

Safeguarding Adults Policy

1. Introduction

- 1.1 This policy sets out how to minimise risk and deal with abuse, and how to protect both customers and staff. Abuse may be experienced by people of any age and in a variety of domestic and institutional circumstances. Our commitment to protect individuals from abuse applies to all customers and staff (which includes contractors and volunteers unless we say otherwise).
- 1.2 This policy also includes information on what to do if staff suspect or know that a colleague is experiencing harm or abuse. A2Dominion strongly encourage all staff members to take action to ensure staff are also safeguarded, both within work and outside of work.
- 1.3 Safeguarding can be defined as protecting the health, wellbeing and human rights of adults who are experiencing or at risk of abuse, neglect or harm.
- 1.4 The Care Act 2014, aims to create a legal framework so key organisations and individuals with responsibilities for adult safeguarding can agree on how they must work together and what roles they must play to keeps adults at risk safe.

The Care Act states:

- All housing providers and housing support providers should have clear operational policies and procedures in adult safeguarding.
 - All housing staff must be:
 - Familiar with the six principles underpinning safeguarding adults (see details in the [definitions](#) section)
 - Trained in recognising the symptoms of abuse
 - Be vigilant and able to respond to adult safeguarding concerns.
- 1.5 Guidance is also offered to staff so that they minimise the risk of harm and complaints being made against them.



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- 1.6 This policy also reflects compliance with Local Protocol on Adults, which states that residents, housing applicants and others have ready access to an effective complaints and compensation policy, administered effectively.
- 1.7 “The Public Interest Disclosure Act of 1998: Provides protection to ‘workers’ making disclosures in the public interest and allows such individuals to claim compensation for victimisation following such disclosures. It protects whistle-blowers from detrimental treatment or unfair dismissal by their employers, because they have raised a concern”.

2. Policy aims and objectives

- 2.1 A2Dominion Group (A2D) is committed to protecting all staff and people who use our service from abuse. A2Dominion will not tolerate any kind of abusive behaviour regardless of the status or position of the perpetrator and status or position of the person experiencing the abuse.
- 2.2 As a non-statutory agency, A2Dominion will work in partnership with relevant statutory partners, such as police and social services, to respond to suspicions or incidents of abuse in accordance with statutory procedures.
- 2.3 This policy, and its procedure, covers the responsibilities of the A2Dominion Board/Committee Members, staff, contractors working on behalf of A2Dominion and volunteers in relation to the protection and safeguarding of adults.
- 2.4 It is everyone’s responsibility to act if they are concerned about, suspect or are told about safeguarding concerns, including A2Dominion Board/committee members, staff, contractors, volunteers and customers.
- 2.5 Finally, this policy seeks to ensure all staff are accountable for their actions, behaviours and decisions when dealing with safeguarding disclosures. Increase understanding of expectations and positive actions to reduce adverse consequences which could negatively impact our customers, colleagues and the organisation.

3. Definitions

- 3.1 A2Dominion customers who may be considered most vulnerable to abuse include:
 - Children and young people
 - Young parents
 - People with learning disabilities
 - People with physical disabilities
 - People with mental health problems
 - People with complex medical needs
 - People escaping violent partners

- Frail and disabled older people
- People with alcohol or substance misuse problems
- People from minority groups.

3.2 **Safeguarding:**

- Protecting the health, wellbeing and human rights of Adults '**At Risk**' from abuse and harm
- Protecting vulnerable adults from abuse, harm and neglect, and creating a '**Risk**' free environment
- Protecting the health, wellbeing of children and young people '**At Risk**' of abuse and harm
- Safeguarding is about people and organisations working together to prevent and reduce '**Risk**' and experience of abuse or neglect.

3.3 **Abusive behaviours include, but are not limited to, the following (as defined by the Care Act 2014):**

- 3.3.1 **Physical Abuse** – (including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions).
- 3.3.2 **Domestic Violence** – (including psychological, physical, coercive, sexual, financial, emotional abuse; so called 'honour' based violence).
- 3.3.3 **Sexual Abuse** – (including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting).
- 3.3.4 **Psychological Abuse** – (including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks).
- 3.3.5 **Financial or Material Abuse** – (including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits).
- 3.3.6 **Modern Slavery** – (encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane conditions).
- 3.3.7 **Discriminatory Abuse** – (including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion).
- 3.3.8 **Online Abuse** – vulnerable clients may be at risk of online exploitation, cyber bullying, inappropriate text messages/social media messages.

- 3.3.9 **Organisational Abuse** – (including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one’s care home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation).
- 3.3.10 **Neglect and Acts of Omission** – (including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating).
- 3.3.11 **Self-Neglect** – (this covers a wide range of behaviour neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding).
- 3.3.12 **Hoarding** – Could be attributed to a mental health condition that causes someone to want to accumulate and keep a large number of things that are not needed or have no value. Compulsive hoarding can leave no space for someone to clean, cook, socialise, move around their home or even sleep in a bed. If this occurs and their safety is compromised, support for their welfare should be sought. Hoarding is often linked with mental health conditions such as depression and anxiety, some may acknowledge that they have a problem, others may not).
- 3.3.13 **Radicalisation and Extremism** – vulnerable adults can be at risk of being drawn into terrorism, and both violent and non-violent extremism. The Counter Terrorism and Security Act 2015 imposes a ‘Prevent’ duty on a list of specified authorities to have ‘due regard to the need to prevent people from being drawn into terrorism’.
- 3.4 A2Dominion is not a ‘specified authority’ for the purposes of the ‘Prevent’ duty however, we will work with the specified authorities, such as local authorities, universities, the NHS and the police, in carrying out their ‘Prevent’ duties.

The ‘Prevent’ strategy has 3 specific objectives:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it,
- prevent people from being drawn into terrorism and ensure that they are given advice and support and
- work with sectors and institutions where there are risks of Radicalisation that need to be addressed.

3.5 **Six key principles underpin all adult safeguarding work**

- **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** – Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** – Accountability and transparency in delivering safeguarding.

3.6 Indicators of Abuse

A2Dominion is committed to providing a service delivery environment which is free from abuse. Signs of abuse may include:

- Seeking shelter or protection
- Unexplained reactions towards particular individuals
- Unexplained reactions towards particular settings
- Frequent or regular visits to the GP, hospital A&E department or hospital admissions
- Frequent or irrational refusal to accept investigations or treatments for routine difficulties
- Unexplained change in material circumstances
- Inconsistency of explanation or no explanation.

3.7 The following problems exhibited by the adult may increase the risk and likelihood of an abusive situation:

- Substance misuse
- Mental illness
- Stress
- Chronic fatigue
- Conflicting demands of other family members
- Individual's unmet needs.

3.8 Contractors

A2Dominion will ensure our contractors/partners have policies and procedures in place to empower their staff and volunteers to recognise and identify safeguarding concerns. A2Dominion will ensure that contractors policies and procedure include the following:

- Guidance for contractors on how to report safeguarding concerns relating to A2Dominion customers
- Guidance on Safer Recruitment, and how they will adhere to the Safer Recruitment Standards
- How contractors will mitigate risks of harm and abuse to customers
- Details of the training that contractors will undertake to ensure they can report safeguarding concerns when needed.

4. Implementation

- 4.1 A2Dominion will work within all statutory and regulatory guidance on safeguarding clients from abuse, including local frameworks and the legislation set out in the Care Act.
- 4.2 A2Dominion applies the principles of the Care Act to its work with all customers.
- 4.3 A2Dominion recognises that the denial of either choice or positive risk-taking opportunities to customers constitutes institutional abuse. A2Dominion will not conduct any organisational or work practices that could be abusive in this way.
- 4.4 A2Dominion will offer support to customers to exercise their right to give valid consent, based on informed and comprehensive choices. A2Dominion recognises the 'diagnostic test' and 'functional test' of an adult's capacity to make decisions set out by the Mental Capacity Act 2005.
- 4.5 A2Dominion will ask applicants for housing for background information to enable us to identify those adults and children who may be at risk of abuse or neglect or who may pose a risk to others. We will liaise and work with other agencies, including the local authorities, probation service MARAC and MAPPA if an applicant for housing discloses a criminal conviction or other history and A2Dominion are concerned regarding the suitability of the accommodation for the applicant in light of that conviction/history.
- 4.6 A2Dominion will operate clear safeguarding processes and confidential reporting systems so that anyone who suspects that abuse is taking place or is concerned about it can 'blow the whistle' and take action against board members, staff, volunteers, or residents who use their positions, or any influence, power or authority they may have to abuse others or the organisation.
- 4.7 A2Dominion will identify Champions in all relevant operation areas for Safeguarding Adults. The Safeguarding Champions Network is used to coach and support staff when dealing with specific issues regarding
 - Child Protection
 - Dementia
 - Safeguarding Adults
 - Mental Capacity Act.
- 4.8 A2Dominion ensure that HR procedures, such as Disclosure and Barring Service (DBS), Good Repute and Code of Conduct, are linked and aligned with Safeguarding procedures and policies. In the case of a member of staff being subject to disciplinary action following inappropriate behaviour which has caused customers harm, or put customers at risk of future harm, managers should ensure that the Safeguarding team are informed. Hiring managers must

ensure the relevant level of DBS checks are sourced, based on HR's recruitment policy, which is aligned with staff's roles and relates to customer's vulnerabilities. Staff will not be allowed to commence their role until a satisfactory DBS check has been completed. There are some *exceptional circumstances* where staff could commence prior to their DBS results, and this must include a risk assessment and working under supervision.

- 4.9 All staff receive appropriate safeguarding training. All new starters complete Safeguarding Adults Level 1 and Safeguarding Children Level 2 during their first 3 months, and all front-line staff and safeguarding champions complete Safeguarding Adults and Children Level 2. Further safeguarding training is available to anyone who needs it as part of their role; some roles, including our safeguarding team and managers of frontline teams, must complete Safeguarding Adults and Children Level 3.
- 4.10 A2Dominion will provide housing which is safe for clients. In some cases this might include CCTV, lockable and monitored communal areas, and private and confidential areas for customers to speak to staff when they need to for instance; conducting telephone calls with residents in private spaces. Staff will be trained in the appropriate use of CCTV, and other electronic devices with recording capabilities to ensure they are safeguarding clients; for example, staff will gain explicit consent before photographing a resident. Staff will adhere to the Group's "Photography, Film and Audio Consent Policy".
- 4.11 We will offer other associated safeguarding training to enhance competencies, based on staff's roles and responsibilities, such as:
- Hoarding
 - Modern Day Slavery
 - Risk Assessments
 - Suicide Awareness
 - First Aid
 - Professional Boundaries
 - Domestic Abuse
 - Mental Health Awareness.
- 4.12 In specialist housing services in which clients share communal spaces, such as lounges/kitchens/bathrooms, consideration will be given to safeguarding and minimising risk when matching housemates. Staff will carry out risk assessments and comprehensive discussion will take place with current and potential clients to identify their needs and ensure that they are suitable house mates to each other.

5. Performance measures and targets

- 5.1 Safeguarding adults from abuse is a complex process. Staff assessment and action on abuse must always be in co-operation and collaboration with other

agencies, such as Adults Services, DBS, doctors and other health services, and the police.

- 5.2 All safeguarding adults' referral and incidents will be reported to A2D's Audit and Risk Committee.
- 5.3 A2Dominion is committed to multi-agency working within the guidelines as laid out in the Care Act 2014 and government guidance.

6. Monitoring and review arrangements

- 6.1 We will monitor the effectiveness and implementation of this policy to ensure that residents are treated fairly and equitably.
- 6.2 The policy will be reviewed every three years year, unless legislation or sector developments require otherwise, ensuring that it continues to meet its objectives and take account of good practice developments.
- 6.3 Completed incident forms will be held in a safe and secure place with the Champion.
- 6.4 We will consult with our customers on any review of this policy and demonstrate how their views have influenced the process.

7. Consultation

- 7.1 Specialist housing business improvement team, safeguarding team.
- 7.2 This policy will be reviewed by customers through our Resident Scrutiny Panel.

8. Equality, Diversity & Inclusion Statement

- 8.1 A2Dominion group, staff, partners, stakeholders and contractors are committed to providing services, which are relevant and appropriate to the needs of people. We will treat others fairly and without discrimination.
- 8.2 We will ensure that all our services relating to this policy are accessible and available for all customers as set out in the requirements of the Equality Act 2010.
- 8.3 We have undertaken an Equality Impact assessment for this policy with no areas for concern identified.

9. Associated Documents

Related Policies

- A2Dominion's privacy and cookies policy (www.a2dominion.co.uk/privacy)
- Data Protection policy

- Good Repute Standards policy
- Hoarding policy
- Medication policy
- Safeguarding Children policy
- Whistleblowing policy

Useful Web addresses

- CQC – Abuse and Neglect - <http://www.cqc.org.uk/content/safeguarding-people>

10. Data Protection Statement

- 10.1 The protection of personal data is of great importance to A2Dominion Group and more than just a legal obligation.
- 10.2 A2Dominion Group and affiliate organisations are the data controllers registered with the ICO with the following registration numbers:
- A2Dominion Housing Group Limited: Z4843307
 - A2Dominion Homes Limited: Z9799978
 - A2Dominion South Limited: Z7835340
 - A2Dominion Housing Options Limited: Z5412073
 - A2Dominion Residential Limited: Z3391351
 - A2Dominion Developments Limited: ZA103931
 - Pyramid Plus London LLP: Z3594227
 - Pyramid Plus South LLP: Z3594230
- 10.3 Our data protection policy and procedures are governed by the Data Protection Act 2018. We collect and process personal information in order to provide housing services and meet our contractual and legal obligations. All persons authorised to receive personal data are obliged to handle personal data in accordance with applicable laws and regulations at all times.
- 10.4 For information on how we collect, store, process and use customers' personal data, please visit our website on <https://www.a2dominiongroup.co.uk/privacy-and-cookie-policy>.
- 10.5 For employee related privacy statement, please contact our HR team at hrenquiries@a2dominion.co.uk.
- 10.6 You can also contact the Data Protection Officer / Data Compliance team at governance@a2dominion.co.uk