

Safeguarding Policy

1. Summary

- 1.1. This Policy defines the different types and signs of abuse and advises staff members on what actions should be taken if abuse is suspected.
- 1.2. SHAL expects its staff, Contractors and Volunteers to be able to respond appropriately to reduce risk to a person with care, support, safety or wellbeing needs and to play a part in the prevention, detection and reporting of neglect and abuse. Everyone should be alert to the potential signs and signals of abuse and the risk others can pose to vulnerable adults and children. Everyone should share any concerns and information they have and contribute to whatever actions are needed to ensure a person's safety.
- 1.3. SHAL is committed to working with other organisations and members of the community and understands the benefits of a multi-agency approach.

2. Objectives

- 2.1. SHAL will not knowingly ignore or allow any incidents of abuse to continue unchallenged and will require all staff to take action in all cases where it is suspected that abuse of a vulnerable person is occurring, no matter whom the perpetrator is or who the victim is.
- 2.2. Anyone visiting a SHAL home will be open to their surroundings and will be encouraged to 'see something, say something' to ensure anyone who is vulnerable and suffering or likely to suffer abuse can access the support they need quickly.

3. Details

- 3.1. All staff employed by SHAL, Contractors, Board Members and Volunteers are in a position of trust and should promote the welfare of Tenants and their children. If you suspect abuse or receive a report that abuse to a person with care or a support need is occurring, including by anyone in a relationship with them (e.g.

Current version	Date agreed/reviewed	Review due	Owner	Pages
1.1	2025-02	2027-02	HM	Page 1 of 10

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friends, relatives, housing staff, volunteer workers, health/social care workers, Board members, contractors), this policy should be implemented. You do not have to be 100% certain that abuse is taking place. It might turn out that there is not a problem, or that the problem is not about abuse, it doesn't matter. Never turning a blind eye is very important. Everyone is expected to follow 'See Something, Say Something' guidance.

3.2. Effective sharing of information between professionals and other agencies is essential. This Policy gives and advice and guidance on:

3.2.1. The different types and indicators of abuse (Appendix 1)

3.2.2. Patterns of abuse (Appendix 1)

3.2.3. When abuse may constitute a crime (Appendix 2)

3.2.4. The reporting and recording of abuse

3.2.5. Sharing information (GDPR) (Appendix 3)

3.2.6. When is a person in need of care and support

3.3. If any visiting staff member has reasonable cause to think a person is experiencing, or at risk of, abuse or neglect and as a result of their care and support needs the person is unable to protect themselves, they must liaise with SHAL's Safeguarding Lead (Housing Manager or the CEO) and report this either directly to Adult Social Care or the Police where a crime has been committed. In domestic abuse cases where there are children present, we must inform Children's Social Care even though the abuse maybe only directed at the adult. Anyone who visits a SHAL home is actively encouraged that if they see something, they must say something and report this concern as soon as possible.

3.4. Staff members must come forward with any concerns within 24 hours. Where it is safe for you and the victim then the person/persons involved should be asked for permission to report concerns and advised that you intend to report the incident to the relevant authorities. Where possible they should be asked what their views and wishes are and what they would like the outcome to be, and this should be included in the report. However, a person's right to confidentiality is

not absolute and may be overridden where there is evidence that sharing information is necessary in exceptional circumstances to:

- 3.4.1. prevent serious crime
- 3.4.2. prevent significant risk to a person's life
- 3.4.3. prevent significant risk to others or to the community
- 3.5. When responding to a disclosure:
 - 3.5.1. Stay calm, listen and reassure the person
 - 3.5.2. Listen carefully and be sympathetic
 - 3.5.3. Do not dispose of evidence
 - 3.5.4. Record any concerns immediately and correctly
 - 3.5.5. Never question the person other than for clarification – if necessary, more detailed enquiries can take place later in the process
 - 3.5.6. Tell the person they were right to talk and reassure them it will be treated seriously
 - 3.5.7. Tell the person that the staff member will need to discuss it with SHAL's safeguarding lead
 - 3.5.8. Never make promises they can't keep – never promise to keep 'secrets' or maintain confidentiality (though they can explain the information will only be passed to those who have a need to know and will be in line with GDPR legislation)
 - 3.5.9. Never approach the alleged abuser
 - 3.5.10. See the person – ask for views and understanding of the actions needed and what outcome they would like to see
 - 3.5.11. Ensure the correct agency is contacted quickly i.e. Adult/ Children Social Care, Police etc
- 3.6. If you suspect that abuse is being committed by another member of SHAL staff, Contractor or Volunteer you should raise your concerns with a member of the Management Team or the CEO immediately.

3.7. Safeguarding Lead

Current version	Date agreed/reviewed	Review due	Owner	Pages
1.1	2025-02	2027-02	HM	Page 3 of 10

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- 3.7.1. The Safeguarding Lead Officer at SHAL is the Housing Manager. The Safeguarding Lead has direct responsibility for dealing with any Safeguarding concerns regarding both adults and young people.
- 3.7.2. The role of the Safeguarding Lead is to:
 - a Assess any concern brought to their attention and determine the steps to be taken
 - b Know who to contact in the event of a concern requiring action
 - c Liaise with agencies, or advise colleagues so they can do so, as appropriate
 - d Provide information and advice to other staff on safeguarding and ensure appropriate information is made available to partner agencies
 - e Ensure proper records are kept and that staff follow policies and procedures
 - f Ensure all staff receive the appropriate training
- 3.8. Staff could identify a safeguarding concern in a number of ways, the most likely being:
 - 3.8.1. A tenant reporting, directly or indirectly, that they have been abused
 - 3.8.2. Someone else who knows the tenant telling staff about potential abuse
 - 3.8.3. Unusual behaviour by either the suspected abuser or victim
 - 3.8.4. Anyone visiting a SHAL home seeing something themselves
- 3.9. If a staff member identifies potential abuse, or receives a report of potential abuse and the situation is an emergency (i.e. there is a significant risk of immediate harm) they should call 999 and report the incident to the police immediately. This information must also be passed to SHAL's Safeguarding Lead as soon as possible.
- 3.10. It is important to maintain clear and accurate records. Where potential abuse other than self-neglect is identified, staff should record as much as possible of the information on a Safeguarding referral form (Appendix 4) before sending it to

the Safeguarding Lead. These forms must be treated as confidential and their contents should be disclosed only to the Safeguarding Lead or to the Chief Executive in their absence.

- 3.11. Where the potential abuse is a case of self-neglect, there is no need to complete a Safeguarding referral form. Instead, the matter should be reported directly to the Safeguarding Lead by phone or email (or, in their absence, to another member of the Housing Management Team). It will be recorded on a central log retained within that team.
- 3.12. When they have received a report of potential abuse or self-neglect, the Safeguarding Lead will decide on the appropriate course of action. This action will be directly in proportion to the risks identified and could include a Police referral or referrals to Adult/ Children's Social Care. If the Safeguarding Lead is unavailable, this decision will be made by the Chief Executive.
- 3.13. The Safeguarding Lead and any SHAL staff involved in delivering support to the alleged victim should agree a method of supporting them and regularly review this if there is continued cause for concern. Other staff members, and potentially other organisations may need to be involved in the delivery of that support.
- 3.14. It is the responsibility of the Safeguarding Lead to establish what the approach should be to any alleged abuser if they are also a SHAL tenant. Whilst this will depend on the nature of the allegation and the outcome of any investigation, it is likely that the alleged abuser will continue to be a SHAL tenant for some time in which case a co-ordinated approach to their support, perhaps involving external agencies, will be necessary.
- 3.15. In all instances where abuse is suspected and you consider someone may not have full capacity to make decisions then a report should always be made to the Local Authority, explaining why you consider there are capacity issues. However, a person who lacks capacity should still be included in the decision making.

Under section 68 of the Care Act the relevant LA must arrange for an advocate to represent and support involvement. If an advocate is not available the person

Current version	Date agreed/reviewed	Review due	Owner	Pages
1.1	2025-02	2027-02	HM	Page 5 of 10
Crypton House, Bristol Road, Bridgwater, TA6 4SY – Online: www.shal.org – Email: information@shal.org – Tel: 01278 444344				
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would have difficulty understanding the information, retaining the information, using/weighing up the information, communicating their views, wishes or feelings. If you think this is the case and they do not have an advocate appointed, you should challenge this with the LA.

- 3.16. If you have concerns about the actions of an attorney acting under a registered enduring power of attorney (EPA) or lasting power of attorney (LPA), or a deputy appointed by the Court of Protection, you should contact the Office of the Public Guardian (OPG). The OPG can investigate the actions of a Deputy or Attorney and can also refer concerns to other agencies. Whilst the OPG primarily investigates financial abuse it also has a duty to investigate concerns about the actions of an attorney acting under a health and welfare lasting Power of Attorney or a Personal welfare deputy. The OPG can investigate concerns regardless of an adult's capacity to make decisions.
- 3.17. Social Services may visit the victim, they may wish to interview the person alleged to have caused the harm or neglect and they may request further confidential information. Members of staff should advise their manager of any such requests. Also, court attendance maybe requested through summons. SHAL will co-operate with all reasonable requests by Social Services in connection with an investigation.
- 3.18. If SHAL is called to a serious case review or safeguarding adults review, then the Officer involved should contact their line manager. Line managers should discuss the case with our CEO and Legal Team as necessary.
- 3.19. Follow up actions and monitoring
 - 3.19.1. If you have reported a concern then you should be informed of any follow up actions. Following a referral, you can request the name of the case worker, actions taken, who is involved, what meetings are being arranged, is the person aware of the action, what is our role going forwards and to be informed when the case is closed.

- 3.19.2. If you are not satisfied with the response from Social Services then you should challenge it and continue to contact them and insist on action where you feel the person or child meets their statutory duty. Ask for the rationale for their decision not to undertake an enquiry and ask them to put it in writing. If this fails to reach a satisfactory decision, you should you speak your Manager about logging a professional differences claim.
- 3.19.3. SHAL work in a compassionate way to understand the effects of Adverse Childhood Experiences and trauma, and will always work to ensure that we do not re-traumatise anyone whilst working with them to find the right support.
- 3.19.4. All members of staff always have access to a manager to talk through concerns and judgements and to have the opportunity for debriefing and reflective practice.
- 3.19.5. Understandably dealing with cases of abuse may cause stress or ongoing upset and the support of a manager should be sought in the first instance. This will likely involve an in-depth conversation, talking through what has happened and the effect on the member of staff to try and counter vicarious trauma.
- 3.19.6. Safeguarding reports are monitored closely by the Housing Team and the Health and Safety Committee. All safeguarding concerns (defined as a concern prior to a referral being submitted), and all referrals, including actions, must be recorded on the safeguarding record spreadsheet. Any supporting documentation should be saved in the 'safeguarding' folder within the tenant filing system.
- 3.19.7. The Health and Safety Committee review all safeguarding cases at each committee meeting to ensure compliance with this policy. Significant safeguarding cases, or those cases which lead to further action being

taken are reported to the Board to ensure that they have strategic oversight and assurance.

4. Outcomes

- 4.1. SHAL staff, Contractors, Board Members and Volunteers will be able to identify abuse or the risk of abuse in a SHAL home and work to ensure the right level of support can be provided
- 4.2. SHAL will work closely with other agencies, tenants and the wider community to ensure that abuse is challenged quickly and effectively
- 4.3. Anyone who visits a SHAL home will be encouraged to 'see something, say something'
- 4.4. SHAL staff will receive regular safeguarding training.

5. Consultation

- 5.1. A draft copy of this policy will be available on our website to allow members of the public an opportunity to comment on its contents prior to being submitted for approval by SHAL's board.
- 5.2. All tenants will be contacted by text to advise of its availability online and a draft copy will also be made available on request.
- 5.3. SHAL's tenant scrutiny panel will also be invited to review the policy and suggest any comments and amendments prior to the policy being approved by the board.

6. Equality and Diversity

- 6.1. We will treat all our customers fairly and equally. We will not, under any circumstances, discriminate against anyone because of: age; gender reassignment; being married or in a civil partnership; being pregnant or on maternity leave; disability; race including colour, nationality, ethnic or national origin; religion or belief; sex; sexual orientation.
- 6.2. We will understand the different needs of our customers and we will ensure our services are accessible to everyone.

7. Value for Money

Current version	Date agreed/reviewed	Review due	Owner	Pages
1.1	2025-02	2027-02	HM	Page 8 of 10
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- 7.1. We will regularly review our processes to ensure resources and services are providing best value for money to our residents.

8. Owner

8.1. Housing Manager

9. Version and Revisions

9.1. This policy will be reviewed every 2 year(s)

9.2. Revisions

New version	Date	Revision details
	June 2023	No changes required.
1.1	February 2025	Paragraphs 3.19.7, 3.19.7 added