Together with Tenants charter, particularly on tenant voice, relationships, accountability, quality, and complaints.

- 2.7 Nehemiah agrees to adapt the 6 principles which are critical to prevent abuse and neglect from occurring, while also ensuring the best possible level of care is given when working with tenants experiencing safeguarding issues. By following the key safeguarding principles, we will ensure we are doing the best we can to protect vulnerable people from harm.

**The six principles of safeguarding are:**

- **Empowerment:** People being supported and encouraged to make their own decisions and informed consent.
- **Prevention:** It is better to take action before harm occurs.
- **Proportionality:** The least intrusive response appropriate to the risk presented.
- **Protection:** Including support and representation.
- **Partnership:** Multi agency approach.

- **Accountability** and transparency.

### **3. Our Policy**

- 3.1 All vulnerable adults, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have a right to protection from significant harm or abuse.
- 3.2 All vulnerable adults have a right to information which could make life better and/or safer for them and we therefore will provide our service users with information about how and with whom they can share their concerns and complaints. We also, where possible, offer a choice in working together including signposting to other agencies.

### **4. Designated Safeguarding Leads (DSL)**

It is the responsibility of the Board to ensure that this policy is successfully implemented, and the procedures followed. The Housing Service Manager will act as the Safeguard Lead. Managers with staff responsibility, will be responsible for ensuring that all staff and contractors understands the importance of this policy and the related procedures and comply with them.

It is essential to the implementation of this policy that staff know how to deal with emergencies and to express concerns to the appropriate person in the organisation. During the Designated Safeguarding Lead's absence, Deputy Housing Service Manager will lead with support from Operations Director.

### **5. Definitions**

#### **5.1 Adult safeguarding – what it is and why it matters.**

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances, (source: <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1>)

#### **5.2 Abuse has been defined as:**

*“the violation of an individual's human and civil rights by another person or persons” (No Secrets DH 2000)”*

Abuse may consist of a single act or repeated acts. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. The abuse can encompass, but is not limited to:

- Psychological and emotional abuse
- Physical abuse
- Sexual abuse
- Financial abuse
- Self-neglect: A wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- **Neglect or Acts of Omission**; ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition, and heating.
- Social media networks
- Modern slavery
- Human trafficking
- Discriminatory abuse - values, beliefs, or culture result in a misuse of power that denies mainstream opportunities. It includes discrimination on the basis of race.
- **Domestic Violence Abuse**: An incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse, by someone who is personally connected. Includes psychological, physical, sexual, financial, economic, emotional abuse; so-called 'honour-based' violence; Female Genital Mutilation; forced marriage.
- Radicalisation, terrorism, and extremism.

### 5.3 Definition of adult at risk:

An adult at risk is someone who is 18 or older and needs care and support, but may be at risk of abuse or neglect:

- They may have a physical disability, learning disability, sensory impairment, or mental health needs
- They may be frail due to ill health or cognitive impairment
- They may misuse substances or alcohol
- They may lack the mental capacity to make certain decisions
- They may be an unpaid carer who is subject to abuse

(source The Birmingham Safeguarding Adults Board (BSAB))

### 5.4 Work Experience

Nehemiah is aware of its responsibilities in relation to under 16s, who are offered periods of work experience. We ensure that the proper protocols are observed, and risk assessments are carried out. For example, individuals are in plain sight of their supervisor, site visits are supervised, and all staff are DBS checked on a 3 yearly cycle.

This policy has increasingly been developed with reference to the following organisational policies and guidance:

- Anti-Social Behaviour

- Hate Crime and Harassment
- Equality and Diversity
- Whistleblowing
- Lone Working
- Disciplinary
- Recruitment and Selection
- Health and Safety
- Confidentiality and Data Protection
- Comments Compliments and Complaints
- Domestic Abuse
- Legislation listed in Appendix 1

## **6 Staff Roles and Responsibilities**

Safeguarding is everyone's responsibility, whether it is preventative action or taking action to protect someone, we all have a part to play. Our safeguarding procedure is attached in Appendix 1 of this document.

Frontline staff are often those who are placed in the best position to identify safeguarding concerns. Additionally, they are also in a position of trust. In order to ensure safeguarding is in place appropriately, staff will be responsible for:

- undertaking scheduled induction and updated training on safeguarding
- understanding their function in carrying out child protection procedures
- remaining aware of reporting requirements and who to contact if there are safeguarding concerns.
- remaining aware of how to identify signs of harm and documenting concerns.
- taking timely action to report safeguarding concerns to their line manager.

All managers are expected to take responsibility for any alerts that come to their attention in their service area. They must never ignore, underplay, or pass on responsibility to another member of staff or peer.

In order to carry out their DSL responsibilities, the DSL will undertake safeguarding training at least every two years which covers their requirements, responsibilities, and safeguarding processes. As well as maintaining their own training, the DSL will ensure each member of staff, understands the safeguarding processes, and receives appropriate training. Managers and Officers who line manage staff should ensure the Designated Safeguarding Lead and Deputy are made aware of any safeguarding issues.

### **Contractors Responsibilities**

Contractors, including third-party service providers, play a key role in safeguarding. All contractors working with or in proximity to tenants must adhere to the following safeguarding responsibilities:

- **Reporting Concerns:** Contractors must report any concerns related to abuse, neglect, or exploitation they encounter during their work to Nehemiah staff immediately. This includes concerns about tenants, other staff members, or visitors.
- **Confidentiality:** Contractors must respect the privacy of those involved and maintain confidentiality when reporting safeguarding concerns. Information should only be shared with Officers and Managers at Nehemiah.
- **Safeguarding Training:** Contractors must ensure that their staff have appropriate safeguarding training, especially if their work involves direct contact with vulnerable tenants. Nehemiah reserves the right to request proof of safeguarding training for contractors.
- **Compliance with Safeguarding Procedures:** All contractors must comply with the safeguarding procedures outlined in this policy and any legal obligations related to safeguarding. This includes understanding how to recognise signs of abuse and knowing the correct reporting channels.

## 7 Equality and Diversity

We will ensure that the ethnic, cultural, or religious needs of those at risk are understood and met when dealing with cases of safeguarding, domestic abuse, or neglect; but we will not accept ethnicity, culture, or religion as a reason for a perpetrator committing abuse.

## 8 Monitoring, Evaluation and Review

There are a number of arrangements in place to ensure incidences of abuse are effectively managed and that Nehemiah is fulfilling its corporate/strategic duties. It also ensures that key learning points/areas for improvement are identified and shared across the organisation, including near misses as well as actual incidents.

A review of all abuse cases across the organisation is undertaken, coordinated by all managers and the Designated and Deputy Safeguarding leads. Safeguarding cases are also discussed in supervision sessions with staff and at key meetings in departments Risk Management, and Consumer Standards and Tenant Satisfaction Working Group.

All serious incidents including any that involve staff will be reported to the Local Authority. The Corporate Services Manager is always notified of any incident (either alleged, suspected or actual) that involves a member of staff, and the Accident and Incident reporting process is followed.

We will monitor and report on the following to the Operations Committee and Executive Board quarterly, including the production of an Annual Safeguarding Report:

- The number and type of Safeguarding referrals made to Local Authorities and the number and type accepted as Safeguarding by the Local Authority.
- The number of Safeguarding by types of abuse and outcomes from interventions and actions taken.
- Any Safeguarding Adults reviews we have been involved in and the learning and improvements we have made as a result.
- Safeguarding concerns relating to our contractors or partners which involve our customers including outcomes.

## **9 Training**

All relevant staff will receive training on using our policy and procedures as part of their induction. Identified training is in place for all Nehemiah staff. The level of training they receive will be considered in proportion to the role within the organisation, clients they work with and risk with which they are potentially dealing. All frontline staff will complete safeguarding awareness training, and all designated leaders will complete annual fresher training for designated leads.

Everyone working on behalf of the organisation is expected to behave towards customers and staff in a way that demonstrates their commitment to this policy. Failure to do so could result in disciplinary action or termination of contracts.

All staff training will be monitored via our HR training records.

All contractors, agencies and individuals working within our services will confirm they have carried out safeguarding awareness training with their staff and read and understand our safeguarding policy and procedure. Confirmation should be obtained by Contract Lead (Property Service Officers, Seniors, and Managers) and forwarded to HR. Our Safeguarding Procedure (Appendix 1) of this policy sets out the process to assist staff and contractors who need to raise a safeguarding concern.

## **10 Equality Impact Assessment**

Nehemiah carries out Equality Impact Assessments to understand the impact that our policies may have on groups of people or individuals. These impacts may be positive or negative.

This policy will be reviewed every 3 years or sooner if legislation or good practice dictates.



### **Nehemiah Housing Safeguarding Vulnerable Adults at Risk Procedure**

The Safeguarding Vulnerable Adults at Risk Procedure should be used in conjunction with Nehemiah's Safeguarding Vulnerable Adults Policy and Local Authorities Safeguarding processes. This procedure is to ensure staff understand the processes involved in safeguarding our tenants and their family.

Each Local Authority has a safeguarding body who are responsible for vulnerable adults, (see links in policy). The referral paperwork may vary. Each Local Authority provides training on safeguarding which should ensure staff are familiar with their processes. All frontline staff supporting tenants and customers will receive regular training from Nehemiah Housing and should attending any safeguarding training organised by Local Authorities.

Safeguarding issues can happen any point in our tenants lives after any accident or bereavement. So, it is important we are alert to this. Tenants information should be regularly updated, especially when we are interacting with them at sign-ups, when reviewing their tenancy, (for example starter tenancies), arrears and ASB interviews, and estate inspections.

The following section outlines provides a brief outline of the safeguarding process:

- 1. What is a safeguarding concern.**
- 2. Who to seek further clarification from to confirm safeguarding concern.**
- 3. Who to report safeguarding concern at Nehemiah.**
- 4. Where and how to report and record safeguarding concern.**
- 5. How the organisation will monitor and review safeguarding.**

#### **1. What is a safeguarding Concern?**

A safeguarding concern is when you are worried about the safety or well-being of a child or adult because of something seen or heard, or information which has been given to you. There are many different types of safeguarding issues and types of abuse and these can range typically from physical abuse, sexual abuse, psychological & emotional abuse, self-harm and suicidal tendencies, neglect and acts of omission, financial abuse, discriminatory abuse, peer on peer abuse, trafficking and sexual exploitation, bullying including cyber bullying, physical bullying, sexting, female genital mutilation, forced marriage, extremism and radicalisation and gang based crime, (See policy for further clarification).

All staff members have a key role to play in order to safeguarding vulnerable adults and to help identify welfare concerns and possible indicators of abuse or neglect at an early stage. For some young people/children/adults a "one

off' serious incident or concern may occur, and you will have no doubt that this must be immediately recorded and reported. However, it is the gathering of a number of small incidents, events or observations that provide evidence of harm being caused to a young person or vulnerable adult.

Concerns arising in one or more of the following areas:

- adults' behaviour
- adults have a physical injury
- adults make a disclosure or allegation
- adults' physical presentation
- Information received from, or the behaviour of a carer.

What to record:

- The incident, event or observation of concern describing as clearly and concisely
- When recording a disclosure, the tenant own words are recorded and any questions you may have asked to be included.
- Noting any physical marks and/or injuries on a body map where appropriate
- Straightforward language and for fact and opinion to be differentiated.
- Any action you have taken to be recorded
- The form dated, signed, and detailed legible.
- Any errors should not be removed but should be clearly crossed out and initialled and dated.

## **2. Who to seek further clarification from to confirm safeguarding concern,**

When you have concerns about a possible safeguarding incident you should refer to our policy and discuss with you line manager immediately.

If you believe that there is an immediate risk to our tenant or a member of their family i.e., child/children, you should report concern immediately to the safeguarding board (Local Authority – Safeguarding department).

If you believe the safeguarding is a risk or danger to life you should always call 999 immediately.

## **3. Who to report safeguarding concern at Nehemiah**

If safeguarding concerns raised relate to a contractor this should be immediately reported to your line manager. You should also report concerns to the contract manager i.e., repairs contractors would be Property Service Manager, the Safeguarding Lead and Corporate Service Manager.

**4. Escalation:** Where colleagues or contractors are not satisfied with the response received from any other agency or stakeholder regarding a Safeguarding concern they should :

- discuss the concern with their line manager and agree an action plan (within 1 working day). Contractors should share their concerns with a Nehemiah member of staff who will escalate to a manager where appropriate.
- The manager should then liaise with the deputy designated safeguarding lead who will review the concern raised and if applicable contact equivalent in external organisation.
- If outcome remain unsatisfactory the designated safeguarding lead should escalate.

#### **5. Where and how to report and record safeguarding concern**

All staff must report any safeguarding concerns, suspicions, or disclosures as soon as the issue is raised. If a tenant wants to disclose any concerns staff should ensure they are made aware how information will be logged and shared both internally, (housing management system ...Safeguarding Lead etc...) and externally (social services, safeguarding board etc...). Documenting the concern is important because verbal communications may be misunderstood or forgotten. All information logged should be factual.

You should ensure you keep regular contact with referral agencies. For example, once you report to MARF contacts worker for updates.

You should inform your line manager (via telephone call and email) of any safeguarding concerns and also report it to your local Safeguarding Board. The concern should also be logged on HomeMaster and updated as and when you receive any further information relating to concern raised. When the safeguarding concern has been addressed staff should close case on HomeMaster and inform their line manager.

#### **6. How the organisation will monitor and review safeguarding**

- All cases reported and logged on HomeMaster will be reviewed in your monthly 1-2-1.
- Quarterly audits are carried out on cases place on housing management system
- Quarterly figures and outcomes will be shared with board and operations committee.
- Key cases will be used to share good practice and learning at team meetings.
- Cases are regularly evaluated, and action agreed at review meetings.

If staff require any further information, they should discuss initially with their line manager followed by the Safeguarding Lead.