



**PRIMA**  
GROUP

**Safeguarding  
Policy**

## Contents

Safeguarding Policy .....	3
1 Aim of the Policy .....	3
2 Who does this Policy apply to? .....	3
3 Policy Statement .....	4
4 What is Safeguarding? .....	5
4.1 Who is at risk? .....	5
4.2 What is abuse, neglect and exploitation? .....	5
4.3 Different types of abuse .....	6
4.4 Signs and indicators of abuse and neglect .....	7
4.5 Other concerns .....	7
4.6 Wellbeing Principle .....	8
4.7 Mental Capacity and Decision Making .....	9
4.7.1 What is mental capacity? .....	9
4.7.2 What does it mean to lack mental capacity? .....	9
4.7.3 Why is mental capacity important when talking about safeguarding? .....	9
4.7.4 What to do if a decision needs to be made for a person who lacks mental capacity .....	10
5 Roles and Responsibilities .....	10
5.1 Contractors .....	10
5.2 Prima Safeguarding Team .....	11
6 Concerns and Reporting Requirements .....	12
6.1 How to report a concern .....	12
6.2 Immediate Danger .....	12
6.3 Concerns raised externally to Prima .....	12
6.4 Reporting to statutory agencies .....	13
6.5 Multi-Agency working .....	13
7 Data Sharing and Data Protection .....	14
8 Making sure we do what we say .....	16
8.1 Training .....	16
9 Other things to bear in mind .....	16
9.1 Prima policies and procedures .....	16
9.2 Legislation and Guidance .....	17
10 Consultation .....	18
11 Equality Impact Assessment .....	18
12 Document Control Data .....	19
Appendix 1 – Types of Abuse and Indicators .....	20

## Safeguarding Policy

### 1 Aim of the Policy

Prima Group is committed to safeguarding all customers (adults and children) to provide a living environment that allows them to live a life that is free from harm and abuse, neglect or exploitation. This is a fundamental human right and an essential requirement for health and wellbeing.

As a social landlord Prima has a key role to play in keeping people safe from harm, working alongside its partners and external agencies.

Prima recognises that safeguarding those at risk of abuse or neglect is everyone's responsibility, and Prima aims to develop a zero tolerance culture that encourages people to raise concerns.

Across the Prima Group, everyone plays a part in preventing, being alert to and responding appropriately to abuse and/or neglect.

- This policy: Outlines Prima's approach in identifying and reporting safeguarding concerns.
- Aims to raise awareness about abuse and/or neglect.
- Aims to prevent abuse happening wherever possible, and responding promptly where abuse does happen, making necessary referrals and engaging the appropriate authorities to stop the abuse continuing, and to ensure the person harmed receives effective support.
- Sets out people's responsibilities around safeguarding.
- Ensures that all employees and contractors are aware of their responsibility to identify and report safeguarding concerns.
- Enables employees and contractors to identify the types of abuse relating to children and adults, along with recognising the symptoms of abuse.
- Enables employees to report concerns internally, and to statutory bodies.

This policy is supported by an associated procedure which must be read in conjunction with this policy.

### 2 Who does this Policy apply to?

Prima Group will work actively to safeguard adults and children who are our tenants and/or live in Prima properties.

The specific focus of this policy is adults and children who are "at risk" of experiencing abuse, neglect or exploitation.

The policy applies to all Prima employees regardless of their role, along with people who work with Prima.

It is acknowledged that frontline employees are best placed to identify any concerns about safeguarding adults and children, however all employees are responsible for reporting concerns in line with the associated Safeguarding Procedure.

Prima expects its partner organisations, including for example contractors to adopt and demonstrate their commitment to the principles and practices as set out in this policy and associated procedure.

Contractors who attend the homes of Prima Group tenants will be expected to report any concerns identified to Prima Group.

As Prima does not have facilities for children which are directly managed by Prima, Prima does not have a separate Child Safeguarding Policy, and any concerns will be dealt with under this policy and any referrals made to the Children's Services.

### 3 Policy Statement

Prima believes that everyone has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status, or tenancy status.

Prima acknowledges that safeguarding is everyone's responsibility and is committed to prevent abuse and neglect through safeguarding the welfare of all adults and children involved.

Prima recognises there is a legal framework within which social landlords need to safeguard adults who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding adult legislation and with local statutory safeguarding procedures.

Actions taken by Prima will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the adult concerned.

The Care Act 2014 requires that social landlords have effective policies and procedures in place for adult safeguarding practice.

Prima Group has chosen to adhere to the guidance set out by the Merseyside Safeguarding Adults Board and the guidance issued by the Government in 2018 contained in the publication '[Working together to Safeguard Children](#)'.

Prima will also adhere to the principles outlined in local safeguarding arrangements adopted by each Local Authority.

Where concerns are raised, that on investigation by the Local Authority Safeguarding

Teams are found to have no ongoing safeguarding implications, but highlight other support needs for the individuals concerned, Prima will provide additional support services and make referrals to external agencies as required.

## 4 What is Safeguarding?

Safeguarding means protecting adults, young people and children from abuse, risk of abuse, exploitation, neglect, or self-neglect.

It is the right to live in safety, free from abuse and neglect. It is about working together to support people to make decisions about the risks they face in their own lives; also protecting and supporting those who lack the capacity to make these decisions.

It is important to remember that:

- Everyone has the right to be treated with dignity and respect.
- Abuse is always wrong and can happen anywhere and at any time.
- It can be caused by anyone; a partner, friend, family member, neighbour, a carer, someone in a position of trust or a stranger.

### 4.1 Who is at risk?

**An “adult at risk” is defined as:**

An individual aged 18 years and over who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) AND;
- 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 or neglect.

**A ‘Child at risk’ is defined as:**

All children and young people under the age of 18 years, including unborn babies.

The Government’s guidance on safeguarding children and promoting their welfare includes:

- Protecting children from maltreatment.
- Preventing impairment of children’s health or development.
- Protecting children to exposure to domestic abuse.
- 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 outcomes.

### 4.2 What is abuse, neglect and exploitation?

To abuse someone is to treat them badly.

To neglect someone is to fail to care for them. An action or a failure to take action that

causes someone harm.

It might be a single act or a repeated act over time, it could be intentional or accidental, the abuse may also be a crime.

Exploitation is a form of abuse and is when someone, or a group of people tricks or misleads people into doing things for them that are not right; either criminally or sexually. It can happen with anyone; where they take advantage of someone for them to do things that are to their benefit. This is sometimes called “grooming”. They will make the victim feel special and will manipulate that person, and get them to do things they do not want to do, can may threaten, blackmail, hurt or abuse the victim to get what they want.

### 4.3 Different types of abuse

Prima defines abuse or neglect as follows:

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those who are or have been intimate partners or family members, or where there is a relationship of trust or authority, regardless of age, gender or sexuality. This can encompass, but it not limited to the following types of abuse:

- Physical abuse
- Domestic abuse
- Coercive or controlling behaviour
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern Slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect and acts of omission
- Self-neglect

Any concerns about an adult, or child who is, or may be experiencing domestic abuse falls under the Group’s Domestic Abuse Policy, and is not dealt with by this policy, unless there is a risk to the safety of that person.

It is important to remember that exploitation is a form of abuse and there are different types of exploitation that fall under the above categories, such as:

- Sexual exploitation – being encouraged, tricked or forced to take part in a sexual activity (like having sex with someone, performing a sexual act, or sending/receiving indecent images) in exchange for something.
- Criminal exploitation – being encouraged, tricked or forced to take part in criminal activities (like stealing, selling or holding drugs. An example of this is “county lines”).

- Online exploitation – this is like any form of exploitation that can happen with people face to face, but this is happening in the online world, through things like chat, social media and online gaming.
- Trafficking and Modern Slavery – being tricked, forced or persuaded to leave where you live and then moved or transported from one area to another to work or perform sexual or criminal acts.

#### 4.4 Signs and indicators of abuse and neglect

There are many signs and indicators that may suggest someone is being abused or neglected. There may be other explanations, but they should not be ignored.

The signs and symptoms include, but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending / no longer enjoying their activities / school.
- Someone losing or gaining weight / an unkempt appearance, including not wearing suitable clothing / there is a deterioration in hygiene.
- A change in the behaviour or confidence of a person. For example, someone may be looking quiet and withdrawn and become low and depressed. In addition they may develop a possible addiction to drugs/alcohol or engaging in risky behaviours which are not the norm and where there has been no previous history.
- Self-harm.
- A fear of a particular group of people or individual.
- A parent / carer always speaks for the person and does not allow them to make their own choices.
- They may tell you / another person they are being abused – i.e. a disclosure.

Appendix 1 of this policy sets out the different types of abuse, including the associated possible signs and indicators of abuse.

#### 4.5 Other concerns

There may be other situations, where a person is not experiencing, or at risk of abuse or neglect, but there are still other concerns where a safeguarding referral would need to be made.

These scenarios would include the following:

- Where a person is at risk of suicide.
- Where a person is expressing suicide ideation.
- Where a person is at risk of self-harm.
- Where a person has expressed an intention to self-harm.

This list is not exhaustive, and a referral should also be made when there are concerns around someone's wellbeing.

## 4.6 Wellbeing Principle

Our wellbeing includes our mental and physical health, our relationships, our connection with our communities and our contribution to society.

Being able to live free from abuse and neglect is a key element of wellbeing.

Legislation recognises that statutory agencies have sometimes acted disproportionately in the past. For example, removing an adult at risk from their own home when there were other ways of preventing harm.

For that reason any actions taken to safeguard an adult must take their whole wellbeing into account and be proportionate to the risk of harm.

It is also acknowledged that adults may make choices that mean their wellbeing suffers – for example, moving away from friends and family to take a better job. They can also put their personal safety at risk – e.g. to provide care to a partner with dementia who becomes abusive when they are disorientated and anxious.

As such in all safeguarding work that Prima undertakes it will adhere to the **six key principles** (as outlined in the Care Act 2014) of:

- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** – It is better to take action before harm occurs.
- **Proportionality** – Taking the least intrusive appropriate response to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with communities.
- **Accountability** – Accountability and transparency in delivering safeguarding.

Prima will work to support adults to achieve the outcomes they want for themselves. The adult's views, wishes, feelings and beliefs must be taken into account when decisions are made about how to support them to be safe.

There may be many different ways to prevent further harm. Working with the person will mean that actions taken help them to find the solution that is right for them. Treating people with respect, enhancing their dignity and supporting their ability to make decisions also helps promote people's sense of self-worth and supports recovery from abuse.

If someone has difficulty making their views and wishes known, then they can be supported or represented by an advocate. This might be a safe family member or friend of their choice or a professional advocate.



## 4.7 Mental Capacity and Decision Making

### 4.7.1 What is mental capacity?

All people over the age of 16 have the ability to make their own decisions, unless they lack capacity (Mental Capacity Act 2005).

This means that people have the right to make any decision they wish, even if this is considered unwise, and there is a presumption that people have capacity, unless a formal assessment has been carried out by a recognised health professional who has determined that such capacity is lacking.

### 4.7.2 What does it mean to lack mental capacity?

To lack capacity within the meaning of the Mental Capacity Act 2005, a person must be unable to make a decision because of an impairment or disturbance in the functioning of the mind or brain, and this is the reason they are unable to make a decision.

Under Section 3 of the Mental Capacity Act 2005, a person is unable to make a decision for themselves if they are unable to do **one or more** of the following:

- Understanding relevant information given to them.
- Retain that information long enough to be able to make the decision.
- Weight up the information to make the decision; and
- Communicate their decision.

Mental capacity refers to the ability to make a decision at the time that decision is needed. A person's mental capacity can change. Each decision must be considered as a matter in its own right and historical mental capacity assessments cannot be used to make judgments about current capacity, or to generalise on a person's ability to make decisions.

### 4.7.3 Why is mental capacity important when talking about safeguarding?

Mental Capacity is important for safeguarding for several reasons.

Not being allowed to make decisions one is capable of making is abuse. For example, a disabled adult may want to take part in an activity but their parent who is their carer will not allow them to and will not provide the support they would need. Conversely the adult may not seem to be benefiting from an activity other people are insisting they do.

Another situation is where an adult is being abused and they are scared of the consequences of going against the views of the person abusing them. It is recognised in law as coercion and a person can be seen not to have mental capacity because they cannot make 'free and informed decisions'.

Mental Capacity must also be considered when it is believed abuse or neglect might be

taking place. It is important to make sure an 'adult at risk' has choices in the actions taken to safeguard them, including whether or not they want other people informed about what has happened, however, in some situations the adult may not have the mental capacity to understand the choice or to tell you their views.

#### **4.7.4 What to do if a decision needs to be made for a person who lacks mental capacity**

If a decision needs to be made for a person who lacks capacity:

- This can only be done if at the time they cannot make that decision when it is needed.
- If the decision can wait, wait (e.g. to get help to help the person make their decision or until they can make it themselves).
- The decision must be made in the person's best interests (for their benefit) and take into account what is known about their preferences and wishes.
- If the action that is being taken to keep people safe will restrict them then we must think of the way to do that which restricts their freedom and rights as little as possible.

It is to be noted that people who lack capacity will usually have an Attorney who will be able to make decisions on their behalf (there are two sorts of Lasting Powers of Attorney (LPA) – a health and welfare LPA, and a property and financial affairs LPA.

If a person lacks mental capacity and has not previously appointed an Attorney, an application will need to be made to the Court of Protection who will seek to appoint a Deputy who will be able to make decisions on behalf of that person.

### **5 Roles and Responsibilities**

Safeguarding is everyone's business and responsibility regardless of their role.

All employees and contractors must be alert to the possible signs of abuse or neglect, and act on those concerns.

If a report is made to an employee by an external party, it is their responsibility to report this (see the section below).

#### **5.1 Contractors**

All contractors employed by Prima have agreed to adhere to the requirements of Prima's Policies and Procedures and to take part in safeguarding awareness training.

The Prima Safeguarding Team will work with contractors to raise awareness of Prima safeguarding procedures, via toolbox talks which will be held with contractors on a regular basis. In addition, Prima will brief contractors on any new procedures put in place by Prima.

A Safeguarding Alerter's Card will be issued to all contractors working with Prima.

Contractors will be asked to provide statements (if required) to support any action taken by employees.

## 5.2 Prima Safeguarding Team

Prima has a Safeguarding Team who will:

- Act as a main point of contact for employees and/or contractors who have any concerns with regards to safeguarding.
- Provide advice around safeguarding concerns and what steps to take.
- Assist and support employees in reporting, monitoring and reviewing all safeguarding cases.

The roles and responsibilities of the members of the Safeguarding Team are as follows:

Role	Responsibilities
Safeguard Lead	<ul style="list-style-type: none"> <li>• Overarching responsibility for safeguarding to ensure that Prima provide an effective and robust safeguarding service.</li> <li>• Responsible for Identifying trends.</li> <li>• Provide an in-depth knowledge of safeguarding.</li> <li>• Applies knowledge to help implement safeguarding policies and procedure.</li> <li>• Ensures all employees receive appropriate trainings</li> <li>• Provides safeguarding expertise and leadership throughout Prima to support strategic planning, quality assurance and performance management.</li> <li>• Responsible for ensuring compliance.</li> </ul>
Housing Manager Interim responsibility	<ul style="list-style-type: none"> <li>• Responsible at an operational level: ensuring that Housing Officers are following Prima’s safeguarding procedure in reporting and recording safeguarding concerns.</li> <li>• Liaises with the Designated Safeguarding Officer.</li> <li>• Keeps a record of all safeguarding referrals.</li> </ul> <p><i>Responsibility in absence of Safeguarding Lead (see role responsibilities above)</i></p>
Designated Safeguarding Officer	<ul style="list-style-type: none"> <li>• Provides advice and guidance on safeguarding issues.</li> <li>• Produces monthly reports for the Safeguarding Team.</li> <li>• Makes employees aware of any changes in legislation and changes in social housing processes.</li> <li>• Provides advice of best practice.</li> <li>• Escalates cases as and when necessary and liaises with Local Authorities and other agencies, such as police, social</li> </ul>

	<p>services, fire service, mental health services to ensure effective partnership working.</p> <ul style="list-style-type: none"> <li>• Keeps a record of all safeguarding referrals.</li> <li>• Assists employees when they are unclear about procedures, their roles and responsibilities around how to report and record safeguarding concerns .</li> </ul>
Champions	<ul style="list-style-type: none"> <li>• To act as a resource and a point of contact for colleagues who require support and guidance on safeguarding issues.</li> <li>• To cascade information received at the quarterly Safeguarding Team meeting to colleagues.</li> <li>• To encourage colleagues to identify trends and themes within their area and communicate these as appropriate to their line manager or the Safeguarding Team.</li> </ul>

**6 Concerns and Reporting Requirements**

**6.1 How to report a concern**

Any employee regardless of their role must report any concern, whether this turns out to be a safeguarding matter or not. The form is available on the Group’s [SharePoint page](#). The associated procedure sets out in detail how to report a concern.

All employees can contact the Group’s Designated Safeguarding Officer and/or members of the Safeguarding Team for any advice, queries, concerns or support.

Contractors may report safeguarding concerns, which must be recorded and reported by Prima employees, using the safeguarding referral form.

**6.2 Immediate Danger**

In the event of a situation, where there is a concern around the immediate safety to a person and/or to others, a report should be made without delay to the appropriate external agencies (e.g. emergency services or social services).

If there is any emergency which would include threat of life and/or risk (e.g. suicide), child in danger or a crime being committed, a report to 999 must be made immediately. This must also be logged using the Safeguarding Recording Form on SharePoint.

**6.3 Concerns raised externally to Prima**

Prima customers or other people are able to report a safeguarding concern directly to

Prima, either by completing the link directly on the Group's website or by calling the Group.

These reports can be made anonymously.

Once these reports have been made, they will be logged and Prima's safeguarding procedure will be followed.

#### **6.4 Reporting to statutory agencies**

Where a contractor has raised a concern, Prima will act as an Alerter and will report all concerns of harm, neglect or exploitation to the Local Authority.

Prima Group will share information appropriately, on a need to know basis, with partners that have statutory responsibility to investigate safeguarding concerns, including the Local Authority social care teams and the Police.

All employees who report safeguarding concerns will adhere to the procedures set out by the relevant Local Authority where referrals are required.

Prima will co-operate with the Police and the relevant Local Authorities in taking action to safeguard an adult.

Where Prima suspects modern slavery is taking place, it will make a referral to the Police or Local Authority as part of its alert raising process.

Prima will record and refer concerns, suspicions and allegations of abuse, harm or neglect to the lead statutory agency responsible for carrying out safeguarding assessments and enquiries. In most cases, this will be the Police or Local Authority. Prima will record all decisions made not to refer a concern, and the reason why.

Prima will ensure that all safeguarding referrals that employees or customers have made are recorded appropriately, and Prima will also record any incidents where it refers onto another agency.

#### **6.5 Multi-Agency working**

Prima Group will adopt a multi-agency approach, working jointly with those specialist organisations who are best placed to provide specialist and additional support and share information with key agencies in the interest of keeping tenants safe.

Safeguarding adults' legislation gives the lead role for adult safeguarding to the Local Authority. However, it is recognised that safeguarding can involve a range of organisations.

Prima may need to co-operate with the Local Authority, and the Policy including to:

- Provide more information about the concern you have raised.
- Provide a safe venue for the adult to meet with other professionals e.g. Police/Social Workers/Advocates.
- Attend safeguarding meetings.
- Co-ordinate internal investigations (e.g. complaints, disciplinary) with investigations by the police or other agencies.
- Share information about the outcomes of internal investigations.
- Where possible depending on the individual case, provide a safe environment for the adult to continue living in their home.

## 7 Data Sharing and Data Protection

Information about concerns of abuse includes personal data. It is therefore important to be clear as to the grounds for processing and sharing information about concerns of abuse.

Processing information includes record keeping. Records relating to safeguarding concerns must be accurate and relevant. They must be stored confidentially with access only to those with a need to know.

Sharing information, with the right people, is central to good practice in safeguarding adults and children. However, information sharing must only ever be with those with a 'need to know'. This does **NOT** automatically include the persons spouse, partner, adult, child, unpaid or paid carer. Information should only be shared with family and friends and/or carers with the consent of the adult or if the adult does not have capacity to make that decision and family/ friends/ carers need to know in order to help keep the person safe.

The purpose of data protection legislation is not to prevent information sharing but to ensure personal information is only shared appropriately. Data protection legislation allows information sharing within an organisation. For example:

- Anyone who has a concern about harm can make a report to an appropriate person within the same organisation.
- Case management meetings can take place to agree to co-ordinate actions by the organisation.

There are also many situations in which it is perfectly legal to share information about adult safeguarding concerns outside the organisation. Importantly personal information can be shared with the consent of the adult concerned. However, the adult may not always want information to be shared. This may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to statutory bodies or because they feel stupid or embarrassed. Their wishes should be respected unless there are overriding reasons for sharing information.

The circumstances when we need to share information without the adult's consent include

those where:

- It is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk.
- You believe they or someone else is at risk, including children.
- You believe the person is being coerced or is under duress.
- It is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed.
- The adult does not have mental capacity to consent to information being shared about them.
- The person causing harm has care and support needs.
- The concerns are about an adult at risk living in Wales or Northern Ireland (where there is a duty to report to the Local Authority).

When information is shared without the consent of the adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them.

If you are in doubt as to whether to share information seek advice e.g. seek legal advice and/or contact the Local Authority and explain the situation without giving personal details about the person at risk or the person causing harm.

Any decision to share or not to share information with an external person or organisation must be recorded together with the reasons to share or not share information.

Prima is aware that under this policy it will be handling personal information. All handling of personal data will be conducted under the Group's Data Protection Policy ensuring compliance with the Data Protection Act 2018. In some circumstances, depending on the data being shared and project aims, detailed data sharing agreements may be required and will be used in circumstances where needed, this is to ensure transparency and correct data handling and processing.

It is to be noted that where there are concerns that a person is in immediate danger, or is at risk of being abused or neglected, personal information may be shared with appropriate external agencies (e.g. emergency services or social services in line with the exemptions outlined in the Data Protection Act 2018 and the UK General Data Protection Regulation 2018).

Personal data that is inappropriately accessed or disclosed may constitute a data breach. The GDPR (General Data Protection Regulation) requires organisations to keep a record of all data breaches and, where the breach is likely to result in a risk to the rights and freedoms of individuals, the organisation must notify the Information Commissioner within 72 hours of becoming aware of the breach. If the data breach results in a high risk to the rights and freedoms of individuals, those individuals must be notified without undue delay.

## 8 Making sure we do what we say

This policy will be reviewed every two years or sooner, if required, in response to legislative changes or recognised examples of best practice.

Monthly reports will be produced to ensure safeguarding referrals are tracked, and the Group's Safeguarding Team will meet regularly to discuss these.

Safeguarding referrals will be reported to the Board via the housing performance reports. Quarterly reports will also be made to the Group's Executive Team.

Prima uses safe recruitment practices to prevent the employment/deployment of unsuitable individuals in the organisation. Prima shares information about anyone found to be a risk to adults with the appropriate bodies. For example: Disclosure and Barring Service, Police, Local Authority / Social Services.

Copies of all resources, guidance documents and publications referenced in this policy are available to employees on the SharePoint site under 'Safeguarding'.

Customers can access information, advice and guidance about Safeguarding on Prima's website. Prima will also promote safeguarding awareness via its social platforms, as well as various communication methods like its newsletters.

### 8.1 Training

All employees will receive training on safeguarding, and how to make a report and to ensure compliance with Prima's policy and procedure. This training will be carried out at the time of their induction.

Employees who are classed as "frontline" will undertake refresher training every two years.

Any changes in legislation and/or best practice will be communicated to all employees.

## 9 Other things to bear in mind

### 9.1 Prima policies and procedures

This policy must be read together with:

- Whistleblowing Policy.
- Domestic Abuse Policy.
- Data Protection Policy.
- Code of Conduct.
- Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Hate Crime and Harassment Policy.



- Domestic Abuse Policy and associated procedure.
- Employment of Offenders Policy and associated procedure.
- Anti-Social Behaviour Policy and associated procedure.
- Lone Working Procedure
- Recruitment and Selection Policy and associated procedure
- Disciplinary Procedure
- Grievance Procedure
- Health and Safety Policy

This list is not exhaustive. All policies are available on SharePoint.

## 9.2 Legislation and Guidance

Several pieces of legislation and guidance have informed this policy including:

- Care Act 2014.
- Children's and Families Act 2014
- Child Care 2006
- DHSC - Care and Support Statutory guidance (updated 26th October 2016).
- 'Social Care Institute of Excellence' At a Glance 53 - Adult Safeguarding for Housing Staff.
- Equality Act 2010
- Equality Act (Protected Characteristics) 2019
- Social Care Institute of Excellence - Types and indicators of abuse.
- Merseyside Safeguarding Adults Board - 'North West Safeguarding Adults Policy'.
- Safeguarding vulnerable Adults Act 2006
- ["Working Together to Safeguard Children" July 2018.](#)
- 'Social Care Institute of Excellence' - At a glance 66: Safeguarding adults for housing staff (updated October 2018).
- Statement of Government Policy on adult safeguarding - Department of Health updated 10 May 2013.
- Mental Capacity Act 2005 and Code of Practice
- Mental Health Act 2007
- Freedom of Information Act 2000
- Anti-Social Behaviour Act 2014 Data Protection Act 2018.
- Humans Rights Act 1998.
- Crime and Disorder Act 2014.
- Crime and Policing Act 2014
- SCIE DOHLS - At a glance 43 DOHLS (updated June 2017).
- DHSC - No Secrets: Guidance on Protecting Vulnerable Adults in Care (updated Jan 2015).
- Coronavirus Act 2020 (Easement of care amendment)
- SCIE Adult Safeguarding for Housing Staff: guidance for frontline housing staff and contractors.
- Serious Crime Act 2015.

- Children Act 2014.
- Modern Slavery Act 2015.
- ASB, Crime and Policing Act 2014
- Police Act 1997
- Care Standards Act 2000
- Sexual Offences Act 2003
- Domestic Violence, Crime and Victims Act 2004
- Serious Organised Crime and Police Act 2005
- Public Interest Disclosure Act 1998
- Safeguarding and Vulnerable Adults Act 2006
- Caldicott Principles - Guidance on information sharing 2020
- Mental Capacity Act 2005

Housing Act 1996 – clauses in there about ASB which can escalate to Safeguarding etc.  
Prevent Strategy [www.gov.uk/publications](http://www.gov.uk/publications)

Information sharing and advice for safeguarding practitioners 2015 [www.gov.uk](http://www.gov.uk)

United Nations consultation on the rights of the individual UNICEF 1999

SCIE DOHLS - At a glance 43 DOHLS (updated June 2017)

DHSC - Care and Support Statutory guidance (updated 26th October 2016)

'Social Care Institute of Excellence' At a Glance 53 - Adult Safeguarding for Housing Staff

## 10 Consultation

This policy review commenced in February 2023, and has incorporated recommendations made by internal auditors, BDO, in July 2023 and discussions with the Director of Housing and Growth, Director of Insight and Group Services, Head of Housing and Growth (Lead), Housing Manager, the Head of HR and Group Services and the Prima Safeguarding Team.

Further consultation was carried out in October 2023 with some Board Members, and an external colleague.

## 11 Equality Impact Assessment

Prima welcomes feedback on this policy and the way it operates. Prima is interested to know of any possible or actual adverse impact that this policy may have on any groups in respect of gender or marital status, race, disability, sexual orientation, religion or belief, age or other characteristics.

The policy has been screened to determine equality relevance for the following equality groups: gender or marital status, race, disability, maternity or pregnancy, sex, sexual orientation, religion or belief, age or other characteristics.

## 12 Document Control Data

<b>Version:</b>	V42023
<b>Review Date:</b>	October 2023
<b>Name of Reviewer:</b>	Jennifer Devon Tenancy Sustainment Officer Stephen Cody (Designated Safeguarding Officer), John Kavanagh (Housing Manager) and Angela Dodson (Safeguarding Lead)
<b>Owner of the policy:</b>	Director of Housing and Growth
<b>Consultation Panel:</b>	Anita Leech and Lisa Knight – Prima Board Members. Policy was reviewed by BDO as part of an internal audit in July 2023. Reviewed by Alison Brooks, a safeguarding colleague with Sanctuary Supported Living. Head of HR and Group Services, Director of Insight and Group Services, Risk and Assurance Officer.
<b>Change Log:</b>	Incorporated internal auditors, Housing Ombudsman’s recommendations and additional legal and regulatory added.
<b>Date approved by EMT:</b>	22/11/2023
<b>Date to Customer Voice Board:</b>	04/12/2023
<b>Date approved by Committee:</b>	N/A
<b>Date approved by Group Board:</b>	13/12/2023
<b>Date of Equality Impact Assessment:</b>	24/10/2023
<b>Date due for next review:</b>	October 2024

## Appendix 1 – Types of Abuse and Indicators

Signs of abuse can often be difficult to detect. The following is a guide to the most common types of abuse and their signs/indicators. Many types of abuse are also criminal offences and should be treated as such.

The lists of possible indicators and examples of behaviour are not exhaustive and people may be subject to a number of abuse types at the same time. Some further information from the Social Care Institute for Excellence on this topic is available to view [here](#).

Physical abuse	Possible signs of physical abuse
<ul style="list-style-type: none"> <li>• Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing</li> <li>• Rough handling</li> <li>• Scalding and burning</li> <li>• Physical punishments</li> <li>• Inappropriate or unlawful use of restraint</li> <li>• Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)</li> <li>• Involuntary isolation or confinement</li> <li>• Misuse of medication (e.g. over-sedation)</li> <li>• Forcible feeding or withholding food</li> <li>• Unauthorised restraint, restricting movement (e.g. tying someone to a chair)</li> </ul>	<ul style="list-style-type: none"> <li>• No explanation for injuries or inconsistency with the account of what happened</li> <li>• Injuries are inconsistent with the person's lifestyle</li> <li>• Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps</li> <li>• Frequent injuries</li> <li>• Unexplained falls</li> <li>• Subdued or changed behaviour in the presence of a particular person</li> <li>• Signs of malnutrition</li> <li>• Failure to seek medical treatment or frequent changes of GP</li> </ul>

### Domestic Abuse Definition

Domestic abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour-based violence', female genital mutilation and forced marriage.

Types of domestic abuse	Possible signs of domestic violence or abuse
Psychological Physical Sexual (including Female Genital	<ul style="list-style-type: none"> <li>• Low self-esteem</li> <li>• Feeling that the abuse is their fault</li> <li>• Physical evidence of violence such as bruising, cuts, broken bones</li> </ul>

<p>Mutilation) Financial Emotional Forced Marriage Honour-based violence</p>	<ul style="list-style-type: none"> <li>• Verbal abuse and humiliation in front of others</li> <li>• Fear of outside intervention</li> <li>• Damage to home or property</li> <li>• Isolation – not seeing friends and family</li> <li>• Limited access to money</li> </ul>
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<p><b>Coercive or controlling behaviour</b></p> <p>This is a common feature of domestic abuse. Coercive behaviour may include:</p> <ul style="list-style-type: none"> <li>• Acts of assault, threats, humiliation and intimidation</li> <li>• Harming, punishing, or frightening the person</li> <li>• Isolating the person from sources of support</li> <li>• Exploitation of resources or money</li> <li>• Preventing the person from escaping abuse</li> <li>• Regulating everyday behaviour</li> </ul>
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<b>Sexual Abuse</b>	<b>Possible signs of sexual abuse</b>
<ul style="list-style-type: none"> <li>• Rape, attempted rape or sexual assault</li> <li>• Inappropriate touch anywhere</li> <li>• Non- consensual masturbation of either or both persons</li> <li>• Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth</li> <li>• Any sexual activity that the person lacks the capacity to consent to</li> <li>• Inappropriate looking, sexual teasing or innuendo or sexual harassment</li> <li>• Sexual photography or forced use of pornography or witnessing of sexual acts</li> <li>• Indecent exposure</li> </ul>	<ul style="list-style-type: none"> <li>• Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck</li> <li>• Torn, stained or bloody underclothing</li> <li>• Bleeding, pain or itching in the genital area</li> <li>• Unusual difficulty in walking or sitting</li> <li>• Foreign bodies in genital or rectal openings</li> <li>• Infections, unexplained genital discharge, or sexually transmitted diseases</li> <li>• Pregnancy in a woman who is unable to consent to sexual intercourse</li> <li>• The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude</li> <li>• Incontinence not related to any medical diagnosis</li> <li>• Self-harming</li> <li>• Poor concentration, withdrawal, sleep disturbance</li> </ul>

	<ul style="list-style-type: none"> <li>• Excessive fear/apprehension of, or withdrawal from, relationships</li> <li>• Fear of receiving help with personal care</li> <li>• Reluctance to be alone with a particular person</li> </ul>
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<b>Psychological or emotional abuse</b>	<b>Possible signs of psychological or emotional abuse</b>
<ul style="list-style-type: none"> <li>• Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends</li> <li>• Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance</li> <li>• Preventing someone from meeting their religious and cultural needs</li> <li>• Preventing the expression of choice and opinion</li> <li>• Failure to respect privacy</li> <li>• Preventing stimulation, meaningful occupation or activities</li> <li>• Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse</li> <li>• Addressing a person in a patronising or infantilising way</li> <li>• Threats of harm or abandonment</li> <li>• Cyber bullying</li> </ul>	<ul style="list-style-type: none"> <li>• An air of silence when a particular person is present</li> <li>• Withdrawal or change in the psychological state of the person</li> <li>• Insomnia</li> <li>• Low self-esteem</li> <li>• Uncooperative and aggressive behaviour</li> <li>• A change of appetite, weight loss/gain</li> <li>• Signs of distress: tearfulness, anger</li> <li>• Apparent false claims, by someone involved with the person, to attract unnecessary treatment</li> </ul>

<b>Financial or material abuse</b>	<b>Possible signs of financial or material abuse</b>
<ul style="list-style-type: none"> <li>• Theft of money or possessions</li> <li>• Fraud, scamming</li> <li>• Preventing a person from accessing their own money, benefits or assets</li> <li>• Employees taking a loan from a person using the service</li> <li>• Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions</li> <li>• Arranging less care than is needed to</li> </ul>	<ul style="list-style-type: none"> <li>• Missing personal possessions</li> <li>• Unexplained lack of money or inability to maintain lifestyle</li> <li>• Unexplained withdrawal of funds from accounts</li> <li>• Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity</li> <li>• Failure to register an LPA after the person has ceased to have mental</li> </ul>

<p>save money to maximise inheritance</p> <ul style="list-style-type: none"> <li>• Denying assistance to manage/monitor financial affairs</li> <li>• Denying assistance to access benefits</li> <li>• Misuse of personal allowance in a care home</li> <li>• Misuse of benefits or direct payments in a family home</li> <li>• Someone moving into a person's home and living rent free without agreement or under duress</li> <li>• False representation, using another person's bank account, cards or documents</li> <li>• Exploitation of a person's money or assets, e.g. unauthorised use of a car</li> <li>• Misuse of a power of attorney, deputy, appointee-ship or other legal authority</li> <li>• Rogue trading - e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship</li> </ul>	<p>capacity to manage their finances, so that it appears that they are continuing to do so</p> <ul style="list-style-type: none"> <li>• The person allocated to manage financial affairs is evasive or uncooperative</li> <li>• The family or others show unusual interest in the assets of the person</li> <li>• Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA</li> <li>• Recent changes in deeds or title to property</li> <li>• Rent arrears and eviction notices</li> <li>• A lack of clear financial accounts held by a care home or service</li> <li>• Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person</li> <li>• Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house</li> <li>• Unnecessary property repairs</li> </ul>
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<p><b>Modern Slavery</b></p> <ul style="list-style-type: none"> <li>• Human trafficking</li> <li>• Forced labour</li> <li>• Domestic servitude</li> <li>• Sexual exploitation, such as escort work, prostitution and pornography</li> <li>• Debt bondage - being forced to work to pay off debts that realistically they never will be able to</li> </ul>	<p><b>Possible signs of modern slavery</b></p> <ul style="list-style-type: none"> <li>• Signs of physical or emotional abuse</li> <li>• Appearing to be malnourished, unkempt or withdrawn</li> <li>• Isolation from the community, seeming under the control or influence of others</li> <li>• Living in dirty, cramped or overcrowded accommodation and or living and working at the same address</li> <li>• Lack of personal effects or identification documents</li> <li>• Always wearing the same clothes</li> <li>• Avoidance of eye contact, appearing frightened or hesitant to talk to strangers</li> <li>• Fear of law enforcers</li> </ul>
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<p><b>Discriminatory abuse</b></p> <ul style="list-style-type: none"> <li>• Unequal treatment based on age,</li> </ul>	<p><b>Possible signs of discriminatory abuse</b></p> <ul style="list-style-type: none"> <li>• The person appears withdrawn and</li> </ul>
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<p>disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as <u>'protected characteristics' under the Equality Act 2010</u>)</p> <ul style="list-style-type: none"> <li>• Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic</li> <li>• Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader</li> <li>• Harassment or deliberate exclusion on the grounds of a protected characteristic</li> <li>• Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic</li> <li>• Substandard service provision relating to a protected characteristic</li> </ul>	<p>isolated</p> <ul style="list-style-type: none"> <li>• Expressions of anger, frustration, fear or anxiety</li> <li>• The support on offer does not take account of the person's individual needs in terms of a protected characteristic</li> </ul>
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<b>Organisational or institutional abuse</b>	<b>Possible signs of organisational or institutional abuse</b>
<ul style="list-style-type: none"> <li>• Discouraging visits or the involvement of relatives or friends</li> <li>• Run-down or overcrowded establishment</li> <li>• Authoritarian management or rigid regimes</li> <li>• Lack of leadership and supervision</li> <li>• Insufficient staff or high turnover resulting in poor quality care</li> <li>• Abusive and disrespectful attitudes towards people using the service</li> <li>• Inappropriate use of restraints</li> <li>• Lack of respect for dignity and privacy</li> <li>• Failure to manage residents with abusive behaviour</li> <li>• Not providing adequate food and drink, or assistance with eating</li> <li>• Not offering choice or promoting independence</li> <li>• Misuse of medication</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of flexibility and choice for people using the service</li> <li>• Inadequate staffing levels</li> <li>• People being hungry or dehydrated</li> <li>• Poor standards of care</li> <li>• Lack of personal clothing and possessions and communal use of personal items</li> <li>• Lack of adequate procedures</li> <li>• Poor record-keeping and missing documents</li> <li>• Absence of visitors</li> <li>• Few social, recreational and educational activities</li> <li>• Public discussion of personal matters</li> <li>• Unnecessary exposure during bathing or using the toilet</li> <li>• Absence of individual care plans</li> <li>• Lack of management overview and support</li> </ul>



<ul style="list-style-type: none"> <li>• Failure to provide care with dentures, spectacles or hearing aids</li> <li>• Not taking account of individuals' cultural, religious or ethnic needs</li> <li>• Failure to respond to abuse appropriately</li> <li>• Interference with personal correspondence or communication</li> <li>• Failure to respond to complaints</li> </ul>	
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<b>Neglect and acts of Omission</b>	<b>Possible signs of neglect and acts of omission</b>
<ul style="list-style-type: none"> <li>• Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care</li> <li>• Providing care in a way that the person dislikes</li> <li>• Failure to administer medication as prescribed</li> <li>• Refusal of access to visitors</li> <li>• Not taking account of individuals' cultural, religious or ethnic needs</li> <li>• Not taking account of educational, social and recreational needs</li> <li>• Ignoring or isolating the person</li> <li>• Preventing the person from making their own decisions</li> <li>• Preventing access to glasses, hearing aids, dentures, etc.</li> <li>• Failure to ensure privacy and dignity</li> </ul>	<ul style="list-style-type: none"> <li>• Poor environment – dirty or unhygienic</li> <li>• Poor physical condition and/or personal hygiene</li> <li>• Pressure sores or ulcers</li> <li>• Malnutrition or unexplained weight loss</li> <li>• Untreated injuries and medical problems</li> <li>• Inconsistent or reluctant contact with medical and social care organisations</li> <li>• Accumulation of untaken medication</li> <li>• Uncharacteristic failure to engage in social interaction</li> <li>• Inappropriate or inadequate clothing</li> </ul>

<b>Self- Neglect</b>	<b>Signs of self-neglect</b>
<ul style="list-style-type: none"> <li>• Lack of self-care to an extent that it threatens personal health and safety</li> <li>• Neglecting to care for one's personal hygiene, health or surroundings</li> <li>• Inability to avoid self-harm</li> <li>• Failure to seek help or access services to meet health and social care needs</li> <li>• Inability or unwillingness to manage one's personal affairs</li> </ul>	<ul style="list-style-type: none"> <li>• Very poor personal hygiene</li> <li>• Unkempt appearance</li> <li>• Lack of essential food, clothing or shelter</li> <li>• Malnutrition and/or dehydration</li> <li>• Living in squalid or unsanitary conditions</li> <li>• Neglecting household maintenance</li> <li>• Hoarding</li> </ul>

	<ul style="list-style-type: none"><li>• Collecting a large number of animals in inappropriate conditions</li><li>• Non-compliance with health or care services</li><li>• Inability or unwillingness to take medication or treat illness or injury</li></ul>
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