

Safeguarding Adults Policy and Procedure

SAFEGUARDING ADULTS POLICY AND PROCEDURES	
Purpose	This policy sets out how Dulwich Almshouse Charity manages Safeguarding concerns.
Applies to	Dulwich Almshouse Charity trustees, Harrison Housing Scheme Manager, Operations Manager, Chief Executive, Home Instead employees providing relief cover.
Date first implemented	June 2025
Author	Almshouse Association; Natalie Carter
Date first approved by Trustees	June 2025
Review frequency	Annually (or earlier if required)
Operational area	Trustee policies
Document status: This is a controlled document. Any printed copies of this document are not controlled. As a controlled document, this document should not be saved onto local drives but always accessed from the Policy Library available on the 'DAC Intranet' on Sharepoint.	

VERSION HISTORY				
Revision Date	Ver. No.	Revised by	Principal changes	Approved by
18 June 2025	2	Natalie Carter		DAC Board of Trustees

CURRENT POLICY REVISION	
Date revised	18 June 2025
Revised by	DAC Board of Trustees
DAC Board Meeting approval date	18 June 2025
Next revision due	June 2026

Key contacts

Scheme Manager	Barbara Purkiss
Harrison Housing	barbarapurkiss@harrisonhousing.org.uk

Designated Safeguarding Lead	Housing Manager
Harrison Housing	safeguarding@harrisonhousing.org.uk

Safeguarding Trustee	This function is being performed by the Acting Governance Consultant for Dulwich Almshouse Charity as of 19 June 2025 until 1 August 2025, when a trustee will be appointed.
Dulwich Almshouse Charity	natalie.carter@thedulwichestate.org.uk

Multi-Agency Safeguarding Hub (MASH)	MASH@southwark.gov.uk
This hub is the primary point of contact for raising concerns about the safety of children or adults in Southwark.	020 7525 1921 (weekdays 9-5) or 020 7525 5000 (out of hours)

Southwark Safeguarding Adults Board	SSAB@southwark.gov.uk
This board focuses on safeguarding adults in Southwark.	

Safeguarding Policy

1. Introduction

The trustees of Dulwich Almshouse Charity (DAC) acknowledge that all residents, contracted staff, volunteers and visitors have the right to a safe and secure environment and respect for their dignity, privacy, independence and individuality.

This safeguarding policy has been developed to protect those who live, work and visit Edward Alleyn House and to ensure any concerns about physical, financial, sexual or emotional abuse or neglect will be dealt with quickly and effectively.

Any Harrison Housing staff member, Home Instead agency relief worker, DAC trustee or resident having concerns about possible abuse being perpetrated towards one of the Dulwich Almshouse Charity residents should report the matter in confidence to the **Designated Safeguarding Lead at Harrison Housing**, who is responsible for undertaking an initial enquiry to establish the facts and then deciding on appropriate action.

The charity will, where appropriate, work with other agencies, to resolve matters.

- The Housing Manager at Harrison Housing is designated as having responsibility for any safeguarding issues and can be contacted at safeguarding@harrisonhousing.org.uk.
- This policy must be reviewed annually by the Safeguarding Trustee and approved by the Trustees of Dulwich Almshouse Charity. That review may take place sooner where the incident or allegation necessitates an earlier review of the efficacy of the policy, if the Safeguarding policy of Harrison Housing changes, or if there is a change in legislation.
- If the Housing Manager at Harrison Housing is unavailable or the Scheme Manager is the subject of a complaint, the Chief Executive Officer of Harrison Housing should be informed immediately of any safeguarding issue that has arisen (AlisonRobson-Young@HarrisonHousing.org.uk).
- If the concern which is being raised is about the conduct of any member of the Harrison Housing Leadership Team (or they have failed to respond), the appropriate trustee should be contacted. The designated trustee to take the lead on Safeguarding concerns is Elizabeth McGinn safeguarding.trustee.HH@gmail.com

2. Legislative Frameworks

The Care Act 2014 places an individual's well-being at the centre of the care and support system. The Care Act places responsibilities on social housing providers to look out for potential abuse and to work with the local authority Safeguarding teams to protect and implement safeguarding procedures. We have a responsibility and a 'duty of care' to our residents to recognise abuse, and to respond and report appropriately.

Any allegation of abuse needs to be handled sympathetically and sensitively whilst ensuring that no commitment or agreement is given at the outset. At this stage it is important to ensure that the complainant is not in direct contact with the alleged abuser and that sensitivity is used when handling the situation.

3. Definitions of Abuse and Harm

- Abuse is a violation of an individual's human and civil rights by an act or a failure to act on the part of person or persons
- Abuse can occur in any relationship, both formal and informal and may result in significant harm to, or exploitation of the person subjected to it
- Abuse may consist of a single act or repeated acts
- Harm: ill-treatment, impairment or avoidable deterioration of physical or mental health

4. **Types of Abuse** (as identified by the Care Act but not necessarily exclusive) (See Appendix B for more detailed explanations):

- | | |
|------------------|---|
| ○ Physical | ○ Mate crime |
| ○ Financial | ○ Self-neglect – life threatening |
| ○ Restraint | ○ Domestic violence (see appendix 1) |
| ○ Psychological | ○ Modern slavery (forced labour, county lines, human trafficking, and domestic servitude) |
| ○ Sexual | ○ Radicalisation |
| ○ Neglect | ○ Sexual exploitation |
| ○ Organisational | ○ Female Genital Mutilation |
| ○ Discriminatory | |
| ○ Hate crime | |

Risk Factors associated with Abuse

Anyone may fit this criteria at a particular time of their lives. However, the following people may be at higher risk, older people, adults with a physical or learning disability, mental health needs, long term health needs, or those who are drug or alcohol dependant.

Risk factors may include loneliness, social isolation, difficulty with communication, dependent on carers either physically, psychologically, or financially, emotional vulnerability, or the person may have unusual behavioural traits, poor quality relationships, pressures and responsibilities, lack of emotional support and social contact, frequent requests for help and the problem not being resolved.

When Safeguarding comes within the responsibility of the Local Authority (section 42 Care Act)

The threshold is defined as:

- 'an adult in need of care and support (whether or not that support is provided by the local authority)
- who is experiencing or is at risk of abuse and neglect,

- and as a result of these needs is unable to protect him or herself against abuse or neglect or the risk of it.'

If in doubt always contact the Local Authority for guidance. Someone may not meet the criteria for referral to the local authority but any cause for concern should be responded to appropriately and recorded. Sometimes it may be an accumulation of small incidents that point to a more serious situation occurring; for example, coercive control or domestic violence.

Contact details for Local Authority services are on the Contact List at the start of this policy.

The six principles of the Care Act provide guidance. They are:

EMPOWERMENT: person – led decisions and informed consented

PREVENTION: better to take action before harm occurs

PROPORTIONALITY: least intrusive response appropriate to the risk presented

PROTECTION: support and representation

PARTNERSHIP: communities have a part to play in prevention, detection and reporting neglect and abuse

ACCOUNTABILITY: accountability and transparency in our response to safeguarding

Safeguarding Procedure

The procedure below is to be followed if abuse is suspected. Depending upon the circumstances of the individual case:

- Ensure the person is safe
- If necessary, seek medical assistance
- Listen carefully and find out the wishes of the abused person,
- Do not make promises
- Explain what you are going to do and what information will be shared and why
- Ascertain the basic facts (but do not start investigating) including:
 - date, time and place of alleged abuse
 - name of complainant
 - where different, name of person who has allegedly been abused
 - nature of alleged abuse
 - description of any injuries observed
 - account of the incident which has been given
- Inform the Harrison Housing Designated Safeguarding Lead within 24 hours.

- Write a report recording any observation (photographs are acceptable with person's permission) and details of accounts given (in the persons own words if possible)
- If a complainant requests that the information is kept secret, it is important that they are sensitively advised that cases of alleged abuse will be referred to the appropriate agencies and explain the reasons why.

Within 2 working days, the Harrison Housing Designated Safeguarding Lead will gather any further information available and arrange a meeting between the Harrison Housing Scheme Manager or agency relief scheme manager to establish the facts. In their absence this will be carried out by the Chief Executive Officer. A full record of the meeting will be made.

If the Harrison Housing Scheme Manager is the subject of the complaint the meeting will be attended by the Chief Executive of Harrison Housing, the Harrison Housing Designated Safeguarding Lead to establish the facts. A full record of the meeting will be made.

If the Home Instead agency relief worker is the subject of the complaint the meeting will be attended by Tony O'Flaherty (tony.oflaherty@homeinstead.co.uk) and the Harrison Housing Designated Safeguarding Lead to establish the facts. A full record of the meeting will be made.

This meeting is to establish facts and decide given the nature of the report, if the individual and the incident fall within the Care Act section 42 criteria for referral to the Local Authority safeguarding team or if another course of action is more appropriate. The Local Authority safeguarding team may be contacted for advice. If the police or other emergency services were called, the incident must be reported to the Local Authority.

If a referral is made to the Local Authority safeguarding team from then on any action should be guided by them (*See Appendix A*) and the Safeguarding trustee informed.

If the Local Authority safeguarding team are not involved the situation will continue to be monitored by the Designated Safeguarding Lead at Harrison Housing. Minutes of the meeting will be presented at the next available Trustee meeting.

Any serious incidents of this nature which are reported to the Local Authority must also be notified to the Charity Commission.

- **Multi-Agency Safeguarding Hub (MASH):**
 - **Phone:** 020 7525 1921 (weekdays 9-5) or 020 7525 5000 (out of hours)
 - **Email:** MASH@southwark.gov.uk
 - **Purpose:** This hub is the primary point of contact for raising concerns about the safety of children or adults in Southwark.
- **Southwark Safeguarding Adults Board:**
 - **Email:** SSAB@southwark.gov.uk
 - **Purpose:** This board focuses on safeguarding adults in Southwark.

Contractor and Trustee Recruitment, Training, Supervision and Support

To safeguard the welfare of almshouse residents, Harrison Housing and Home Instead are required to carry out enhanced Disclosure and Barring Service (DBS) checks on all staff who have direct contact with residents. This

includes (but is not limited to): The Scheme Manager, Operations Manager and relief for the Scheme Manager, e.g. on weekends and during periods of annual leave. Written confirmation is required from Harrison Housing and Home Instead annually that checks are up to date on all staff (carrying out a regulated activity) working with older residents prior to their appointment. All DAC trustees are required to undertake a basic DBS check every three years.

Training in Safeguarding Vulnerable Adults is provided to relevant trustees so that they understand their roles and responsibilities in relation to safeguarding and are enabled to identify and report the signs of abuse in accordance with safeguarding procedures. This training is repeated every 2 years.

This procedure will be reviewed annually in line with the review of the main Safeguarding Policy statement above. This will take place sooner in the event of any incident which raises concerns about the efficacy of the current procedure.

Almshouse residents will be informed each time this policy is reviewed and copies will be made available to them at their almshouses and on the Dulwich Almshouse Charity website. Copies of this policy will be available at all times to trustees, Harrison Housing staff and relief staff.

This policy has been approved for issue by the board of trustees of Dulwich Almshouse Charity

A handwritten signature in black ink, appearing to read "C Price".

Signature:

Name: Caroline Price, Acting Chair

Date: 24 July 2025

Appendix A - Information that may be needed by a Local Authority Safeguarding Team when raising a concern.

Be open and honest from the outset. Any information sharing should be clear regarding the nature of the problem and the purpose of sharing. It should be based on fact not assumption and restricted to those who need to know. It should be relevant to the specific incidents and should be limited to the needs of the situation at the time. It should be necessary, relevant accurate and proportionate

- 1 Alleged victim's name, and addresses (including previous addresses if known)
- 2 Date of birth
- 3 The details of the concern or disclosure, circumstances, dates, times, witnesses,
- 4 Type of abuse
- 5 Key people, family, agencies, workers involved
- 6 Details of whether the alleged victim knows of the referral and has given consent. If not why not
- 7 Alleged victim's preferred outcomes
- 8 Any concerns about capacity
- 9 What discussion has taken place
- 10 Any others at risk
- 11 Extent of harm
- 12 Details of any immediate action taken eg police contacted or action taken to reduce risk.

Appendix B - Signs and indicators of abuse

Physical Abuse: hitting, slapping, punching, pushing, kicking, burns, misuse of medication, inappropriate restraint.

Sexual Abuse: rape sexual assault, sexual acts where the adult has not consented, could not have consented, or was pressurised into consenting, non-contact sexual abuse e.g. coerced to be photographed or videoed or for someone to look at their bodies. Sexual activity involving staff is considered abusive.

Financial Abuse: theft, fraud, exploitation, pressure in connection with wills, or property, inheritance or financial transactions, misuse or misappropriation of property, possessions, or benefits.

Neglect or Acts of Omission ignoring medical or physical care needs, failure to provide access to appropriate health care, social care or education services, heating, medication, adequate nutrition and essential needs.

Psychological: emotional abuse, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, harassment, verbal abuse/ excessive criticism, isolation or withdrawal from services or support networks.

Organisational/Institutional: where there is a culture of abusive behaviour, tolerance of abusive behaviour, repeated failure to address abusive behaviour. It may be an isolated incidence through to a pervasive ill treatment or gross misconduct when an organisation fails to treat individual needs in favour of the needs of organisation. This can occur in any organisation not just those associated with delivering health or personal care in residential/hospital setting.

Discriminatory: abuse that is motivated by discriminatory or oppressive attitudes towards race, gender, sexual orientation, cultural background, religion, physical or learning disability or sensory impairment, age, mental health. This may take the form of harassment, verbal abuse, disparaging remarks.

Hate Crime: Can come under safeguarding if the person has care and support needs and comes under the requirements of sect 42 of the Care Act for a safeguarding adult Enquiry. Hate crime can be defined as any hate incident which constitutes a criminal offence, perceived by the victim or any other person as being motivated by prejudice or hate.

Mate Crime: is usually used to refer to where the adult with care and support needs is the victim of abuse or exploitation by one or more people where the victim wants them to be their friend or believes them to be their friend.

Domestic Violence/ Abuse: physical, sexual, psychological, or financial, violence that takes place within an intimate or family type relationship and forms a pattern of coercive, controlling and threatening behaviour. It should be addressed under safeguarding only-

- If the person has care and support needs and is unable to protect him or herself from abuse
- Where it is proportionate and beneficial to the person involved taking into account their wishes, capacity and level of risk

Otherwise, individuals should be given information about agencies that can support them to take their own action (Woman's Aid, National Domestic Violence helpline, local domestic violence teams)

Self-Neglect Self neglect becomes a safeguarding concern when the level of neglect becomes life threatening. Otherwise, serious self-neglect may be helped through Social Services or Mental Health Services.

Modern Slavery: Modern Slavery can take a number of forms. Sexual exploitation, forced labour, domestic servitude, criminal exploitation. This can include 'county lines' drug dealing in local areas and may include 'cuckooing the setting up of drug basis in peoples own homes. Police should be notified if modern slavery is suspected. It is often the most vulnerable who are targeted, the homeless, those with learning disabilities, or mental health issues.

Radicalisation: The Prevent Strategy aims to protect those who are vulnerable to exploitation from those who seek to support or commit acts of violence. This may be right wing extremism as well as Islamic extremism. The most vulnerable are often targeted. The police should be contacted if it is suspected that an individual is being radicalised.

Female Genital Mutilation

Online Training

www.almshouses.org/news/safeguarding-vulnerable-adults-sova-online-training-course/
