



Supporting BAME communities to thrive

Date Adopted	November 2017
Policy Title	Safeguarding Vulnerable Adults at Risk Policy and Procedure
Review Date	May 2026 (previous approval November 2024)
Approved by Operations Committee	May 2026
Date of Next Review	May 2029
Department	Operations-Housing Service

Contents

1. Policy Statement, Values and Commitment
2. Scope and Application
3. Definitions
4. Housing-Specific Safeguarding Risks (Illustrative Examples)
5. Recognition, Reporting and Escalation of Safeguarding Concerns
6. Consent, Mental Capacity and Information Sharing
7. Safeguarding and Tenancy Enforcement
8. Safeguarding Concerns Involving Children
9. Multi-Agency Working
10. Governance, Monitoring and Review
11. Legislation, Guidance and Related Policies
12. Local and Multi-Agency Arrangements
13. Related Nehemiah Housing Policies and Procedures

Nehemiah Housing – Safeguarding Vulnerable Adults Policy

1. Policy Statement, Values and Commitment

Nehemiah Housing is committed to building successful, sustainable, and diverse communities by providing housing and related services in a culturally sensitive, inclusive, and professional manner. Safeguarding is a core organisational responsibility and is integral to how we deliver housing, manage risk, and support tenants—particularly those who may be vulnerable due to age, disability, mental health needs, or social circumstances.

This document sets out Nehemiah Housing’s safeguarding policy and the associated procedures that all staff, contractors, and partners must follow to identify, report, escalate, manage, and close safeguarding concerns in a consistent and lawful manner.

We are committed to protecting individuals from abuse, neglect, exploitation, and self-neglect; promoting dignity, autonomy, and wellbeing; taking proportionate, lawful action to prevent foreseeable harm; and working in partnership with statutory and voluntary agencies to achieve effective safeguarding outcomes.

This approach is informed by Nehemiah Housing’s ethical values of advocacy, respect, and care for people at risk, alongside our statutory and regulatory duties.

2. Scope and Application

This policy applies to all Nehemiah Housing employees, Board members, agency workers, contractors, and volunteers who may come into contact with tenants, service users, or members of the public in the course of their work.

All individuals covered by this policy share responsibility for safeguarding and must act in accordance with safeguarding principles, remain alert to indicators of abuse or neglect, and report concerns promptly.

3. Definitions

Safeguarding means protecting a person’s right to live in safety, free from abuse, neglect, and exploitation, and responding appropriately where concerns arise.

An adult at risk is a person aged 18 or over who may be unable to protect themselves from abuse or neglect due to care and support needs.

Forms of abuse recognised under this policy include, but are not limited to, psychological and emotional abuse, economic abuse, domestic abuse, modern slavery, online exploitation, self-neglect, and hoarding behaviours.

4. Housing-Specific Safeguarding Risks (Illustrative Examples)

Certain safeguarding risks occur more frequently in social housing settings. The examples below are illustrative and not exhaustive and must be applied using professional judgement.

Mental Health and Suicide Risk: Where there is evidence of mental ill-health or heightened risk, staff should consider safeguarding implications within allocations, tenancy management, and risk assessment processes.

Exploitation and Cuckooing: Where a tenant's home is being used or controlled by third parties for criminal purposes, the tenant will generally be treated as a victim, and safeguarding and support will be prioritised over enforcement.

Hoarding and Self-Neglect: Hoarding behaviours may indicate underlying vulnerabilities. Responses should focus on engagement, safety, and support while managing property and fire risks proportionately.

5. Recognition, Reporting and Escalation of Safeguarding Concerns

All staff must remain alert to signs of abuse, neglect, exploitation, or self-neglect. Concerns may arise through direct disclosure, observation, information from third parties, or professional judgement.

Safeguarding concerns must be recorded promptly and reported to the Designated Safeguarding Lead. Immediate risks of serious harm require contact with emergency services.

6. Consent, Mental Capacity and Information Sharing

Safeguarding activity should be undertaken with the involvement of the individual and, wherever possible, with their informed consent. Where there are concerns about mental capacity, staff must apply the Mental Capacity Act 2005: presume capacity unless established otherwise, support the person to decide, and where the person lacks capacity make decisions (including about information-sharing) in their best interests and using the least restrictive option.

Information-sharing must be lawful, necessary and proportionate under the UK GDPR and the Data Protection Act 2018. Staff must share only what is relevant with the right people, at the right time, using secure methods, and record the rationale for sharing (or not sharing). Consent is not required where seeking it would increase risk, where there is risk of serious harm or serious crime, where others may be at risk, or where a statutory duty requires information to be shared. Where it is safe to do so, the person should be informed that information has been shared and why.

7. Safeguarding and Tenancy Enforcement

Safeguarding considerations must inform tenancy enforcement decisions. Where tenancy issues are linked to vulnerability, exploitation, or self-neglect, Nehemiah Housing will seek to address safeguarding risks alongside enforcement action wherever possible.

8. Safeguarding Concerns Involving Children

Although this policy focuses primarily on adults, staff may become aware of safeguarding concerns involving children. The welfare of the child is paramount.

Concerns must be recorded and reported without delay to the Designated Safeguarding Lead. Where immediate risk exists, emergency services must be contacted. Appropriate referrals will be made to Children's Social Care in line with local safeguarding procedures.

9. Multi-Agency Working

Nehemiah Housing works in partnership with Safeguarding Adults Boards, local authorities, health services, and the police where appropriate. We support the Right Care, Right Person approach, as set out in the National Partnership Agreement: Right Care, Right Person, to help ensure individuals are supported by the most appropriate professionals.

10. Governance, Monitoring and Review

The Board holds ultimate accountability for safeguarding. Operational responsibility sits with the Designated Safeguarding Lead, supported by the Deputy Designated Safeguarding Lead. Safeguarding activity is monitored through recording systems, case reviews, KPIs, audit activity, and organisational learning.

Safeguarding Assurance and Compliance

Nehemiah Housing ensures safeguarding arrangements are compliant with statutory guidance and regulatory expectations through clear policies and procedures, defined reporting and escalation routes, senior management oversight, multi-disciplinary panel review, and organisational learning. Safeguarding practice is subject to ongoing monitoring, quality assurance, and review to ensure effectiveness and continuous improvement.

11. Legislation, Guidance and Related Policies

This policy should be read alongside relevant legislation and guidance, including:

- Care Act 2014 (including the duty on local authorities to make, or cause to be made, safeguarding enquiries under section 42)
- Care and Support Statutory Guidance

- Health and Social Care Act 2008
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1998
- Crime and Disorder Act 1998 (s.115)
- Equality Act 2010
- Domestic Abuse Act 2021
- Domestic Violence, Crime and Victims Act 2004
- Protection from Harassment Act 1997
- Modern Slavery Act 2015
- Anti-Social Behaviour, Crime and Policing Act 2014
- Online Safety Act 2023
- UK GDPR and the Data Protection Act 2018 (ensuring information sharing is lawful, necessary and proportionate)

DoLS (Deprivation of Liberty Safeguard), currently apply under the Mental Capacity Act 2005; LPS (Liberty Protection Safeguard), are intended to replace DoLS but are not yet in force (this policy will be updated when LPS commence) Improved safeguarding and protections for vulnerable people - GOV.UK .

We support multi-agency approaches such as Right Care, Right Person, where relevant.

12. Local and Multi-Agency Arrangements

- Local **Safeguarding Adults Board (SAB)** policies, procedures, and multi-agency safeguarding pathways applicable to the area in which the tenant resides.
- Information-sharing agreements and escalation routes agreed with local authorities, health services, and the police.

13. Related Nehemiah Housing Policies and Procedures

This policy should be used alongside, and not in isolation from, Nehemiah Housing's internal policies, including (but not limited to):

- Adult Safeguarding Procedures
- Domestic Abuse Policy
- Anti-Social Behaviour Policy
- Mental Health and Wellbeing Policy
- Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Whistleblowing Policy
- Missing Person Policy

Where there is a conflict between policies, safeguarding duties and statutory responsibilities must take precedence. Staff should seek advice from the Designated Safeguarding Lead where uncertainty exists.

This policy will be reviewed at least every three years or sooner where legislative change or learning identifies the need.

Safeguarding Procedures – Reporting, Escalation and Case Oversight

1. Purpose of this Procedure

This procedure sets out how safeguarding concerns are identified, reported, escalated, recorded, overseen, and closed within Nehemiah Housing. It ensures safeguarding concerns are responded to promptly, consistently, and proportionately, with clear lines of accountability and robust governance arrangements.

2. Raising a Safeguarding Concern

Any employee, officer, contractor, or volunteer who becomes aware of, suspects, or receives information about a safeguarding concern **must act without delay**.

Safeguarding concerns may arise through:

- Direct disclosure by a tenant or third party
- Observation of behaviour or environmental indicators
- Information received from partner agencies or other professionals
- Professional judgement or cumulative low-level concerns

All concerns must be recorded in line with organisational recording procedures and escalated as set out below.

3. Reporting and Escalation Pathways

3.1 Housing for Older People (HfOP) Schemes

Where the safeguarding concern relates to a tenant living in a Housing for Older People scheme:

1. Initial reporting

- Concerns must be reported immediately to the **Scheme Officer**.

2. Escalation

- The Scheme Officer must escalate the concern to the **Senior Supported Housing Officer** without delay.

3. Further escalation (serious or complex cases)

- Where the concern is serious, high-risk, complex, or requires wider tenancy enforcement consideration, the matter must be escalated to the **Tenancy Services Officer**.

3.2 General Needs Housing

Where the safeguarding concern relates to a tenant in General Needs housing:

1. Initial reporting

- Concerns must be reported directly to the **Tenancy Services Officer**.

2. Absence arrangements

- In the absence of the Tenancy Services Officer, the concern must be escalated to the **Housing Officer**.

3.3 Immediate Risk

At any point, where there is:

- Risk of significant harm
- Risk to life
- Serious criminal activity

Emergency services must be contacted immediately. This does not replace internal reporting and escalation.

4. Multi-Disciplinary Oversight – ASB & Safeguarding Panel

4.1 Panel Role

All safeguarding concerns, regardless of level or service area, are overseen through the **ASB & Safeguarding Panel**.

The panel provides:

- Strategic oversight of safeguarding activity
- Challenge, consistency, and assurance in decision-making
- A forum for discussion of **complex, high-risk, or escalating cases**
- Agreement of proportionate actions, referrals, and risk management plans

4.2 Panel Membership

The ASB & Safeguarding Panel meets **fortnightly** and includes:

- Designated Safeguarding Lead
- Deputy Designated Safeguarding Lead
- Tenancy Services Officer
- Other relevant officers as required

Any officer may bring a safeguarding concern or case to the panel for discussion and advice.

4.3 Case Discussion and Decision-Making

The panel will:

- Review safeguarding concerns and existing cases
- Assess risk and vulnerability
- Consider engagement, enforcement, and support options
- Agree actions, responsibilities, and review timescales
- Identify learning and good practice

Actions agreed by the panel must be recorded and progressed by the responsible officer.

5. Safeguarding Concerns Raised by Tenants Involving Staff or Contractors

Where a safeguarding concern is raised by a tenant and relates to the actions, behaviour, conduct, or alleged misconduct of a member of staff or contractor, the concern must be treated as a serious safeguarding matter and escalated immediately. Such concerns must not be handled solely through routine service management, disciplinary, complaints, or contract management processes. The primary focus must be the safety and wellbeing of the tenant.

All safeguarding concerns of this nature must be reported without delay to Senior Management, including the Designated Safeguarding Lead, Corporate Services Manager, Head of Governance, and Property Services Manager, regardless of the housing type or service area. Immediate protective actions must be considered to reduce risk to the tenant, including restricting contact where necessary. The concern must be recorded as a safeguarding case and referred to the ASB & Safeguarding Panel for oversight. Safeguarding cases involving staff or contractors may only be closed following panel review and agreement.

6. Case Monitoring and Review

- All safeguarding cases remain **open and monitored** until reviewed by the ASB & Safeguarding Panel.
- Case progress, risk levels, and actions are reviewed at panel meetings.
- Cases may be re-escalated or referred to external agencies where risk increases or new information emerges.

7. Case Closure

A safeguarding case must not be closed without discussion and agreement at the ASB & Safeguarding Panel.

Case closure decisions will consider:

- Current risk and vulnerability
- Evidence of engagement or resolution
- Outcomes of any referrals or interventions
- Ongoing monitoring or support requirements

Closure decisions and rationale must be clearly recorded.

8. Professional Curiosity and Accountability

All staff are expected to:

- Maintain professional curiosity
- Challenge drift or inaction
- Escalate concerns where risk remains unmanaged
- Seek advice from the Designated or Deputy Safeguarding Lead where unsure
- Safeguarding remains everyone's responsibility.