Rolig Homes
Transforming Lives One Home at a Time

Safeguarding Adults Policy

1.0 Introduction

1.1 Rolig Homes is not a statutory partner. However, it recognises its legal obligations and takes adult safeguarding seriously. As required by law and regulation and in alignment with its mission, vision and values, adopt clear safeguarding policies and procedures and work with local agencies to ensure the safeguarding of vulnerable adults at all times in all aspects of its operations and practices and in collaboration with:

2.0 Scope

2.1 Safeguarding is everyone's responsibility. This policy applies across Rolig Homes. It applies to Rolig Homes Directors, all Rolig Homes employees, contractors, volunteers and all those managing or providing services for or on behalf of Rolig Homes.

2.2 This policy is specifically for the purpose of safeguarding vulnerable adults at risk of neglect and abuse as defined in the Care Act 2014.

3.0 Definition of Terms

3.1 For the purposes of this policy, the following definition of terms is adopted:

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect.

Wellbeing The "wellbeing principle" is a guiding principle placed at the heart of The Care Act 2014 in respect of every persons care and support. Wellbeing is acknowledged by the Care Act Guidance (updated 2022) as a broad concept. It is described therein (s.1.5), and therefore adopted for the purposes of this policy, as relating to the following areas in particular:

- personal dignity (including treatment of the individual with respect);
- physical and mental health and emotional wellbeing;
- protection from abuse and neglect;
- control by the individual over day-to-day life (including over care and support provided and the way it is provided);
- participation in work, education, training or recreation;
- social and economic wellbeing;
- domestic, family and personal;
- suitability of living accommodation;

- the individual's contribution to society.

Types and indicators of abuse:

Physical	Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable (e.g. opening a window and removing blankets), involuntary isolation or confinement, misuse of medication (e.g. over-sedation), forcible feeding or withholding food, unauthorised restraint, restricting movement (e.g. tying someone to a chair), domestic violence or abuse.
Sexual	Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing of sexual acts, indecent exposure.
Psychological/Emotional	Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying.
Financial/material	Theft of money or possessions, fraud, scamming, preventing a person from accessing their own money, benefits or assets, employees taking a loan from a person using the service, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care home. Misuse of benefits or direct payments in a family home, someone moving into a person's home and living rent free without agreement or under duress, false representation, using another person's bank account, cards or documents, exploitation of a person's money or assets, e.g.

	unauthorised use of a car, misuse of a power of attorney, deputy, appointee-ship or other legal authority, rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.
Modern Slavery	Human trafficking, forced labour, domestic servitude, sexual exploitation e.g. escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to.
Discriminatory	Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010), verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic, denying access to communication aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic, substandard service provision relating to a protected characteristic.
Neglect or acts of omission	Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure to administer medication as prescribed, refusal of access to visitors, not taking account of individuals' cultural, religious or ethnic needs, not taking account of educational, social and recreational needs, ignoring or isolating the person, preventing the person from making their own decisions, preventing access to glasses, hearing aids, dentures etc., failure to ensure privacy and dignity.
Self Neglect	Lack of self-care to an extent that it threatens personal health and safety, neglecting to care for one's personal hygiene, health or surroundings, inability to avoid self-harm, failure to seek help or access services to meet health and social care needs, inability or unwillingness to manage one's personal affairs.
Domestic	Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.
Organisational or Institutional	Discouraging visits or the involvement of relatives or friends, run-down or overcrowded establishment, authoritarian management or rigid regimes, lack of leadership and supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful attitudes towards people using the service,

	inappropriate use of restraints, lack of respect for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or assistance with eating, not offering choice or promoting independence, misuse of medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence or communication, failure to respond to complaints.

4.0 Legislation and Regulation

4.1 As service providers Rolig Homes will respect the views, feelings, beliefs and wishes of the individuals they support.

4.2 The Care Act (Section 42-47) defines Safeguarding adults, gives a definition of adults at risk, the roles and responsibilities of a range of organisations and how these organisations must work together in response to adult safeguarding concerns. The Act lays down the statutory basis for safeguarding adults and the legal duties local authorities must fulfil in their lead and coordination roles.

4.3 Statutory Guidance on care and support was updated in 2023.

5.0 Policy Statement

5.1 The Care Act 2014 sets down the requirements placed on local authorities to promote wellbeing when undertaking their adult care and support functions to help improve people's independence and wellbeing and Rolig Homes will work to its remit. This includes protection from abuse and neglect, personal dignity and control, physical, emotional and mental health, suitable accommodation and domestic and social wellbeing.

5.2 Whilst Rolig Homes is not a statutory partner, the organisation recognises its legal obligations and takes adult safeguarding seriously. We will, as required by law and regulation and in alignment with its mission, vision and values, have clear safeguarding and whistleblowing policies and procedures.

5.3 Local authorities take the lead responsibility for safeguarding adults and ensuring they provide services to people in need of care and support, and that they respond to concerns relating to harm and abuse. Adult services directors and lead councillors provide a leadership role in safeguarding across councils, organisations and in communities.

5.4 With their expertise in managing cases of abuse, and providing victims of abuse with support and counselling as well as assisting with police investigations, Safeguarding Adult Boards (SABs) are responsible for co-ordinating safeguarding and carrying out reviews.

5.5 The police are statutory members of the SAB and Police and Crime Commissioners work to ensure their force is effective in offering protection and access to justice where adults are in need of care and support. Where crime is suspected the criminal justice system and the police will lead.

5.6 The police also play a key role in the promotion of community safety and work with Community Safety Partnerships to identify vulnerable adults at risk of abuse due to their need for care and support. They do this whether or not needs are being met by the Local Authority where someone is at risk of abuse and neglect and, as a result of their needs, they are not able to protect themselves from the risk or experience of it.

5.7 Working with its partners Rolig Homes will, at all times, aim to protect and maintain customer safety and wellbeing by:

- ensuring employees are aware of the signs and indicators of abuse;
- identifying abuse where it is reasonable to do so as part of providing services to adults;
- alerting partner agencies as appropriate where there is an adult safeguarding issue;
- maintaining records of safeguarding concerns;
- recruiting and supervising employees appropriately;
- in line with the Data Protection Act and UK General Data Protection Regulation, use agreed protocols;
- reviewing safeguarding cases to ensure lessons are learned from reviews and that safeguarding is managed within the Rolig Homes culture of continuous improvement;
- establishing performance measures;
- raising awareness of safeguarding with customers;
- providing appropriate safeguarding training.

5.8 Rolig Homes will work with local agencies to ensure the safeguarding of vulnerable adults and children (see the Rolig Homes Safeguarding Children Policy) at all times in all aspects of its operations and practices, and to ensure compliance will:

- appoint a Safeguarding Strategic and Operational Lead for the organisation. The Safeguarding Strategic and Operational Lead will be the Chief Executive Officer (CEO);

- ensure Rolig Homes has a safeguarding policy and procedure;
- ensure robust recruitment practices and training include safeguarding considerations;
- maintain clear and accurate records of all adult safeguarding allegations including the responses made and actions taken, sharing the information as appropriate when this is in the best interests of a vulnerable adult;
- attend Local Safeguarding Adults Boards (SABs) if necessary, although this is not a legal requirement, provide information to them, and participate in relevant safeguarding adult reviews as requested;
- co-operate with local authority enquiries where suspected adult safeguarding concerns are raised and, where outcomes require it, protect the adult from actual, or risk of, abuse or neglect as part of a safeguarding plan;
- review all safeguarding incidents and adopt a lessons-learned approach to inform future practice.

5.9 Safeguarding is about people and organisations working in partnership to prevent and stop the risks and experience of abuse or neglect. Synonymous with this, and building on the Mental Capacity Act, they must ensure an adult's wellbeing is promoted. In addition and, where appropriate, the views, wishes, feelings and beliefs of a person must be given due regard in deciding on actions and it must be assumed that the person receiving care and support best knows their own desired outcomes, goals and wellbeing regardless of their medical condition or disability. Assumptions should not be made as to what matters most to the person.

5.10 Rolig Homes will work in alignment with the Mental Capacity Act which requires an assumption that people have capacity and can make decisions for themselves. Unless otherwise established, every adult has the right to make his or her own decisions in respect of his or her care and support, and must be assumed to have capacity to do so unless it is proved otherwise. It must not be assumed that someone cannot make a decision for himself or herself just because they have a particular medical condition or disability (see 10.60 of the Statutory Guidance on Care and support, updated April 2022).

Safeguarding Adults and Vulnerable People Procedure

6.0 Procedures

6.1 It is the responsibility of every board member, all Rolig Homes employees, contractors, volunteers and all those managing or providing services for, or on behalf of Rolig Homes, to report any safeguarding issues of concern.

6.2 An employee who becomes aware that a safeguarding concern has arisen has a duty to inform the local safeguarding teams of that concern. Ideally, it would be best practice to discuss this referral with the Chief Executive Officer or Chief Operating Officer or a Tenancy Sustainment Manager before making a referral, but it is recognised that this is not always possible.

6.3 Any employee can raise a safeguarding alert and must do so either on the appropriate form stored in the safeguarding area of the SharePoint site or using the direct access form on the Local Authority website.

6.4 Where a Local Authority database has been used to complete a referral, a copy of that referral should be taken and recorded on our database.

6.5 If a Local Authority triage team have been contacted to discuss a safeguarding concern and a decision has been taken by the Local Authority not to progress the referral, the decision to end the concern at that point should be recorded on our database.

6.6 Where colleagues are aware that a current customer of Rolig Homes has an allocated safeguarding practitioner and a new safeguarding concern is raised, the safeguarding practitioner should be contacted and asked whether a new referral is required or an existing referral should be updated. Where an update to an existing referral is required the safeguarding practitioner must, then, be notified in writing. Rolig Homes records must also be updated.

6.7 Within 24 hours of a safeguarding referral being emailed to the local authority, a follow up phone call must be made to the relevant authority to ensure the referral has been logged. If an issue arises where the referral has not been logged, the referral must be re-sent and followed up with an immediate telephone call to the local authority to establish receipt. Follow up calls should be recorded on our database.

6.8 The manager/supervisor of the area, upon being notified of the safeguarding concern will:

1. If required, attend the property where the safeguarding concern has occurred to ensure the safety of customers and colleagues.
2. Where required, ensure that any additional statutory organisations are notified of the safeguarding concern, and will ensure that any actions required as a result of the referral are completed in a timely manner.
3. On being notified of the safeguarding concern, check the database and ensure any actions outlined in the report have been completed.
4. Regularly review the case and ensure any updates are recorded.

For the purpose of Rolig Homes records, the safeguarding case is considered closed when notified by the local authority that the case is closed.

6.9 When a safeguarding concern is highlighted which includes allegations against a Rolig Homes colleague, the Whistleblowing Policy should be adhered to. The Chief Executive Officer should be made aware (unless the concern raised is about the CEO in which case the Chief Operating Officer (COO) should be made aware) and they will nominate someone to raise the safeguarding concern with the relevant Local Authority.

7.0 Roles and Responsibilities

7.1 The responsibility for safeguarding rests with every Rolig Homes employee, contractor and volunteer. The following Rolig Homes structure applies (see below):

7.2 The Role of the CEO is to

- act as the Safeguarding Strategic and Operational Lead;
- monitor any changes to legislation or good practice and advise Directors of corresponding updates required to Rolig Homes policy and procedures;
- work with the COO to review the adult safeguarding policy on an annual basis and ensure that other policies have regard to adult safeguarding as appropriate then submit to the Rolig Homes boards for approval;
- with regard to value for money, ensure sufficient resources are in place to provide adequate and up to date training and supervision of employees in respect of managing and/or reporting safeguarding concerns with appropriate induction and update training programmes in place;
- report to the Rolig Homes Board annually and, in the event of a serious case review inform them of this;
- report quarterly to the Senior Leadership Team on the number of safeguarding cases and any issues of note;

- lead internal quarterly review meetings as necessary and maintain records of this;
- promote and raise awareness and understanding of safeguarding across relevant Rolig Homes services;
- work with external organisations as appropriate in relation to adult safeguarding and ensure statutory agencies including local authorities and the police and adult safeguarding boards in its areas of operation are aware of this;
- write and review adult safeguarding policy and procedures and ensure other procedures have regard to adult safeguarding as appropriate;
- oversee safeguarding cases and ensure that adult safeguarding cases are recorded and reported in accordance with procedures.

7.3 The COO will

- promote safeguarding within and across all Rolig Homes operations;
- ensure safeguarding is regularly discussed at team meetings and as part of one-to-one meetings;
- ensure the appropriate supervision of colleagues as part of the Line Management process;
- attend quarterly safeguarding review meetings held by the Rolig Homes strategic and operational lead for safeguarding.;
- attend external multi agency meetings representing Rolig Homes as required;
- respond to safeguarding audits adopting a reflective approach to inform future practice.

7.4 All other Colleagues;
Safeguarding responsibilities lie with all colleagues and everyone has a duty to report all safeguarding incidents to the Local Authority. Colleagues must:

7.5 Report concerns promptly in line with the safeguarding procedure;

- maintain a record or all referrals;
- be alert to signs and symptoms of abuse;
- cooperate with any Local Authority enquiries;
- support any protection plans put in place;
- if institutional abuse is suspected, please report immediately to the local authority.

8.0 Learning Lessons

8.1 Where service failings are identified, the lessons that can be learned will be established by the local authority in a serious case review and appropriate actions will be taken to rectify areas of failure. In such instances, the CEO and COO shall be informed and regularly updated in respect of the outcomes of any reviews that take place and Rolig Homes will act in accordance with any recommendations.

9.0 Taking a Multi-Agency Approach

9.1 In acknowledgement of its role in supporting the functions of statutory agencies, including local authorities and the police in the safeguarding of adults, Rolig Homes will ensure it maintains appropriate, up to date records to enable appropriate information sharing. The Rolig Homes Safeguarding Strategic and Operational Lead will ensure adult safeguarding boards in its areas of operation are aware of this.

9.2 Rolig Homes recognises its role in adult safeguarding as one of supporting the functions of statutory agencies, including local authorities and the police and will maintain and review records regularly as part of their commitment to joined-up working.

9.3 As required a Rolig Homes representative will attend multi-agency meetings to review adult safeguarding cases including the Safeguarding Adults Board (SAB) where it is invited and is appropriate to do so.

9.4 Where appropriate Rolig Homes will complete MARAC referrals and DASH assessments as part of a comprehensive multi-agency approach.

10.0 Information Sharing

10.1 Rolig Homes employees must, at all times, comply with the employee handbook and Rolig Homes's Data Protection and Information and Communications Technology (ICT) Policy requirements relating to information shared, transmitted or accessed via email or the Internet.

10.2 Rolig Homes will share information with other agencies appropriately and in accordance with the Data Protection Act and the UK General Data Protection Regulation. Information sharing agreements may be put in place.

10.3 Rolig Homes will only share information without an information sharing agreement where there is an immediate risk of harm, or criminal activity is taking place.

10.4 Rolig Homes may have to disclose unconfirmed third-party information and/or reports of the potential abuse of a child and/or vulnerable adult, in circumstances where it could be considered organisationally negligent not to do so.

11.0 Recording and Reporting

11.1 All concerns relating to safeguarding must be reported to local authority safeguarding teams and recorded as outlined in this document.

11.2 All Rolig Homes employees have a duty to record and report adult safeguarding concerns in accordance with the organisation's best practice guidance on reporting and recording.

12.0 Training

12.1 Rolig Homes will ensure all colleagues having contact with Rolig Homes customers will receive safeguarding training, providing them with an understanding of safeguarding and enabling them to fulfil the requirements of Rolig Homes policy and procedures.

12.2 Training will be tailored and appropriate to individual roles and the requirements of these in respect of adult and child safeguarding.

12.3 Refresher training will be provided at least annually to all colleagues having contact with Rolig Homes customers and sooner if any significant changes to legislation or good practice affecting Rolig Homes policy and procedures arises.

12.4 Rolig Homes volunteers will be provided with safeguarding training as and when this is deemed appropriate.

12.5 Colleagues will be provided with guidance and training on professional boundaries when working with adults with care and support needs.

13.0 Safeguarding and HR

13.1 The Rolig Homes COO will ensure the appropriate recruitment of employees to new roles and will ensure relevant role recruitment procedures are adhered to and include DBS checks. DBS checks will be repeated every three years.

13.2 The CEO and COO will provide support to any colleague dealing with safeguarding cases as necessary. This will include providing access to confidential counselling.

13.3 If an allegation about a colleague is received, and it constitutes an adult safeguarding issue, investigations will be conducted in accordance with the Rolig Homes disciplinary policy and procedure. A safeguarding referral will be made to the appropriate local authority. In cases where an allegation of this nature is received, the colleague may be suspended pending the outcome of the investigation.

13.4 In cases where an allegation against a colleague is proven Rolig Homes will update LA safeguarding teams, inform the police and make a referral to the DBS.

13.5 In respect of allegations made by concerned employees about the conduct of a colleague, contractor or board member the Rolig Homes Whistleblowing Policy will be followed.

14.0 Contractors and Partners

14.1 Contractors will be obliged to report concerns about adult safeguarding to Rolig Homes in accordance with their contract of engagement.

14.2 Where Rolig Homes works with partners, they will be required to have and follow their own safeguarding policies and procedures. This will be checked as part of the due diligence process.

15.0 Perpetrators of Abuse

15.1 Abuse and neglect will not be tolerated. Rolig Homes will take a risk management approach including considering legal courses of action and sanctions against perpetrators of abuse who are Rolig Homes customers.

15.2 Perpetrators of abuse and neglect will be referred to appropriate support agencies as and when this is deemed relevant to a situation.

16.0 Raising Awareness of Safeguarding

16.1 Rolig Homes is committed to ensuring it raises awareness of adult safeguarding with customers and will work in partnership with other appropriate agencies to ensure this is achieved.

17.0 Referral to Local Authority

17.1 All alerts for adult protection issues must be referred to the local authority in whose area the alleged incident or abuse occurred.

18.0 Monitoring and Review

18.1 This policy will be monitored by Rolig Homes CEO. The CEO will review cases with the COO on a quarterly basis and report as appropriate.

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Policy owner	Nathan Stolborg
Policy author	Nathan Stolborg

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1.0	New policy, February 2025	Nathan Stolborg, CEO