



POLICY DOCUMENT

Group Member: Progress Housing Group

Service Area: Progress Lifeline

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Subject Title: Safeguarding Adults Policy

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1. INTRODUCTION

- 1.1 PHG is committed to safeguarding adults in line with legislation and relevant national and local guidelines.
- 1.2 The Group is committed to creating a culture of zero tolerance of harm to adults and a willingness to report safeguarding concerns.
- 1.3 This policy states our commitment to raise awareness of and to tackle the issues surrounding the abuse of vulnerable adults. We aim to develop and maintain a culture of safeguarding where we treat people as individuals with integrity and respect. We aim to take all reasonable measures to secure the health, safety and welfare of people involved in our work.
- 1.4 Safeguarding duties apply to 'adults at risk', this is an adult (anybody over the age of 18 who):
- Has needs for care and support (whether or not the local authority is meeting any of those needs)
 - Is experiencing, or is at risk of, abuse or neglect
 - As a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it
- 1.5 This policy is our commitment to the following principles:
- People using our services are safe.
 - Everyone has the right to live their life free from violence, fear and abuse.
 - All adults have the right to be protected from harm and exploitation.
 - All adults have the right to self-determination, which may involve a degree of risk.
- 1.6 We will:
- Ensure a consistent and effective response to any concern, allegation or disclosure of abuse.
 - Implement effective policies and procedures and ensure that the need for confidentiality is balanced with safeguarding the adult.
 - Support colleagues in reporting and investigating incidents of adult abuse.
 - Take steps to minimise the risk of abuse from occurring in our organisation.

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- Ensure colleagues have the knowledge and understanding of safeguarding adults issues and receive training.
- Work in partnership with other organisations.

1.7 Progress Housing Group (the Group) recognises that a multi-agency approach is required to ensure effective safeguarding is provided to its customers.

1.8 Whilst the Group has a national footprint, the majority of its activity takes place within the Lancashire and Cumbria and therefore this policy has been developed with reference to the *Multi Agency Safeguarding Adults Policy* created by the *Pan Lancashire and Cumbria Safeguarding Adults Boards*. It is recognised that policies adopted by other local authorities where the Group operates may differ to that operated by Lancashire County Council. Colleagues will be required to ensure that they are aware of any action that needs to be taken in regard to the local authority policy. It must also meet the referral and process requirements. Referrals will be made to the local authority where the adult resides.

2. SCOPE OF THE POLICY

2.1 This Policy reflects the commitment of the Group to work together with our partner organisations to safeguard adults at risk. This policy applies to all Group employees and volunteers including Key Unlocking Futures and Concert Living Limited.

3. RESPONSIBILITY

3.1 The first priority of all colleagues must always be to ensure the safety and protection of the adult at risk.

3.2 All colleagues should be aware of this policy and procedure and have a responsibility to be aware of issues of abuse, neglect or exploitation.

3.3 All colleagues should be made aware of their safeguarding lead for their part of the business.

3.4 All colleagues have a duty to act in a timely manner on any concern or suspicion that an adult who is being, or is at risk of being, abused, neglected or exploited and to ensure that the situation is assessed and investigated.

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3.5 All colleagues have a duty to undertake and follow the guidelines in the procedures set out in this Safeguarding Adults policy.

3.6 All colleagues are required to have a mandatory induction program which includes training on safeguarding adults and undertake refresher training on a three yearly cycle. The training will ensure that all colleagues:

- Understand the definition of an adult at risk.
- Understand what constitutes abuse for both adults and children/young people.
- Be able to recognise signs of abuse as related to their role.
- Know what to do when they are concerned that a child/young person or adult at risk is being harmed and be aware of their own and other's professional boundaries.
- Be able to seek advice and report concerns, ensuring they are listened to.
- Understand the importance of sharing information, how it can help and the dangers of not sharing information.
- Understand that abuse can take place on line, such as on social media, as well as in person
- Know how to share information in writing and document appropriately by telephone, electronically or in person, differentiating between fact and opinion.
- Know who to report safeguarding concerns to within their place of work.

Safeguarding Review Group

3.7 The Quarterly Safeguarding Review Group, chaired by the Group's safeguarding lead will:

- Review the number of safeguarding alerts made by staff
- Identify any actions arising out of the alerts, such as training or contact with Lancashire County Council Safeguarding Boards
- Receive reports on the numbers of staff receiving safeguarding training
- Receive safeguarding monitoring reports from the Support Services and Allocations Team
- Escalate any areas of concern to SLT Business
- Highlight the importance of safeguarding to staff through the intranet and suggest content for the safeguarding page on the intranet

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- Highlight the importance of tackling modern slavery, including raising awareness amongst staff and suppliers
- Ensure that Progress Housing Group meets its duty of care to refer concerns to local authority safeguarding boards
- Review the safeguarding policy and leads (see appendix 1 for safeguarding leads)
- Identify best practice and promote that to PHG staff

Allegations against a colleague or 'Persons in a Position of Trust'

- 3.8 For the purposes of this policy, a Person in a Position of Trust is someone who works with or cares for adults in a paid or voluntary capacity and about whom allegations of abuse or neglect are made (who may/may not work for the Group).
- 3.9 In all cases in which there is an allegation or suspicion that a Person in a Position of Trust working with adults has:
- behaved in a way that has harmed or may have harmed an adult
 - possibly committed a criminal offence against or related to an adult
 - behaved towards an adult at risk in a way that indicates she or he is unsuitable to work with such individuals
 - behaved in a way that has harmed children or may have harmed adults which means their ability to provide a service to adults at risk must be reviewed
 - been subject to abuse themselves, which means their ability to provide a service to adults at risk or Children/Young People must be reviewed.
- 3.10 All allegations of abuse, neglect or maltreatment of adults by a Person in a Position of Trust (who may/may not work for the Group) must be treated in accordance with the Raising Concerns at Work policy. The Head of Governance & Head of Internal Audit are responsible for the effective implementation of this policy.
- 3.11 All Safeguarding Adults Board relevant partners are to identify a person who will hold responsibility for information management oversight within their respective organisations of individuals within their agencies where concerns have been raised about a person in a position of trust (PiPoT). This person may be a Safeguarding Lead or specifically a Position of Trust Lead.

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4. POLICY

Aims & Objectives

- 4.1 This policy is based on the six principles of safeguarding:
- Empowerment – The presumption of person led decisions and informed consent
 - Prevention – It is better to take action before harm occurs
 - Proportionality – Proportionate and 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 delivering safeguarding
- 4.2 Making Safeguarding Personal (MSP) is a person-centred and outcome focused approach to safeguarding adults. It emphasises that the adult concerned must always be at the centre of adult safeguarding, and that their wishes and views should be sought at the earliest opportunity.
- 4.3 Where the person refuses to give consent it may be justifiable in certain circumstances to override confidentiality and share information due to the risk posed to themselves or others. Colleagues should seek support if unsure from their manager or a Safeguarding Champion.

Mental Capacity

- 4.4 The Mental Capacity Act 2005 defines capacity as a person's ability to make a decision regarding an issue that affects them and it must be assumed that a person has capacity until it is proved otherwise. To establish whether a person has capacity the following principles should be applied to the capabilities of that person in that they are:
- Principle 1 – A person must be assumed to have capacity unless it is established that they lack capacity
 - Principle 2 – A person is not to be treated as unable to make a decision unless all practicable steps to help them do so have been taken without success.
 - Principle 3 – A person is not to be treated as unable to make a decision because they make an unwise decision.

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- Principe 4 – An act or decision made under this Act for or on behalf of a person who lacks capacity must be done, or made, in their best interests.
- Principe 5 – Before the act is done, or the decision is made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person’s right and freedom of action.
- able to understand the information relevant to the decision;
- able to retain that information;
- able to use or weigh that information as part of the process of making the decision; and
- able to communicate his or her decision (whether by talking, using sign language or any other means).

4.5 Risk assessments will be conducted for all independent living and supported housing tenants of the Group at the beginning of their tenancy, considering any safeguarding requirements above those already in place. These are conducted by trained members of colleagues and updated periodically.

4.6 The Care Act 2014 places a specific duty on local authorities to implement a Safeguarding Adults Board. The Care Act Statutory Guidance includes housing providers in the list of suggested partners to be invited to Safeguarding Adult Board meetings. The Group will work in partnership with Safeguarding Adult Boards where it deems it proportionate and relevant to do so.

4.7 The Group records safeguarding alert information provided to the local authority and uses it in reviews of its processes to highlight possible areas of improvement and to learn from cases.

4.8 The Group’s Raising Concerns at Work Policy enables concerned colleagues to confidentially report any unacceptable behaviour of other colleagues members. This may include invoking the Group’s Disciplinary Procedure.

Prevent Strategy

4.9 The Counter Terrorism and Security Act 2015 that came into force in March 2015 includes a provision called the Prevent Duty which places a general requirement on specified authorities to “have due regard to the need to prevent people from being drawn into terrorism”.

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4.10 The “specified authorities” include local authorities, the NHS, schools, further and higher education bodies, probation service providers and police forces across England, Wales and Scotland (the duty does not apply to Northern Ireland). The full listing of “specified authorities” is set out in schedule 6 of the legislation.

4.11 Although the Group does not fall under the Prevent Duty “specified authorities” we work closely with many of them and will therefore ensure that colleagues have an awareness of the prevent agenda and signs of radicalisation, the link between the vulnerabilities making people more susceptible to abuse and being susceptible to radicalisation, and what to do should they suspect an adult is at risk of radicalisation.

Customers at risk

4.12 The Group appreciates that certain household’s circumstances may require our services to be tailored to provide the necessary service.

4.13 Where a household is identified as requiring a more tailored service, colleagues are provided with alternative ways of delivering a standard service which will better meet the needs of the household.

4.14 Through meeting the needs of our customers and tailoring service delivery, we are furthering our commitment to customer focus.

4.15 The Group understands that certain client groups are more vulnerable to certain types of abuse than others. Where a client group is particularly vulnerable to a specific type(s) of abuse, additional methods, such as specific literature and discussions at tenant meetings, will be employed to raise awareness to identify and report abuse.

What constitutes abuse

4.16 Abuse is a violation of an individual’s human and civil rights by another person or persons and may result in significant harm to, or the exploitation of the person subjected to it;

4.17 Abuse may consist of a single act or repeated acts;

4.18 It may be physical, verbal, psychological or emotional;

- It may be an act of neglect or an omission to act;

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- It may occur when a person is persuaded to enter into a financial or sexual transaction to which they had not consented, or cannot consent;
- Abuse may be deliberate or unintentional or result from lack of knowledge.

Who may be the abuser

4.19 Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual. A wide range of people may harm others.

4.20 These include:

- a member of staff, owner or manager at a residential or nursing home
- a professional worker such as a nurse, social worker or general practitioner
- a volunteer or member of a 'community group' such as a social club or place of worship another service user
- a spouse, partner, parent, relative or friend
- a carer
- a neighbour, member of the public or a stranger
- a person who deliberately targets others in order to exploit them.

Types of Abuse

4.21 The main categories of abuse are as follows:-

- Psychological
- Physical
- Sexual
- Financial or Material
- Neglect and Acts of Omission
- Discriminatory

4.22 The Care Act 2014 also identifies the following categories of abuse:

- Self-Neglect
- Modern Slavery
- Domestic
- Organisational (Institutional)
- Multiple

4.23 References;

- The Care Act 2014
- Counter-Terrorism and Security Act 2015

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- Mental Capacity Act 2005
- Care and Support Statutory Guidance issued under the care act
- 2014
- Health and Social Care Act 2008
- Modern Slavery Act 2015
- The Allegation Management Framework 2016

General Data Protection Regulations

- 4.24 The principles that should govern the sharing of information include: -
- Confidentiality must not be confused with secrecy.
 - Information will only be shared on a 'need to know basis' when it is in the best interests of the service user(s).
 - Informed consent should be obtained but if it is not possible and other vulnerable adults are at risk, it may be necessary to override the requirement.
 - It is inappropriate for partner agencies to give assurances of absolute confidentiality in cases where there are concerns about abuse, particularly in those situations when other vulnerable people may be at risk.
- 4.25 Further information on sharing of information on confidentiality and principles governing sharing of information, Pan Lancashire and Cumbria Safeguarding Adult's Boards – Practice Guidance Document (section 11).
- 4.26 Progress Housing Group treats all information regarding vulnerability confidentially. Responsible information sharing between organisations is sometimes necessary to aid safeguarding. We will only share information with appropriate organisations.
- 4.27 There are 7 golden rules for information sharing and these are that it follows the principles that it is; Necessary, Proportionate, Relevant, Adequate, Accurate, Timely and Secure.
- 4.28 For the purpose of this policy, consent is defined where a vulnerable adult with capacity agrees to and accepts assistance. Should the person refuse to engage in the provision of assistance their rights and wishes should be upheld, although this will not limit the action that may be required to protect others who are at risk of harm.
- 4.29 Progress Housing Group recognises the importance of confidentiality and will ensure that when information is provided to other agencies, it

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will be in line with the Data Protection Act 1988 and the Human Rights Act 1998, although this will not be at the expense of leaving the vulnerable person at risk.

Monitoring

4.30 The number of type of safeguarding concerns raised will be monitored and reported to the Safeguarding Review Group quarterly and Executive Board annually.

4.31 Learning from this is considered and embedded across the organisation through the internal review group.

5. IMPLEMENTATION

Training

5.1 Safeguarding is a specific requirement of the Group's corporate induction training with all new frontline colleagues required to attend.

5.2 Training is mandatory for all Group colleagues and is to be refreshed on a 3 year cycle.

5.3 Training will be in accordance with the Pan Lancashire and Cumbria Safeguarding Adults Boards Guidance.

5.4 Procedure references;

- Group Disciplinary Procedure
- Group Grievance Procedure

5.5 Linked documents

- Group Equality and Diversity Policy
- Group Raising Concerns at Work Policy
- Group Personal Safety & Lone Working Policy
- Group Code of Conduct
- Group Complaints & Feedback Policy
- Group Domestic Abuse Policy
- Group ASB Policy
- Group Witness Support Policy
- Group Disclosure and Barring Service Check Policy
- Group Modern Slavery & Human Trafficking Statement – <https://intranet.progressgroup.org.uk/News/Pages/Modern-slavery-and-human-trafficking.aspx>
- The relevant local authority Safeguarding Adults Board (dependent upon where the property is located)

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6. CONSULTATION

7. REVIEW

- 7.1 It is recommended that this policy is reviewed every two years or as a result of any change in legislative requirements and contractual requirements.

8. EQUALITY IMPACT ASSESSMENT

- 8.1 We welcome feedback on this policy and the way it operates. We are interested to know any possible or actual adverse impact that this policy may have on groups in respect of gender, marital status, race, disability, sexual orientation, religion or belief, age or other characteristic.
- 8.2 We aim to consult those who may be affected by a policy before it is formally introduced. We encourage involvement in shaping new services. We want to take account of the needs, circumstances, and experience of those likely to be affected by a proposed policy and identify any possible inequalities or discrimination between different groups.
- 8.3 A full Equality Impact Assessment has been undertaken and reviewed against this policy.

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Appendix 1

Progress Housing Group Safeguarding Strategic Lead:

Job Title	Area of Business	Contact
Director (Housing Operations & RWP) Safeguarding Lead and Person in Position of Trust Lead	Reside with Progress	In any cases where abuse is identified
Head of Lifeline	Lifeline/Control Centre	

Progress Housing Group Safeguarding Review Group Members:

Job Title	Area of Business	Contact
Head of Operations	Homes and Opportunities	In any cases where abuse is surrounding a General Needs & Independent Living tenants
Refuge Manager	Clare House	In any cases where abuse is surrounding Domestic Violence
Head of Operations	Income and Communities	In any cases where abuse is surrounding Progress Living customers
Director (Housing Operations, Reside with Progress)	Supported Living Schemes	In any cases where abuse is surrounding a tenant of a supported living scheme

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Property Services Coordinators	Property Services	In any cases where abuse surrounding a tenant is identified by property services colleagues
Director (People & Culture)	HR	In any cases where abuse is surrounding a member of staff.
Director (Key)	Key	In cases where abuse is surrounding schemes where Key are providing support
Head of Customer Experience	Progress Connect	In any cases where abuse is surrounding the safeguarding of a tenant is identified by a Progress Connect member of staff.