

Safeguarding Adults Policy

Scope of Policy

This policy outlines the responsibilities and procedures for safeguarding adults across all areas of Platform Housing Group (the Group) operations. It applies to:

- Colleagues, Board Members, Stakeholders
- Consultants, Sub-contractors, Partners
- Volunteers, Agents, and Customers

Any other individuals or agencies working with or on behalf of the Group (collectively referred to as “Workers”)

The policy sets out how concerns regarding actual, suspected or alleged abuse of an adult should be reported and the steps we will take to respond appropriately.

All colleagues must understand that ‘safeguarding is everyone’s responsibility’. Every individual has a duty to act on concerns of abuse or neglect, regardless of their role.

For the purposes of this policy, abuse is defined as deliberate or unintentional actions or omissions which causes or may cause harm, distress, or neglect to a person. Abuse can take many forms, including physical abuse, emotional or psychological abuse, sexual abuse, neglect, financial or economic abuse, domestic abuse including honour-based abuse and forced marriage, discriminatory abuse, slavery and human trafficking.

For the purposes of this policy, an adult is defined as anyone aged 18 years or over.

All concerns or incidents of suspected or actual abuse will be managed in accordance with this policy and its associated procedures.

Applicability

The policy applies to all members of the Group.

1. Policy Statement

- 1.1 "Safeguarding means protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances."

Care and Support Statutory Guidance issued by the Department of Health, June 2020
(Care Act Guidance)

2. Overview and Context

2.1 Definitions for Adults

The definition of adult safeguarding in the UK, as outlined in the Care Act 2014 and reaffirmed in the 2025 statutory guidance, is:

"Protecting an adult's right to live in safety, free from abuse and neglect."

An adult is a person over 18 years of age. This definition applies to adults who:

- have care and support needs (whether or not the local authority is meeting any of those needs)
- are experiencing, or are at risk of, abuse or neglect
- are unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

2.2 In accordance with the:

- Care Act 2014
- Mental Capacity Act 2005
- Domestic Abuse Act 2021
- Human Rights Act 1998
- Crime and Policing Bill 2026
- Equality Act 2010

All colleagues have a responsibility to be vigilant and be able to identify and raise any safeguarding concerns they may have involving adults.

Our approach is underpinned by the six principles derived from the Care Act 2014, these are:

- 1) **Empowerment** - supporting and encouraging people to make their own decisions, including supporting those who lack capacity to get involved and helping them remain informed where possible.
- 2) **Prevention** - acting before harm occurs and responding quickly to suspected cases of abuse.
- 3) **Proportionality** - making sure that what we do is appropriate and the least intrusive for the person and to the situation.
- 4) **Protection** - support and representation for those in greatest need.
- 5) **Partnership** - sharing the right information in the right way and involving appropriate agencies.
- 6) **Accountability** - making our processes transparent and ensuring everybody understands their role in safeguarding.

3. Aims and Objectives

3.1 The aims of this policy are to make sure we play our part to assist to:

- Prevent harm and reduce the risk of abuse or neglect to adults at risk.
- Protect all individuals working with or on behalf of the organisation—including colleagues, volunteers, contractors and agents.
- Raise awareness of the different types of abuse and the signs and indicators to look out for.
- Clarify the actions to be taken when abuse or inappropriate conduct is suspected, witnessed or disclosed.
- Provide accessible information and support to help individuals understand:
 - The different forms of abuse
 - How to stay safe
 - How to raise concerns about the safety or wellbeing of an adult at risk
- Recognise and to the extent it is necessary respect cultural, ethnic and individual diversity in all safeguarding practices.
- Work in partnership with multi-agency safeguarding partners to ensure a coordinated and effective response to safeguarding concerns.

3.2 Roles and Responsibilities

- **Our responsibility:** to recognise, record, and report any safeguarding concerns to appropriate bodies.
- **Statutory responsibility:** held by Adult Social Care to assess, investigate, and act on those concerns.
- **Duty of care:** while we do not take on investigative roles, our responsibility is not discharged once a referral has been made. We still have an ongoing duty to escalate, follow up, and continue to monitor any concerns as appropriate.

3.2.1 Designated Strategic Safeguarding Lead

- Our Director of Housing Operations holds strategic responsibility for safeguarding across the organisation.
- This role is supported operationally by our Domestic Abuse and Safeguarding Manager, who has a dedicated team to help operationally support our teams in effectively managing and overseeing concerns of safeguarding.

3.2.2 All Workers (including colleagues, Board and Committee Members, volunteers, agents and contractors)

- Must comply with the organisation's Safeguarding Adults Policy.
- Are required to complete mandatory safeguarding training in line with organisation expectations.
- Must understand the different types of abuse and how to recognise signs of harm or neglect.

- Are responsible for reporting any concerns or suspicions of abuse promptly in accordance with procedure.

3.2.3 **Managers**

- Are accountable for ensuring that safeguarding concerns are reported appropriately.
- Must ensure safeguarding is effectively managed within their teams and areas of responsibility.
- Should support colleagues in raising internal concerns, referrals and liaising with safeguarding leads when necessary.

3.2.4 **All Colleagues**

- Must raise an internal safeguarding concern for suspected or actual abuse as soon as possible after becoming aware of it.
- If an adult is believed to be at immediate or significant risk, colleagues must:
 - Contact emergency services immediately.
 - Take steps to ensure the adult is safe.
 - In serious cases, colleagues should consult with their line manager or Safeguarding team to determine whether a referral to the local authority Safeguarding team is needed.

Our levels of involvement may vary depending on the services we are providing. As a social landlord, we provide accommodation to a diverse range of customers who may live within our general needs, retirement or supported living accommodation (i.e., our Foyer for Young People in Malvern).

We understand colleagues may not be sure whether a matter is a safeguarding issue or not and we encourage them to raise concerns internally so that these can be fully investigated and we can ensure adults at risk are protected. We would much rather explain why something is not a safeguarding issue than take no action which risks abuse that could have been prevented. Colleagues need to contact the Safeguarding team for guidance if they are unsure of how to proceed with/navigate a safeguarding concern.

The Executive Team receive quarterly safeguarding reports from the Domestic Abuse and Safeguarding Manager plus an annual safeguarding report is provided to the Executive Team and Group Board.

3.3 **The Mental Capacity Act 2005 (MCA)**

Mental capacity refers to an individual's ability to make informed decisions about their own life from the age of 16 years; the provisions of the Mental Capacity Act 2005 apply.

The MCA was established to:

- Empower individuals to make their own decisions wherever possible.
- Protect those who lack the capacity to make certain decisions for themselves.

3.3.1 The Five Key Principles of the MCA:

1. Presumption of capacity – Every person aged 16 years and over has the right to make their own decisions unless it is proven to the balance of probabilities that they lack capacity.
2. Support to make decisions – Consideration must be given to what practical help can be provided to assist someone to be capacitous before it is determined they cannot make their own decisions.
3. Right to make unwise decisions – Making a decision that others may consider unwise does not mean the person lacks capacity.
4. Best interests – Any decision made on behalf of someone who lacks capacity must be in their best interests.
5. Least restrictive option – Any action taken should be the least restrictive of the person's rights and freedoms.

If the person at risk has an allocated social worker or care coordinator, they should be contacted as the first point of call.

Concerns can also be raised via local authority reporting pathways. Please note, due to our extensive geography these will differ depending on the local authority in question.

4. Policy Outline

4.1 Identifying Signs of Abuse and Neglect

The Care Act 2014 statutory guidance identifies ten main categories of abuse and neglect for safeguarding adults at risk:

- **Physical Abuse** - Involves causing physical harm or injury. Examples: Hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- **Domestic Abuse** - Abuse between partners or family members, including coercive control. Examples: Physical violence, emotional manipulation, sexual abuse, financial control, isolation.
- **Sexual Abuse** - Non-consensual sexual activity or exploitation. Examples: Rape, sexual assault, inappropriate touching, sexual harassment, or being made to watch sexual acts.
- **Psychological or Emotional Abuse** - Undermining a person's sense of self-worth. Examples: Threats, intimidation, humiliation, isolation, verbal abuse, or controlling behaviour.

- **Financial or Material Abuse** - Illegal or improper use of a person's money, property, or assets. Examples: Theft, fraud, misuse of benefits, coercion in wills or property.
- **Modern Slavery** - Exploitation through forced labour, human trafficking, or domestic servitude. Examples: Being forced to work for little or no pay, living in poor conditions, restricted movement.
- **Discriminatory Abuse** - Abuse based on race, gender, age, disability, sexual orientation, or religion. Examples: Harassment, slurs, unequal treatment, or hate crimes.
- **Organisational or Institutional Abuse** - Poor care practices within settings like hospitals or care homes. Examples: Lack of choice, rigid routines, neglect, or misuse of power.
- **Neglect and Acts of Omission** - Failing to meet basic needs. Examples: Ignoring medical needs, withholding food or medication, or failing to provide adequate care.
- **Self-Neglect** - When a person fails to care for themselves, putting their health or safety at risk. Examples: Hoarding, poor hygiene, not eating, or refusing medical care.

4.2 Making Safeguarding Personal

Making safeguarding personal means it should be person-led and outcome-focused. We will engage the adult in a conversation about how best to respond to their safeguarding situation in a way that enhances their involvement, choice and control as well as improving their quality of life, wellbeing and safety.

The following should be considered:

- What are their priorities?
- What outcomes do they want to achieve?
- Are they aware of all the available options to keep them safe now and in the future?
- Who in their network would they like to be involved in keeping them safer?
- What other agencies may be able to contribute to their safety?

We take a coordinated community approach to ensure that our relevant partner agencies are also involved in keeping our customers safe.

4.3 Response

We will:

- Follow up safeguarding concerns and, where appropriate, make the necessary referrals to engage the relevant authorities, to take measures to prevent the abuse continuing.
- Respond in an open manner, be non-judgemental and be culturally sensitive, where appropriate.

- Follow a multi-agency approach with effective joint working. The Group recognises the lead responsibility of local authorities in co-ordinating safeguarding, and the role of staff in alerting adult services and/or the police of any concerns regarding safety. Any suspected or actual crime will be referred to the police.
- Ensure, where a customer or potential customer is a known risk to others, a risk assessment is undertaken regarding the appropriateness of any proposed letting and to agree how risks will be managed in a proportionate and feasible way. We will work in partnership with the relevant Multi Agency Risk Assessment Conference (MARAC) or Multi Agency Public Protection Arrangements (MAPPA) in this respect.
- Ensure appropriate information sharing between organisations to safeguard people at risk and act in accordance with agreed inter-agency information sharing protocols.
- Where possible, seek a person's consent to share information, however we cannot guarantee full confidentiality when our responsibility to safeguard adults at risk, or the public interest, is greater than our responsibility to an individual.
- Following serious cases, conduct an internal review identifying improvements to working practices and processes where required.
- Share lessons learnt across the organisation.

4.4 Information Sharing

The Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) allow for the sharing of personal information without consent in safeguarding contexts, provided certain conditions are met.

Information can be shared without consent when:

- The public interest in protecting the individual outweighs the interest in maintaining confidentiality.
- There is a lawful basis for sharing, such as:
 - Safeguarding individuals at risk
 - Preventing neglect or physical, mental, or emotional harm
 - Protecting the well-being of an individual

When sharing information, it must be:

- Necessary and proportionate
- Shared only with those who need to know
- Accurate and up to date
- Shared in a timely manner
- Shared securely

Prioritising Safety

- If an adult is suffering or at risk of abuse or neglect, their safety is the overriding priority.
- Information must be shared with statutory authorities in such cases, regardless of consent.

Transparency and Cooperation

- It is good practice to inform parents/carers (or the individual if aged 16 years or over) that information is being shared, and to work cooperatively with them where it is safe to do so. Sometimes informing parents/carers may not be appropriate if there is an increased risk of harm to the individual arising from the sharing of such information.

Record Keeping

Clear factual and transparent records must be kept of:

- The decision to share information
- What was shared
- With whom it was shared
- The purpose of sharing

4.5 Recording Safeguarding Concerns

All incidents, allegations, or concerns of abuse, harm must be recorded in a clear, accurate, and timely manner using the organisation's case management system.

Recording Safeguarding Concerns

- All safeguarding concerns are logged in the organisation's Case Management System. Cases are triaged within one working day of them being logged and a full risk assessment completed.
- Training is provided to ensure colleagues understand how to record concerns appropriately.
- Access to logged cases is restricted due to the sensitive nature of the information.

Standards for Reporting

- Reports must be written using factual, objective, and professional language.
- Reports must not include or blame and should resist including speculation, individual opinions and assumptions unless necessary.
- Colleagues must always maintain the appropriate level of confidentiality when handling safeguarding information.

Investigating Concerns

- A visit will be completed for each safeguarding concern raised.
- If after making contact the reported concerns are confirmed by the case officer these should be fully documented on dynamics. A referral may be raised with the relevant Local Authority Safeguarding Team, or the individual may need to be signposted to other organisations for specialist support.
- The organisation will respond to any reported incidents in a way that does not compromise ongoing police or local authority investigations.
- We work proactively and collaboratively with partner agencies to safeguard adults at risk.
- Information is recorded and shared appropriately with other professionals and statutory agencies involved in safeguarding.

Colleagues should not assume or depend on another person or agency to report the concern and must ensure we make our own referrals.

Prevent

- The Government Prevent programme highlights that some people may be vulnerable to radicalisation and involvement in terrorism. Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works with individuals and communities by using voluntary early intervention to encourage them to challenge extremist and terrorist ideology and behaviour. Terrorism is an action or threat designed to influence the government or intimidate the public. Its purpose is to advance a political, religious or ideological cause. Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to negate or destroy the fundamental rights and freedoms of others; or undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for others to achieve the above.
- We recognise that it supports people who may be at risk of radicalisation, and we will work closely with local voluntary and community groups as well as local authorities and the police to engage with and co-deliver support to customers who might be at risk of radicalisation.
- In line with procedure, the following form should be completed and submitted to the local police force for the relevant area when it is suspected that radicalisation is a risk: National Prevent referral form.

4.6 Escalating Concerns

If there is a case involving death or serious harm to an adult living in our properties or receiving a service from us that could lead to reputational, financial, or regulatory risk, colleagues must report this to the Domestic Abuse and Safeguarding Manager who will immediately alert the Safeguarding Lead and the Executive Team.

4.7 Safer Recruitment

We are committed to ensuring no person is placed at risk where our recruitment practice could have reasonably foreseen and prevented the risk occurring.

Our Recruitment and Selection Policy covers our approach to recruiting: ensuring that we take all reasonable steps to protect vulnerable individuals from harm such as the use of Disclosure and Barring Service (DBS) and enhanced DBS checks.

4.8 Whistleblowing

If a concern or allegation is raised about an employee, one of our agents or a contractor; then we will fully support and protect anyone who, in good faith, reports a concern relating to an adult at risk (see our Whistleblowing Policy, Disciplinary Policy and Procedure, Complaints, Comments and Compliments Policy). In such cases the relevant Director and the Safeguarding Lead should be informed as well as the senior manager in the agency/contracting company as appropriate and statutory authorities. We will ensure that the employee is treated fairly and honestly and supported throughout the process.

Should we receive any calls, emails, or any other form of communication with safeguarding concerns where a colleague may be the perpetrator, please collect all necessary information and email this to secureinformationrequests@platformhg.com.

We will ensure that allegations regarding inappropriate conduct of colleagues, in or outside the workplace, are investigated thoroughly and with urgency, through the Disciplinary Policy and Procedure with our Employee Relations colleagues.

Where such allegations are made, the Safeguarding Lead and Safeguarding and Domestic Abuse Manager must be notified on the same day in the first instance.

4.9 Training of Colleagues and Volunteers

Our induction process for new colleagues and volunteers includes information on all relevant policies and procedures, including this Safeguarding Adults Policy.

Every employee will undertake safeguarding training at the level appropriate to their role. Additional training will be sourced dependant on job role.

Online mandatory safeguarding training modules are completed every 2 years. Completion of mandatory training is reported to the Group Audit and Risk Committee (Board level).

All colleagues and volunteers will have a designated supervisor who will provide appropriate on-going support, supervision or signposting.

All colleagues will be trained to recognise the symptoms of abuse and neglect and made aware of their duty to report any concerns or evidence that they have of alleged abuse or neglect of a child, young person or adult at risk.

Policies are disseminated across the Group through internal communications and on our intranet pages. A read and sign acknowledgment will be completed by colleagues to state that they have read, understood, and agree to uphold the principles and responsibilities outlined in our safeguarding policies.

5. Equality and Diversity

- 5.1 We are committed to fairness and equality for all regardless of age, gender reassignment, marriage or civil partnership, pregnancy, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, as referred to in our relevant Group policies. Our aim is to ensure that our policies and procedures do not create an unlawful disadvantage for anyone, either directly or indirectly.
- 5.2 An equality impact assessment has been undertaken in respect of this policy and which concluded that there is no negative impact on any person or group with a protected characteristic.

6. Complaints

- 6.1 We aim to meet the needs of our customers by providing an excellent service. However, it is acknowledged that occasionally things go wrong and customers may wish to complain. Should the need arise to make a complaint, please refer to our Complaints, Comments and Compliments Policy.

7. Monitoring and Review

- 7.1 The Executive Team receive quarterly safeguarding reports from the Domestic Abuse and Safeguarding Manager plus an annual safeguarding report is provided to the Executive Team and Group Board.

This policy will be reviewed every three years or on the introduction of new legislation, best practice guidelines or required operational changes, whichever is the sooner.

- 7.2 We may update this policy from time to time to reflect changes in the law, regulations, or how we operate.
- 7.3 Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until an updated version is available.

8. Associated Documents

8.1 List of documents - associated policies, procedures and publications:

- Data Protection Act 2018
- Care Act 2014
- Mental Capacity Act 2005
- Human Rights Act 1998
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Modern Slavery Act 2015
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Housing Act 1985 and Housing Act 1996
- Deprivation of Liberty Safeguards (DoLS)
- Disability Discrimination Act 1995 (Amendment) Regulations 2003
- Safeguarding Adults – National Framework of Standards 2005
- Regulator for Social Housing – Consumer Standards
- Local Authority Guidelines as appropriate

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Safeguarding Definitions and Glossary

Care and Support Needs	The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 years or 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. Care and support is the mixture of practical, financial and emotional support for adults who need extra help to manage their lives and be independent - including older people, people with a disability or long-term illness, people with mental health problems, and carers. Care and support include assessment of people's needs, provision of services and the allocation of funds to enable a person to purchase their own care and support. It could include care home, home care, personal assistants, day services, or the provision of aids and adaptations.
Section 42 Referral	Section 42 of the Care Act 2014 in the UK mandates that local authorities make inquiries (or cause others to do so) when they suspect an adult with care and support needs is experiencing, or is at risk of, abuse or neglect. The goal is to protect the person, prevent harm, and ensure their safety.
Care Needs Assessment	A free, statutory process provided by local councils (or social services) for adults aged 18 years and over who appear to need support, regardless of income. It evaluates how physical, mental, or emotional needs impact daily life and wellbeing to determine if a person is eligible for council-funded care services.
Safeguarding Adults Review (SAR)	A statutory, multi-agency learning process mandated by the Care Act 2014 for situations where an adult with care and support needs has died or experienced serious harm due to abuse or neglect. It aims to identify lessons learned, improve agency collaboration,

	and prevent future incidents rather than assigning blame.
Multi-Agency Public Protection Arrangements (MAPPA)	Statutory frameworks in the UK used by police, probation, and prison services to assess and manage the risks posed by violent and sexual offenders in the community. They ensure information sharing and create risk management plans, often involving housing, health, and social services, with three levels of management ranging from single agency to active, multi-agency oversight.
Multi-Agency Risk Assessment Conference (MARAC)	Regular local meeting in the UK where agencies — including police, health, child protection, and housing — share information to create safety plans for victims at high risk of serious harm or murder due to domestic abuse. It focuses on improving victim safety and holding perpetrators accountable.
Hate Crime	Any crime that is perceived by the victim, or any other person, to be racist, homophobic, transphobic, or due to a person's religion, belief, gender identity or disability.
Disability Hate Crime	Any criminal offence, which is perceived, by the victim or any other person, to be motivated by hostility or prejudice based on a person's disability or perceived disability.
Female Genital Mutilation (FGM)	Partial or total removal of external female genitalia for non-medical reasons. Illegal in the UK and a form of child abuse. Signs include difficulty walking or sitting, or reluctance to undergo medical exams.
Forced Marriage	A marriage where one or both parties do not consent. Often involves coercion, threats, or abuse. Indicators include sudden travel abroad, withdrawal from education, or family pressure.
Honour Based Abuse	Violence committed to protect perceived cultural or religious honour. May include physical violence, forced marriage, or restrictions on freedom. Signs include fear of family, isolation, or injuries.
Mate Crime	Vulnerable people are befriended by members of the community who go on to exploit and take advantage of them.

Cuckooing	A criminal befriends a vulnerable person and uses their home to conduct illegal activities which the tenant has no involvement with, often ousting the legal tenant. Children may be present or involved. Indicators include unfamiliar individuals at the property or changes in behaviour.
Radicalisation and Extremism	The process by which an adult is drawn into extremist ideologies. Under the Prevent Duty, professionals must act to prevent this. Indicators include changes in behaviour, isolation, or expressing extremist views.
Human Trafficking	Adults are tricked, forced, or persuaded to leave their homes and are then exploited. This includes domestic slavery, forced labour, or sexual exploitation. Signs include lack of freedom, fearfulness, or poor living conditions.
Self-Harm	When a person intentionally hurts themselves to cope with emotional distress. Methods include cutting, burning, or hitting oneself. Indicators include unexplained injuries, wearing long sleeves, or withdrawal.
Suicide	Involves a person intentionally ending their own life. Suicidal feelings may include thoughts of death, hopelessness, or planning suicide. Warning signs include talking about death, giving away possessions, or sudden calmness after depression.