

Policy Title: Safeguarding Adults Policy

Department: Corporate

Policy Owner: Charlotte Smith– Head of Community Safety & Safeguarding
Amy Crocker - Assistant Director of Business Development and Compliance

Author/ prepared by: Charlotte Smith – Head of Community Safety & Safeguarding

Approved by: Executive Team

Date of approval(s): 29 July 2020

Effective Date: 29 July 2020

Review Date: July 2021

Version: 9

Contents

- 1 Policy Statement
- 2 Objectives
- 3 Related Documents and Policies
- 4 Definitions
- 5 Principles
- 6 Policy
- 7 Accountability & Responsibility
- 8 Monitoring, Auditing and Controls
- 9 Version Control

1.	<p>Policy statement</p> <p>All One Housing staff have a duty to ensure that action is taken if they have any concerns that a customer is at risk of abuse or neglect. This document sets out One Housing’s approach to Safeguarding and the procedure for reporting and investigating allegations of abuse.</p> <p>This policy must be read in conjunction with:</p> <ul style="list-style-type: none">• The Care and Support (“CS”) Safeguarding Adults Procedure – for all Care and Support staff, working across both Season and One Support services• The Group Safeguarding Procedure – for all other One Housing staff <p>This policy applies to all individuals aged 18 years and above. It applies to One Housing’s customers, and also to members of the public who staff suspect may be being abused. 5</p> <p>Throughout this policy, the term ‘customer’ or ‘victim’ refers to adults. The Safeguarding Children Policy sets out our approach to safeguarding those aged 17 and below.</p>
2.	<p>Objective(s)</p> <p>Our services will provide a safe and secure setting for all adults. We will also enable and support customers to self-protect, reducing the opportunities for people to abuse by:</p> <ul style="list-style-type: none">• Encouraging our customers to develop and maintain independence• Working with customers to build positively on their esteem• Assisting them in building and maintaining appropriate relationships with peers• Providing information on what constitutes abuse and how to report it• Involving customers in decisions made in response to allegations of abuse <p>One Housing staff are likely to be involved in safeguarding in 3 main ways:</p> <ul style="list-style-type: none">• We may have concerns about an adult’s safety and report these to Adult Safeguarding Teams and/or the police.• Adult Safeguarding Teams may ask us to provide them with information about an adult in relation to an assessment or investigation.• We may be asked to provide specific support to the adult, family or carer as part of an agreed plan and contribute to the ongoing reviewing of the adult’s needs. <p>All One Housing staff working with adults will be trained to:</p> <ul style="list-style-type: none">• Recognise the signs of abuse and behaviours which should give cause for concern• Assess the risk of abuse to customers and ensure measures are in place to minimise this as part of assessment and support planning• Respond to abuse in accordance with this policy and the relevant Safeguarding Adults Procedure• Refer cases of abuse to the local authority Adult Safeguarding Team and relevant Community mental health team safeguarding lead

3.	<p>Related Documents and Policies</p>
	<p>This policy should be considered in conjunction with the following documents;</p> <ul style="list-style-type: none"> • Community Safety Policy • Safeguarding Procedure • Safeguarding Strategy • Equality & Diversity Policy • Domestic Abuse Policy • Domestic Abuse Procedure • Code of Conduct • Complaints and Resolutions Policy • Data Protection Policy • Disciplinary Policy • Employee Screening Policy & Procedure • Recruitment and Selection Policy • Whistleblowing Policy • Assessment and Support Planning Policy – CS • Confidentiality and Access to Records Policy – CS • Customer Money and valuables Policy – CS • Delivery of Personal Care Policy – CS • Lone Working Policy – CS • Management on Call Policy – CS • Incident Management Policy – CS • Service Risk Assessment Policy – CS • Supervision Policy – CS • Duty of Candour Policy – CS • MCA Policy - CS
3.1	<p>Government legislation has an impact on how One Housing can implement its Safeguarding policy. Listed below are the key Acts which may form part of One Housing’s approach to Safeguarding;</p> <ul style="list-style-type: none"> • The Care Act 2014 • Health and Social Care Act 2008 • Housing Act 1985 • Housing Act 1988 • Housing Act 2004 • Equality & Diversity Act 2010 • Localism Act 2011 • The Domestic Violence, Crime and Victims Act 2004 • The Protection from Harassment Act 1997 • The Family Law Act 1996 • The Crime and Disorder Act 1998 • Human Rights Act 1998 • Mental Capacity Act
3.2	<p>In meeting the standards that our regulators, commissioners and customers expect, this policy is developed in line with the:</p>

	<ul style="list-style-type: none"> • Quality Assessment Framework (QAF) • CQC Fundamental Standards as outlined in the Health and Social Care Act 2008 (Regulated Activities 2014) • Regulations 2014 Adult safeguarding for housing staff (SCIE 2014) • The Care Act 2014 • London ADASS (Directors of Adult Social Services London Region): Pan London Multi-Agency Adult Safeguarding Policy and Procedures.
4.	<p>Definitions</p>
	<p>The Human Rights Act (1998) imposes a positive duty on the state to protect individuals from serious breaches of their personal integrity such as violence and abuse. It is therefore necessary that all agencies working with adults at risk of abuse or neglect have mechanisms in place to minimise the risks of harm and abuse occurring and, where concerns exist, to ensure appropriate action is taken to address them. Working in partnership with other agencies is also integral to Safeguarding, and a multi-agency approach must be adopted in response to all instances of abuse or suspected abuse.</p> <p>Safeguarding adults is defined in the <i>Care Act 2014, Care and Support Statutory Guidance</i> as: “...protecting a person’s right to live in safety, free from abuse and neglect.”</p> <p>The Guidance states the aims of adult safeguarding are:</p> <ul style="list-style-type: none"> • To prevent harm and reduce the risk of abuse or neglect to adults with care and support needs. • To safeguard individuals in a way that supports them in making choices and having control in how they choose to live their lives. • To promote an outcomes approach in safeguarding that works for people resulting in the best experience possible. • To raise awareness around safeguarding so that staff and the wider community play their part in preventing, identifying and responding to abuse and neglect.
5	<p>Abuse and Neglect</p> <p>Regulation 13 of the CQC Fundamental Standards as outlined in the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 defines abuse as:</p> <ul style="list-style-type: none"> • Any behaviour towards a service user that is an offence under the Sexual Offences Act 2002(a) • Ill-treatment (whether of a physical or psychological nature) of a service user • Theft, misuse or misappropriation of money or property belonging to a service user • Neglect of a service user <p>Adults can suffer abuse by a range of possible perpetrators including relatives, carers, friends, acquaintances, ‘trusted adults’ (for example a professional who works with them), neighbours, other customers, and strangers.</p> <p>The abuse may be the result of a direct act, or omission of an act, or both. Abuse can take a number of forms, and it may be the case that two or more types of abuse are occurring simultaneously. Furthermore, staff should not be constrained in their view of what constitutes abuse or neglect, and should always consider the circumstances of the individual case.</p>

5.1

Types of abuse

- **Disability hate crime** – is any criminal offence, which is perceived, by the victim or any other person, to be motivated by hostility or prejudice based on a person’s disability or perceived disability.
- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Domestic abuse** – any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over, who are intimate partners or family members regardless of gender or sexuality.
- **Female genital mutilation (FGM)** – involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act 2003 makes it illegal to practice FGM in the UK, or to take girls who are British Nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in another country.
- **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.
- **Forced marriage** – describes a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties’ consent to the assistance of a third party in identifying a spouse.
- **Hate Crime** – defined as ‘any incident 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.
- **Honour-based violence** – has been committed when families feel that dishonour has been brought to them. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community.
- **Human trafficking** – Traffickers exploit the social, cultural or financial vulnerability of the victim and place huge financial and ethical obligations on them. They control almost every aspect of the victim’s life, with little regards for the victim’s welfare and health.
- **Mate crime** – is when vulnerable people are befriended by members of the community who go to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.
- **Modern slavery** – encompasses slavery, 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.
- **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 and self-neglect.
- **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 own 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.
- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- **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.

- **Restraint** – Unlawful or inappropriate use of restraint or physical interventions. Someone is using restraint if they use force, or threaten to use force, to make someone do something they are resisting, or where an adult's freedom of movement is restricted, whether they are resisting or not.
- **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.
- **Sexual exploitation** – involves exploitative situations, contexts and relationships where adults at risk (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. People who are sexually exploited do not always perceive they are being exploited.

Patterns of abuse vary and include:

- **Serial abusing** in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse.
- **Long-term abuse** in the context of an ongoing family relationship such as domestic violence between spouses or generations, or persistent psychological abuse.
- **Opportunistic abuse** such as theft occurring because money or jewellery has been left lying around.

5.2

Prevent

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works with individuals and communities by using voluntary early intervention to encourage them to challenge extremist and terrorist ideology and behaviour.

At One Housing we recognise that Prevent is safeguarding our residents, service users and staff in the same way that support is provided to people at risk of involvement with drugs, gangs, or other forms of harm, and we acknowledge that individuals vulnerable to being groomed into radicalisation can also be helped. We believe that community engagement is essential, and we will work closely with local voluntary and community groups to co-deliver support with the local authorities and the police.

Radicalisation is the process by which a person comes to adopt increasingly extreme political, social, or religious ideals. This can in extreme cases, result in condonation or support of terrorism. Extremism covers vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

In the UK, we define terrorism as an action used to further an ideological aim that:

- Endangers a person's life, other than that of the person committing the action
- Involves serious violence against a person
- Causes serious damage to property
- Creates a serious risk to the public's health and safety
- Interferes with or seriously disrupts an electronic system

Radicalisers prey on the need for self-esteem, achievement, meaning or identity, competence and control. Every case is different, but the following are possible indicators that someone might be at risk:

	<ul style="list-style-type: none"> • Desire for status • Victim of or experience of discrimination or racism • Going through a transitional time of life • Being influenced or controlled • Feelings of grievance or injustice • Experiencing a traumatic event • A desire for political or moral change • Struggling with a sense of identity, meaning and belonging or questioning their place in society
6	<p>Principles</p>
	<p>One Housing will not tolerate or collude with any form of neglect or abuse. We aim to promote and safeguard the welfare of all our customers and will be proactive in responding to any allegation or suspicion of abuse. We also empower our customers by ensuring they are fully aware of what constitutes abuse and how to report it.</p> <p>The government has identified six key principles and their individual outcomes, underpinning all safeguarding work:</p> <ul style="list-style-type: none"> • Empowerment: Personalisation and the presumption of person-led decisions and informed consent. <i>Outcome: I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.</i> • Prevention: It is better to take action before harm occurs. <i>Outcome: I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.</i> • Proportionality: Proportionate and least intrusive response appropriate to the risk presented. <i>Outcome: I am sure that the professionals will work for my best interests, as I see them and will only get involved as much as needed.</i> • Protection: Support and representation for those in greatest need. <i>Outcome: I get help and support to report abuse. I get help to take part in the safeguarding process to the extent to which I want and to which I am able.</i> • Partnership: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. <i>Outcome: I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together to get the best result for me.</i> • Accountability: Accountability and transparency in delivering safeguarding. <i>Outcome: I understand the role of everyone involved in my life.</i> <p>Furthermore, One Housing’s Safeguarding Adults Policy is based on the following principles:</p> <ul style="list-style-type: none"> • ensuring suitable and appropriate staff are recruited • ensuring effective management of staff through regular supervision, support and training • sharing information about concerns with agencies who need to know, including care-coordinators and the safeguarding authority • involving and supporting victims appropriately and, wherever possible, respecting their choice in the range of agencies they may wish to work with • where the perpetrator, or alleged perpetrator, is another customer of One Housing, we will provide them with appropriate support to enable them to engage with the investigation and to understand and comply with the outcome and any subsequent action plan

	<ul style="list-style-type: none"> • sharing information about adult safeguarding and good practice with customers, staff, partner organisations and carers • ensuring that partner organisations (e.g. suppliers of agency staff, voluntary organisations) apply adult safeguarding practice when operating from One Housing's premises • ensuring action is sensitive to and takes account of the victim's gender, age, disability, stage of development, religion, culture and race • we aim to identify customers at risk from abuse and take a proactive approach to reducing risk.
7	<p>Policy</p>
7.1	<p>This policy applies to One Housing's customers, and also to members of the public who staff suspect may be being abused.</p> <p>The Care Act refers to 'people with care and support needs' in relation to safeguarding. One Housing provides services to adults with a wide range of care and support needs including those arising from mental health problems, drug and alcohol use, learning disabilities, poverty and marginalisation, offending, old age, disabilities and ill health. For the purposes of this policy all instances of adult abuse or suspected abuse towards customers will be managed in accordance with this policy's framework.</p> <p>Recognising Abuse</p> <p>Whilst allegations of abuse may be raised directly by the victim through them disclosing abuse to a staff member, there may be occasions where the victim is unwilling or unable to disclose the abuse. All staff must be aware and mindful of possible indicators of abuse, such as:</p> <ul style="list-style-type: none"> • unexplained changes in mood or behaviour • nervousness or watchfulness • inappropriate relationships with peers • inappropriate sexual language • attention-seeking behaviour • changes in appearance or hygiene • scavenging or compulsive stealing • persistent fatigue • running away • injuries inconsistent with an explanation given.
7.2	<p>Code of Conduct</p> <p>One Housing expects all its staff to abide by the Code of Conduct, in order to avoid situations where their actions could be mistakenly interpreted and perhaps lead to allegations of abuse. Good practice will reduce the possibility of anyone using their position to gain access to adults in order to abuse them. Staff must also ensure their actions are sensitive to customer needs.</p> <p>One Housing staff will always:</p> <ul style="list-style-type: none"> • listen to customers • value and respect customers as individuals, regardless of their gender, ethnicity, nationality, disability or sexual identity • involve customers in decisions made in response to allegations of abuse • empower customers with the necessary information to make informed decisions.

7.3

Safe Working

When working with customers, One Housing staff must avoid placing themselves in positions that may cause customers to feel uncomfortable, and which could lead to questions and/or false accusations of abuse. While this policy cannot cover every eventuality, staff must not:

- meet with customers outside of work or work related activities
- discipline customers
- restrain customers
- make unnecessary physical contact with customers. In cases where physical contact is unavoidable (for instance providing comfort/reassurance for a distressed customer, physical support or contact in sports) this should only take place with the consent of the customer and be included with the provision of personal care as per the customers care plan
- engage in sexually provocative or rough physical games
- do things of a personal nature for customers that they can do themselves, and if the customer does require help (for instance because of a disability) then only with their consent and his or her understanding of what is happening
- engage in or tolerate any bullying
- allow customers to use inappropriate language unchallenged
- engage in favouritism or in singling out of "trouble-makers"
- make sexually suggestive remarks or discriminatory comments about or to customers, even in jest
- trivialise abuse
- let allegations made by a customer go unrecorded or unaddressed, including any made against themselves.
- Adding/using or borrowing customer property unless required for the specific use of delivering care and support in line with the customers care and support plan.

7.4

Whistle Blowing

If a member of staff suspects that a customer is being abused by another member of One Housing staff, there is a failure to respond appropriately to allegations of abuse, or where staff have concerns that a colleague or superior is responsible for the abuse, staff must follow the One Housing Whistleblowing Policy.

Staff should report any concerns directly to their line manager. It is hoped that in many cases a concerned individual will be able to raise any concerns with their line manager. This can be face to face, or by putting the matter in writing if preferred. A line-manager may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious, or it is felt the line manager has not addressed the concern, or it does not feel possible to raise it with them for any reason, you should contact one of the following:

- The Whistleblowing Officer, (Group Director, Governance and Compliance);
- Your HR Business Partner

7.5

Regulatory Framework

When an allegation of abuse is made, the Team Manager or Head of Service must notify the appropriate commissioning body as contractually obliged. This will usually be either the Local Authority or the local NHS Foundation Trust and CQC for registered services.

When an allegation is raised with the Local Authority in line with safeguarding procedures, CQC is then notified via a statutory notification to update in addition to the alert.

In services where care is provided, staff must work in compliance with the CQC Fundamental Standards as outlined in the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, in particular; Regulation 13 Safeguarding service users from abuse and improper treatment and Regulation 18 (notification of other incidents) of the Care Quality Commission (Registration) Regulations 2009 (part 4).

Regulation 13 states that providers must ensure that care and treatment is not provided in a way that:

- Discriminates against a customer on the grounds of any protected characteristic (as defined in the Equality Act 2010)
- Includes acts of control or restraint that are not necessary or proportionate to the risk of harm posed to the customer or another individual if the customer was not subject to control or restraint
- Is degrading to the customer
- Significantly disregards the needs of the customer
- Deprives a customer of their liberty for the purpose of care and treatment.

Regulation 18 requires that CQC are notified without delay:

- If any serious injury occurs to a customer
- The death of a customer
- Any applications made to deprive a person of their liberty
- Abuse or allegations of abuse
- Events that stop or threaten to stop the service from carrying out a regulated activity safely and to the appropriate standard
- Incidents reported to or investigated by the police.

All staff must ensure that they respond in accordance with the relevant regulations of the commissioning and governing bodies in all cases of abuse. Details of who to contact must be readily available in all services.

7.6

Confidentiality and the Mental Capacity Act

Due attention must always be paid to confidentiality when working with customers. All staff must be familiar with the One Housing Data Protection Policy. Staff working in CS services must also ensure familiarity with the CS Confidentiality and Access to Records Policy, including the limits to confidentiality and the circumstances under which confidentiality may be breached.

Furthermore, staff must also be aware of the customer's capacity to make decisions, as governed by the Mental Capacity Act (2005). In all cases it is assumed that adults have the capacity to make informed choices and decisions, unless they have been deemed to lack capacity by a qualified health or social care professional.

The Mental Capacity Act (2005) was created to enable people receiving support to make their own decisions, and to offer protection for those individuals charged with making decisions on the behalf of those lacking capacity.

The Act has 5 main principles:

- Every individual has the right to make their own decisions unless it can be shown they are incapable of doing so.
- Individuals should be supported to make their own decisions where possible.
- A person has the right to make decisions even if others regard the decisions made as being inappropriate or 'unwise'. A decision deemed as inappropriate does not in itself mean the client should be deemed incapable.
- A person making decisions on behalf of someone lacking capacity must do so in their best interests.
- Decisions made by a third party on behalf of someone lacking capacity should always be the option which is least restrictive on their basic rights and freedoms.

Where staff have concerns about a customer's ability to make an informed decision that relates to an abuse allegation or concerns around abuse, they must request that social services, the local CMHT or NHS Trust arrange for an assessment to take place. Where the customer has an allocated social worker or care coordinator, they should be contacted in the first instance. In care support plus and other 'integration plus' services, the in-house NHS employed care coordinator and/or other clinical staff will complete the capacity assessment.

Although One Housing staff will not be completing formal capacity assessments, those involved in the care and treatment of a customer who may lack capacity should keep a record in the customer's notes, care/support plan and risk assessment of long term or significant decisions made about capacity. The record should show:

- How the issue of capacity was determined
- What the decision was
- How the decision was made
- Why the decision was made – best interests' checklist
- Who was involved
- What information was used

Recording decisions in this way will help staff to demonstrate why they had a reasonable belief that the customer lacked the capacity to make the decision in question and why there was a referral for assessment. If a member of staff's decision is challenged, they must be able to describe why they had a reasonable belief of lack of capacity.

The decision about lack of capacity should always be recorded in the person's care/support plan. Although this does not need to be done on a daily basis the record should identify the decisions made, and document that this will be reviewed regularly unless or until capacity is regained. It is important to note that where a customer lacks capacity to make a particular decision, e.g. for treatment, or sharing information, then they cannot sign a consent form or any other document relating to consent or refusal. In this case, those acting on their behalf must act in the person's best interests and records should reflect this.

It is important that a copy of any capacity assessments, and any associated best interest meeting minutes be obtained and securely stored in the customer's records.

If a customer has been assessed as lacking capacity, then any decision made on their behalf must be done in their best interests. At the point in which a customer is assessed not to have capacity, the assessor and decision maker must ensure that a best interest meeting is held to explore the least restrictive option that is in the customer's best interest.

The decision maker should be a third party professional such as a social worker, nurse or doctor but the expectation is that key staff and those important to the customer such as family, will be consulted in the decision making process to ensure that all relevant circumstances and the customers past and present wishes, feelings, beliefs and values are taken into account. The views of the customer, who has been assessed not to have capacity, should still be taken into account. A customer may not understand the complexities of the decision but may still have a view on the decision.

Staff must ensure that copies of the minutes from the best interest meeting are obtained for record within the customers file. What is in a customer's best interests may well change overtime. This means that decisions made must be regularly reviewed as part of a multi-disciplinary team approach.

7.8 **Independent Mental Capacity Advocates**

An Independent Mental Capacity Advocate (IMCA) is utilised to safeguard the interests of customers who lack capacity to make an important decision if there is no other person except paid staff to represent them and the decision pertains to serious medical treatment, a hospital admission of more than 28 days or care home for more than 8 weeks or a care home wants to deprive a customer of their liberty. Local councils or NHS Trusts are responsible for contacting and arranging the involvement of an IMCA however, staff must be aware of what an IMCA is, when they should be involved and understand their duties and responsibilities so that they can assist them appropriately.

IMCAs have the right to see all relevant care and support records for a customer, and services must provide these to assist with the decision making process when requested.

More information on the Mental Capacity Act is available in: *Making Decisions. A Guide for Advice Workers, The Mental Capacity Act* and CS Mental Capacity Act Policy which can be found in the Associated Documents.

7.9 **Partnership Working and Information Sharing**

Working in partnership with statutory and other relevant agencies is a key element of investigations into suspected abuse. The wishes of the customer in relation to what information should be shared, and with whom, should be respected where possible. However, where there is a concern that the customer may be suffering or is at risk of abuse or neglect, their safety must be the over-riding priority. Information must be shared with statutory authorities where there is any indication of abuse or neglect.

The following points must be considered as part of this process:

- It should be explained openly and honestly to the customer what information will have to be divulged to statutory authorities and any other third parties, how it will be divulged and to whom.
- Information should not be shared with other non-statutory third parties where it would increase the risk to the victim or undermine the prevention, detection or prosecution of a crime.
- Information shared must be accurate and up-to-date, necessary for the purpose for which it is being shared and shared only with those who need to know.

7.10 **Duty of Candour**

In line with Regulation 20: Duty of Candour of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, One Housing will provide all relevant information to persons who have or may have been harmed in the provision of our services. The Duty of Candour will apply to safeguarding incidents that have resulted in significant avoidable harm or death to a customer. It will not apply to other incidents, but these incidents will still be reported to the customer if appropriate as set out above.

7.11 Recording and Reporting

Full details on recording and reporting allegations of abuse are provided in the following Safeguarding Procedures:

- CS Safeguarding Procedure – for CS staff
- Safeguarding Procedure – for all other Housing staff

When managing any allegation of abuse, it is essential that information is recorded accurately and in a timely manner. In addition, staff may also be called upon to complete relevant forms for the local authority, the local Safeguarding Team the police or NHS Trust.

7.12 Disincentives to Reporting

One Housing Group recognises that it is often difficult for victims of abuse to disclose or report instances of abuse. This may be for a number of possible reasons, such as:

- fear
- stigma
- not realising it is abuse
- not knowing how to report it
- thinking they won't be taken seriously
- learned Helplessness
- not being able to see any solutions
- feeling ashamed
- not wanting to get someone else into trouble
- lacking capacity or experiencing poor mental health

Overcoming these barriers is key to ensuring that no abuse goes unnoticed or unaddressed, and One Housing aims to achieve this by:

- regularly exploring barriers to reporting abuse with customers during House Meetings, and Key-working sessions. This includes discussing example cases.
- using Team Meetings, training and supervision to ensure staff are aware of how to recognise and respond to abuse, and how to empower and encourage customers to report it.
- encouraging services to learn from each Safeguarding Alert by including the need for service improvements, including overcoming barriers, to be recorded as part of every safeguarding investigation.

7.13 Raising Awareness

One Housing have developed a Safeguarding Strategy for customers and staff. Our strategy sets our commitment to preventing abuse and safeguarding our residents and staff through developing clear

	<p>policies, robust leadership and empowering our staff to deliver services that minimise the risk of abuse to our residents and staff; or intervene swiftly to prevent abuse continuing.</p> <p>The strategy consists of the following key subject areas;</p> <ul style="list-style-type: none"> • <i>Policies and Procedures</i> • <i>Reporting and Auditing</i> • <i>Managing and Identifying Risk</i> • <i>Raising Awareness</i> • <i>Compliance</i> • <i>Partnership and Engagement</i> • <i>Aims and Objectives</i> <p>The purpose of the strategy is to ensure that all aspects of Safeguarding are fully integrated into the management of One Housing Group across the business, aligning itself to the vision and values of the business.</p> <p>To raise awareness across the business, One Housing have a dedicated Safeguarding Campaign. The campaign focuses on staff reporting safeguarding concerns, and encourages staff to “Feel, Think, Act”! If they see a safeguarding concern.</p> <ul style="list-style-type: none"> • Feel – Does something not quite feel right? • Think – Does the resident require support, what are their circumstances? • Act – Reporting and recording information to the safeguarding team. <p>In alignment with the campaign and strategy as part of One Housing’s mandatory induction for all staff, One Housing have developed an online eLearning training video which is suitable for all staff across the business. The training provides a basic overview of the types of abuse, signs of abuse and how to report Safeguarding concerns.</p>
8	<p>Accountability and responsibility</p>
	<p>This policy will be reviewed annually, in accordance with broader guidance and legislation, and taking into account feedback from staff and customers.</p> <p>The Group Director of Governance and Compliance will ultimately be responsible for ensuring that the policy is reviewed.</p> <p>The Group Director and internal Safeguarding Panel will be responsible for monitoring developments in relation to legislation, regulation, or good practice with regards to data protection. They will further, be responsible for ensuring that these developments are incorporated into this policy and are communicated with all staff.</p>
9	<p>Monitoring / Auditing and Controls</p>

9.1	<p>One Housing takes our responsibilities in relation to safeguarding very seriously by prioritising safeguarding, ensuring the opportunities for abuse are minimised, and that it is safe for those affected to report safeguarding concerns with the assurance they will be managed sensitively and properly.</p> <p>To ensure that all safeguarding concerns are managed effectively and transparently, One Housing has a robust reporting and monitoring process in place which provides oversight at all levels of the organisation such as regular reporting to the Audit and Risk Committee, Care and Support Committee, Customer Service Committee, The Group Board and Executive Team.</p> <p>Safeguarding Panel</p> <p>A Safeguarding Panel has been created internally to oversee our overall approach. It identifies areas of potential risk and provides recommendations on best practice that can be rolled out across all departments within One Housing.</p> <p>The Safeguarding Panel supports the Group Board in its responsibilities for overseeing and scrutinising the Safeguarding services across One Housing, performance and operational delivery of Safeguarding services.</p> <p>It's key areas of responsibility are to:</p> <ul style="list-style-type: none"> • Regularly report to the Group Board, relevant Board sub-committees and Executive Team • Review best practice and implement actions to manage risk • Engage and liaise with Local Safeguarding Boards • Review training and knowledge across the business • Continuously review policy and procedure ensuring it is up to date with legislation changes • Review the efficiency and effectiveness of the delivery of all Safeguarding services including relevant benchmarking and board-level KPIs • Review serious case reviews and recommend learning across the business • Manage and identify critical incidents, ensuring mitigating factors are implemented. • Review Safeguarding performance indicators and targets on an annual basis with residents and partners to ensure they are fit for purpose and challenge improvement. • Carry out regular internal case audits ensuring that we are learning from best practice and reviewing inconsistencies. • Scrutinise reporting systems ensuring that they are updated, accurate and enable information-sharing between internal and external partners. • Carry out regular audits to ensure that we are up to date with improvements in legislation and include additional acts that aim to prevent abuse and support community safety and safeguarding activities. 			
9	Version Control			
9.1	No	Author	Date	Summary of Changes
	9	Charlotte Smith	June 2020	Format change, inclusion of PREVENT, updates to whistleblowing, Safeguarding Strategy and Safeguarding Panel.