



Safeguarding adults policy

1.0 Purpose and scope

This policy sets out our approach to preventing and responding to concerns of abuse, harm, or neglect of adults. A safeguarding concern may arise from a range of sources and what action we take will depend upon the circumstances.

This policy applies to all permanent and temporary staff, consultants, contractors, sub-contractors, partners, volunteers, subsidiaries, executive and non-executive board members, and anyone working on behalf of Notting Hill Genesis (NHG). When we are the landlord or business partner, and the service provider may not have a clear safeguarding approach, our safeguarding policy should be followed.

This policy should be read alongside the [Domestic Abuse Policy](#), [Hate Incidents and Hate Crime Policy](#), [ASB Policy](#), [Modern Slavery Statement](#).

2.0 Definitions

Safeguarding is defined by the Care Act 2014 as 'protecting an adult's right to live in safety, free from abuse and neglect.'

An adult at risk is a person over 18 years old who: has care and support needs (whether or not those needs are being met), is experiencing/at risk of abuse or neglect, and as a result of their care and support needs is unable to protect themselves against the abuse or neglect or the risk of it.

This may include but is not limited to:

- Elderly people experiencing vulnerabilities such as frailty or dementia
- People with a long-term physical or mental disability
- People with a mental health condition
- People with substance or alcohol dependency
- People who are homeless or at risk of being homeless

Abuse is a violation of a person's human and/or civil rights by any other person or persons. The [Care and Support statutory guidance](#) identifies 10 types of abuse:

- Physical abuse – this can be hitting, kicking, choking or other intentional bodily injury.
- Sexual abuse – this can be inappropriate touching or looking, subjecting someone to pornography or any other sexual act which a person does not consent to.
- Financial or material abuse – this can be restricting someone's access to money, stealing their money, pressuring them about their will or any other act which uses someone's money or assets against them.
- Discriminatory abuse – this can be verbal abuse, deliberate exclusion from services or similar treatment based on difference or perceived difference.
- Neglect and acts of omission – this is failure to provide access to food, shelter, clothing or other things that are essential for someone to live safely and comfortably.
- Domestic violence or abuse – this can be incidents of controlling, coercive, threatening, degrading and sometimes violent behaviour, from someone personally connected to you.
- Psychological or emotional abuse – this can be intimidation or threats, undermining someone or enforcing isolation.
- Modern slavery and trafficking in person – this can be someone being forced, tricked or coerced to work or traded for commercial or personal gain.
- Organisational or institutional abuse – this looks like lack of choice, inappropriate use of control over people, inappropriate confinement or lack of personal belongings.
- Self-neglect – this can look like poor personal hygiene, malnutrition, neglecting household maintenance or hoarding.

Perpetrator or alleged perpetrator is a person or organisation who has been named by the witness or victim as the person or organisation responsible for abusing or exploiting a vulnerable adult.

Channel is an early intervention multi-agency panel, made up of safeguarding professionals and local partners. It provides an appropriate support package tailored to the individual's needs, and is designed to assess the risk to individuals and decide whether intervention is necessary.

Prevent is a community safeguarding programme about safeguarding and supporting those vulnerable to radicalisation. It aims to stop people becoming terrorists or supporting terrorism. The Home Office works with local authorities, a wide range of government departments, and community organisations such as housing to deliver the prevent strategy.

Statutory agencies – the NHS, police and local authorities are recognised as three key statutory agencies for leading safeguarding process.

3.0 Guiding principles

We recognise that all staff have a responsibility for the safety and wellbeing of residents and staff. Our approach to safeguarding is guided by the six safeguarding principles enshrined within the [Care Act 2014](#).

Empowerment: We ensure adults at risk are supported and encouraged to make their own decisions and make informed decisions. We do this by making safeguarding personal.

Prevention: It is better to take action before harm occurs. We are proactive in preventing abuse both through our recruitment practices([see section 4](#)) and our training practices (see [section 12](#)).

Proportionality: we seek to provide the least intrusive response appropriate to the risk presented along with statutory agencies.

Protection: We provide support and representation for those in greater need. We support adults at risk in making reports and getting what they need from the safeguarding process.

Partnership: we work collaboratively with services and develop partnerships with them in the communities we serve, to deliver local solutions.

Accountability: We ensure staff know that they are accountable and have a role to play, by ensuring relevant staff are trained on how to spot the signs of and appropriately respond to reports of safeguarding issues.

1.1 Making safeguarding personal

We always prioritise the wellbeing of identified adults at risk when reporting and responding to safeguarding concerns. We understand that adults at risk can sometimes have complex relationships or personal circumstances, and we will use our professional curiosity to explore this. We will listen to adults at risk when making referrals, and aim to get their consent to share information and work toward the outcomes they wish. We respect their choices and will put those at the heart of our approach.

4.0 Preventing the risk of abuse

We recognise the detrimental impact safeguarding incidents can have on individuals, so we aim to prevent safeguarding incidents from occurring (or recurring) wherever possible. We aim to do this through the following organisational practices:

- **Identifying risk and areas of risk:** We rely on available information and our own data to highlight risk factors. We consider national, regional, and local trends that have been linked to abuse and neglect and use these to inform training and how we define abuse. This allows staff to identify abuse and respond appropriately when this occurs.
- **Due diligence:** We exercise an appropriate level of caution or investigation prior to acting or making a decision in relation to agreeing contracts with suppliers and recruiting new staff, by checking references and criminal records of resident-facing staff by completing a disclosure and barring service (DBS) application.

5.0 Identifying potential signs of abuse

If we notice signs of abuse, we will use our professional curiosity to explore the situation by asking questions and listening to our residents rather than making assumptions or accepting things at face value, so we can get a holistic view of the situation and make informed decisions around safeguarding.

In cases investigated by other agencies, we participate fully and co-operate with inquiries, agreeing a lead investigator and an investigation timetable. If we suspect that our staff or practices are causing harm, the investigation will be highlighted to the director of the department, who may choose to seek advice from the safeguarding lead and HR.

6.0 Responding to a report

All resident facing staff may receive reports of safeguarding concerns. Reports can be made in person, via the customer service centre or via MyAccount. Staff will treat all reports seriously and listen empathetically, so witnesses and individuals experiencing safeguarding issues feel supported and believed. Reports can be made by someone experiencing abuse or external parties such as a concerned neighbour, a relative, a contractor, the police or support agencies. Due to data protection, we may not always be able to keep people updated on the management of issues that they report.

Staff are required to record any safeguarding concerns or suspicions on our internal systems as soon as they arise. Once we receive a report or suspect abuse or neglect, staff may do some initial fact-finding to assess if a referral is required. If we need to discuss the concerns or disclosure with the adult at risk to determine if a referral is required, we will explain why we are asking further questions and handle this sensitively.

All concerns are recorded and if we decide a referral is required, it will be submitted by staff to the local authority via their referral process. As part of this process staff may refer to agencies such as safeguarding adults' boards, modern slavery unit, gangmasters and labour abuse authority, Channel or Prevent to inform them of any serious concerns we may have.

We are conscious that residents may include both victims and perpetrators. In cases where a perpetrator is a Notting Hill Genesis customer, we will use an intervention proportionate to the level of risk to manage their behaviour and work with relevant agencies to support action plans and interventions as required. Interventions could include moving home, acceptable behaviour contracts or legal action.

7.0 Multi-agency working

As part of multi-agency working, we will make referrals to local authorities and other relevant support services. If other agencies request further information from us at any stage, we will provide this and attend meetings where required to ensure the safety of the adult at risk. We will also respond to and act in accordance with recommendations that statutory agencies make to support the adult at risk to live safely and independently.

This could include a range of different interventions, including but not limited to adaptations to properties for those who self-neglect, moving home or the way we manage contact with our residents.

Throughout the process, we will maintain clear records about the decisions that have been made and what action has been taken, including any relevant contact with other agencies regarding these decisions.

8.0 Recording, reporting and sharing information

Recording and sharing information is an important aspect of responding to safeguarding concerns and managing risk. To keep adults at risk safe, we will maintain clear records on each safeguarding case.

We keep information confidential as far as possible, but our staff will share information on a need-to-know basis both within the organisation and with the relevant external organisations.

We understand and respect adults' choices and require our residents to consent to share information where there is a safeguarding concern. With the consent of the adult at risk, we share information with the appropriate agencies, who will support the adult at risk in building a plan for their safety. All decisions and consequent action will be recorded, as well as any relevant contact with other agencies regarding these decisions.

If consent is not provided, we will only proceed with sharing our concern if there is either:

- A public interest – for example, not acting will put other adults or children at risk
- A duty of care to intervene – for example, a crime has been or may be committed or without intervention there is a risk to life

When taking decisions about what information to share, we consider how much information we need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and we consider the impact of disclosing information on the information subject and any third parties.

If we know or suspect that a criminal offence has occurred, the customer faces an imminent risk, or if we have any concerns about someone's immediate health and welfare, we notify the emergency services and local authority as soon as possible.

As a recognised partner agency in the Care Act 2014, we support and work with statutory agencies where they have concerns that relate to one of our residents. We respond to all local authority requests regarding safeguarding (sometimes referred to as section 42 requests) in a timely manner to minimise risk to those involved.

9.0 Consent and capacity

We respect adults' rights to be independent, have control, choice and say when sharing information. However, we have a duty and obligation to share information when considering safeguarding interventions. When sharing information, we will consider adults ability to make informed choices about the way they want to live.

We always assume that an adult has the mental capacity to make decisions about their personal safety, unless we have been formally advised otherwise by an appropriate health and/or social care professional or have seen relevant documentation such as lasting power of attorney.

A person's mental capacity is assessed on the basis of their ability to make decisions regarding different aspects of their life. Lacking capacity to make one type of decision does not necessarily mean that the same person lacks capacity to make other types of decision. For example, someone may lack capacity to make decisions about their finances long term, but they may retain the capacity to make decisions about day-to-day issues.

If we suspect that an adult does not have mental capacity, or they are making choices that are putting them and others at risk, we will make a referral to appropriate agencies for an assessment. If a person makes a decision that others think is unwise, this does not automatically mean that the person lacks capacity.

10.0 Preventing risk in the workplace

We take allegations of abuse by staff or anyone working for us in any capacity extremely seriously. Staff should report suspected abuse by staff towards an adult at risk or Notting Hill Genesis as an organisation as outlined in our whistleblowing policy. Where an accusation is made, we will mitigate any potential further risk of harm by:

- Reporting to the local authority and adult multi-agency safeguarding services
- Reporting to the police for investigation of a possible criminal offence
- Working in line with our disciplinary policy (including investigation and potential suspension).

We take guidance from the police and local authority to initiate our own internal investigations and disciplinary processes related to abuse of an adult at risk by staff as safeguarding partners. We share information and fully participate and co-operate with inquiries.

In instances where we are the landlord or business partner, and the service provider or grantee does not have a clear safeguarding adults approach, we will follow our own safeguarding adults and procedure to manage any allegations against their staff.

11.0 Supporting residents without care and support needs

Many individuals may not have care and support needs but may still be at risk of experiencing harm, abuse, and exploitation. Some of this may fall under risk areas such as [Modern Slavery](#), [Domestic Abuse](#) and violence. Often individuals who do not have identified care and support needs will not meet the criteria for a formal local authority safeguarding plan. Nevertheless, it is our duty to protect our residents by working in partnership and sharing information with the relevant specialist agencies, for example the fire brigade or the police.

12.0 Monitoring, evaluation and learning

Safeguarding training is mandatory for some specific roles e.g, housing officer, and will be provided to all staff in these identified roles. Additionally, awareness resources are available on our intranet for all staff to promote understanding of adults at risk or those who are vulnerable to abuse and exploitation, spot the signs of abuse, and what steps to take to prevent and protect individuals from further harm.

We are committed to ensuring our practice and processes align with legislation and best practice and we have established a safeguarding steering group who have oversight and scrutinise our practice. We closely observe reports of abuse and review anonymised cases as part of shared learning. As part of this process, the safeguarding steering group and our executive board receive regular updates from the tenancy

sustainment and safeguarding team leader on the safeguarding programme, risks, and trends in cases.

For quality assurance purposes and to gain insight into our safeguarding culture and good practice, we conduct regular audits. This process helps us identify strengths and gaps and allows us to focus our attention and resources where they are required.

13.0 Our approach

In writing this policy we have carried out assessments to ensure that we are considering equality, diversity, and inclusion.

We also carry out consultation with our staff, residents, and the wider community. If you would like more information about this work, please contact us at policy@nhg.org.uk

14.0 Reference

Further legislations that underpin safeguarding practices and development of this policy are as follows:

- [Health and Social Care Act 2008](#)
- [Care and Support Statutory Guidance 2024](#)
- [Care Act 2014](#)
- [Domestic Abuse Act 2021](#)
- [Data Protection Act 2018](#)
- [London Multi-Agency Safeguarding Policy and Procedures 2019](#)
- [Modern Slavery Act 2015](#)
- [Equality Act 2010](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Mental Capacity Act 2005](#)
- [Human Rights Act 1998](#)
- [Public Interest Disclosure Act 1998](#)
- [Counter Terrorism and Security Act 2015](#)

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