Teachers Housing Association

POLICY TITLE:	SAFEGUARDING POLICY		
BUSINESS AREA:	HOUSING MANAGEMENT		
APPROVAL DATE:	MARCH 2025		
APPROVED BY:	BOARD		
VERSION:	2	**RENEWAL DATE:**	MARCH 2028

LEGISLATION AND REGULATION	The Regulator of Social Housing (RSH) Transparency, Influence and Accountability Standard and Neighbourhood and Community Standard The Care Act 2014 The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 The Care and Support Statutory Guidance Care Quality Commission Regulations 2009 The Anti-social Behaviour Act 2014 Adult safeguarding for housing staff guidance (SCIE 2014) The Human Rights Act 1988 Equalities Act 2010
SUPPORTING DOCUMENTS	Domestic Abuse Policy Whistleblowing Policy Anti-social Behaviour Policy
SCOPE	This Policy covers the safeguarding of vulnerable adults and children.

1. PURPOSE

1.1 Safeguarding is defined in the Care Act as *'protecting a person's right to live in safety, free from abuse and neglect*'. This Policy is intended to ensure we have the processes in place to ensure legislative and regulatory compliance in relation to safeguarding.

1.2 While those who live in sheltered housing may be more vulnerable to abuse, an increasing number of people with care and support needs now live in general needs housing. It is important that we have safeguarding systems in place, and all staff are aware of how to prevent abuse and respond appropriately and proportionately when it occurs or is suspected.

2. INTRODUCTION

2.1 Safeguarding applies to any adult, regardless of mental capacity who:

- Has need for care and support (regardless of whether these have been assessed or being met by a local authority)
- Is experiencing, or at risk of experiencing abuse or neglect, and
- As a result of their care and support needs is unable to protect themselves against the abuse or neglect

2.2 The definition of safeguarding for children is:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcome

2.3 This Policy sets out Teachers' Housing Association's (THA) position on safeguarding adults and children and the approach that should be taken by our staff, contractors and any others acting on our behalf, who while carrying out their duties, have concerns, allegations or actual evidence of abuse or neglect.

2.4 The Care Act sets out six safeguarding principles that underpin our approach to safeguarding:

- **Empowerment** – people are supported and encouraged to make their own decisions and informed consent.
- **Prevention** – it is better to take action before harm occurs.
- **Proportionality** – the least intrusive response appropriate to the risk presented.
- **Protection** – support and representation for those in greatest need.
- **Partnership** – local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** – accountability and transparency in safeguarding practices.

2.5 When considering a potential safeguarding concern it is important to distinguish fact from opinion. Staff must ensure they are giving the right information to the right person. Information must be shared securely and the person made aware the information has been shared, and that it would not create or increase the risk of harm.

2.6 In most cases consent must be given by the adult before a referral is made unless:

- There is an obvious lack of capacity
- A wider risk to them and the community is identified
- A risk to life is identified

- A crime has been committed
- There is obvious coercion or duress

2.6 All relevant staff will have the required checks by the Disclosure and Barring Service (DBS/DBS enhanced) so staff working with vulnerable people have the correct and appropriate checks in place.

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3. POLICY STATEMENT

3.1 This Policy covers all adults and children living in THA properties and is not specific to sheltered housing. It is intended to protect all adults who are subject to, or at the risk of abuse or neglect. Adults are defined as those over 18 years. Some aspects of safeguarding only apply to adults, others only to children and young people, and some apply to both.

3.2 It covers adults who may be vulnerable and already in receipt or in need of social care services by reason of mental and/or physical difficulties and disabilities, age or illness and who may be unable to take care of themselves, or unable to safeguard themselves against significant harm or exploitation. This could include:

- People with learning difficulties
- Older people
- People with physical disabilities
- People with visual and sensory impairment
- People who rely on others for care and/or support

3.3 Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. This can be achieved by:

- Complying with legal and regulatory requirements
- Having robust safeguarding arrangements in place
- Ensuring that everyone is clear about their role and responsibilities
- Creating strong partnerships with other agencies to reduce the risk of harm and abuse
- Making safeguarding person-led and outcome focused decisions

3.4 It is the responsibility of all staff who encounter a child in their working day to take steps to ensure their safety. Abuse of children can be physical or emotional and caused intentionally or through neglect. Advice should always be sought if abuse of a child is suspected.

3.5 Abuse may result from a deliberate intention to cause harm but may also occur where a provider of a service lacks the necessary knowledge or skills to respond to an individual's needs appropriately.

3.6 Abusive behaviour between a member of staff and a vulnerable service user will always be investigated under the code of conduct and could possibly require police involvement.

3.7 Multiple forms of abuse may occur in an ongoing relationship or an abusive service setting to one person, or to more than one person at a time making it

important to look beyond single incidents or breaches in standards to underlying dynamics and patterns of harm. Any or all of those types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.

3.8 The Mental Capacity Act places emphasis on supporting and empowering people to make decisions for themselves whenever this is possible. We recognise that capacity and consent are central themes in safeguarding adult work and that every adult has the right to make their own decisions, a person is assumed to have capacity to do so unless it is proved that they do not. Individuals should be supported to make their own decisions where possible.

3.9 If staff are informed that something has happened or is happening that could be abuse, they are duty bound to report the incident and must undertake an initial assessment of the situation and report this to THA Safeguarding Lead. From this report a decision will be made as to whether it is appropriate to contact the Police or the Safeguarding Team at the Local Authority.

3.10 If an allegation of abuse is made against a member of staff the Safeguarding Lead must be informed immediately and the member of staff concerned must not have any further contact with the individual concerned while the matter is investigated. This will include considering whether the Police and/or other agencies need to be informed.

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4. ROLES AND RESPONSIBILITIES

4.1 As a provider of services to vulnerable adults THA have a responsibility and duty to consider and follow the relevant Local Authority Safeguarding Policy, Procedure and Practice Guidance. The Care Act 2014 reinforces this responsibility which is further defined in the Department of Health and Social Care publication Care and Support Statutory Guidance.

4.2 All staff, both individually and collectively are responsible for preventing and stopping safeguarding risks and any experience of abuse or neglect. Failure to comply with this Policy may result in disciplinary action.

4.3 All staff must report any concerns of abuse, harm or neglect to their line manager immediately, or another manager if their line manager is not available. If the manager does not take a safeguarding concern seriously, then the concern can be escalated under the Whistleblowing Policy.

4.4 The Police should be contacted if there is an immediate risk to life or if a crime has been committed. This should then be followed up by raising a safeguarding concern to the Local Authority.

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5. EQUALITY AND DIVERSITY

5.1 THA recognises that all adults and children, without exception, have the right to protection from harassment, harm or abuse. This Policy complies with the Equalities Act 2010 to ensure equality of treatment for all without

discrimination or prejudice. It pays regard to diversities surrounding access to properties and delivery of services.

6. PERFORMANCE CONTROLS AND BUSINESS RISK

6.1 Safeguarding is a key responsibility for housing providers. THA will seek to mitigate business risk through this Policy to ensure compliance with safeguarding standards.

6.2 We will keep confidential and secure records and refer concerns, suspicions and allegations of abuse, harm or neglect to the lead statutory agency responsible for carrying out safeguarding assessments and enquires. We will record all decisions made not to refer a concern, and the reason why.

6.3 THA 'Safeguarding Lead' will provide help and advice to staff and act as the lead on safeguarding issues and be responsible for ensuring the Local Authority Safeguarding Team is notified if abuse is identified or suspected. They will conduct regular reviews of THA safeguarding practices.

6.4 The Safeguarding Lead at THA is the Operations Director who can be contacted at Head Office, telephone number 020 7440 9440. In the event the Operations Director is not available enquiries should be forwarded to the relevant Housing Manager or the Chief Executive.

7. MONITORING

7.1 THA will review and monitor this Policy and our working arrangements regularly to ensure they remain effective in highlighting any barriers to reporting abuse.

7.2 We will monitor the number of safeguarding referrals made and evaluate investigated cases and alerts and the lessons learnt. A report will be made available to the Board annually.

8. REVIEW

8.1 The Safeguarding Policy will be reviewed every 3 years or earlier in response to regulatory or legislative changes.

Definition of abuse and neglect as set out in the Care and Support Statutory Guidance 2014 (updated October 2018) issued under the Care Act 2014.

Type	Including
Physical abuse	Assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions
Domestic violence	Psychological, physical, sexual, financial, emotional abuse, so called 'honour' based violence
Sexual abuse	Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts
Psychological abuse	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, unreasonable and unjustified withdrawal of services of supportive networks
Financial or material abuse	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, the misuse of misappropriation of property, possessions or benefits
Modern slavery	Slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
Discriminatory	Harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, religion
Organisational	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.
Neglect and acts of omission	Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support of educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
Self-neglect	Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.