

Adult Safeguarding Policy



Safeguarding Policy

1. Policy Introduction

This policy sets out Legal & General Affordable Homes' (LGAH) approach to promoting the wellbeing of its customers (tenants, leaseholders and household members) to ensure they are safe from risk of harm, abuse and/or neglect.

This policy applies to adults over the age of 18. If people under the age of 18 are involved, then this policy should be read in conjunction with LGAH's Child Safeguarding Policy.

LGAH considers the abuse of anyone to be unacceptable and fully recognises the harmful effect that abuse has, not just on the victim but also their families and the wider community.

This policy outlines our dedication to safeguarding practices that identify abuse or risk of abuse, ensuring appropriate and effective actions are taken to protect vulnerable individuals and promote their welfare.

2. Applies to

This policy will apply to the following entities and any reference to LGAH within this policy relates to all entities listed below:

Legal & General Affordable Homes Limited
Legal & General Affordable Homes (AR) LLP
Legal & General Affordable Homes (SO) LLP
Legal & General Affordable Homes (Capital) Limited
Legal & General Affordable Homes (Development 3) Limited
Legal & General Affordable Homes (SO) Limited
Legal & General Affordable Homes (Investment 2) Limited
Legal & General Affordable Homes (Investment 3) Limited
Legal & General Affordable Homes (Development 4) Limited

This policy also applies to all LGAH staff (including those on fixed-term or temporary contracts), Board members, agency workers, consultants, volunteers, third party agencies, developers, contractors, subcontractors and suppliers providing services to LGAH and its customers.

3. Policy Aims

We know abuse against people occurs in society, and individuals from all communities may be at risk of abuse.

Abuse can take many different forms. It may occur via neglect of an individual, by inflicting harm, or failing to act to prevent harm. It is behaviour that either deliberately or unknowingly causes harm, endangers life, or infringes on rights.

In accordance with the Care Act 2014, we are committed to maintaining safeguarding policies and procedures, implemented by knowledgeable and trained staff.

The objectives of this policy are to set a clear framework to achieve the following:

- **Customer empowerment:** educate customers on abuse and reporting mechanisms.
- **Prevent and protect:** proactively prevent harm and reduce risks.
- **Defined roles:** clear individual and corporate safeguarding responsibilities.
- **Support systems:** provide or refer to relevant support agencies.
- **Transparency:** publicly available policy for awareness.
- **Training:** comprehensive training for abuse identification and response.
- **Professional boundaries:** establish clear boundaries in safeguarding.
- **Continuous improvement:** regular review and enhancement of safeguarding practices.

4. Legal Framework

This policy is designed with consideration of the following legal and statutory instruments:

- Mental Capacity Act 2005
- Health and Social Care Act 2008
- Protection of Freedoms Act (2012)
- Equality Act 2010
- Care Act 2014
- Counter Terrorism and Security Act 2015

5. Definitions

Adult: is any person aged 18 years or over. Adults at risk within the Care Act 2014 are referred to as 'people with care and support needs'. Safeguarding duties apply to an adult who:

- 'Has needs for care or support (whether or not the local authority is meeting any of these needs)
- Is experiencing, or at risk of, abuse or neglect, and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse and neglect.'

Safeguarding adults at risk includes protecting health, wellbeing and human rights, allowing individuals to live free from harm, abuse and neglect.

Types of abuse (Care Act 2014): includes physical abuse, domestic violence, sexual abuse, psychological abuse, financial abuse, modern slavery, discriminatory abuse, organisational abuse, neglect and self-neglect.

5.1 Safeguarding principles (Care Act 2014):

Empowerment: support individuals to make their own decisions.

Prevention: take action before harm occurs.

Proportionality: respond appropriately to the level of risk.

Protection: provide support for those in greatest need.

Partnership: collaborate with communities and services.

Accountability: ensure transparency in safeguarding practices.

6. Addressing Safeguarding Concerns

There are four stages to effective management of safeguarding concerns. These are identification, prevention, reporting and responding.

Identification

LGAH's responsibility is to be vigilant regarding the welfare of adults at risk, and to train staff to recognise the signs of abuse and/or neglect. All staff undertake annual safeguarding training and LGAH will regularly raise awareness across its businesses to ensure staff remain vigilant to indicators of abuse and neglect. LGAH will ensure its management providers and contractors carry out regular training for their staff and abide by this Safeguarding Policy.

We also encourage customers and members of the local community to highlight and report suspected abuse either to LGAH, its management providers or to a relevant agency. LGAH will facilitate this through wider communication with customers to raise awareness of adult safeguarding matters and to offer support in reporting concerns as part of its housing management duties.

Prevention

LGAH's obligation is to ensure it only recruits and employs staff working with adults at risk who are competent and safe to do so. LGAH will undertake the necessary DBS (Disclosure & Barring Service) checks and will share information on staff found to be unsuitable to work with people at risk, by referring their details to the DBS. LGAH will ensure via its selection processes that appointed contractors, and sub-contractors also comply with these requirements

LGAH views abuse or suspected abuse as extremely serious and is committed to exposing, investigating and addressing issues of abuse or suspected abuse. It recognises that because of the level of contact some staff and partners have with customers, we are well placed to identify vulnerable adults who may be experiencing, or at risk of, abuse.

LGAH also recognises the need to be vigilant that abuse may be committed by a member of staff, agent or by others who are in a trusting relationship with a vulnerable person.

By identifying signs early on, LGAH's intention is to prevent and take appropriate action before any harm occurs.

Reporting

All staff are required to report any safeguarding concerns they have as soon as they arise. LGAH fully support staff to report concerns and ensure that their concerns are taken seriously. When a concern is identified, we will always report it to the local authority or the police, who have a statutory duty to investigate any concern. Where further advice is also needed, a notification

should be made to LGAH's Safeguarding Officer (Head of Customer Care & Nominations) to agree the best course of action going forward.

LGAH's Safeguarding Officer will record any reports of abuse, harm and/or neglect centrally which will be saved in a private and confidential location and will only be shared in line with LGAH's confidentiality and data protection procedures.

LGAH's responsibility is to ensure, where a customer or potential customer is a known risk to others, that a risk assessment is undertaken. Risk assessments will differ depending on the harm/abuse identified and risk assessments will also be undertaken by LGAH and its management providers regarding the suitability of any proposed letting and to agree how risks will be managed. LGAH will work in partnership with the relevant Multi Agency Risk Assessment Conference (MARAC) or Multi Agency Public Protection Arrangements (MAPPA) in this respect.

Overarching any safeguarding matters, LGAH places importance on operating a victim-centred approach, which treats people with dignity, respect and without prejudice.

If LGAH considers a criminal offence has occurred, or a customer faces an imminent risk, the police will be notified immediately. If there are concerns about the immediate health and welfare of a customer in relation to a safeguarding matter, LGAH will notify the emergency services and local authority as soon as possible.

Responding

LGAH seeks to offer customers the safest and most supportive environment in which they can report abuse. Any report or allegation of abuse will be listened to and investigated. As a responsible housing provider, LGAH adopts the six key principles which underpin all adult safeguarding work within the [Care and Support Statutory Guidance](#) (Department of Health and Social Care 2014):

- Empowerment – people being supported and encouraged to make their own decisions.
- 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 delivering safeguarding.

Essential to LGAH's response is keeping clear, concise, factual and accurate records as part of its safeguarding processes, enabling appropriate responses to concerns. This is also key to preventing abuse as it can provide indicators of particular risks or vulnerabilities, especially for customer facing officers and operatives visiting our customers who are alerted to a concern.

LGAH recognises the majority of its customers have the capacity to keep themselves safe and to make informed choices and decisions. LGAH will not assume someone is vulnerable to abuse (e.g. because of a disability), however, it will act to support customers and help them to seek protection from abuse, in light of particular concerns and in response to an individual's particular needs

7. Working with Partners

Responsibility for safeguarding adults at risk is shared amongst a number of agencies. Local authorities and other statutory agencies play a vital role in our response to addressing concerns of safeguarding and hold the strategic responsibility for co-ordinating any local concerns for adults at risk. They also have expertise in handling cases of abuse, providing support and counselling to victims of abuse, and in assisting the police with any criminal investigations

LGAH recognises that its customers will include both victims and those committing these crimes. LGAH therefore works in partnership with other agencies to support victims of abuse and address the risks presented by people committing these crimes. In cases where someone committing these crimes is an LGAH customer, it will utilise the most appropriate intervention available to manage their behaviour and will work with relevant agencies to provide support as needed.

LGAH will work with statutory partners, adhere to Section 42 obligations, and participate in multi-agency safeguarding efforts as required to produce a holistic solution that best meets the individual's needs.

LGAH recognises the importance of cooperating with the police to help them protect, investigate and prevent abuse. LGAH will co-operate with local Safeguarding Adults Boards and inform them of any serious concerns. LGAH will make relevant referrals to MARAC, MAPPA using prescribed risk assessment matrix's and will engage at a local and regional level with local authorities risk assessment frameworks for adult safeguarding boards.

As a minimum, LGAH expects all its contracted management providers to hold policies that are at least equivalent to the policy position held by LGAH on this matter.

8. Consent to make a referral

LGAH always assumes that an adult has the mental capacity to make decisions about their personal safety, unless we have been formally advised otherwise by an appropriate health and/or social care professional or have seen relevant documentation e.g. power of attorney. If LGAH suspects that an adult does not have mental capacity, LGAH will refer them to the appropriate agency for an assessment.

LGAH will only accept consent to share information with other agencies if it is freely given, informed and not inferred or provided under duress. If consent is refused, safeguarding decisions will consider the overriding need for consent where there is a risk of serious harm, or if by asking for consent we would be putting the victim at further risk of abuse.

In such instances, where consent is not needed, such as when others are at risk or if a crime may have occurred or the person lacks capacity to decide, the Data Protection Act 2018 allows sharing information without consent for safeguarding purposes, and we will:

- Inform the adult of the actions where it is safe and possible.
- Record decisions and reasons for sharing or not sharing information.

9. Roles and Responsibilities

Specific roles ensure effective safeguarding implementation:

Management Provider (MP): Customer facing identification and reporting of concerns.

Customer facing LGAH colleagues (CFC): Identification and reporting of concerns.

Director of Customer and Property (DCP): Holds strategic oversight.

LGAH Head of Customer Care & Nominations (HOCN): Oversees safeguarding across services.

Contract Manager (CM): Oversees Management Provider services.

Responsibility	MP	CM	CFC	DCP	LGSO
Will complete training every 2 years	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Ensures operational risk considerations includes safeguarding				<input checked="" type="checkbox"/>	
Oversees MP casework		<input checked="" type="checkbox"/>			
Supports Leaders with specific safeguarding responsibilities					<input checked="" type="checkbox"/>
Fully understands and implements the safeguarding policy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Reports to Business Committee and Boards				<input checked="" type="checkbox"/>	
Owns and maintains the central safeguarding log					<input checked="" type="checkbox"/>
Holds and reviews updates of safeguarding policies and procedures				<input checked="" type="checkbox"/>	
Will review safeguarding activities and ensure policy implementation				<input checked="" type="checkbox"/>	
Supports all colleagues across the organisation					<input checked="" type="checkbox"/>
Ensures adequate resources for safeguarding practices				<input checked="" type="checkbox"/>	

Leads on reviews for internal safeguarding matters					<input checked="" type="checkbox"/>
Oversees safeguarding training and compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Records and assesses safeguarding concerns	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Reports concerns to Safeguarding Lead	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Makes safeguarding referrals promptly, maintains accurate records of concerns and actions taken	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Represents LGAH in multi-agency meetings if needed.	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		

9. Equality and Diversity

LGAH is committed to making sure all services are accessible to all our customers. Our employees will be trained to make sure they are communicating appropriately with our customers and they have the relevant information.

This policy will be applied in a way which makes sure we treat all customers with fairness and respect. We recognise our duty to advance equality of opportunity and prevent discrimination or victimisation on the grounds of age, sex, sexual orientation, disability, race, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and any other protected characteristic defined within the Equality Act 2010.

On request, we will provide translations of all our documents, policies and procedures in various languages and formats including braille and large print.

10. Policy Review

We will review this policy every two years to make sure it meets our aims and continues to be relevant and accurate.

This policy will be reviewed sooner if:

- Legislation / regulation or industry changes require it.
- We identify any problems or failures in this policy as a result of customer or stakeholder feedback, complaints or findings from any independent organisations.

Recommendations are made following investigations into significant incidents.

Accountable Director	Manpreet Dillon
Approval Date	April 2023

Review Date	April 2025 <i>(or subject to any changes in regulatory, legislative and/or areas of best practise where a review is required sooner than the stipulated review date)</i>
Next Review Date	April 2027