



Places to live. Space to grow.

Safeguarding Adults Policy

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1 Introduction: the purpose of this policy

- 1.1 We are committed to safeguarding and promoting the welfare of adults at risk throughout the areas where we operate and recognise that successful outcomes depend on strong partnership working. This policy has been written in line with the Kent & Medway Safeguarding Adults Board (KMSAB) Multi-Agency Safeguarding Adults Policy, Protocols and Guidance for Kent and Medway, and the Care Act 2014.
- 1.2 The purpose of this policy is to demonstrate our commitment to safeguarding adults. It sets out the approach to be taken by staff and contractors who have concerns, receive allegations, or have evidence of abuse or neglect of adults at risk. The policy aims to ensure that everyone at West Kent is aware of:
- The legislation, policy and procedures for safeguarding adults.
 - Their role and responsibility for safeguarding adults.
 - What to do or who to speak to if they have a concern relating to the welfare or wellbeing of an adult within the organisation.
 - The need to work in partnership with other agencies to reduce the risk of harm and abuse.
 - The fact that safeguarding is everyone's responsibility.

2 Policy Statement

- 2.1 We believe 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.
- 2.2 We are committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.
- 2.3 We acknowledge that safeguarding is everybody's responsibility and we're committed to preventing abuse and neglect through safeguarding the welfare of all adults involved with West Kent.
- 2.4 We recognise that health, well-being, ability, disability, and need for care and support can affect a person's resilience. We recognise that some people experience barriers; for example, in communicating, raising concerns, or seeking help. We recognise that these factors can vary at different points in people's lives. We are committed to removing barriers to disclosure by ensuring staff use clear, supportive communication, offer multiple ways to raise concerns, and provide access to advocacy or translation services where needed.
- 2.5 Actions we take 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 consent section of this policy describes the limited circumstances under which we will raise concerns against the adult's wishes.

- 2.6 Where a staff member observes or has concerns about an adult's welfare or receives a safeguarding disclosure from a third party, the incident must be treated seriously and immediately responded to in accordance with our Safeguarding Adults and Children Procedure.
- 2.7 In line with our Vulnerability Policy, vulnerability is defined as circumstances where individuals are especially susceptible to physical or emotional harm or distress. Vulnerability can be influenced by a range of factors, including (but not limited to): age, disability, bereavement, mental health, domestic violence, or poverty.
- 2.8 Where a person or household is identified as vulnerable, we will make every effort to provide Reasonable Adjustments to our services to accommodate additional needs.

3 Scope

- 3.1 This policy applies to adults aged 18 or over. We have a separate policy for safeguarding children.
- 3.2 As a social housing provider and by working closely with members of the community, we have an obligation to safeguard adults at risk. This policy sets out our responsibilities.
- 3.3 All staff and volunteers, including contractors and partner agencies, are required to take shared responsibility for the safeguarding and safety of any adults at risk of abuse ('adults at risk') who are encountered in the course of our work.

4 Responsibilities

- 4.1 All staff and volunteers, including contractors and partner agencies, are required to take shared responsibility for the welfare of adults who are encountered in the course of our work.
- 4.2 The Head of Support is our Designated Safeguarding Lead (DSL) and is the senior member of staff responsible for safeguarding adults and children. The DSL will be responsible for monitoring and reporting. They are supported by a Designated Safeguarding Officer (DSO) for adults, this is the Tenancy Sustainment Manager at West Kent. The DSO will also provide guidance to staff or line managers on how to respond to safeguarding concerns.
- 4.3 There is also delegated responsibility to line managers of front-line staff in implementing this policy. Line managers (of front-line staff) must:
 - Attend training at the relevant level and ensure their staff also attend appropriate training.

- Act as the first source of advice for colleagues on Safeguarding, escalating to the DSO or DSL when necessary.
- Respond to all concerns swiftly in line with the process.
- Ensure accurate recording of all safeguarding concerns.
- Keep up to date with local safeguarding arrangements in Medway and Kent.
- Make sure that any allegations of colleague conduct around Safeguarding are investigated in line with HR processes.
- Recognise that dealing with safeguarding situations can be distressing and support the wellbeing of colleagues dealing with reports.

4.4 Our staff are in a position of trust, particularly those staff who support, guide or in any way interact with adults at risk. All staff must be aware of this and always act accordingly, and in line with the staff code of conduct.

4.5 We have processes in place to check the suitability of all staff and volunteers working directly with adults at risk. Some staff across West Kent will be in regular or significant occasional contact with adults at risk during their work. We are committed to ensuring that all such staff and contractors will have formal checks through the Disclosure and Barring Service (DBS). Where a check highlights 'reported information' this should be discussed with HR and the line manager as per the Safeguarding: Safer Recruitment DBS Procedure.

5 Definitions

5.1 Abuse is a breach of an individual's rights which may be a single act or happen repeatedly over a period of time. The abuse may be deliberate, but it may also happen as a result of neglect or ignorance. The adult at risk may be neglected, persuaded to agree to something against their will or taken advantage of because they do not fully understand the consequences of their choices or actions.

5.2 The following definition has been adopted for adult safeguarding:

"Adult safeguarding is 'protecting an adult's right to live in safety, free from abuse and neglect.' (Care and Support statutory guidance, chapter 14)."

5.3 Our Domestic Abuse Policy and Procedure should also be referred to in cases of domestic abuse.

6 Adults at risk of abuse

6.1 Safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs)

- is experiencing, or at risk of, abuse or neglect
- 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.

6.2 Where possible, we will identify adults who may be at risk and ensure appropriate support measures are in place. Staff should continually consider whether a person's situation indicates a safeguarding concern (for example, where abuse or neglect is suspected) or whether their needs can be met through general vulnerability support without making a safeguarding referral.

6.3 If any member of staff has concerns that an adult may be experiencing, or is at risk of, abuse or neglect, they must follow the Safeguarding Adults & Children Procedure, available on West Kent's intranet site, Bettie. Any safeguarding concern that arises during the course of work must be treated as a priority.

6.4 It is the duty of staff to inform, not to investigate - this is the responsibility of the Police and Social Services.

7 Categories of adult abuse

7.1 The following forms of abuse have been taken from Kent and Medway Multi Agency Safeguarding Adults Board website as of October 2024. This list is not exhaustive. Definitions of each category can be found in the safeguarding procedure.

- Physical abuse
- Sexual abuse
- Honour-based abuse
- Psychological abuse
- Financial or material abuse
- Neglect and acts of omission
- Self-Neglect
- Modern slavery and human trafficking
- Discrimination and hate crime
- Organisational abuse
- Domestic abuse (Please refer to our Domestic Abuse Policy).

Other forms of abuse:

- Radicalisation
- Gang-related abuse and cuckooing
- Mate crime
- Online/digital abuse.

8 Safeguarding principles

8.1 The Care Act 2014 introduced a legal framework so key organisations and individuals with responsibilities for adult safeguarding can agree on how they must work together and what roles they must play to keep adults at risk safe. The Act and its commencement in

April 2015 were used as an opportunity to bring in more robust safeguarding duties, which will have a range of potential consequences for social landlords and housing support providers.

8.2 The legislation highlights six key principles which we should aim to demonstrate and promote in our work:

- Empowerment: Presumption of person-led decisions and informed consent.
- Protection: Support and representation for those in greatest need.
- Prevention: It is better to act before harm occurs.
- Proportionate responses: Proportionate and least intrusive response appropriate to the risk presented.
- Partnership: Local solutions through services working with their communities.
- Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability: Accountability and transparency in delivering safeguarding.

9 Adults and mental capacity

9.1 We recognise that capacity and consent are key themes in safeguarding practice and that every adult has the right to make their own decisions. A person is assumed to have capacity to do so unless it is proven that they do not.

9.2 Whilst we recognise that capacity is decision-specific and can fluctuate, if a customer does not have the capacity to make a decision relating to a safeguarding concern, then we have a duty to report the matter following our safeguarding procedures.

10 Consent

10.1 Where an adult has capacity to consent to a safeguarding referral being made, but declines, there are specific circumstances that must be justified under which a referral may still be undertaken without consent, including where:

- there is a serious risk to the individuals wellbeing and safety
- other children or adults may be at risk
- a serious crime has been committed, or may be prevented by sharing information
- the adult has capacity but is under duress or being coerced.

10.2 As far as possible, where consent has been overridden, the adult at risk should be made aware of the decision and why the decision was made.

11 Position of trust

- 11.1 People in a Position of Trust are defined as *‘those who work with adults, whether in a paid or a voluntary basis and that may hold a position of authority over a person’*. Any actions or inaction that causes harm or could cause harm to an adult could lead to disciplinary action or criminal prosecution if a criminal offence is committed.
- 11.2 In the housing sector, being in a “position of trust” means that staff hold roles where tenants, especially vulnerable adults, depend on them. Because staff are in people’s homes, handle sensitive information, and influence safety and wellbeing, they must adhere to strict safeguarding expectations, follow Person in Position of Trust (PiPoT) procedures, and be accountable for maintaining professional boundaries.

12 Allegations of abuse or inappropriate behaviour involving staff

- 12.1 Allegations involving a member of staff will be dealt with in the strictest confidence and reported immediately to the Head of Human Resources and relevant Department Director. Consideration will be given as to whether the situation falls within the definition of abuse (see appendix one). The situation will be dealt through the organisation’s disciplinary procedure and/or reported to appropriate agencies.

13 Reporting and monitoring

- 13.1 All reported suspicions or allegations of abuse will be recorded and monitored to ensure the procedures are followed, and so any patterns may be identified. Outcomes will be monitored to check we are meeting our aims relating to adult safeguarding.
- 13.2 Safeguarding case numbers and training information will be reported quarterly to the Executive team. A full safeguarding report will be produced every six months for the Communities and Housing Committee, where we will identify trends, risks and ongoing actions.
- 13.3 Safeguarding cases will also be reported in the health and safety report which is reported monthly to the Executive team and quarterly to the Communities and Housing Committee.

14 Training and awareness

- 14.1 In accordance with good practice, we will ensure that staff and contractors likely to be in regular contact with adults at risk receive appropriate training. This will also include volunteers and involved residents employed in similar roles.
- 14.2 The following levels of safeguarding training are provided for staff:

- Introduction and General Awareness- mandatory for all staff, volunteers and Board members.
- Level 1 – For all staff who interact with customers on phones or whilst carrying out duties.
- Level 2 – Increased Awareness for staff who visit customers and can make referrals to the local authority.

14.3 The level of training that is required for individual role profiles has been assessed depending on the level of contact with adults and the responsibilities that are associated with the role.

14.4 Safeguarding will form part of induction training at all levels and must be repeated every three years. Training records will be maintained and monitored for compliance.

14.5 We will also offer training to contractors, so they understand the signs of abuse and what actions to take.

14.6 Where opportunities arise, we will also look to raise awareness of safeguarding with our staff and with our tenants, be that through internal communications, Neighbourhood News (our resident magazine), at events, or through other means.

15 Media relations

15.1 For any activity involving adults at risk, consideration should be taken as to whether it is appropriate to take photographs, video, or images, and whether the person themselves can give permission.

16 Contractors

16.1 As described above, West Kent expects contractors to ensure that their staff are aware of safeguarding issues and have clear routes to raise these. Where applicable safeguarding will be considered as part of the procurement process. Contractors will be expected to have appropriate DBS checks, to ensure staff are trained to understand safeguarding, recognise where abuse may be happening, and raise this appropriately.

17 Review

17.1 This policy and associated procedures will be monitored and reviewed on an annual basis, in accordance with changes guidance on the safeguarding of adults at risk, or any changes within West Kent, or any issues or concerns raised about the safeguarding of adults at risk within West Kent.

17.2 If any changes to safeguarding legislation, regulations or guidance occur, we will review this policy in a timely manner to ensure it remains compliant.

18 Regulation

18.1 The Care Act 2014 puts safeguarding on a statutory footing and sets out a framework for multi-agency working. The statutory duties of the Care Act are the responsibility of the Local Authority such as Kent County Council and Medway Unitary Authority.

19 Communication

19.1 This policy will be published on West Kent's intranet and on the website.

19.2 We will publish advice and guidance on our website for residents on what to do if they are concerned about their own or someone else's safety. We will signpost to external agencies and how to report a concern to us.

20 Consultation

21 This policy has been implemented following consultation with residents.