

SAFEGUARDING ADULTS POLICY

EG/Board Approval:	June 2024	Responsible Board:	Ocean Housing Group Ltd
Next Review:	June 2027	Responsible Executive:	Managing Director of Ocean Housing Ltd

1.0 Policy Statement

- 1.1 Ocean is a provider of social housing for people in need in Cornwall. Our mission is 'to be an innovative provider of quality homes and services, with residents and staff at the heart of Ocean, and Ocean at the heart of the community'.
- 1.2 This policy sets out Ocean's approach to safeguarding adults.
- 1.3 Adult safeguarding is the process of protecting adults with care and support needs from abuse or neglect. It is an important part of what many public sector services do, and a statutory responsibility for local authorities.
- 1.4 All organisations, commissioned services, providers, and the voluntary and community sector are required to work in partnership and co-operate with the local authority (adult social care) to respond to allegations of abuse or neglect of adults with care and support needs.
- 1.5 This policy applies to Ocean Housing Group and all staff, although it primarily concentrates on Ocean Housing's role as a landlord and in particular how it ensures that safeguarding measures for vulnerable adults are taken in a timely and appropriate way.
- 1.6 This policy may need to be read in conjunction with other Ocean policies, including:
 - Safeguarding Children Policy
 - Services for Vulnerable People Policy
 - Allocations and Lettings Policy
 - Anti-Social Behaviour (ASB) Policy
 - Harassment Incidents, Crime & Racial Harassment Policy
 - Equality, Diversity and Inclusion Strategy
 - Compliments and Complaints Policy
 - Domestic Abuse Policy

2.0 Background

2.1 Ocean believes that:

- 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
- Not everyone can protect themselves
- All adults have the right to independence, which may involve some risks

- 2.2 Ocean therefore has in place appropriate policies and procedures to help safeguard vulnerable adults.
- 2.3 Although not statutorily responsible for safeguarding, Ocean takes its responsibilities seriously, as a landlord, service provider and employer, in safeguarding the independence, safety and wellbeing of its tenants, their families and other customers.
- 2.4 Ocean is committed to ensuring that the nature of abuse and vulnerability is understood throughout the organisation. Training for staff is provided on procedures produced in respect of safeguarding vulnerable adults experiencing abuse or in potentially abusive situations.

3.0 Policy Objectives

- 3.1 To ensure Ocean does all it reasonably can to protect vulnerable adults living in or visiting our homes who may be at risk of neglect or abuse.
- 3.3 To ensure that Ocean's working practices support effective safeguarding referrals for people who may be at risk of neglect or abuse.
- 3.4 To ensure Ocean staff are appropriately trained, taking account of their job role, to help protect vulnerable adults living in, and visiting, our homes, who may be at risk of neglect or abuse.
- 3.5 To ensure our services are open and accountable and that information on raising safeguarding alerts is available.
- 3.6 To ensure that staff are aware of Ocean's policy and procedures on safeguarding.
- 3.7 To ensure that staff are confident in their ability to raise a concern about safeguarding and there are systems in place for concerns to be heard, evaluated and if required to act swiftly in passing on information to the relevant authority for further investigation and action.

4.0 What is considered abuse and neglect?

- 4.1 The Care and Support statutory guidance identifies 10 types of abuse. These are:
- 4.2 Physical abuse includes assault, hitting, slapping, pushing, misuse of medication, restraint, and inappropriate physical sanctions.
- 4.3 Sexual abuse which includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, incident images, subjection to pornography or witnessing sexual acts, sexual assault, sexual acts to which the adult has not consented or was pressured into consenting.
- 4.4 Psychological abuse which includes 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 or supportive networks.

- 4.5 Financial or material abuse which includes 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 or misappropriation of property, possessions, or benefits.
- 4.6 Discriminatory abuse which includes forms of harassment, slurs or similar treatment: because of race, gender and gender identity, age, disability, sexual orientation or religion.
- 4.7 Domestic abuse (also known as domestic violence) which can be a single incident, or a pattern of incidents or behaviour, that is some or all of the following: controlling, coercive, threatening, degrading, violent. It can include sexual violence and is usually carried out by a partner or ex-partner but can also be committed by a family member or carer. Domestic abuse is not always physical and can also include: coercive and controlling behaviour and 'gaslighting', economic abuse, online abuse, threats and intimidation, harassment and stalking, emotional abuse, sexual abuse.
- 4.8 Neglect and acts of omission which include the refusal of, or failure to fulfil, a caregiving obligation, for example ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating. This may also involve omissions in care when there was no conscious and or intentional attempt to inflict physical or emotional distress on the person at risk.
- 4.9 Modern-slavery which can take many forms including the trafficking of people, forced labour, servitude and slavery. Modern slavery is a global problem that transcends age, gender, and ethnicity. It is not an issue confined to history or an issue that only exists in certain countries.
- 4.10 Self-neglect which describes a wide range of behaviours, where a person with mental capacity neglects to care for their personal hygiene, health, or surroundings. It can be challenging to address because of the need to find the right balance between respecting a person's autonomy and fulfilling a duty of care to protect their health and wellbeing. When considering if a safeguarding response is required it is essential to establish if the person has capacity to make decisions about their own wellbeing, and if they are able or willing to care for themselves — adults who are able to make choices may make decisions that others think of as self-neglect.
- 4.11 Organisational abuse which is not directly caused by individual action or inaction, but occurs as a consequence of the structure, policies, processes, and practices within an organisation. Organisational abuse can affect one person or many people, range from one-off incidents to on-going ill-treatment and includes acts of neglect or omission and poor care practice (such as a health care setting or care agency).

5.0 Roles and Responsibilities

- 5.1 Ocean Group Board will receive and consider an annual report from the Ocean Housing Safeguarding Board on safeguarding activities and issues, as well as agreeing significant policy revisions.
- 5.2 Executive Group will receive and consider a quarterly report from the Ocean Housing Safeguarding Board, on safeguarding activities and issues, as well as agreeing significant policy revisions in line with its delegation from Group Board.

5.3 The Ocean Housing Safeguarding Board, chaired by the Head of Neighbourhood Services, will:

- Ensure Ocean does all it reasonably can to protect and promote the welfare of children and vulnerable adults living in our homes.
- Ensure Ocean complies with relevant legislative and regulatory requirements
- Develop, monitor, and review Ocean's safeguarding, and associated, policies and procedures.
- Ensure effective reporting of issues to both Ocean Group Board and the Executive Group.
- Ensure Ocean staff are appropriately trained to help protect and promote the welfare of children and vulnerable adults living in our homes, taking account of their job role.
- Raise awareness of welfare issues within Ocean.
- Ensure team members are supported when dealing with other agencies and, where necessary, escalate concerns both internally and externally.
- Review safeguarding cases and cause for concern referrals to identify trends and learning.
- Ensure that learning is shared.

5.4 Neighbourhood Services Managers and Home Ownership Manager will ensure the policy is implemented correctly and all relevant processes are followed.

5.5 Ultimately, safeguarding is the responsibility of every Ocean employee.

6.0 Concerns that may not meet the threshold for a safeguarding referral

6.1 Ocean employees may encounter 'welfare' issues that are not covered by the 10 types of abuse and neglect set out above, and which would not be accepted as a safeguarding referral e.g threats of suicide. Other issues may be referred for a safeguarding assessment but those assessing the referral may decide the threshold for acceptance has not been met.

6.2 Ocean takes all welfare issues seriously and will ensure that the same principles are applied to welfare concerns that may not qualify for a safeguarding referral, or may not be accepted if they are referred. It will put in place appropriate process so that we do all we reasonably can to protect and promote the welfare of children and vulnerable adults living in, or visiting, our homes.

7.0 Our Approach

7.2 Ocean will make a safeguarding, or other type of referral, without the persons permission where it is assessed there is a significant risk of harm. We will carry out a risk assessment to determine whether a safeguarding referral is required.

- 7.3 We will provide a safe, non-judgmental environment, within which someone can report concerns and seek advice.
- 7.4 We will tailor our services, as far as possible, to meet the needs of the person we are working with e.g. meeting at a neutral location, meeting out of normal working hours and/or providing an officer of the same gender.
- 7.4 We will provide advice on housing options where appropriate, and support to access alternative housing if required.
- 7.5 We will signpost to specialist agencies who can offer tailored advice and support to the person we are working with.

8.0 Equality, Diversity & Inclusion

- 8.1 Ocean collects data to understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and also to assess whether all tenants have fair access to, and equitable outcomes of, housing and landlord services
- 8.2 Ocean recognises that often vulnerable people may be disadvantaged socially, isolated and/or financially excluded. Where appropriate we will offer services in line with this policy to assist vulnerable tenants to sustain and maintain their tenancy.
- 8.3 Everyone has a right to be treated with dignity, fairness, and respect. This Policy is in line Ocean's Equality, Diversity, and Inclusion Strategy.
- 8.4 This policy does not unfairly or unlawfully discriminate and will be applied equally for all Protected Characteristics. Reasonable Adjustments, under the Equality Act 2010, will be considered on a case-by-case basis.
- 8.5 We are committed to addressing any communication or language barriers by providing translation services for face-to-face contact and written communication when needed. We will also produce information in alternative formats such as audio or large print where required.
- 8.6 Staff are made aware of our approach to Customer Care and Equality, Diversity, and Inclusion, and Safeguarding.