

## **Safeguarding Adults at Risk Policy Statement**

**October 2025**

This policy is implemented by Midlands Rural Housing on behalf of four independent partner associations: Leicestershire Rural Housing Association, Northamptonshire Rural Housing Association, Peak District Rural Housing Association and Warwickshire Rural Housing Association. Midlands Rural Housing provides the full range of housing and management services for these four associations in line with a procedure agreement.

<b>Document title</b>	Safeguarding Adults at Risk Policy Statement
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<b>Author title &amp; issuing department</b>	Area Housing Manager
<b>Target audience</b>	This policy applies to all colleagues working for MRH whether employed, contracted or on a voluntary basis.
<b>Approved by</b>	Richard Mugglestone
<b>Date approved</b>	20.10.2025
<b>Review date</b>	June 2028 – and 3 yearly thereafter
<b>Links to Regulatory Standards – Economic/ Consumer Standards</b>	<ul style="list-style-type: none"> <li>• The Transparency, Influence and Accountability Standard (“the TIA Standard”)</li> <li>• The Safety and Quality Standard (“the SQ Standard”)</li> <li>• The Tenancy Standard</li> <li>• The Neighbourhood and Community Standard (“the NC Standard”)</li> <li>• The Code of Practice (“the Code”)</li> </ul>
<b>Outcome for customers</b>	<p>Residents</p> <p>The policy will ensure a clear process and proactive approach for the reporting and monitoring of any resident identified at risk. Protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse, and neglect.</p>
<b>Links to Regulatory Standards – Economic/ Consumer Standards</b>	<p>The Care Act 2014  <a href="https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted">https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted</a></p> <p>The Equality Act 2010  <a href="https://www.legislation.gov.uk/ukpga/2010/15/contents">https://www.legislation.gov.uk/ukpga/2010/15/contents</a></p> <p>Health and Social Care Act 2008  <a href="https://www.legislation.gov.uk/ukpga/2008/14/contents">https://www.legislation.gov.uk/ukpga/2008/14/contents</a></p> <p>Mental Capacity Act 2005  <a href="https://www.legislation.gov.uk/ukpga/2005/9/contents">https://www.legislation.gov.uk/ukpga/2005/9/contents</a></p> <p>Safeguarding Vulnerable Groups Act 2006  <a href="https://www.legislation.gov.uk/ukpga/2006/16/contents/enacted">Safeguarding Vulnerable Groups Act 2006 (legislation.gov.uk)</a></p> <p>Data Protection Act 2018  <a href="https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted">https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted</a></p> <p>Domestic homicide reviews: statutory guidance  <a href="https://www.gov.uk/government/publications/revised-statutory-guidance-for-the-conduct-of-domestic-homicide-reviews">https://www.gov.uk/government/publications/revised-statutory-guidance-for-the-conduct-of-domestic-homicide-reviews</a></p>

## 1. Introduction

The Safeguarding Adults at Risk Policy and Procedure for MRH provides the framework for safeguarding adults at risk from abuse and neglect. Safeguarding adults requires all employees to support and safeguard adults at risk of abuse and neglect. Strong partnerships are those whose work is based on an agreed policy and strategy, with common definitions and a good understanding of each other's roles and responsibilities. The purpose of this policy is to provide colleagues with a clear and reliable framework to enable them to identify and report concerns surrounding Individuals we support and / or residents.

## 2. Scope

This policy applies to all colleagues working within MRH whether employed, contracted or on a voluntary basis. This policy should be read in conjunction with the local authority policy for safeguarding adults at risk.

## 3. Definitions

<b>Safeguarding Incident</b>	A safeguarding incident which is reportable to external parties.
<b>Safeguarding Concern</b>	A concern around an individual who is potentially at risk of harm and abuse, however this may not reach external reporting thresholds, this may require signposting and documented internal actions. The concern process will also track information requests from other professionals linked to statutory and / or mandatory reviews which cannot be linked to safeguarding incidents already reported and logged within MRH.
<b>Colleague</b>	Someone working within MRH whether employed, contracted or on a voluntary basis.
<b>Alerter</b>	The colleague who alerts the referrer of a safeguarding incident / concern.
<b>Referrer</b>	The colleague who has the appropriate training and experience, who is responsible for submitting relevant referrals to local authorities and statutory bodies in relation to a safeguarding incident / concern. This will be a member of the HM Team.
<b>PIPOT</b>	A PIPOT means 'Person in a position of trust' that work with (either paid or unpaid) adults with care and support needs and/or is in a role where they hold power and authority over these individuals.

## 4. The Care Act 2014 Specifics of the Policy

The Care Act 2014 defines adult safeguarding as: 'Protecting an adult's right to live in safety, free from abuse and neglect. The Care Act 2014 requires 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.

Adults at risk such as older people or people with disabilities, are more likely to be abused or neglected. They may be less likely to identify abuse themselves or to report it. Adults with communication difficulties can be particularly at risk because they may not be able to alert others. Sometimes people may not even be aware that they are being abused, and this is especially likely if they have a cognitive impairment. Abusers may try to prevent access to the person they abuse.

All MRH colleagues have a duty to safeguard adults at risk from harm, abuse, or neglect and to co- operate with other agencies to achieve:

- ▶ Knowledge of when to report concerns and to whom to report.
- ▶ An emphasis on prevention, information, and advocacy.
- ▶ A balance of choice, control, and safety – helping you to Make Safeguarding Personal (The Care Act, 2014)

## 5. The Six Principles

These six principles apply to all health and care settings and all safeguarding work should be based on them:

- ▶ Empowerment - People being supported and encouraged to make their own decisions and informed consent.
- ▶ Prevention - It is better to act before harm occurs.
- ▶ Proportionality - The least intrusive response appropriate to the risk presented.
- ▶ Protection - Support and representation for those in greatest need.
- ▶ Partnership - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- ▶ Accountability - Accountability and transparency in safeguarding practice.

MRH aims to ensure that adults at risk, when encountered as part of the service delivery, are protected from harm, and fully adheres to all safeguarding and relevant legislation. Safeguarding duties apply to an adult who:

- ▶ Who may be in need for care and support (whether the local authority is meeting any of those needs); and
- ▶ Is experiencing, or is 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.

## 6. Duty Of Candour

Within the Health and Social Care Act 2008 under Regulation 20, registered persons must act in an open and transparent way with relevant persons in relation to care and treatment provided to service users in carrying on a regulated activity.

## 7. Section 42

Section 42 of The Care Act 2014 applies where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there) is experiencing or at risk of abuse and neglect. The local authority must make (or cause to be made) whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case (whether under this Part or otherwise) and, if so, what and by whom.

## 8. PIPOT

The PIPOT process is the framework and protocols for responding to concerns about people in these roles. It involves:

- Identifying a concern- noticing something that raises concerns about a PIPOT and their ability to work safely with vulnerable adults.
- Risk Assessment – evaluating the immediate risk to the people with care and support needs.
- Information Sharing – sharing concerns and information with relevant partners as such the regulatory bodies, the police, and local authorities.
- Action – Consider safeguarding duties and disciplinary policies within MRH.

The PIPOT process must be followed even if the person in a position of trust works for another organisation.

If MRH are requested to be part of an investigation of a PIPOT (for example, from a local authority) a safeguarding concern form must be completed and submitted to Central Hub, Area Housing Manager and the Peoples Team must be informed for consideration against policies and procedures held by the Peoples Team department.

Refer to PIPOT procedures set by the relevant local authority / safeguarding adults board

## 9. Abuse

### What is abuse?

Abuse and neglect can take many forms. MRH should not be constrained in its view of what constitutes abuse, neglect or harm and should always consider the circumstances on

a person- centred basis. Colleagues do not need to know what type of abuse or harm is happening to report concerns, simply state what was seen or heard that has caused concern.

Incidents of abuse may be one-off or multiple, and in a service, can affect one person or more. The responsible individual who is appointed to investigate and review incidents should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of safeguarding concerns / incidents may be an indication of more serious problems and of what is organisational abuse. It is important that information is recorded and appropriately shared so that themes, trends, and patterns can be identified.

## 10. Types Of Abuse

Within the Safeguarding Adults at Risk Process & Guidance document there is a list of different types of abuse - this is not an exhaustive list - which provides a wide range of examples of the types of abuse adults may experience. If colleagues suspect someone is at risk of abuse, exploitation or neglect they must contact their Line Manager and complete and internal Safeguard Form in the first instance. If colleagues believe that the adult at risk is in immediate danger, they can also contact the police and the relevant Local Authority Social Services team.

## 11. Consent And Mental Capacity Act 2005

Any intervention to protect an individual who receives support and / or is an MRH tenant must be carried out with the consent of the individual concerned, there may be occasions where their consent may not be valid, e.g. due to consent needing to be over-ridden by the organisation's duty to protect others when there are concerns regarding wider groups of vulnerable adults or children or when a criminal offence has taken place.

Where the individual has been assessed as lacking capacity to make the decision on whether to give or withhold consent, then MRH will act in the best interests of the individual who receives support in line with the Mental Capacity Act (2005) and the associated code of practice.

## 12. Implementation

### Employers Responsibility

The Care Act (2014) requires employers who are aware of abuse or neglect in their organisation to correct this and protect the adult from harm as soon as possible and inform the local authority, CQC and CCG (where the latter is the commissioner). Which roles are responsible for conducting the statements contained within the policy.

### Colleagues Responsibility

All colleagues have a duty to report and escalate concerns of abuse they identify or suspect as part of their role within MRH. This includes, identifying abuse by colleagues, family members, carers, contractors or other third parties e.g. healthcare professionals and

the general public. Concerns may include abusive behaviour, poor professional practice, neglect, or any other issues which colleagues observe or suspect.

All colleagues should be aware of the group's whistleblowing policy and use this where appropriate to raise a concern if you feel unable to raise this internally

### Board Members Responsibility

Duties and responsibilities of RHA Board members. RHA Boards have a responsibility to ensure that the organisation as a whole complies with safeguarding duties under legislation and will take leadership responsibility for overseeing safeguarding arrangements. Safeguarding is a standing item at quarterly Board meetings.

### Senior Management Team (SMT)

SMT will ensure that:

The safeguarding policies and procedures approved and adopted by the Board(s) are fully implemented and followed by all staff and volunteers.

Sufficient resources are allocated to enable the Designated Safeguarding Lead (DSL) and other staff to discharge their responsibilities, including recording and monitoring safeguarding activities, taking part in strategy discussions, other inter-agency meetings and contributing to the assessments.

They undertake appropriate training to carry out their safeguarding responsibilities effectively and keep this up to date.

## 13. Designated Safeguarding Lead

The Designated Safeguarding Lead is a senior member of staff who co-ordinates adult safeguarding and child protection arrangements by providing advice and support to other staff on safeguarding matters, to take part in strategy meetings and inter-agency meetings and/or to support other staff to do so and to contribute to the assessment of adults at risk. The lead is responsible for the development of a safeguarding framework which includes:- policies, processes, guidance, and training for MRH, which each area will implement and maintain.

## 14. Reporting & Recording

If there is a risk of danger, or a crime has been committed, immediately report the incident to the Police calling 999. To report a non-emergency police matter call 101. Serious cases where there is a significant risk of immediate danger must be reported to a line manager within 24 hours.

Where there is a Safeguarding Concern, the Alerter must notify the referrer immediately. Referrer must then decide whether this meets the safeguarding requirements set by the Local Authority.

The Referrer must complete either of the following:

► **If classed as a 'Safeguarding Concern'** - The Referrer must complete the 'Safeguarding Concern and Prevent Reporting Form' with a clear description of the concern and action(s) taken as soon as possible. The 'Safeguarding Concern and Prevent Reporting Form' must then submit to Central Hub within 3 working days (for EMH managed homes only), and emailed to an Area Housing Manager for review and sign off, it will then be saved under our safeguarding file. Depending on the nature of the concern, a follow up may be required.

► **If classed as a 'Safeguarding Incident'** - Where there is a Safeguarding Incident that meets requirements set by the Local Authority, the Referrer must submit the relevant referrals. The referral document must be submitted to Central Hub within 3 working days (for EMH managed homes only), a copy should also be emailed to the Area Housing Manager and a copy saved on our safeguarding file. The Area Housing Manager and Central Hub requires all updates relevant to the Safeguarding Incident and proof of closure. Where applicable, the Referrer is responsible to submit referrals to statutory bodies, also ensuring copies are submitted to Central Hub. In addition, Area Housing Managers will review all safeguarding referrals on a monthly basis.

The Referrer of the safeguarding must ensure that all records are legible, factual, timely and accurate of the witnessed, suspected, or disclosed abuse. Information recorded for sharing with the local authority or to the police must be as accurate as possible, as it may be used in any subsequent legal action; hence there is the necessity for making a factual and detailed record.

KPIs, along with qualitative reports relating to safeguarding incidents, practices, audits, and developments will be submitted to the Board on a quarterly basis to provide members with assurances that MRH is meeting its safeguarding duties.

***[Safeguarding Adults at Risk Process & Guidance for full process information]***

## 15. Information Sharing

This policy must be read alongside the groups' Data Protection Policy. Where there are safeguarding concerns / incidents, colleagues have a duty to share information. It is important to remember that in most serious case reviews, lack of information sharing can be a significant contributor when things go wrong. Information should be shared with consent wherever possible. A person's right to confidentiality is not absolute and may be overridden where there is evidence that sharing information is necessary to support an investigation or in best interests e.g. in the interests of public safety, police investigation, implications for regulated service. Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.

## 16. Statutory and mandatory reviews

MRH will participate in statutory and mandatory reviews as required, with support from legal teams on a case-by-case basis. The input and involvement will be agreed in the terms of reference for the review. Broadly this could involve evidence of contribution, meeting regularly, attending panel or review meeting throughout the investigation phase. At times parallel investigations can be commissioned for example domestic homicide review and a child death review. The review leads should aim to avoid duplication and follow a parallel process. The following reviews could include but not limited to.

- ▶ Rapid reviews: - serious child safeguarding cases
- ▶ Child safeguarding practice review
- ▶ Child death reviews
- ▶ Learning disability mortality review
- ▶ Domestic homicide reviews
- ▶ Safeguarding adult reviews

If any area of the group is notified of any reviews or request for information linked to statutory or mandatory reviews central hub must be informed immediately for monitoring and support purposes.

### 17. Damp and Mould (Housing Regulations)

MRH group as a landlord have a statutory duty to ensure their properties are fit for human habitation at the start, and throughout the tenancy. One of the factors considered in determining if a property is unfit is “freedom from damp”.

Any individual, including children and young people living in a home with damp and mould can cause detrimental health conditions if left untreated.

MRH adopts a ‘zero-tolerance’ based approach to damp and mould, in line with the Housing Ombudsman ‘It’s not a life-style report’. MRH must ensure that any damp and mould cases are dealt with and resolved promptly and effectively. Where damp and mould cases are not responded to and resolved, this could result in Safeguarding concerns for the child and/or young person.

For more information regarding Damp and Mould, you should refer to the MRH *Damp and Mould* Policy.

### 18. Training & DBS

All colleagues must be trained to an appropriate level for their role. The training levels

include:

<b>Level 1</b>	Safeguarding Adults at Risk – E-Learning all colleagues
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All colleagues will have completed Level 1 training. Colleagues who are responsible to submit safeguarding referrals as part of their role (the referrer) will receive Level 1 and Level 2 training.

Safeguarding Adults at Risk E-Learning will be refreshed every 3 years or sooner if required for all colleagues.

The Disclosure and Barring Service (DBS) helps employers in England, Wales and Northern Ireland make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. The DBS decides whether it is suitable for a person to be placed on or removed from the barred list.

All colleagues who require a in date DBS check must be conducted by the Disclosure and Barring Service within their roles and responsibilities to maintain compliance with statutory requirements.

Please refer to *DBS Risk Assessment Form & Guidance for Managers and Recruitment Policy* for further reading and information.

## 19. Prevent

### What is prevent?

The Government's counter-terrorism strategy is known as CONTEST. Prevent is part of the strategy and its aim is to stop people becoming terrorists or supporting terrorism. The strategy promotes collaboration and co-operation among public service organisations. The Office for Security and Counter Terrorism in the Home Office is responsible for providing strategic direction and governance on CONTEST.

CONTEST has four key principles:

- ▶ Pursue: to stop terrorist attacks
- ▶ Prevent: to stop people becoming terrorists or supporting terrorism
- ▶ Protect: to strengthen our protection against a terrorist attack
- ▶ Prepare: to mitigate

There is no such thing as a "typical extremist" and those involved in extremism come from a range of backgrounds and experiences.

Both adults at risk and children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include through the influence of family members or friends and/or direct contact with extremist

groups and organisations or, increasingly, through the internet. This can put a person at risk of being drawn into criminal activity and has the potential to cause significant harm.

The risk of radicalisation is the product of a number of factors and identifying this risk requires that colleagues exercise their professional judgement, seeking further advice, as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

- ▶ Noticeable behavioural changes.
- ▶ Expression of extreme views
- ▶ Possession of extremist literature or symbolism
- ▶ Advocating violent actions and means
- ▶ Seeking to recruit others to an extremist ideology

**See ‘Safeguarding Adults at Risk Process & Guidance’ for the referral process in relation to PREVENT.**

## 20. Associated Documents

- ▶ Data Protection Policy
  - ▶ Recruitment Policy
  - ▶ Vulnerability Policy Statement
  - ▶ Safeguarding Adults at Risk Process & Guidance
  - ▶ Safeguarding Concern / PREVENT Reporting Form
  - ▶ Body Map for Reporting Alleged Physical Abuse Concerns Form
  - ▶ DBS Risk Assessment & Guidance
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- Safeguarding Policy
  - Equal Opportunity Policy
  - Allocation Policy
  - Adaptations Policy
  - Anti-Social Behaviour Policy
  - Complaints Policy
  - Domestic Abuse Policy
  - Data Protection Policy
  - Disability Policy
  - Maintenance and Repairs Policy
  - Retention Policy
  - Damp and Mould Policy

## 21. Data Protection

Midlands Rural Housing will treat personal data in line with our obligations under the current data protection regulations and our own Data Protection Policy. Information regarding how resident data will be used and the basis for processing customer data is provided in the Association's Privacy Notice.

## 22. Equality Of Access

It is essential that the Safeguarding of Adult Policy should be equally accessible to our residents. We will ensure that the policy is provided in easy-to-read formats and provide customers access to appropriate support which will include:

- translation of communications into another language
- translation of communications into braille
- use of Language Line interpretation service
- communicating with the resident's advocate, where permission has been granted.

## 23. Review

We will review this Policy every 3 years and/or to address changes in legislative, regulatory, best practice or operational issues.

## 24. Complaints

If you're dissatisfied with the service you have received you can raise a complaint by accessing the relevant association's link below:

[Warwickshire Rural Housing Association](#)

[Peak District Rural Housing Association](#)

[Leicestershire Rural Housing Association](#)

[Northamptonshire Rural Housing Association](#)