

# Safeguarding Adults policy

---

## 1. Introduction

- 1.1 This policy outlines our approach to preventing and reducing the risk of harm to vulnerable adults who are experiencing or are at risk from abuse or neglect.
- 1.2 This policy should be read in conjunction with the Safeguarding Children policy  
Other related documents:
  - Whistleblowing Policy
  - Mental Capacity Act Policy
  - Domestic Abuse and VAWG Policy
  - Wellbeing Policy
  - Code of Conduct
  - Data Protection Policy
  - Equality, Diversity and Inclusion Policy
  - Care and Support Needs guidance note

## 2. Scope

- 2.1 This policy applies to vulnerable adults that live in our properties or use our services, and all Peabody Group colleagues and volunteers. It also applies to all board and committee members and agency workers. The term 'colleague' in this policy refers to Peabody employees and volunteers.
- 2.2 Other organisations working on our behalf, or on our premises, are expected to have their own safeguarding policy and procedures or adhere to ours.

## 3. Key terms and definitions

- 3.1 Abuse and neglect– Abuse is violation of an individual's human and civil rights by any other person or persons. Abuse is when a person or persons have caused harm, or may be likely to do so, to the physical, sexual, emotional, psychological, financial or material wellbeing of a vulnerable person. Harm may be caused by direct acts or actions leading to unintentional harm taking place, or by failure to provide adequate care. It may be systematic and repeated or may consist of a single incident.
- 3.2 Abuse may also include Violence Against Women and Girls which refers to crimes predominantly, but not exclusively, experience by women and girls including: domestic violence and abuse; sexual offences; stalking; female genital mutilation (FGM); crimes said to be committed in the name of 'honour'; forced marriage; prostitution; and human trafficking for sexual exploitation; exploitation of girls by gangs. A full definition is included in the VAWG guidance note.

## 4. Our approach

- 4.1 As defined in the Care Act 2014, safeguarding duties will apply to an adult (someone over the age of 18) who:
  - Has needs for care and support – eligibility criteria to be included in guidance note (whether or not the Local Authority is meeting any of those needs)
  - Is experiencing, or at risk of, abuse or neglect; and

## Safeguarding Adults policy

- as a result of those care and support needs is unable to protect themselves from wither risk, or experience, of abuse or neglect
- 4.2 We will apply the Department of Health and Social Care's six key safeguarding principles when working with adults at risk of abuse: empowerment, protection, prevention, proportionality, partnership and accountability.
- 4.3 All Peabody Group colleagues have a duty to act upon and report actual, suspected or allegations of abuse in line with the Peabody Code of Conduct.
- 4.4 We make sure colleagues in direct contact with residents, customers and service users are aware of the signs of abuse and know the appropriate action to take when any concerns are raised, this includes contractors. Training is provided to colleagues appropriate to their role within the organisation.
- 4.5 We take a customer centred approach when working with individuals, family members and their representatives. We support and assess their circumstances and recognise the confidentiality of all the individuals concerned. However, the safety of the individual is paramount and where it is suspected that abuse may be occurring and an individual is in immediate risk of harm we will contact the emergency services and authorities.
- 4.6 We will record and refer all concerns, suspicions and allegations of abuse or neglect to lead agencies responsible for carrying out safeguarding assessments and enquiries, specifically the Local Authority in line with section 42 of the Care Act 2014. We will do this only with consent from the adult at risk, unless they lack capacity or there is an overriding public interest consideration. Where appropriate we will provide or refer the customer to additional support services.
- 4.7 We will work in partnership with lead agencies and relevant partners, to respond to suspicions or incidents of abuse or make safeguarding enquiries in accordance with statutory procedures
- 4.8 We will report any incidents of abuse that we suspect are a criminal offence to the Police. We will treat any disclosures of actual historical abuse in the same way as an allegation, disclosure or suspicion of current abuse.
- 4.9 We will share information for the purposes of safeguarding and will comply with the statutory duty to provide information where requested. We will develop processes and principles for sharing information.
- 4.10 We will handle data in accordance with the Data Protection Act, UK General Data Protection Regulation and the Peabody Data Protection Policy.
- 4.11 We will involve adults at the risk of abuse on any safeguarding decisions. However, where someone is judged as not having capacity to make an informed decision about their own wellbeing, these will be made in their best interest on their behalf. The decision will be made in accordance with the requirements of the Mental Capacity Act 2005, and in liaison with the necessary statutory services and agencies involving carers and family members as appropriate.
- 4.12 We will develop and implement internal procedures for colleagues that establish clear lines of accountability, responsibility and processes for reporting safeguarding concerns.
- 4.13 We will meet our responsibilities in the safe recruitment, selection and vetting of colleagues by using the Disclosure and Barring Service and undertake any other pre-employment screening checks as appropriate.

## Safeguarding Adults policy

- 4.14 We will provide support and supervision for employees, creating a safe environment in which they feel able to report safeguarding issues, including where they have concerns about the behaviour of another Peabody employee in line with our Whistleblowing Policy.
- 4.15 We will address any allegations or suspected abuse by Peabody employees through formal statutory investigative procedures reporting cases to the Police is appropriate. Further action may be our own internal disciplinary procedures.
- 4.16 We recognise the emotional impact on staff of recognising and reporting safeguarding concerns. Employee support will be available through line managers and in line with our Wellbeing Policy.
- 4.17 We promote our safeguarding policy and principles to residents and service users through our lettings processes, support services and through the day to day services provided to residents in their homes, on estates and in the communities where we work.

## 5. Equality, Diversity and Inclusion

- 5.1 We value diversity and promote equality, ensuring people are treated accordingly to their individual needs. This ensures that no person or other organisation is discriminated against on the grounds of race, colour, nationality, ethnic origins, sex, disability, sexual orientation, gender reassignment, marital or civil partner status, pregnancy, unrelated criminal activities, illness or any other matter that may cause a person to be treated with prejudice.
- 5.2 We will endeavour to ensure that services are delivered fairly and equally to all and to the highest possible standard. We provide all customers, prospective customers and other stakeholders with the information they require, in a format to meet their individual needs, using clear language which is easy to understand.
- 5.3 This policy impacts on our most vulnerable customers, many who will have protected characteristics under the Equality Act 2010. Therefore, we have completed an Equality Impact Assessment to ensure that any action we take does not discriminate, is the least restrictive and enables the person as much choice and control over decisions as is possible.

## 6. Legislation and Regulation

- Counter Terrorism and Security Act Prevent Duty 2015
- Care Act 2014
- Mental Capacity Act 2005
- Modern Slavery Act 2015
- Modern Slavery and Human Trafficking: National Referral Mechanism
- London Multi-Agency Adult Safeguarding Policy & Procedures
- Local Adult Safeguarding Board policies
- Data Protection Act and General Data Protection Regulation

## 7. Responsibilities

- 7.1 The Managing Directors of all regions have overall responsibility for delivery and compliance with the policy

## Safeguarding Adults policy

### Approval

<b>Version number</b>	01
<b>Effective from</b>	21 November 2022
<b>Policy owner</b>	Managing Director South London and Hackney