



INNISFREE HOUSING ASSOCIATION

November
2021

Safeguarding Policy

SAFEGUARDING POLICY

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SAFEGUARDING POLICY

1. INTRODUCTION

- 1.1 Innisfree Housing Association (Innisfree) provides housing and support to a wide range of people, some of whom are vulnerable or may be at risk of harm. We actively safeguard children, young people and vulnerable adults, and will respond appropriately if harm is threatened or occurs.
- 1.2 Safeguarding means protecting people's health, wellbeing and human rights, enabling them to live free from harm, abuse and neglect.
- 1.3 We are committed to working collaboratively with Local Authorities and other partner agencies to effectively safeguard vulnerable people.
- 1.4 This policy should be read in conjunction with the Whistleblowing Policy and Domestic Abuse Policy.
- 1.5 The Legal framework in which this policy operates includes:
 - Children Act 1989 and 2004
 - Mental Capacity Act 2005
 - Health and Social Care Act 2008
 - Equality Act 2010
 - Care Act 2014
 - Care standards Act 2000
 - Data Protect Act 2018
 - The Human Rights Act 1998

2. OUR APPROACH

- 2.1 Innisfree understand that abuse can take many forms and can affect many different people in a number of ways. Innisfree is dedicated to supporting tenants and agencies to identify abuse in a proactive and risk-based approach – we promote communication, tenant engagement and early intervention.
- 2.2 Innisfree works within the guidelines of current legislation and aims to achieve best practice within the housing sector. We take into account relevant legislation such as The Care Act 2014, The Children Act 2004, and the Humans Rights Act 1998.
- 2.3 This policy is designed to provide a framework for staff and tenants to help identify early signs of abuse and, where necessary offer guidance of how to suitably safeguard those involved.

3. WHAT IS ABUSE?

- 3.1 Innisfree adopts the definition of abuse as a single or repeated act which causes harm or distress to a person, within a relationship where there is an expectation of trust.
- 3.2 Abuse is any behaviour towards a person that deliberately or unknowingly causes them harm, endangers life, or violates their rights. Abuse may be:
- Physical - any non-accidental act or behavior causing injury, trauma, other physical suffering, or bodily harm.
 - Sexual - sexual behavior or a sexual act forced upon a person without their consent.
 - Emotional – repeatedly being made to feel unhappy, humiliated, afraid, or devalued by others
 - Financial or material – stealing or denying access to money or possessions
 - Neglect – where a person responsible for caring for someone fails to provide appropriate care. This could be not providing food, clothing, shelter, medicine, treatment, or not providing support for their mental health or emotional needs. Self-neglect is where a person has a refusal or inability to cater for their own basic needs like personal hygiene, wearing appropriate clothing, or not seeking assistance for medical issues.
 - Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender, sexuality, disability, or cultural background
 - Institutional – abuse arising from the development of practices which allows the abuse of residents

4. POLICY AIMS

4.1 The aims of this policy are to:

- Take a holistic approach to preventing and ending abuse of vulnerable adults, children and young people in our homes and neighbourhoods. We focus on identifying early signs of abuse and spreading awareness of these signs.
- Demonstrate accountability, leadership, and commitment
- Communicate clearly in an open and transparent way with all parties involved
- Engage, empower, and reassure our tenants and staff to understand what abuse is, their rights in their home, and how to seek help
- Promote a safe space for tenants and staff to report their concerns
- Ensure that Innisfree build and maintain strong relationships with external agencies to encourage a positive multi-agency approach towards safeguarding
- Take a risk-based approach to reports of safeguarding concerns, and employ meaningful and early intervention and enforcement, so as to prevent people from further harm
- Enable tenants to report concerns for safeguarding easily
- Signpost tenants to external agencies for support where necessary and appropriate
- Provide support to victims of abuse
- Provide support and training to staff to enable them to work confidently with tenants, and to provide them with a range of tools for intervention and enforcement

5. SAFEGUARDING VULNERABLE ADULTS

5.1 Innisfree defines an adult at risk as person over the age of 18 who:

- Has care and support needs, regardless of whether these needs have been acknowledged by an authority
- Is experiencing or is at risk of abuse and neglect
and
- As a result of their care and support needs, is unable to protect themselves against abuse, neglect, or the risk of it

5.2 This policy uses guidance from the Department of Health's Care and Support Statutory Guidance 2017 issued under the Care Act 2014. The Care Act outlines six principles that underpin adult safeguarding work:

- **Empowerment** – the personalisation of support, and the presumption of person-led decisions, with informed consent
- **Prevention** – taking steps to take action before harm occurs
- **Proportionality** – tailoring responses to ensure our reaction is appropriate to the risk presented
- **Protection** – support and representation for those in greatest need, using a risk-based approach
- **Partnership** – working with local services within the community to prevent, detect and report neglect and abuse
- **Accountability** – a duty to co-operate with local authorities to implement their statutory duties around safeguarding

5.3 Abuse against vulnerable adults may include the following:

- **Physical abuse** - punching, hitting, pinching, burning, and misuse of medication, excessive restraint and forced feeding
- **Sexual abuse** - sexual activities when the victim does not want to participate in the activity, or they have not consented, they do not understand or have the capacity to understand
Examples include rape or sexual assault, inappropriate touch, sexual teasing, innuendo, sexual harassment, indecent exposure, sexual photography, or forced use of pornography.
- **Psychological abuse** - threats, intimidation, humiliation, bullying, harassment, verbal abuse, enforced isolation, preventing access to services, preventing choice and opinion, and addressing someone in an infantile or patronising way.
- **Financial or material abuse** - using property, assets, income of adults who are vulnerable without their consent and making financial transactions for adults who do not have mental capacity. This could include preventing them from accessing their own money.
- **Discriminatory abuse** – service or care given influenced negatively by an aspect of the individuality of the victim. For example,
 - Unequal treatment based on a protected characteristic such as age, gender, religion, race, or sexuality
 - Verbal abuse, derogatory remarks, exclusion
 - Hate crime and antisocial behaviour

- **Institutional abuse** - the mistreatment of people brought about by poor or inadequate care or support. For example, lack of leadership and supervision, lack of respect and dignity, not providing assistance with activities of daily living, not offering choice or promoting independence, and failure to respond to complaints.
- **Self-neglect** - this covers behaviour relating to neglecting to care for one's health, personal hygiene and surroundings, and behaviour like hoarding

6 SAFEGUARDING CHILDREN AND YOUNG PEOPLE

- 6.1 Innisfree define a child or young person as anyone under the age of 18. Their status and entitlements to services and protection remains the same regardless of whether they are living independently, in further education, a member of the armed forces, is in hospital, or in custody.
- 6.2 Definitions of child abuse are included in The Children Act 1989:
- **Emotional abuse** - can or has potential to have severe negative effects on the behavioural or emotional development of a child/young person. Examples include: rejection and ill treatment which occurs continually
 - **Physical abuse** - possible or actual physical injury to a child/young person, moreover, a failure to protect a child/young person from injury
 - **Sexual abuse** - sexual exploitation of a child/young person
 - **Neglect** - this is the failure to protect a child/young person from risk of danger. Examples include: aspects relating to care, like starvation
- 6.3 The following factors may make children more vulnerable to abuse, as set out by Working Together to Safeguard Children (2010):
- Domestic abuse
 - Multiple disadvantage and poverty
 - Parental mental illness
 - Parental problem drug misuse (particularly heroin and crack)
 - Parents with a learning disability
 - Parental problem drinking

7 REPORTING A SAFEGUARDING CONCERN

- 7.1 Tenants, staff and contractors that are experiencing or have concerns for abuse can report their concerns to any member of staff in writing, by email, in person, or over the phone.
- 7.2 We offer a supportive and safe environment for people who are suffering from abuse to report it.

8 HOW WE RESPOND TO A SAFEGUARDING CONCERN

- 8.1 Safeguarding is everyone's responsibility. Innisfree believe that all vulnerable adults, children, and young people have rights as individuals and should be treated with dignity and respect.
- 8.2 We recognise all young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and / or sexual identity have the right to safeguarding from abuse when living in an Innisfree property, visiting a property or working with any member of staff employed by Innisfree.
- 8.3 All incidents of abuse will be taken seriously and responded to swiftly and appropriately. When we receive a report of abuse, a Housing Officer will contact the victim or witness within one working day to take a full report of their concerns and complete a risk assessment. We will record the information on our housing management system.
- 8.4 The Housing Officer will refer to the Safeguarding Procedure – and will report concerns to the Local Authority Adult and Children Social Services Departments or the Police. It is the responsibility of each member of staff to report any concerns about abuse to the Safeguarding Lead Officer (Operation Director), in their absence, the Chief Executive.
- 8.5 It is the responsibility of the Adult and Children Social Services Department and the Police to conduct, where appropriate a joint investigation.
- 8.6 All Innisfree staff, contractors, and agencies are responsible for taking action to ensure all vulnerable people are safeguarded.
Information suggesting that a person is in need of safeguarding could come from a number of sources:
 - Directly from a vulnerable adult
 - A tenant who suspects someone may be a victim of abuse
 - A concern arising from an observation
 - From a relative or friend or other service user, another member of staff
 - From a person unable to speak or represent themselves
 - A member of the public raising a concern
- 8.7 Innisfree remind all staff concerned that the Whistle Blowing Policy can be exercised where another member of staff is suspected of abuse.

9 INNISFREE RESPONSIBILITIES

- 9.1 Safeguarding is everyone's responsibility – if any members of staff have concerns for abuse or a safeguarding issue, these concerns to be forwarded to the Housing Team for investigation.
- 9.2 All staff will ensure that they maintain clear and professional boundaries at all times.
- 9.3 All staff will be aware of the different types and indicators of abuse and be familiar with this Policy.
- 9.4 All staff will undertake training on safeguarding awareness.
- 9.5 Housing Officers will manage all safeguarding and vulnerability concerns relating to tenants and household members. They will:
 - Identify vulnerable adults, children, or young people at risk
 - Signpost them to appropriate agencies for support
 - Raise a safeguarding concern with the relevant Local Authority or Police force, where necessary.
- 9.6 The Safeguarding Lead Officer is the Operations Director. They will:
 - Embed safeguarding practices throughout Innisfree and oversee safeguarding training
 - Ensure that safeguarding concerns for abuse and neglect within our homes are reported to the relevant Local Authority safeguarding teams
 - Review individual safeguarding cases
- 9.7 Our Office Services Manager will:
 - Ensure the necessary Disclosure and Barring Service (DBS) checks are undertaken when recruiting new members of staff
 - Review existing employment checks where required

10 CONSENTING TO A SAFEGUARDING REFERRAL

- 10.1 A key aspect of the Care Act 2014 is putting the victim at the centre of the safeguarding process.
- 10.2 If verbal consent has not been received from the adult at risk, we will try to seek consent before sharing information outside of Innisfree. Where consent is not given, the Housing Officer will discuss the case with the Safeguarding Lead Officer – it may be appropriate to override the need for consent to safeguard the victim. Where this happens, a record of the conversation and reasons for overriding consent will be recorded on our housing management system.
- 10.3 If the victim does not give consent to make a safeguarding referral and there are insufficient reasons to override consent, where appropriate we will send a letter to the tenant outlining the action plan and confirming that the actions were not undertaken as they did not give their consent.
- 10.4 If a child safeguarding concern arises, consent is not needed, and the concerns must be reported.

11 THE MENTAL CAPACITY ACT 2005

11.1 Adult safeguarding revolves around the principle that every adult has the right to make their own decision. There are 5 key principles under the Mental Capacity Act 2005:

- **Presumption of capacity** – every adult has the right to make their own decisions and must be assumed to have capacity to do so unless proved otherwise
- **Individuals being supported to make their own decisions** – a person must be given all practicable help before anyone treats them as not being able to make their own decisions
- **Unwise decisions** – people have the right to make decisions that others might regard as unwise or eccentric. However, if an unwise decision is related to exploitation or undue influence then further advice should be sought from social care
- **Best interests** – anything done for or on behalf of a person who lacks capacity must be done in their best interests
- **Least restrictive options** – anything done for or on behalf of a person who lacks capacity should be the least restrictive of their basic rights and freedoms

12 DATA SHARING

12.1 All information will be stored in our Housing Management systems. All case notes, case files, and personal information will be kept confidential in line with the Data Protection Act 2018. We will adhere to the Data Protection Act and comply with General Data Protection Regulation for Sharing Personal Information to ensure that we maintain confidentiality of all parties.

12.2 We will share information with third parties where we have an information sharing protocol in place, if there are safeguarding concerns, or we have a duty to do so for the purpose of crime prevention under the provisions of the Crime and Disorder Act 1998, and the provisions of the Data Protection Act 2018 (and any other relevant legislation) justify it.

13 EQUALITY, DIVERSITY, AND INCLUSION

13.1 We are committed to embedding the Equality Act 2010 into our Policies and Procedures. As part of this commitment, staff should facilitate reasonable adjustments and adapt our standard policies and procedures wherever possible, in order to ensure every individual can report safeguarding concerns.

13.2 To make an adjustment means to change work practices to avoid or correct the disadvantage to a person with a disability. This may include:

- Allowing more time than we would usually for someone to provide information that we needed.
- Providing specialist equipment or additional support such as a sign language interpreter.

14 CONSULTATION AND REVIEWING THIS POLICY

14.1 Innisfree will consult with tenants on this policy via our website and newsletter.

14.2 All open cases will be reviewed regularly by the Housing team and by the Operations Director to assess the effectiveness of the actions being taken in line with the Policy.

14.3 This Policy will be reviewed and updated in accordance with changes in legislation and guidance on the safeguarding of children and vulnerable adults or any changes within Innisfree Housing Association.



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Version: Innisfree Safeguarding Policy November 2021
