

Safeguarding Adults Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	May 2021
Review date:	May 2022

1	Introduction
1.1	In operating this Policy, OVH will comply with all relevant legislation that impacts on adult safeguarding issues including those that define forms of abuse as a crime, those concerned with the provision of health and social care services and any other relevant statutes and statutory instruments.
1.2	<p>The application of this Policy assists OVH to meet the outcomes of the Regulatory Framework for Social Housing in England adopted by the Regulator for Social Housing, as outlined below:</p> <ul style="list-style-type: none"> • Neighbourhood management Registered providers shall keep the neighbourhood and communal areas associated with the homes that they own clean and safe. They shall work in partnership with their tenants and other providers and public bodies where it is effective to do so. • Local area co-operation Registered providers shall co-operate with relevant partners to help promote social, environmental and economic wellbeing in the areas where they own properties.
1.3	Access and Communication
1.3.1	OVH is committed to ensuring that its services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.
1.4	Equality, Diversity and Human Rights
1.4.1	OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Expression / Gender Identity, Sexual Orientation and Religion and/or Belief.
1.4.2	OVH also recognise that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

1.4.3	OVH will also ensure that all services and actions are delivered within the context of current Human Rights legislation. OVH will endeavour to ensure its staff and others with whom it works, will adhere to the central principles of the Human Rights Act (1998).
1.5	<p>This Policy should be read in conjunction with the following:</p> <ul style="list-style-type: none"> • OVH Recruitment and Selection Policy • OVH Confidential Reporting (Whistleblowing) Policy • OVH Data Protection Policy • OVH Work Placement Policy • OVH Maintaining Professional Boundaries Policy • OVH Domestic Abuse Policy
2	Statement of Intent
2.1	OVH will comply with all relevant legislation, regulations and contractual obligations in all areas of work in regard to safeguarding adults.
2.2	OVH will take all reasonable and practical steps to protect vulnerable people from being exploited, neglected or abused and that their wellbeing is promoted including carrying out appropriate risk assessments.
2.3	<p>In all safeguarding work that OVH undertakes it will adhere to the six key principles (as outlined in the Care Act 2014 guidance) of:</p> <ul style="list-style-type: none"> • Empowerment • Prevention • Proportionality • Protection • Partnership • Accountability
2.4	OVH will also adhere to the principles outlined in the Northwest Safeguarding Policy as adopted by many Local Authorities in the Northwest region.
2.5	OVH recognise the specific focus of this Policy is adults who are ‘at risk’ of experiencing abuse, neglect or exploitation. OVH also aim to protect the rights of ‘all’ adults that the organisation’s staff come into contact with whilst carrying out their duties.
2.6	This will include those who are the subject of concern but are not classed as ‘vulnerable’ or are not the focus of the initial concern. This may also include those that provide a caring role to vulnerable adults.
2.7	OVH aim to obtain 100% profile information on all of our customers and their households. OVH will use this information to identify adults who may be vulnerable and will provide services specific to their needs.
2.8	OVH will respond promptly, sensitively, proportionately and consistently in line with its procedures to all reported incidents of neglect (including self-neglect), exploitation or abuse.

2.9	OVH will maintain confidentiality in all information relating to safeguarding adult concerns and will only share information with partner agencies according to the protocols developed in the local Safeguarding Adults Procedural Frameworks.
2.10	However, where there are concerns that a person is in immediate danger, or is at risk of being abused or neglected, personal information may be shared with appropriate external agencies (e.g. Emergency Services or Social Services in line with the exemptions outlined in the UK Data Protection Act 2018 and the UK General Data Protection regulation 2018).
2.11	OVH will respect the rights of individuals to make their own decisions. In all situations there will be an assumption of capacity and individuals will be supported to make choices even where this may seem eccentric or unwise or carry an element of risk.
2.12	Where issues of concern are raised, adults that choose to do so will be kept informed at all stages of any investigation process that is initiated.
2.13	Where adults appear to lack capacity (as defined by the Mental Capacity Act 2005 as being unable to make a decision for him / herself because of an impairment of or a functioning of the mind or brain) the use of advocates will be considered, in line with the provisions and responsibilities outlined for Local Authorities in the Care Act 2014.
2.14	Advocates may also be used where capacity exists but the individuals have substantial difficulties or lack support.
2.15	Where it is suspected that adult customers that are subject of a safeguarding concern lack capacity, OVH will make referrals to professional bodies (normally the customers General Practitioner, or Adult Social Services) for an assessment.
2.16	Where OVH is involved with investigating agencies in the on-going management of safeguarding adult cases, it will endeavour to adopt the principles outlined in the 'Making Safeguarding Personal' guidance.
2.17	OVH will have in place clearly understood and widely accessible procedures for reporting issues of concern to make referrals to the relevant Safeguarding Authorities in accordance with their Frameworks for Action.
2.18	Where concerns are raised, that on investigation by the Local Authority Safeguarding Teams are found to have no ongoing safeguarding implications but highlight other support needs for the individuals concerned, OVH will provide additional support services and make referrals to external agencies as required.
2.19	OVH will provide all frontline staff with comprehensive guidance on spotting the signs of abuse or neglect and specialist training on dealing with challenging behaviour to staff whose roles are mostly concerned with safeguarding adults. The Independent Living Manager and the Independent Living Team Leaders acting as designated persons will receive additional inter-agency training.
2.20	Through internal training, OVH will also encourage frontline staff to develop 'professional curiosity' (staff to avoid making assumptions and to look beyond face value information) to ensure any safe guarding alerts capture an individuals lived experience and environment.

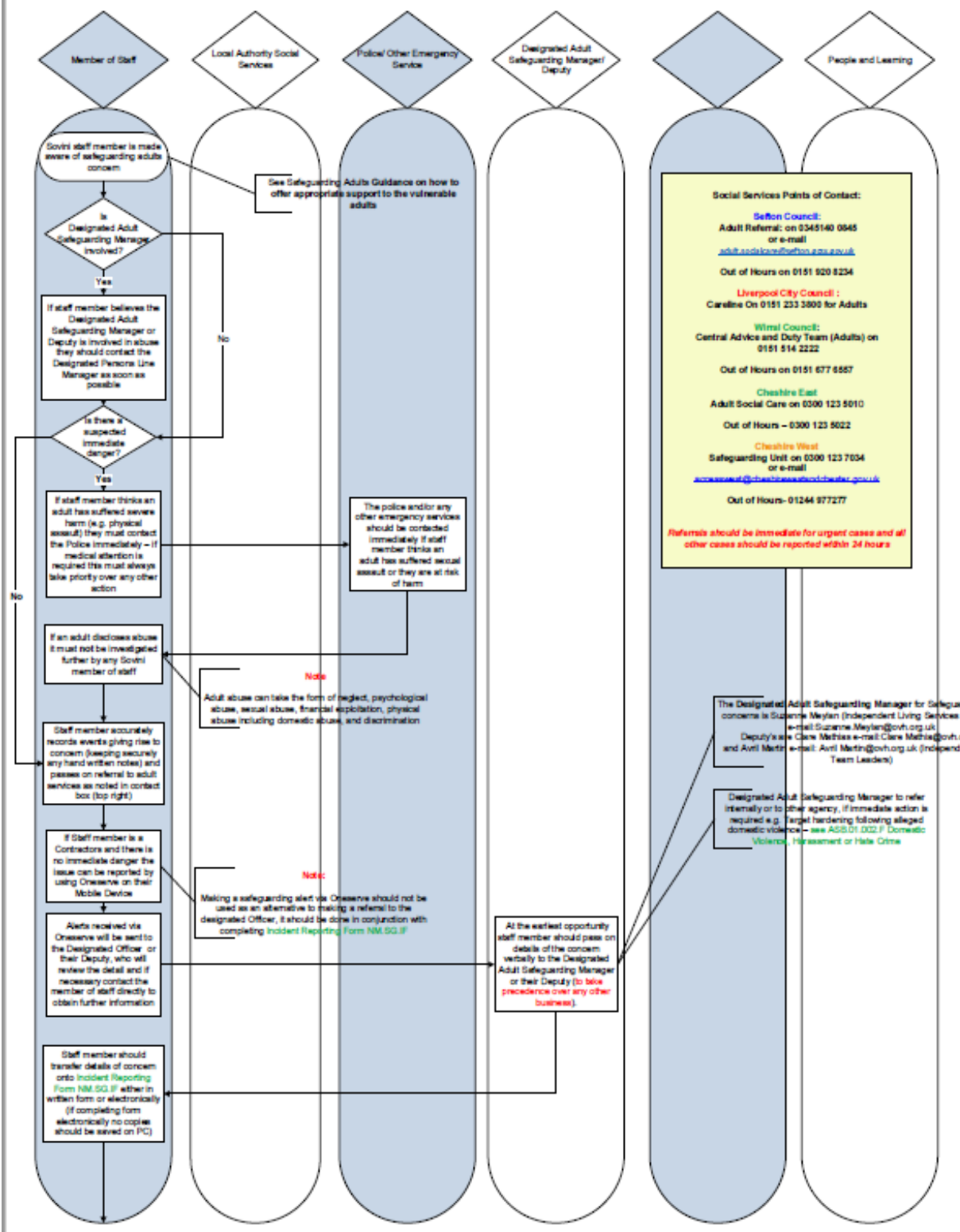
2.21	OVH has clear procedures in place for dealing with allegations made against staff members where safeguarding adult concerns are raised.
2.22	The procedures will include provision for precautionary suspensions of staff members whilst any investigation takes place and subsequent disciplinary action that may result. In the event of any such allegations, OVH will work in close liaison with the Local Authority Designated Officer.
2.23	There are clear procedures in place for dealing with malicious or unfounded allegations including close liaison with the relevant Safeguarding Board. This may involve a change of duties or work location to protect the individual from further allegations and will involve the input of line managers and the People and Learning Team.
2.24	OVH will enforce a zero tolerance approach to all forms of abuse and will take appropriate disciplinary action for any member of staff that is found to be responsible for neglect, abusive or exploitative behaviour.
2.25	OVH will ensure it contributes to continuous improvement of local safeguarding provisions by regularly attending multi-agency meetings where cases involving its customers are reviewed and by taking part in strategic reviews with local Safeguarding Boards.
3	Policy
3.1	<p>In regard to safeguarding adults, the national framework identifies a duty of care to all adults 'whose independence and wellbeing is at risk due to abuse or neglect'. In operating this Policy OVH will define abuse or neglect in any of the following categories:</p> <ul style="list-style-type: none"> • Any incident or pattern of incidents of controlling, coercive or 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. This can encompass, but is not limited to, the following types of abuse: • Physical: assault, hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate physical sanctions • Psychological: 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 from services or supportive networks • Sexual: 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 assaults or sexual acts to which adult has not consented, or was pressured into consenting • Financial or Material: theft, fraud, internet scamming, coercion in relation to adult's financial affairs or arrangement, including connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits • Neglect and acts of omission: ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or

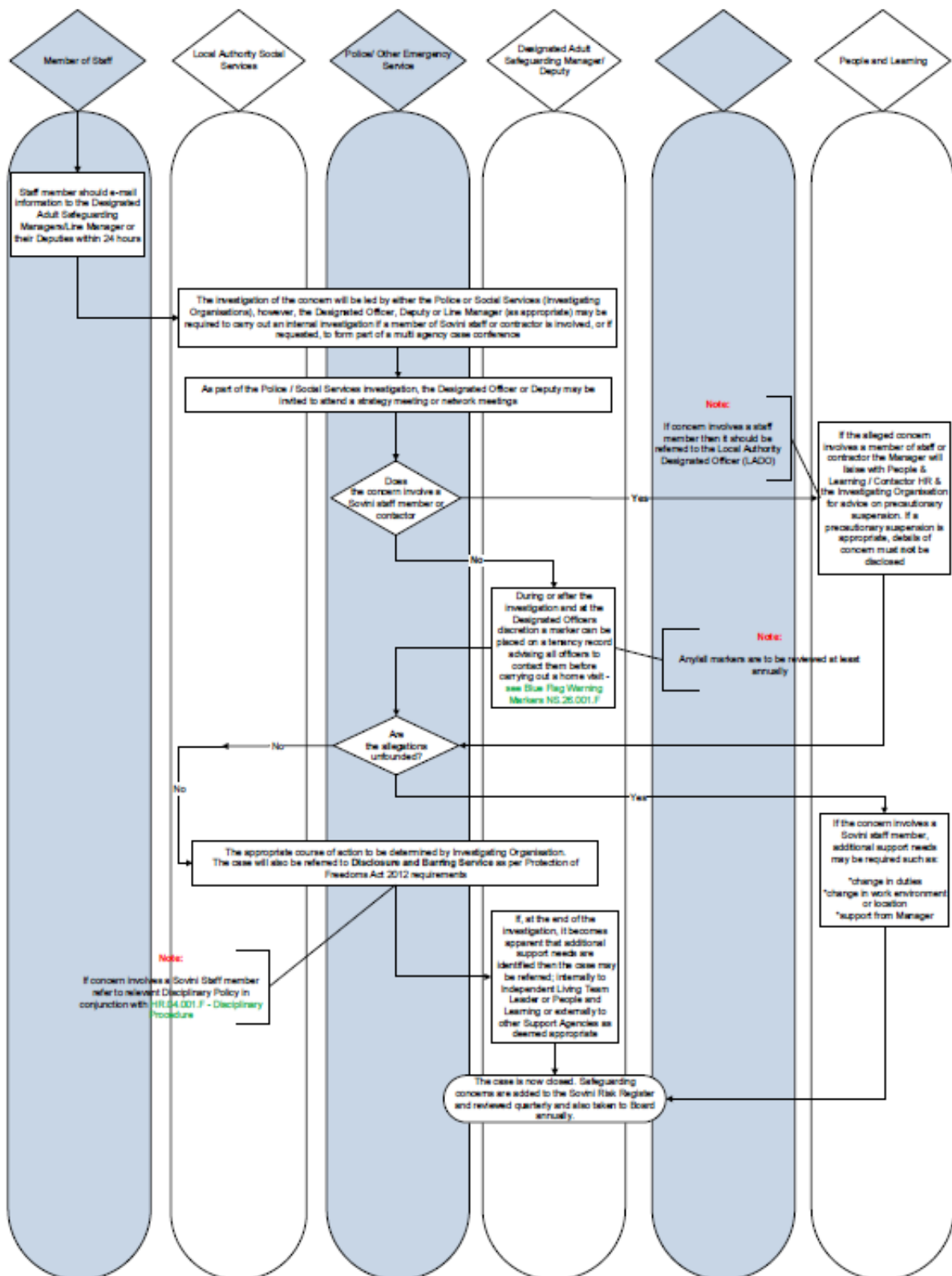
to others particularly when the person lacks the mental capacity to assess risk or themselves

- **Discriminatory:** Discrimination on the grounds of race, faith or region, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes or comments and jokes based on a person's disability or any other form of harassment, slurs or similar treatment. Excluding a person from activities on the basis that they are 'not liked' is also discriminatory abuse, for example, hate crime.
- **Organisational abuse:** is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where an adult lives or that they use. Such abuse violates the person's dignity and represents a lack of respect for their human rights
- **Domestic abuse:** cross-government definition of domestic violence and abuse is, 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. The abuse can encompass but it is not limited to:
 - psychological
 - sexual (including Female Genital Mutilation)
 - financial
 - emotional
 - forced marriage
 - honour- based violence
- **Self-neglect:** covers a wide range of behaviour to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding

3.2

In dealing with safeguarding adult concerns OVH will adhere to the Procedural Flowchart outlined below:





3.3 OVH will promote awareness amongst customers on what constitutes abuse and the methods of how to report issues of concern when they sign-up for an OVH tenancy, including confidential reporting to independent agencies.

3.4 Awareness of safeguarding adults' issues will also be promoted by various communication channels including tenants' newsletter, leaflets available in a variety of formats, website updates

	and informal information sessions held for residents of purpose built independent living accommodation.
3.5	Customers will be encouraged to monitor performance of the Safeguarding Adults' Policy and procedures through the OVH complaints, compliments and suggestions scheme, through regular surveys and via feedback to staff members during the conduct of their duties.
3.6	Customers will also have the opportunity to be involved in future revisions of the Policy and procedures based on performance information, in response to risk assessment information or changes in regulation / legislation, by participation in the OVH Tenant Policy Review Group.
3.7	Through staff training and regular one-to-one supervision sessions with line-managers, all OVH staff that are likely to have to deal with safe guarding adult concerns, will be informed of their responsibilities and good practice in maintaining professional boundaries with service users.
4	Implementation
4.1	OVH will inform all staff of their responsibilities and duties to recognise safeguarding adults concerns via the staff induction programme, on-going training on a rolling three year basis and management supervision sessions.
4.2	Any staff member that has to raise safeguarding adults concerns will be supported through the process via information and advice available via the designated persons.
4.3	The Independent Living Manager and the Independent Living Team Leaders will be the designated person(s) within OVH for safeguarding adults concerns and will be the main point of contact for Case Conferences and development of Safeguarding Plans if required. OVH staff wishing to contact the designated persons with safeguarding concerns will take priority over any other business.
4.4	In line with OVH's Confidential Reporting (whistleblowing) Policy staff will be made aware of how to access confidential and independent advice via the Public Concern at Work Agency for any concerns about fellow staff members or by reporting safeguarding adult concerns direct to the relevant Safeguarding Board.
4.5	The Confidential Reporting (Whistleblowing) Policy is compliant with the Public Interest Disclosure Act 1998 and staff that raise 'whistle-blowing' concerns will receive appropriate support and guidance.
4.6	OVH will have in place recruitment and selection policies that identify which positions are likely to involve 'regulated activity' and will ensure appropriate security checks and clearances are obtained before employees commence work with the organisation. Regulated activities are defined by the Protection of Freedoms Act 2012 as: <ul style="list-style-type: none"> • Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children; • Work for a limited range of establishments ('specified places'), with opportunity for contact: for example, schools, children's homes, childcare premises. Not work by supervised volunteers • The full definitions of regulated activities can be found at https://www.gov.uk/government/organisations/disclosure-and-barring-service

<p>4.7</p> <p>4.8</p> <p>4.9</p> <p>4.10</p>	<ul style="list-style-type: none"> • OVH will comply with the duty (effective from 1st December 2012) to refer information on any member of staff (after appropriate investigation process) to the Disclosure and Barring Service (DBS) where an employee has: <ul style="list-style-type: none"> • Been cautioned or convicted for a relevant offence; or • Engaged in relevant conduct in relation to children and / or vulnerable adults (i.e. an action or inaction [neglect] that has harmed a child or vulnerable adult or put them at risk of harm); or • Satisfied the harm test in relation to children and / or vulnerable adults (i.e. there has been no relevant conduct [i.e. no action or inaction] but a risk of harm to a child or vulnerable adult still exists) <p>OVH will adhere to strict procedures for recording safeguarding adults' information that ensures client confidentiality and Data Protection responsibilities are met.</p> <p>OVH will complete a Housing Action Plan for every OVH tenant in receipt of Independent Living services within four weeks of their moving in. Each Housing Action Plan will be tailored to the individual and will include a risk assessment to address the potential abuse from others.</p> <p>Each support plan will be reviewed after 6 months from start of tenancy and every twelve months thereafter, unless a change in circumstances requires a review to be undertaken earlier.</p>
<p>5</p>	<p>Performance</p>
<p>5.1</p> <p>5.2</p> <p>5.3</p>	<p>The Board of OVH will receive an annual assurance report on all safeguarding provisions including the number of cases referred to relevant investigation agencies.</p> <p>Safeguarding provisions are also included on the OVH risk register which is reviewed quarterly by the Business Assurance Committee.</p> <p>On an annual basis OVH will undertake an audit of all referrals made in regard to safeguarding alerts raised, the results of which will feed into the policy and procedural review mechanisms outlined below in section 7.</p>
<p>6</p>	<p>Consultation</p>
<p>6.1</p> <p>6.2</p> <p>6.3</p>	<p>The Chairs of the Safeguarding Boards in OVH's area of operations have been consulted in the development of this Policy (comments received have been incorporated where appropriate).</p> <p>All OVH staff have been consulted in the development of the Policy.</p> <p>The OVH Tenant Policy Review Group (TPRG) have been consulted in previous revisions of this Policy. Due to Covid19 restrictions it has not been possible to consult with the TPRG on this review. When permissible the Policy will be shared with the TPRG as an information item.</p>
<p>7</p>	<p>Review</p>
<p>7.1</p>	<p>The Policy and all supporting procedures will be reviewed annually (from the date of Executive Management Team (EMT) approval) with input from the Tenant Policy Review Group.</p>

7.2	The review process will ensure continuing suitability, adequacy, and effectiveness of the Policy and may be prompted by the introduction of new legislation or regulations or in the light of findings from system audits.		
7.3	The Policy and procedural review will show the impact of stakeholder and other agency feedback and involvement. The Policy and procedural review will seek to identify and address any disincentives that may exist to reporting concerns.		
8			
8.1	Was a full Equality Impact Assessment (EIA) required?	No	
8.2	When was EIA conducted and by who?	An Equality Impact Assessment was conducted by the Independent Living Manager and the Policy and Strategy Officer on 24-04-13 and is still relevant for this revision of the Policy.	
8.3	Results of EIA	No differential or adverse impacts were identified for any group with protected characteristics as a result of the operation of this Policy. It was noted that as the area of operation of the business grows, note would need to be taken of the local reporting procedures for safeguarding concerns.	
9			
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	EMT	
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Operations Director – Support Services	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operations Director – Support Services	
10		Amendment Log	
Date of revision:		Reason for revision:	Consultation record:
29 January 2019		In line with the review schedule	See Section 6
			<ul style="list-style-type: none"> Shortened form of wording at 1.5 in regard to relevant legislation Inclusion of reference to General Data Protection Regulation and Data Protection Act 2018

			<ul style="list-style-type: none"> • Change in the Process Maps:- The details of contacts for Safeguarding boards have been reviewed
04 February 2020	In line with the review schedule	See Section 6	<ul style="list-style-type: none"> • Additional information included at Sections 5.2 and 5.3 in regard to performance • The procedure has been amended to reflect operational practice
18 th May 2021	In line with the review schedule	See Section 6	<ul style="list-style-type: none"> • Inclusion of new clause re: professional curiosity at 2.20 • Revised definitions of what constitutes abuse included at 3.1