

PA Housing

Adult Safeguarding

Policy

June 2025

Owning manager	Joanna Connolly, Head of Tenancy Sustainment
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Department	Customer Services Directorate
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Approved by	Emma Conlon, Director of Tenancy Management
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Paragon Asra Housing Limited (PA Housing) is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all of our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats we will provide them

1. Introduction

PA Housing provides housing and support services to a diverse range of people, including those who may be vulnerable or at risk of abuse, neglect and harm. This policy outlines PA Housing's commitment to safeguarding adults at risk, ensuring they are protected from abuse, neglect, and harm.

PA Housing is committed to keeping our residents safe and working in partnership with the local authorities and relevant agencies in its areas of operation, to protect people from maltreatment. We take all concerns, allegations and reports of abuse, neglect and harm seriously.

This policy is grounded in our core values of making a positive difference in people's lives. Doing the right thing, whilst treating people with respect and integrity, ensuring we meet our statutory obligations. We are committed to ensuring a supportive and confidential environment for residents, and ensuring that they have access to safe, secure and high-quality housing.

2. Aims and Overview

This policy details how PA Housing will safeguard adults at risk, promote their welfare, and align its practices with current legislative and statutory requirements.

The **Care Act 2014** is the primary legislation governing adult social care in England. It provides a legal framework for safeguarding adults at risk and places a duty on local authorities to prevent, reduce, and respond to the risk of abuse or neglect.

The Act introduces **six key safeguarding principles**:

1. **Empowerment** – Supporting individuals to make their own decisions and giving them control.
2. **Prevention** – Acting before harm occurs to reduce the risk of abuse or neglect.
3. **Proportionality** – Responding appropriately to the level of risk.
4. **Protection** – Safeguarding those in need and ensuring access to support.
5. **Partnership** – Working collaboratively with other services to prevent and address abuse.
6. **Accountability** – Ensuring clear roles and responsibilities in safeguarding practice.

Under the Act, local authorities have a statutory duty to carry out safeguarding enquiries and establish Safeguarding Adults Boards (**SABs**) to oversee multi-agency safeguarding efforts. The Act also introduced the concept of Making Safeguarding Personal (**MSP**) to ensure that safeguarding is person-centred and focused on achieving outcomes that matter to the individual.

This policy aligns with the **Care Act 2014** to ensure that all safeguarding concerns are addressed in accordance with legal requirements, best practices, and the well-being of adults at risk.

3. Scope

This policy applies to all staff delivering services or representing PA Housing, and its residents living in homes owned and managed by us.

4. Definitions

PA Housing will adopt The Care Act 2014 statutory guidance which defines adult safeguarding as: Protecting an adult's right to live in safety, free from abuse and neglect.

We also adopt the following definitions:

- **Safeguarding** - Protecting an adult's right to live in safety, free from abuse and neglect.
- **Adult at risk** – Someone who has care and support needs, is experiencing, or at risk of, abuse or neglect and is unable to protect themselves because of those care and support needs.
- **Making Safeguarding Personal** – Taking a person-centred approach, working in partnership with people to understand their needs and involve them in decision making as far as possible.
- **Statutory Duty** – Several pieces of legislation, guidance, and frameworks that are designed to ensure the protection and wellbeing of children, young people and adults at risk. These responsibilities are legally binding and apply to organisations like PA Housing, which interact with vulnerable individuals.
- **Abuse and neglect** – Actions or inactions that cause harm, distress, or a risk to an adult who has care and support needs and is unable to protect themselves. It can take many forms and may be a single act or repeated acts which may be intentional or unintentional.

Types of abuse for adults identified under the Care Act 2014 include:

- Physical
- Sexual
- Psychological (Emotional)
- Financial or Material
- Neglect and Acts of Omission
- Discriminatory
- Organisational
- Domestic
- Self-neglect
- Modern Slavery

5. Our approach to Adult Safeguarding

PA Housing is dedicated to ensuring the safety and wellbeing of all residents. To do this we will actively collaborate with residents, local authorities, partners, and relevant stakeholders to safeguard adults at risk and:

- Recognise that the welfare of our residents is paramount.
- Ensure a robust referral system is in place where there are concerns about an adult at risk of harm, ensuring that any safeguarding concerns are easily reportable and acted on quickly.

- Collaborate with local authorities, social services, and other agencies, including attending multi-agency meetings, to minimise abuse, neglect and harm
- Share information promptly where required.
- Ensure that appropriate staff are trained to spot the signs of abuse, neglect and harm.
- Signpost residents to relevant stakeholders where appropriate.

We normally seek consent to make a safeguarding referral to the local authority and aligned with the principles of the Mental Capacity Act (2005), PA Housing will presume every adult has capacity to make decisions until it's proven otherwise.

Certain circumstances where we may make a safeguarding referral without consent under the Care Act 2014, include where:

- **The person lacks mental capacity** – If the adult is unable to make an informed decision about the referral due to conditions such as dementia, learning disabilities, or brain injuries, a referral can be made in their best interests under the Mental Capacity Act 2005.
- **There is a risk to others** – If the abuse or neglect poses a risk to other adults or children, a referral can be made without consent to protect wider public safety.
- **The individual is under coercion or control** – If the person is being pressured, manipulated, or controlled (e.g., domestic abuse, modern slavery), consent may not be required, as they may not be freely making decisions.
- **A serious crime has been committed** – If the abuse involves serious criminal offences (e.g., physical assault, sexual abuse, financial exploitation, hate crime), authorities may be involved regardless of consent.
- **The person is at significant risk of harm** – If delaying action could result in serious harm or even death, a referral can be made under a duty of care.

Any decision made on behalf of someone lacking capacity will be made in their best interests with a least restrictive option chosen to least interfere with their rights and freedoms.

5.1 Referral Process:

- **Identify the concern** – signs of abuse, neglect, or risk.
- **Check the local authority** – refer to the person's home borough.
- **Follow local procedures** – each authority may have different reporting mechanisms (e.g., online forms, phone hotlines).
- **Record the referral** – ensure compliance with data protection (GDPR) and safeguarding record-keeping policies.

PA Housing strongly believes that our resident's welfare is paramount, and we will work tirelessly to ensure that all adults living in or affected by our housing services are safe, protected from harm, and supported through robust safeguarding measures, effective partnerships, and a culture of vigilance and care.

6. Roles and Responsibilities

- Recognising safeguarding is everyone's responsibility at PA Housing
- PA Housing has a designated strategic safeguarding lead who is accountable to the PA Housing Board for the overall framework of good practice and control in relation to safeguarding.
- The Safeguarding team manages all safeguarding cases across the organisation.

- We monitor and evaluate our services to ensure fairness, accessibility, and best practice.
- PA Housing aims to meet all statutory safeguarding requirements.
- We ensure effective implementation of this policy, supporting and protecting residents at risk.
- We engage in Serious Case Reviews (SCRs) to learn from critical incidents and improve safeguarding practices.

7. Recognising and Responding to Adult Safeguarding Concerns

- We will treat everyone with dignity, respect, and as individuals
- We will take all reports of abuse, neglect, or exploitation seriously, and ensure residents are heard, valued, and supported throughout the safeguarding process.
- We will work with key stakeholders to ensure tailored support is offered to individuals at risk of abuse, neglect and harm.
- We will review, triage and attempt to contact any person at risk of abuse, neglect or harm within one working day following a report being received.
- A comprehensive risk assessment will be conducted for every open safeguarding case.
- Following triage, an action plan will be agreed upon with the resident, ensuring that we adhere to the six principles of safeguarding.
- We will handle all safeguarding concerns with discretion and sensitivity while adhering to data protection legislation.
- We will be mindful of our language to avoid language that could be triggering, blaming, shaming or judgemental.
- We will monitor and evaluate our services to ensure we meet statutory requirements whilst delivering fair and accessible practices.
- Record all case histories within our housing management systems
- We will use anonymised data to analyse trends, inform future policies and improve service delivery
- Audit findings will be used to identify learning opportunities, inform training and development, and enhance the quality of our responses.
- Implement this policy effectively, ensuring residents feel supported and understood by carrying out regular surveys on residents who have engaged with the service to measure their satisfaction.
- Cases will be reviewed regularly.

8. Recruitment and Training

Induction Training:

All new colleagues, regardless of role, will receive an introduction to safeguarding, covering the basic principles, procedures, and responsibilities. This mandatory training will be repeated annually.

Specialist Roles:

Safeguarding officers and Safeguarding leads will receive advanced safeguarding training, including modules on risk assessments, partnership working, and case management.

Safe Recruitment: PA implements a robust recruitment process, including Disclosure and Barring Service (DBS) checks, to ensure we are safeguarding our residents and neighbourhoods.

9. Data Protection, Information Sharing and Confidentiality

In accordance with data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, we are committed to ensuring that your personal data is handled with the utmost care and confidentiality.

Where information needs to be shared, we will ensure that this is:

- Justified
- Adequate
- Proportionate
- Accurate
- Necessary

Information sharing will only occur when it is:

- With appropriate consent when appropriate.
- Where legally required to safeguard individuals or protect adults.

We will ensure that any data shared with third parties is done so securely and only with appropriate consent or legal basis.

Confidentiality is paramount and all our colleagues are trained to handle personal information responsibly, ensuring that it is used solely for the purposes for which it was collected. Regular audits and reviews will be conducted to ensure compliance with legal requirements and best practices in data protection.

10. Guidance

10.1 Contractual

- Tenancy agreement
- Lease
- License to Occupy

10.2 Legislative

- Care Act 2014
- Deprivation of Liberty Safeguards (DOLS)
- Human Rights Legislation
- Domestic Abuse Act 2021
- Mental Capacity Act 2005
- Counter terrorism and Security Act 2015
- Equality Act 2010
- Health and Social Care Act 2008 (CQC)
- Domestic Abuse Act 2021
- Public Interest Disclosure Act
- Modern Day Slavery Act 2015
- Environmental Protection Act 1990
- Equality Act 2010

10.3 Regulatory

- Regulator of Social Housing Regulatory (RSH) Standard April 2024)
- Neighbourhood and Community Standard

10.4 Identifying Vulnerability

Early intervention is crucial for effective safeguarding of residents, and PA Housing plays a vital role in identifying emerging problems and unmet needs.

Colleagues may observe safeguarding concerns during their work, when in the community or conducting visits to our residents in their homes. These concerns must be referred to the Safeguarding team to triage and signpost where necessary.

Concerns might also arise in the following ways:

- A person discloses concerns directly.
- A person says something concerning.
- A third party voices concerns.
- Evidence of abuse, neglect and harm is observed, such as incidents, injuries, or property damage.

Individuals can become at risk at any time, and this can change over time, all staff and contractors must remain vigilant and follow proper procedures when identifying or reporting risks.

In some cases, the alleged perpetrator of abuse, neglect and harm may also be an adult at risk. These situations must be managed using a multi-agency and cross-team approach to ensure all involved receive the necessary protection and support.

10.5 Keeping Safe Online

Colleagues and contractors must avoid sharing personal contact details and use work-provided equipment for communications.

Social media interactions with residents, especially children or young people, must align with the Social Media policy to prevent misinterpretation or inappropriate behavior.

10.6 Use of Photographs and Videos

- Publications featuring images of vulnerable adults will avoid identifying personal details. Only approved staff or professionals may take photographs or videos, and these must be securely stored in line with the Data Protection policy.
- Written consent from guardians is required before using any child's image.
- Group images do not require consent, but individuals may opt out.

11 Related documents

Managed Move Policy

ASB Policy
Domestic Abuse Policy
Recruitment Policy
Hate Crime Policy
Children's Safeguarding Policy
Whistleblowing Policy

If you have any questions about this policy, please contact: Emma Conlon, Director of Tenancy Management Emma.conlon@pahousing.co.uk