

Adult Safeguarding Policy

Section 1: Introduction

This policy:

- Applies to all workers: paid staff, locum workers, agency workers, sessional workers, students on placement, senior managers and the Board of Trustees
- Has been written to comply with the requirements of the Care Act, 2014 and the *Pan London Multi-Agency Adult Safeguarding Policy and Procedures*

Purpose:

- To safeguard and protect the adults at risk who receive our services; this includes, but is not limited to, the Housing Justice Hosting Project and the Church and Community Night Shelter Network
- To provide the principles and processes that guide our practice

Safeguarding means:

- Protecting individual health
- Maintaining and promoting individual wellbeing (the '**wellbeing principle**')
- Ensuring that human rights are respected
- Enabling a life free from harm, abuse, and neglect

Protection means:

Our overall statutory responsibility to formally raise concerns with the local authority or other relevant agencies when abuse is suspected or has occurred. It includes our responsibility to be transparent and honest, thus fulfilling our duty under the Care Act to work collaboratively and co-operatively with relevant agencies, including the Police, Local Authorities, the Care Quality Commission, and the NHS.

An 'Adult at Risk'

The safeguarding duties apply to any adult (18 years or older) who:

- Has needs for care and support (regardless of whether the local authority is meeting any of those needs) and;
- Experiences, or is at risk of, abuse or neglect; and
- As a result of the above care and support needs is unable to protect themselves from either the risk of, or the experience of abuse and neglect

In the context of safeguarding adults, the vulnerability of the Adult at Risk is related to their ability to make and exercise their own informed choices free from duress, pressure or undue influence of any sort, and their ability to protect themselves from harm including: abuse, neglect, or exploitation.

Six key principles underpinning all adult safeguarding work:

- Empowerment People are supported and encouraged to make their own decisions and give 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 appropriate to the risk presented
- Partnership Local solutions through services working with their communities
- Accountability Accountability and transparency in delivering safeguarding

Making Safeguarding Personal:

- A personalised approach that enables safeguarding to be done with – not to – people, as far as is practically and safely possible. The adult at risk should be involved at every step of the process
- A practice that focuses on achieving meaningful improvement to people's circumstances (as defined by them in their stated outcomes), rather than just on 'investigation' and 'conclusion'

Once a safeguarding concern has been brought to a conclusion, in the spirit of co-evaluation, there should be a review with the adult at risk of their experience of the process. It involves asking questions such as:

- Did you achieve your outcome(s)?
- What did we do that was useful for you?
- What wasn't so useful for you?
- What could we do differently/better if a safeguarding concern was raised again?

Housing Justice will uphold best practice safeguarding principles by:

- Providing education, advice, and support to the adults we work with so that they can understand and manage their own safety and risks in order to protect themselves from threats of or actual abuse
- Providing accommodation which assists to uphold and ideally improve the wellbeing of the adults we support
- Recognising potential signs and indicators of abuse and taking action to raise these as concerns, involving the adult in any such action - mindful of their capacity to make their own decisions (for more information on capacity, please refer to section 4 of this policy)
- Ensuring we have clear policies, training, management support, and guidance so that our staff and volunteers have clear direction and assistance to fulfil their responsibilities
- Ensuring our organisation lives up to its values and fulfils its legal and ethical responsibilities through good governance and leadership

An Effective Safeguarding Culture requires all workers to:

- Monitor their own work and be insightful and reflective about their practice
- Work openly and transparently and inform their manager when they believe that their acts or omissions have fallen short of professional expectations
- Monitor the work of others: colleagues, managers, external professionals, friends and families of the adults they work with and raise concerns with their manager or their manager's manager immediately as they arise
- Provide well-led services where managers are open, supportive, and inspire trust and confidence to their teams

Senior management are fully committed to good practice and are willing to reflect and make changes to policies, protocols etc. which do not meet service needs or the needs of the adults at risk.

If you have concerns about reporting a matter, regardless of the status of the alleged person, please discuss it with your manager. If you make a professional disclosure, you will be protected by the organisation, provided that your report is made in good faith.

Section 2 Responsibilities

All workers: paid staff, locum workers, agency workers, sessional workers, students on placement, will:

- Ensure that their own practice is in line with the principles of effective service provision
- Be alert to signs and indicators that someone may be at risk of, or experiencing abuse
- Work with guests, hosts and other partners to prevent or minimise circumstances which can increase the risk of abuse e.g. isolation, unhealthy relationships, poverty
- Empower guests, hosts and other partners to have open conversations about safeguarding, equality, or radicalisation
- Appropriately challenge unacceptable views, attitudes, or behaviours
- Offer guests, hosts, and other partners opportunities to provide feedback on our services e.g. email, phone, face to face, written surveys, internal/external quality audit reviews
- Maintain clear and comprehensive records in client files as required by the job role
- Keep risk management plans and support plans up to date as required by the job role
- Communicate **any safeguarding concerns** to your Manager/Safeguarding Lead
- Contribute towards whatever actions are needed to safeguard and promote the wellbeing of the guest/individual including completing incident forms and attending/contributing at meetings
- Promote awareness of abuse and provide support and guidance to the adults they work with including discussing safeguarding in guest liaison meetings
- Openly and fully engage in training and supervision

Project Co-ordinators will additionally:

- Identify and report safeguarding risks in their individual projects
- Ensure this procedure is implemented and that reporting structures are used and followed within the project they co-ordinate
- Ensure they are aware of the service's local contact for Prevent and know how to refer concerns about radicalisation to the appropriate Prevent Channel

Managers will additionally:

- Induct all workers in the safeguarding policy
- Ensure that all workers receive relevant training, including refresher training
- Monitor the reporting and recording of safeguarding internally/externally, ensuring it is accurate, timely and centred around the individual concerned, liaising with the Safeguarding Lead as appropriate
- Support and advise their team regarding safeguarding matters, ensuring safeguarding is discussed in team meetings and during supervision
- Be familiar with the Local Safeguarding Adults Board (LSAB) procedures for reporting
- Ensure other requests from the LSAB, and the process for challenging lack of action or disagreement with the local authority (often called the escalation or dissent procedure), is actioned in a timely manner

- Liaise with external professionals as appropriate
- Participate fully and with candour during safeguarding enquiries/investigations
- Ensure all cases are managed in accordance with good practice and this policy
- Create an open and supportive culture for their team

Volunteer Services Manager will additionally:

- Produce a safeguarding policy and procedure for all volunteers, updated every 3 years, as a minimum
- Produce a volunteer handbook which includes guidance on safeguarding and professional boundaries
- Produce training and written guidance for workers who manage volunteers on local volunteer induction and volunteer supervision, to include reference to safeguarding
- Deliver volunteer safeguarding training
- Ensure all workers and volunteers are kept updated on safeguarding issues as required

The Safeguarding Leads will additionally:

- Review safeguarding incident reports
- Provide advice and support through the line management structure when safeguarding matters occur
- Support staff to make referrals to appropriate agencies, including the Local Authority
- Support staff to work constructively with partners, including Local Authorities, Police, NHS and other providers
- Monitor the quality of responses from services
- Conduct a six monthly review of all medium-high rated safeguarding incidents and provide a summary report to the Board of Trustees' safeguarding lead. This will include analysis of numbers, serious cases and lessons learned, recommendations, and planned action.
- Produce an annual safeguarding report for the Board of Trustees
- Represent the organisation at external reviews

NB The Safeguarding Lead for England is Jacob Quagliozzi, Director for England.
The Safeguarding Lead for Wales is Sharon Lee, Director for Wales
Each will act as the Deputy for the other (annual leave, absence etc)

The Chief Executive Officer (CEO) will:

- Be responsible for ensuring the organisation is well-led
- Line manage the Safeguarding Leads
- Ensure good governance, highlight incidents reportable to the Charity Commission to the Board of Trustees and, where directed by them, make the report

The Board of Trustees will:

- Fulfil the Charity Commissions expectations around duty of care, regarding the necessary steps to safeguard and take responsibility for adults at risk, acting in the adults best interests and ensuring all reasonable steps are taken to prevent any harm to them
- Assess the risks that arise from the charity's activities and operations involving adults at risk
- Ensure that appropriate safeguarding policies and procedures are in place
- Monitor to ensure that these safeguards are being effectively implemented in practice e.g. reviewing the annual safeguarding report and challenge as appropriate
- Ensure reportable incidents are made to the Charity Commission
- Appoint a safeguarding lead
- Monitor the role of the CEO in carrying out their responsibilities

Section 3 Forms of Abuse

The Care Act sets out 10 forms of abuse which are listed below. Also listed are some possible indicators of abuse. This is not an exhaustive list.

Physical Abuse is defined as 'non-accidental harm to a person caused by the use of force, which results in pain, injury or a change in a person's natural physical state'. It can include hitting, shaking, biting, pinching, poisoning, burning or scalding, enforced sedation, and the excessive use of restraint.

Possible Indicators: Any unexplained injuries such as fractures, pressure sores, sprains, bruises, especially in well protected areas, dislocations, drowsiness or confusion due to over or under medication, lacerations. These may be accompanied by changes in mood or behaviour e.g. increased anxiety or the very opposite i.e. behaviours that might be considered more 'aggressive'.

Psychological or Emotional Abuse is usually a repeated form of abuse (but can be a one-off), where an individual is subjected to threats of harm, isolation or seclusion from services, harassment or intimidation, as well anything that alters the person's behaviour from the way they'd like to live and impacts negatively on their wellbeing. It can include: an absence of respectful interaction, a denial of measure to promote dignity, absence of warm support or human contact, shouting, swearing, using demeaning terms, insults, threats, ignoring, lack of stimulations, seeking to control or coerce the individual.

Possible Indicators: Fear, depression, withdrawal, passivity, confusion, running away, disturbed sleep patterns, weight loss or gain, low self-esteem, self-harming behaviours, crying, anxiety or the opposite i.e. behaviours that might be considered more 'aggressive'.

There is no one-size-fits-all response to psychological abuse. Any unexplained change in behaviour could indicate that someone is experiencing this. All staff must be alert to such changes and show concerned curiosity by a) exploring why this might be happening with the individual and b) making a comprehensive record of their discussion.

Sexual Abuse includes rape and sexual assault or sexual acts, (not necessarily involving a high level of violence) to which the person has not, or cannot consent, or where coercion/pressure has occurred. Examples of sexual abuse include rape, sexual assault (including non penetrative acts, masturbation, inappropriate touching, oral sex). It also includes activities such as looking at or participating in the production of sexual images or videos, being encouraged to behave in sexually inappropriate ways, or grooming in preparation for abuse (including via the internet). Any male, female or young person can sexually abuse another person.

Possible Indicators: Difficulty in walking or sitting, bruises or lacerations, torn or bloody or semen-stained clothing, pain, sexually transmitted infections, increase in urinary tract infections (e.g. cystitis), an increase in sexualised behaviour, withdrawal, confusion, upset, anxiety, depression. A new relationship which appears controlling in nature may be an indication that grooming is taking place as might gifts or presents such as mobile phones or spending more time on social media/the internet.

Financial or Material Abuse involves an individual's funds or resources being inappropriately used by a third person. It may include theft, fraud, the withholding of money or the inappropriate or unsanctioned use of a person's money or property, taking possessions, coercion or exploitation, misuse of power of attorney, identity theft, cuckooing (where drug dealers take over someone's home and use it as a base to sell/distribute drugs).

Possible Indicators: Inadequate money to pay bills, lack of awareness of what is in a bank account, disappearing money, insufficient funds to purchase necessities, inadequate clothing, heating, sudden or large withdrawals of money, malnutrition, loss of tenancy or homelessness, unexplained changes in mood or behaviour.

Neglect or Acts of Omission is a failure to meet the person's basic physical and/or psychological needs, and is likely to result in the serious impairment of their health or wellbeing. It can include failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to, basic emotional needs. This can also include a failure to protect the Adult at Risk from harm. Neglect of an unborn child is also possible, for example, through maternal substance misuse.

Possible Indicators: Lack of medical care, dehydration, malnutrition, hypothermia, inadequate clothing, infections, unexplained failure to respond to needs or requests for support, failure to follow up on needs/risks, failure to communicate effectively leading to a detriment in health or wellbeing, failure to record information.

Organisational Abuse is the collective failure of an organisation to provide an appropriate and professional service. It includes failure to ensure the necessary safeguards are in place, and it may be part of the accepted 'custom, culture and practices' within an organisation.

Possible Indicators: Poor standards of cleanliness, low staffing levels over a long period of time, lack of training, supervision and leadership, lack of knowledge or enforcement of policies and guidelines, punitive treatment, a culture of disempowerment, unstimulating environments, acceptance at all levels of the hierarchy of poor quality recording, lack of positive attitude towards service users or batch care.

Discriminatory Abuse occurs when values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals. It includes discrimination based on race, culture, gender, sexuality, faith/ religion or disability.

Possible Indicators: Religious observances not encouraged, lack of respect shown to an individual based on a protected characteristic that they hold, exclusion from rights afforded to other people such as health, education, employment, housing, criminal justice, civic status and social contact, development of a damaging self perception, fearfulness, anxiety, withdrawal, anger, frustration.

Domestic Abuse including Female Genital Mutilation, Forced Marriage and “Honour-Based” Violence.

Domestic abuse is defined by the Home Office as: “any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality”. It includes coercive control or exploitation that can be psychological, physical, sexual or financial.

Honour Based Violence (HBV) is an umbrella term encompassing various offences covered by existing legislation. HBV can be described as a collection of practices, used to control behaviour within families or other social groups, to protect perceived cultural and religious beliefs and/or honour. Violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code usually following a failure to conform to family/community standards.

Forced Marriage is a marriage without the full consent of both parties and where pressure or threats are a factor. This is very different to an arranged marriage, which both people will have agreed to. For more information contact www.gov.uk/forced-marriage. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money)

can also be a factor. Both men and women are forced into marriage although most cases involve young women and girls aged between 13 and 30. However, there is no 'typical' victim of forced marriage.

Female Genital Mutilation (often referred to as FGM) is a destructive operation, during which the female genitals are partly or entirely removed or injured with the aim of inhibiting a woman's sexual feelings. Most often, but not always, the mutilation is performed before puberty, often on girls between the age of four and eight.

Possible Indicators: Repeated health issues, the person may describe themselves as 'accident prone' or 'silly', intrusive 'other person' in consultations, including partner or spouse, parent, grandparent, symptoms of depression, anxiety, post traumatic stress disorder, sleep disorders, self harming, increased use of alcohol or other substance misuse, signs of sexual, physical, financial or psychological abuse may be observed.

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 treatment. It includes a range of types of exploitation, many of which occur together. These include, but are not limited to:

Sexual exploitation - Includes, but is not limited to, forced prostitution and the production of abuse images/videos.

Domestic servitude - Includes being forced to work in private households, usually performing domestic chores and childcare duties. Freedom may be restricted and the victims may work long hours, often for little or no pay and sleeping where they work.

Forced labour - Victims may be forced to work long hours for little or no pay in poor conditions under verbal or physical threats of violence to them or their families. It can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (e.g. nail bars).

Criminal exploitation - The exploitation of a person for committing a crime, such as pick-pocketing, shop-lifting, cannabis cultivation, drug trafficking (running county lines), and other similar activities that are subject to penalties and imply financial gain for the trafficker.

Other forms of exploitation – Organ removal, forced begging, forced benefit fraud, and illegal adoption.

Possible Indicators: The person is not free to leave or come and go as he/she wishes, is in the commercial sex industry and has a pimp / manager, is unpaid or paid very little, does not have access to personal bank account or documents (e.g. passport), works excessively long and/or unusual hours, is not allowed breaks or suffers under unusual restrictions at work, owes a large debt and is unable to pay it off, was recruited through false promises concerning the nature and conditions of his/her work, high security measures exist at work and/or living locations (e.g. opaque windows, boarded up windows, bars on windows, barbed wire, security cameras, etc.), poor mental health or abnormal behaviour, fearful, anxious, depressed, submissive, tense, or nervous/paranoid.

The Modern Slavery Helpline can be used to report suspected slavery: **0800 0121 700**

The people we support are at high risk of becoming victims of modern slavery. To this end you must:

- Ensure guests in the hosting projects are aware of the dangers of forced labour and their rights around UK employment, benefits and immigration law
- Warn guest leaving the hosting project that if an opportunity sounds 'too good to be true', it probably is (especially employment offers linked to accommodation)
- Inform guests never to handover their passports/ID documents to anyone other than officials
- Encourage guests to report anyone who approaches them with offers of suspicious employment
- Call 999 if you think someone is in immediate danger

Self-neglect:

- *Lack of self-care*: this includes neglect of one's personal hygiene, nutrition and hydration, or health, to the extent that it may endanger safety or well-being
- *Lack of care of one's environment*: this includes situations that may lead to domestic squalor or elevated levels of risk in the domestic environment
- *Refusal of services that might alleviate these issues*

Possible indicators: very poor personal hygiene, unkempt appearance, lack of essential food, clothing or shelter, malnutrition and/or dehydration, living in squalid or unsanitary conditions, neglecting household maintenance, hoarding, unwillingness to engage with health or care services.

Staff often find self-neglect a difficult issue to address. If an adult has capacity, then they clearly have a right to make choices about how they live their life, even if we consider such choices unwise. However, we still have a duty of care towards the individual and in order to fulfil it, there are certain actions we must be able to evidence:

- *Concerned curiosity*: conversations with the adult about their choices, their motivations, their values, their desired outcomes, their awareness of the benefits and risks of their choices. These should be recorded in detail (not simply accepting statements like 'it's their choice' or that they 'refused' the intervention/support offered)
- *Recording*: clear and thorough records of the work done, agreed plans, outcomes identified and achieved, discussions held, multi agency meetings/discussions
- *Creativity, flexibility and professional optimism*: not simply giving up on the adult
- *Capacity*: awareness of when to request an assessment
- *Safeguarding*: awareness of guidance & procedures
- *Signposting*: referral to specialist agencies and/or seeking advice 'professional to professional'
- *Working together*: with the team, with the manager, with the senior manager, with health professionals, with other agencies, or friends and family where appropriate
- *Sharing documentation appropriately*: assessments, support and risk management plans
- *Advocacy*: consider use with people who are 'hard to engage'
- *Risk plan*: it clearly indicates a pathway for escalation at certain trigger points

In addition to the 10 forms of abuse arising from the Care Act the **Multi Agency (Pan London) Adult Safeguarding Policy and Procedures** state the following may constitute a crime and should therefore be reported to them: hate crime; mate crime; and, radicalisation.

In terms of Hate Crimes and Mate Crimes there is a judgment to be made where the victim has capacity and chooses not to report such a crime themselves. These matters must always be discussed with a Manager/Safeguarding Lead and agreed outcomes recorded.

Hate Crime is defined by the police as ‘any incident act that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person’s religion, belief, gender identity or disability’. It should be noted that this definition is based on the victim’s perception of the situation and it is not based on evidence. In addition, it includes incidents that do not constitute a criminal offence.

Mate Crime is defined by the Safety Net Project as occurring ‘when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual’. Mate crime is often difficult for the police to investigate, due to its sometimes ambiguous nature, but should be reported to the police who will make a decision about whether a criminal offence has been committed. Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Radicalisation or Influenced by Extremism. Where there is any level of concern that someone may be or has been radicalised then a report must always be made. The local council's procedure, which may be via Prevent or via the local MASH team, must be complied with. Although recently commonly associated with religious factors individuals may be radicalised from other sources such as far-right-wing organisations.

Possible indicators: expressed opinions such as support for violence and terrorism or the values of extremist organisations, possession of extremist literature; attempts to access extremist websites and associated password protected chat rooms; possession of material regarding weapons, explosives or military training. behaviour and behavioural changes such as; withdrawal from family and peers; hostility towards former associates and family; association with prescribed organisations and those that hold extremist views, personal history claims or evidence of involvement in organisations voicing violent extremist ideology or attendance at military/terrorist training. Indicators of psychological or physical abuse may also be observed.

Section 4: Confidentiality, Information Sharing, Consent and Capacity

There is no such thing as complete confidentiality only conditional confidentiality

Information given to a Housing Justice worker belongs to Housing Justice NOT to the individual worker; guests must be advised of this in advance

Our Whistle-Blowing Policy underlines the responsibility on us all to report any concerns in relation to a colleague's actions that might be considered abusive, unethical or unboundaried (you can use the email: whistleblowing@housingjustice.org.uk)

There are a number of principles that guide our response in this area:

- When an adult discloses that they may be at risk or are experiencing abuse they must be made aware that you cannot keep this to yourself
- Anything an adult at risk tells the worker must be disclosed to their team/those higher up in the organisation who need to know (if the disclosure is regarding a worker then only the Manager or Safeguarding Lead must be made aware. If it is about the manager then only the Safeguarding Lead must be made aware)
- You have a duty to record any and all conversations e.g. Safeguarding Incident Report Form, Case Notes, updating of the Support and Risk Management Plans as appropriate
- Adults at risk should be made aware of the above when they first join a service so that there are no surprises
- An adult generally has the right to decide who you can share information with outside of the organisation

However, there are times when this right can be overridden:

- Where you have reason to believe that the adult lacks capacity to give consent (please refer to the capacity section below)
- When there is a possibility that any harm could occur to anyone else
- The alleged abuser is a fellow guest/ user of Housing Justice services and may also be at risk
- A Housing Justice worker or other professional is implicated in the abuse
- For the prevention, detection, and prosecution of a crime
- Where a serious crime has been committed, The Department of Health offers the following guidance on what counts as serious crime: 'murder, manslaughter, rape, treason, kidnapping, child abuse, or other cases where individuals have suffered serious harm'
- Where you are required to do so by a court order
- Serious harm to the security of the state or to public order and crimes that involve substantial financial gain and loss will generally fall within this category
- The Terrorism Act 2000 makes it a criminal offence for a person to fail to disclose, without reasonable excuse, any information which he either knows or believes might help prevent another person carrying out an act of terrorism or might help in bringing a terrorist to justice in the UK
- Where support is provided to customers who are subject to Multi-Agency Public Protection Arrangements (MAPPA). The organisation works within this framework and will cooperate

with arrangements within the relevant Local Authority, including information sharing and risk management protocols

- Where the risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral; such a decision should only be made in consultation with the Safeguarding Lead
- Where there is solid reason to believe that, despite capacity, the level of coercion and exploitation is so high that the person cannot freely decide; such a decision should only be made in consultation with the Safeguarding Lead

Guests must be reassured and kept updated on what information will be shared, with whom, why and on the progress of any enquiry.

If the alleged person of concern (perpetrator) is a guest or worker then advice must be sought from the Safeguarding Lead regarding what can be shared with whom and why. No information may be shared until this discussion has taken place.

Information must not be shared with other guests, workers or agencies unless agreement has been obtained to do so.

Capacity

When it comes to safeguarding adults, the law ordinarily assumes that adults have the mental capacity to make their own decisions, even if those decisions appear to others to be misguided or even potentially harmful. The fact that adults are free to do as they wish, so long as they keep within the law and do not harm anyone else, is fundamental to our democracy.

The rights of an adult at risk who has the mental capacity to make their own decisions regarding their present and future circumstances other than in circumstances described above must be respected.

If you have reason to believe that the adult may lack capacity to make a specific decision regarding a safeguarding matter, whether you believe this to be a permanent or temporary state, you must always inform your Manager or the Safeguarding Lead.

Section 5 Responding to a Concern

When you have a safeguarding concern and the situation requires immediate action and/or you need advice or guidance, you must telephone your Manager or the Safeguarding Lead straight away.

Every time you have a concern or are informed of abuse/risk of abuse you must complete a safeguarding incident report form (see Appendix A), even if you have already made a telephone report.

This must be sent immediately to your Manager and/or the Safeguarding Lead no later than 4 hours after the disclosure was made.

This report may be used in court and must, therefore, be an accurate and unbiased record of questions and statements. The record must be factual, and if it does contain the workers opinion or assessment, this should be backed up with factual evidence. Opinion should be stated as such, and facts differentiated from hearsay.

Concern generated through discussion

If you receive a report either directly from the adult at risk, via another adult at risk or a family/friend of the adult please follow these guidelines:

Do

- Thank the person for talking with you and listen carefully
- Reassure them that they have done the right thing and that they will be taken seriously
- Remain calm
- Ensure that the adult at risk is not in immediate danger and, if they are, take steps to protect them
- Seek immediate medical assistance for the adult at risk, if required
- Immediately inform your Manager or in their absence the Safeguarding Lead
- Call the Police immediately in cases of serious assault, indecent assault or rape.
- Listen carefully: summarise and reflect back to ensure understanding of the facts provided
- Ask if there is anything else that the person would like to tell you
- Take action to protect any evidence that might assist the Police e.g. clothing, the environment within which the abuse occurred
- Explain that you will write up notes of the conversation
- Explain that you will share what they have said with your Manager/Safeguarding Lead

Do Not

- Ignore the adult
- Give promises that you will not share the information
- Respond by looking horrified or giving your opinions of what has been said
- Jump to conclusions - stick to the facts as they are given to you
- Ask detailed questions about what you are told
- Share this information with other staff, other service users or anyone other than your Manager/the Safeguarding Lead unless you have been given express permission to do so
- Confront the alleged person of concern (perpetrator)

- If the matter relates to an employee/volunteer do not record in the case records or anywhere else that could be read by the person concerned
- Disturb the evidence e.g. suggest that the person may want to have a shower, put their clothes in the washing, clean up their room, clean their wounds

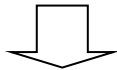
Follow the Incident Management Flow Chart located on the next page.

Manager's Responsibilities

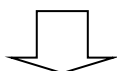
- Deal with any immediate needs, ensuring that adult at risk is safe
- Ensure that emergency medical treatment has been arranged as appropriate
- Ensure that appropriate steps have been taken so that no evidence is lost
- Ensure, if the alleged person of concern is another service user that their needs are met and that their social worker (if relevant) is informed
- Ensure no-one else is at risk
- Review the safeguarding concern report form and where necessary ensure it is updated
- Report the matter to the Safeguarding Lead
- Ensure any contract requirements are fulfilled
- Ensure that all documentation is protected so that the enquiry process/investigation has integrity
- Consider immediate risk and ensure that the Risk Management Plan is updated as appropriate
- Take account of the adult at risk's wishes and feelings regarding the matter (their desired outcomes)
- Seek advice from the Safeguarding Lead where there are concerns regarding capacity of the adult at risk or where consent is not given and there are concerns as to whether to override their wishes that information is not shared with other relevant agencies
- Work openly and collaboratively with the organisation and local authority throughout the safeguarding process

INCIDENT MANAGEMENT FOLLOWING ALLEGATION OF ABUSE

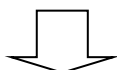
Immediately inform your Manager by telephone that you have a concern (do not delay to further investigate or wait until you have evidence)
Complete & email Safeguarding Incident Report Form **within 4 hours** to your Manager (in the absence of your Manager contact the Safeguarding Lead)



Agree with your Manager on any immediate steps to be taken to safeguard the individual that have not already been taken (see Managers' Responsibilities listed above)

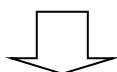


Manager immediately to inform the Safeguarding Lead and review the Safeguarding Incident Form with them to agree on immediate actions



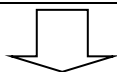
Safeguarding Lead to inform:

- Local Authority via telephone, followed up with LA Safeguarding Concern Form
- The police if the matter is criminal
- HR Partner, Real People (if the matter relates to a worker - to discuss possible options e.g. redeployment, suspension etc)



Manager and Safeguarding Lead to consider who else is aware of the incident e.g. staff/other guests etc and put in place action plan to reassure (with due regard to information sharing)

Alternative accommodation for a guest may be considered in order to keep the guest/host safe



All workers to participate in on-going enquiry, meetings etc. with the Local Authority, Police etc. to ensure that the needs of the individual are met and best practice followed

Alerting Outside of Housing Justice

Where the concern is deemed serious enough, the Local Authority Safeguarding Concern Form should be completed and sent to the local Safeguarding Team **within 24 hours** of the incident/disclosure. Usually it will be the Safeguarding Lead who makes this decision in liaison with the Manager.

The Local Authorities Referral Procedures should be used and a Referral Form may need to be completed following an initial telephone call or discussion.

Further Action

The Local Authorities will decide what enquiries/investigations are to be made and they will inform Housing Justice of their role in the process. Every worker is required to participate fully and transparently in any agreed action.

Where the concern involves an employee/volunteer

In addition to ensuring that the safeguarding concern form is completed a Manager must always inform the Safeguarding Lead where a worker is alleged to have carried out the abuse. If it is decided by the Safeguarding Lead that the person must be suspended this will be carried out in accordance with Housing Justice's disciplinary policy with advice from Real People.

What happens once an enquiry is made?

The relevant Safeguarding Adults Manager at the local authority may decide to hold a strategy discussion or meeting involving all the agencies supporting the guest.

The purpose will be to agree a multi-agency plan to investigate the allegations and assess the concerns to the safety of the person who is being harmed, to address any immediate needs and to co-ordinate the collection of information about the abuse or neglect. This may involve continuing the enquiry, or triggering a referral to other processes, such as a criminal enquiry.

A continuing enquiry may result in a case conference and a protection plan which will be regularly reviewed.

Closing a concern

A concern is closed when relevant action has been taken to address the abuse, even if the abuse is ongoing. It will typically be closed after the process of reporting, external referral, case conferences, and creating an action plan has taken place.

If the allegation is unfounded then the issue should be recorded in the guest's record. It may be that the guest has made the allegation because they didn't like the member of staff, volunteer or host or was unhappy with something the worker did. They may need support around expressing their needs and/or dissatisfaction in more appropriate ways. If the allegation was made about their host it may still be appropriate to discontinue the hosting placement.

Supporting someone who makes repeated allegations

A guest who makes repeated allegations that have been investigated and are unfounded should be treated without prejudice. Each allegation must be responded to under these procedures.

A Safety and Wellbeing Plan must be completed in full, measures have to be taken to protect staff or others, and a case conference must be convened, where appropriate. Each incident must be recorded.

What to do if a safeguarding enquiry is closed with no further action

- Ask for full explanation, in writing, on why the safeguarding enquiry has been closed with no further action being taken
- Review the information in the enquiry for completeness and clarity. Was there something important which was omitted and were concerns about the guests' safety explicitly stated?
- Did the Safeguarding Team have a full and proper understanding of the safety concerns involved?
- Pass any further relevant information to the team such as information missing from the original enquiry or additional information which is now available
- Review the Safeguarding Team's practice and decision against relevant local procedures (often called threshold and/or criteria documents). These are usually published online with the rest of the local authority's procedures or staff should request a copy. Are they working in accordance with these procedures or is there is a gap between what their procedures require and what they have done?
- Challenge the decision on the above basis and, if the disagreement remains unresolved, make a complaint to the relevant local authority complaints officer

If the enquiry is rejected on the grounds that a guest has the capacity to make unwise decisions, consider the following questions and, if the answer is yes, provide this information to the LSAB:

- Might the person have been coerced or subject to duress?
- Are there concerns about anyone else's safety?
- Has the person had a mental capacity assessment regarding the particular safeguarding issue?
- Has the person recently been diagnosed, e.g. with a mental health need?
- Have the person's circumstances deteriorated or their needs increased?
- Does the person have fluctuating or complex needs?
- Is there a sudden change in the person's behaviour indicating an escalating problem?
- Has the Clients Safety and Wellbeing plan been updated regarding the particular safeguarding issue?
- Might the alleged abuser be experiencing harm, or might they have care and support needs?

Staff Training and Support

All workers will receive safeguarding and boundaries induction training within 3 months of joining the organisation and refresher training every **2** years as a minimum. Persistent failure to attend such training will be treated as a conduct issue and will be addressed through the disciplinary procedure.

Training is provided via *face to face training and e-learning*.

Managers must attend appropriate training in relation to their safeguarding role and safe recruitment practice.

Managers will also ensure that Safeguarding is addressed during supervision and at team meetings and will operate an open door policy so that staff can discuss concerns and receive ongoing support. Additional support is provided via the Safeguarding Lead.

Relevant Legislation and Guidelines

- Crime and Disorder Act 1998
- Human Rights Act 1998
- Public Interest Disclosure Act 1998
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Freedom of Information Act 2005
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Borders, Citizenship and Immigration Act 2009
- Equality Act, 2010
- Protection Freedoms Act 2012
- Care Act 2014
- The Anti Social Behaviour, Crime and Policing Act, 2014
- Counter Terrorism and Security Act, 2015
- Making Safeguarding Personal: A Toolkit for Responses. Local Government Association, 2015
- Criminal Justice and Courts Act, 2015
- Digital Economy Act 2017
- Data Protection 2018, incorporating the General Data Protection Regulations 2016

Associated Policies and Procedures

- Preventing Radicalisation and Extremism Policy
- Whistleblowing Policy
- Data Protection and Confidentiality Policy and Procedure
- Equality and Diversity Policy and Procedure
- Recruitment and Selection Policy and Procedure
- Criminal Records Disclosure Policy and Procedure
- Harassment Policy and Procedure

External Help-Lines/Support

- **The Modern Slavery helpline:** 0800 0121 70
- **Hate Crime:** to report externally, http://www.report-it.org.uk/report_a_hate_crime
- **Anti-Terrorist hotline** 0800 789
- **Forced marriage** 020 7008 0151 (Mon-Fri: 09.00-17.00) , Email: fmu@fco.gov.uk or for outreach work: fmuoutreach@fco.gov.uk , Web: www.gov.uk/forced-marriage. For out-of-hours emergencies, please telephone 020 7008 1500 and ask to speak to the Global Response Centre.

Date:

Policy Review Date:

Safeguarding Incident Report Form

Please use the following form to record and report an incident or disclosure. Please send it to your Manager within 4 hours of the incident

Safeguarding Incident	
Your Details:	
• Name:	
• Job Role	
• Date	
• Contact Details (Phone and e-mail)	
Details of Incident / disclosure	
• Date of initial raising of concern / incident	
• Who raised the concern? ○ Name ○ Contact details	
○ Who is the adult at risk/child at risk? ○ Name ○ Age (if applicable in the case of Under 18) ○ Contact details ○ Why are you concerned? (please make reference to level of vulnerability etc as appropriate)	
• Where did the incident occur?	
• When did the incident occur? ○ Date and time	
• What is the nature of your safeguarding concern/form of abuse?	
• What happened?	

• Were there witnesses? ○ Name ○ Age (if applicable in the case of Under 18s) ○ Contact details	
After the incident/ disclosure	
• If you discussed the incident with the person concerned or the witnesses, please give full details of what was said/by whom	
• Who have you discussed this incident with outside of those immediately involved? • Please provide details of what was said/by whom ○ Name ○ Contact details	
Reviewed by Manager on: Signed: Follow up advice given, actions agreed (please state what and by whom)	
Reviewed by Safeguarding Lead on: Signed: Follow up advice given, actions agreed (please state what and by whom)	