

Safeguarding Adults Policy

1.0 Policy statement

1.1 This policy sets out Stonewater's approach towards safeguarding adults at risk from harm and abuse. It is supported by Safeguarding procedures and training, and related policies, such as:

- Vulnerable Customer's policy
- Safeguarding Children policy
- Anti-Social Behaviour policy
- Domestic Abuse policy
- Whistleblowing Policy
- Confidentiality Policy
- Data Protection Policy
- Health and Safety Policy

2.0 Policy scope and objectives

2.1 The Safeguarding policy and procedures will:

- Define Stonewater's organisational and management responsibilities, including contractors working on behalf of Stonewater.
- Detail the potential signs of abuse and neglect to vulnerable adults at risk and guidance in identifying signs of abuse.
- Detail the processes colleagues will follow, including how Stonewater will ensure a multi-agency approach to reporting and dealing with safeguarding concerns and incidents.

2.2 This policy applies to all adult colleagues, customers and agents working on behalf of Stonewater and any person who accesses Stonewater services. This will include non-customers of Stonewater, for example attendees at estate open days or visitors to Stonewater properties.

2.3 Safeguarding in regard to Stonewater means protecting our customers' right to live safely, free from abuse and neglect through Stonewater working with our partners and other organisations to prevent and stop both the risks, and the experience of, abuse or neglect, whilst at the same time making sure their wellbeing is promoted and their preferences taken into account.

2.4 This policy does not apply to children. Please see our Safeguarding Children Policy in respect of children.

3.0 Policy definitions

3.1 Stonewater will adopt the following definitions:

3.1.1 Vulnerable adults at risk:

- 3.1.1.1 A vulnerable adult at risk may become at risk of abuse because of their needs for care and support (whether or not the local authority is meeting those needs) and is experiencing, or at risk of abuse and neglect. As a

result of those needs, they are unable to protect themselves from either the risk of, or the experience of, abuse and neglect. This may include their ability to communicate or making known their wishes and needs.

- 3.1.1.2 Examples of adults who may become at risk of abuse may be because they have a high degree of dependency on others, in need of community care or specialist services due to mental health needs, physical or learning disability, age or illness and may include their ability to communicate or making known their wishes and needs.
- 3.1.1.3 Stonewater's definition of vulnerability can be found in their Vulnerable Customer policy, however, not all vulnerable adults are at risk of abuse.

3.1.2 Abuse and neglect

- 3.1.2.1 Abuse and neglect take many forms and can be caused by single or repeated acts or a failure to act by any other person or persons, or in the case of self-neglect, the victim themselves. The circumstances of each individual case will be considered as to not limit what constitutes abuse or neglect.
- 3.1.2.2 Guidance on the types of abuse and neglect is detailed in the Safeguarding procedure. Stonewater will treat as a safeguarding concern where a vulnerable adult at risk is suspected to be involved in either;
 - Physical abuse.
 - Domestic abuse in all forms (refer to the Customer Domestic Abuse Policy).
 - Sexual abuse.
 - Psychological abuse.
 - Financial or material abuse.
 - Human trafficking and modern slavery.
 - Discriminatory abuse.
 - Organisational abuse.
 - Neglect and acts of omission.
 - Self-neglect.
 - Self-Harm.
- 3.1.2.3 Self-neglect is when someone neglects to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, heating, sleeping, or tending appropriately to any medical conditions they have. Hoarding can also result in self-neglect.

4.0 Engagement with local authorities

- 4.1 The Care Act 2014 states that local authorities must promote wellbeing when carrying out any of their adult care and support functions. Wellbeing is a broad concept and relates to areas which include protection from abuse and neglect, personal dignity and control, physical, emotional and mental health, suitable accommodation and domestic and social wellbeing.
- 4.2 Local authorities have the primary responsibility for safeguarding adults. They must provide mechanisms for safeguarding concerns to be raised, respond to

those alerts and have a local Safeguarding Adult Boards (SAB) to holistically manage safeguarding cases (see below). The objective of SABs is to help and protect adults in its area, by co-ordinating all of the relevant organisations, reviewing information and proposing a resolution to safeguard the relevant individual. This must be a person centred approach with the least intrusive methods of intervention, where necessary, implemented.

- 4.3 Where a SAB requests information or evidence in furtherance of their work, Stonewater has a duty to comply insofar as able to in accordance with relevant laws, such as data protection.

4.4 Safeguarding duties, commitments and principles

- 4.4.1 Due to the nature of our work, Stonewater will be in contact with vulnerable adults at risk throughout their day to day activities and are required through law, their regulator and their organisational objectives to have clear policies and procedures on Safeguarding and working with local agencies. These requirements are detailed in *Appendix 1: Legal and Regulatory Provisions*.

- 4.4.2 Stonewater is committed to safeguarding adults at risk by working with partners to uphold the six principles of the Care Act 2014: empowerment, prevention, proportionality, protection, partnership, and accountability.

4.5 Empowerment – Person-led decisions and informed consent

- 4.5.1 We ensure customers know how to report safeguarding concerns and the support available.
- 4.5.2 Our person-centred approach involves listening, believing, and respecting each individual's needs and preferences.

4.6 Prevention – Taking action before harm occurs

- 4.6.1 We raise awareness of abuse through online platforms, events, and noticeboards.
- 4.6.2 We keep up-to-date records on customer needs to inform safeguarding.
- 4.6.3 Colleagues with access to or working with vulnerable adults undergo appropriate disclosure barring service (DBS) checks.

4.7 Protection – Support for those most at risk

- 4.7.1 We take reasonable steps to protect customers, including re-housing when needed.
- 4.7.2 All Colleagues and contractors share responsibility for identifying and responding to safeguarding concerns.
- 4.7.3 We uphold individuals' rights to make their own decisions and refer to Adult Social Care when mental capacity is in doubt, ensuring a proper assessment.
- 4.7.4 Information is shared appropriately with relevant agencies, such as MAPPA, in line with safeguarding requirements.

4.7.5 We continuously learn from incidents and reviews to improve policy, training, and practice.

4.8 Partnership – Working with communities for local solutions

4.8.1 We build strong, formalised relationships with local authorities and safeguarding partners.

4.8.2 We collaborate in safeguarding investigations, including:

- Referrals to local authorities or police.
- Participation in Safeguarding Adults Boards.
- Supporting reviews and enquiries.
- Maintaining accurate, secure records.
- Sharing relevant information with partners.

4.9 Accountability – Transparency and responsibility in safeguarding

4.9.1 We keep policies and procedures up to date and ensure Colleagues awareness.

4.9.2 Our Safeguarding Adults Leads (Head of Specialist Services and Customer Experience Director) oversee strategy, policy, and reporting to the Board.

4.9.3 We monitor safeguarding data to identify trends, inform improvements, and promote best practice.

4.9.4 All relevant Colleagues and agents receive appropriate training and understand their safeguarding responsibilities.

4.9.5 We follow Stonewater's Safer Recruitment Procedure when hiring for roles involving safeguarding duties.

5.0 Key responsibilities of all colleagues

5.1 Stonewater is committed to creating a culture where safeguarding is embedded throughout the organisation. Safeguarding is everyone's responsibility, and all colleagues must understand their role in protecting adults at risk. All colleagues and contractors will be required to:

- Read and understand this policy and associated procedures.
- Be aware of the signs of abuse, neglect, and exploitation.
- Know how to raise safeguarding concerns promptly and appropriately.
- Attend required safeguarding training and refresher.

6.0 Service standards

6.1 Record Keeping

- 6.1.1 Full details on recording and reporting allegations of abuse are provided in Stonewater's Safeguarding Adults at Risk Procedure.
- 6.1.2 Case Management reviews between colleagues and their manager will look at case progress and handling and ensure quality assurance in how we manage safeguarding cases.
- 6.1.3 The Safeguarding Lead will produce an Annual Safeguarding report for the Board which will provide an overview of safeguarding activity in the year.

6.2 Agency managed services

- 6.2.1 Agencies providing support services will be expected to have their own equivalent safeguarding policies in place. Their responsibilities in this regard will be managed through Stonewater's contractual relationship with them. Agencies are required to report safeguarding concerns to the Local Authority, their service regulator (e.g. Care Quality Commission) and to Stonewater.

6.3 Contractors and agents

- 6.3.1 Contractors working on behalf of Stonewater and visiting homes may encounter evidence of abuse and neglect within the property. Customers may also choose to disclose incidents, so awareness in sensitively preserving or taking evidence and handling reports will be necessary. Contractor organisations will be expected to ensure that they comply with Stonewater's Code of Conduct for Maintenance Contractors, including:
 - Ensuring that colleagues are suitable for the capacity employed, and have relevant DBS checks in place.
 - Ensuring that colleagues receive suitable training on how to deal with Customers, including how to report any concerns they have.
 - Ensure that colleagues are aware of and utilise reporting tools and procedures as specified by Stonewater.
- 6.3.2 Stonewater will monitor the performance of their contractors, compliance with Stonewater's Code of Conduct for Maintenance Contractors and compliance with this policy through regular Contract Meetings.
- 6.3.3 When procuring relevant services / personnel safeguarding questions will be included as part of the procurement exercise where safeguarding risks may exist.

6.4 Whistle Blowing and allegations of abuse by colleagues / contractors

- 6.4.1 If a colleague suspects that someone is being abused by another Stonewater colleagues, they should immediately speak to their line manager or the People Team. Where there is a failure to respond appropriately to allegations of abuse, or where colleagues have concerns that a colleague or superior is responsible for the abuse, colleagues must follow Stonewater's Whistleblowing Policy.

6.4.2 Allegations of abuse towards a customer by colleagues, will be dealt with in line with HR procedures. If a suspected criminal activity is alleged to have taken place, the Police will be notified.

6.4.3 If an allegation of abuse is made about a contractor, the contractor will be expected to investigate in line with their procedures. The contractor may be asked not to return to a Stonewater property while the investigation is taking place.

6.5 Customer Voice in safeguarding

6.5.1 We are committed to ensuring our policies are customer friendly and ensure a positive customer experience.

6.5.2 Whilst Safeguarding is a statutory obligation and a sensitive area, we will proactively aim to get feedback from customers about how we managed their case when it is appropriate for us to do so.

6.5.3 We take a personalised and collaborative approach to safeguarding and wherever possible, we seek customer consent before making a referral, ensuring that individuals are involved in shaping the support they receive and that their wishes, feelings, and experiences guide our actions.

6.6 Confidentiality and information sharing

6.6.1 Stonewater's Confidentiality Policy and Document Retention Schedule should be referred to.

6.6.2 We will respect confidentiality at all times and will not share any information given in confidence unless justified by the assessed risk to the adult at risk or required by law.

6.6.3 Where appropriate, we will discuss our approach to confidentiality with the customer where there are safeguarding concerns. We will be honest and explain that information might need to be shared with other organisations in order for them to respond or resolve a safeguarding issue.

6.7 Decisions about what information is shared and with whom will be taken on a case-by-case basis. Whether information is shared with or without the adult at risks consent, the information shared should be:

- Necessary for the purpose it is being shared.
- Shared only with those who have a need for it.
- Accurate and up to date.
- Shared in a timely fashion.
- Shared accurately.
- Shared securely.

6.8 Consent

6.8.1 In most cases, before we can refer a safeguarding concern to the local authority, we will seek the person's permission. We will make a referral without their consent if:

- There is a serious risk of harm (e.g., their life is at risk or they are experiencing abuse that is harming their mental or physical health).
- Asking for consent could put them in greater danger.

6.8.2 In all cases, we prioritise the person's safety and well-being.

6.9 Complaints

6.9.1 Customers that do not feel satisfied with our service in relation to Safeguarding may wish to make a formal complaint. Stonewater has a Complaints Policy providing information about how to complain about our services. Alternatively, a customer may also wish to contact the relevant Local Authority Safeguarding Adults Board if they feel that Stonewater have not provided an adequate service.

7.0 Equality, diversion and inclusion

7.1 Actions taken in relation to safeguarding, should always be appropriate to the adult at risk; they should not discriminate because of disability, age, gender, sexual orientation, race, religion, culture or lifestyle.

7.2 Stonewater will ensure that we address barriers to disclosure for those with protected characteristics. This will include ensuring that information on safeguarding adults is available to customers in a range of formats and languages, providing bespoke support dependent on the persons needs throughout a safeguarding process, this could be an advocate or an interpreter, for example.

8.0 Quality assurance and monitoring

8.1 We will ensure that all safeguarding cases are subject to a case management review and not dealt with in isolation.

8.2 Colleagues who require safeguarding training will be required to do this on a three yearly basis.

8.3 The Safeguarding Lead will produce an Annual Safeguarding report for the Board which will provide an overview of safeguarding activity in the year.

8.4 We will use feedback from customers to better shape our responses around safeguarding and handling of safeguarding cases.

8.5 We regularly monitor and review our safeguarding practice to ensure effectiveness and continuous improvement. Key measures include:

- We will undertake regular case reviews of safeguarding cases.
- Training participation rates will be monitored to ensure Colleagues are equipped with up-to-date safeguarding knowledge.
- We will review timeliness of referrals made to Local Authorities, the speed and appropriateness of responses to safeguarding concerns and

undertake quarterly analysis of referral rates to identify trends and areas for focus.

Last issued: 29.8.2025

Next review date: 29.8.2028

Appendix 1 –Legislation and regulations

Care Act 2014 (and Care and Support Statutory Guidance Issued under the Care Act)

- Sections 42-47 of the Care Act defines Safeguarding adults, provides details of the local authorities duties and the supply of information and co-operation by other relevant organisations. Section 45 of the Care Act 2014 provides the specific guidance on the supply of information which Stonewater must comply with.
- The Act sets out a statutory basis for safeguarding adults and the legal duties that local authorities will have to fulfil in their lead and coordination roles. The supporting Statutory Guidance on adult safeguarding replaces previous 'No Secrets' official guidance.

Mental Capacity Act 2005

- The Mental Capacity Act 2005 provides the framework to empower and protect people who may lack the capacity to make some decisions for themselves at a given time. We presume that adults have the mental capacity to make informed decisions about their own safety and how they lead their lives. However, some of our customers will have been assessed under the Mental Capacity Act (MCA) as lacking capacity in certain areas – which may include lacking capacity to give informed consent to a safeguarding referral.
- Where a colleague has concerns about a customer's mental capacity they should speak with their manager.
- As a Registered Provider, Stonewater are not statutory partners under this act but are obliged to:
 - Attend and provide information for Local Safeguarding.
 - Adults Boards if necessary. Housing providers will also be asked to participate in relevant Safeguarding Adult Reviews; (although not a statutory requirement, housing may be asked to).
 - co-operate with local authorities in enquiries of suspected adult safeguarding concerns - these may result in us taking action to protect the adult from any actual or risk of abuse or neglect as part of a safeguarding plan;
 - have a safeguarding policy and procedure;
 - keep clear and accurate records of adult safeguarding allegations, responses and actions, then share these with appropriate organisations when in the best interest of the person; and

- Have a Safer Recruitment procedure for required posts.
- Have oversight of Safeguarding training for required posts.

Domestic Abuse Act

- The Domestic Abuse Act 2021 sets out expectations, support and legislation for survivors of domestic abuse. Domestic Abuse is a category of abuse covered in the Care Act and recognised as abuse by Local Authorities. For more details refer to Stonewater's Customer Domestic Abuse Policy.

Prevent Strategy 2011, and Revised Prevent duty guidance for England, 2021

- This guidance talks about specific organisations having due regard to the need to prevent people from being drawn into terrorism and identify groups or individuals who are at risk of being drawn into terrorism / radicalisation.

Sex Offences Act 2003

This act strengthened measures to protect the public from sexual offending.

Part 1 of the act:

- Sets out that any sexual activity involving children under the age of 16 is unlawful, even with consent - this includes exploitation; and
- Provides specific protection from abusive sexual activity for those adults with an 'arrested or incomplete development of mind, psychiatric disorder and any other disability of the mind'.

Safeguarding Vulnerable Groups Act 2006

This act sets out the responsibility we have for vetting and barring people working with children and vulnerable adults.

Data Protection Act 2018

The Act controls how your personal information is used by organisations, businesses or the government. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- Used fairly, lawfully and transparently.
- Used for specified, explicit purposes.
- Used in a way that is adequate, relevant and limited to only what is necessary.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary.

- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

Protection of Freedoms Act 2012

Part 5 of this act created the current disclosure, vetting and barring scheme, which applies to people working with or has access to children and vulnerable adults.

The Disclosure and Barring Service is now responsible for assisting employers, such as Registered Providers, in England and Wales make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups.

Domestic Abuse Act 2021

The 2021 act defines domestic abuse and mitigates for children as victims of Domestic Abuse when witnessing domestic Abuse. Further guidance available in Stonewater Domestic Abuse Policy.