Safeguarding Adults Policy

1. Introduction

1.1 At Peabody we believe every person has the right to live in safety, free from harm, abuse and neglect.

We work with a range of adults, children and young people who may be at risk of abuse or neglect and so it is essential that we have mechanisms in place to minimise the risks of harm and abuse occurring and, where concerns exist, to ensure that appropriate action is taken to address them.

Safeguarding is about people and organisations working together to prevent and stop the risks and experience of abuse or neglect, while ensuring the person's wellbeing is promoted.

Legislation such as the Care Act 2014 (and associated guidance) and Human Rights Act 1998 inform our approach to safeguarding adults across the business.

We remain strongly committed to safeguarding adults, children and young people who use or access our services.

We develop and implement internal procedures for colleagues that establish clear lines of accountability, responsibility and processes for reporting safeguarding concerns. In accordance with the Care Act 2014, we are committed to maintaining safeguarding policies and procedures, implemented by knowledgeable and trained staff.

1.2 This policy has links to some of our other documents, and we've thought about these when developing the policy. This policy should be read in conjunction with the Safeguarding Children policy:

Other related documents:

- Whistleblowing Policy
- Mental Capacity Act Policy
- Domestic Abuse and Violence against women and girls (VAWG) Policy
- Code of Conduct
- Data Protection Policy
- Equality, Diversity and Inclusion Policy
- Building Emergency Evacuation Plans (BEEPs) and Personal Emergency Evacuation Plans (PEEPs) Policy
- Damp and Mould Policy
- Care and Support Needs guidance note

2. Scope

2.1 The purpose of this Policy is to set out Peabody's approach to safeguarding adults, preventing abuse and neglect and responding to concerns or allegations of abuse and neglect where these arise.

2.2 This policy applies to all colleagues working within The Peabody Group and all its subsidiaries as well as agency support workers, volunteers and all committee and board members.

2.3 We expect suppliers, contractors (including subcontractors), and organisations working on our behalf or premises to have their own safeguarding procedures or follow ours, and to actively identify and report any concerns.

3. **Our approach**

3.1 Our approach reflects the statutory guidance where we operate. It meets legislative and regulatory requirements, including those set out in (but not limited to):

- The Care Act 2014 and Care and Support Statutory Guidance,
- Mental Capacity Act 2015,
- The Equality Act 2010,
- Human Rights Act 1998,
- Data Protection Act 2018,

3.2 Peabody recognise that safeguarding is everyone's responsibility and that anyone can witness or become aware of an adult, child or young person being at risk.

3.3 Our adult safeguarding work is underpinned by six guiding principles:

Empowerment: Residents and customers will be supported and encouraged to make decisions regarding the outcomes they want from safeguarding interventions. This is known as Making Safeguarding Personal. This principle is balanced with our duty to report situations of risk which may lead to reports being raised without consent.

Protection: We ensure timely and effective actions are taken to address safeguarding concerns and protect individuals from harm including investigations, safety planning and implementing measures to prevent further harm.

Prevention: It is better to take action before harm occurs. We focus our interventions for adults at risk by taking proactive measures to identify and reduce potential risks of harm.

Proportionality: Interventions must represent the least intrusive response appropriate to the risk presented.

Partnership: Collaboration and partnership working is essential in safeguarding. We work in partnership with lead agencies and relevant partners, to respond to suspicions or incidents of abuse or make safeguarding enquiries in accordance with statutory procedures.

Accountability: Everyone has a responsibility to act in the best interests of adults at risk. This includes being accountable for decisions, actions, and outcomes, and promoting a culture of openness and learning from mistakes (known as duty of candour).

3.4 We will be professionally curious in our approach, to ensure that we proactively seek out what is happening within a household or in a specific situation. This involves not making assumptions about a household or individual, or taking information at face value.

3.5 We take a person-centred and think-family approach, balancing an adult's right to make their own choices with our duty of care to prevent and reduce the risk of abuse, harm, or neglect to those who may be less able to protect themselves.

3.6 We adopt a trauma-informed approach, recognising how past and present experiences may influence behaviour, engagement, and decision-making, and responding in a way that promotes safety, trust, dignity, and empowerment.

3.7 We work from a position that adults have the right to make their own decisions but remain alert to the possibility that some decisions may be made as a result of exploitation, coercion, grooming or duress and we will act on those concerns to safeguard the person being abused or harmed.

3.8 We apply a culturally competent approach to safeguarding, avoiding assumptions based on culture, religion, ethnicity, identity, or lifestyle. We recognise that inequality, discrimination, language barriers, immigration status, and social isolation may increase vulnerability and impact access to support. Cultural or personal factors must never be used to justify delay or inaction in responding to safeguarding concerns.

3.9 We take actionagainst the perpetrators of abuse, harassment and unlawful activity related to antisocial behaviour wherever possible, through our antisocial behaviour policy and procedures.

3.10 We recognise that while some individuals we work with may not always meet the eligibility for safeguarding by the local authority that, they may be dealing with situations which increase the risk of them facing abuse, harm or neglect.

3.11 We recognise that poor housing conditions, including damp, mould, hoarding and fire risk, may constitute safeguarding concerns where they pose a risk of harm or indicate self-neglect.

3.12 We recognise the emotional impact on staff of recognising and reporting safeguarding concerns. Employee support will be available through line managers and in line with our Colleague Health and Wellbeing Offer or subsidiary equivalent.

3.13 We promote the welfare and wellbeing of all participants of Peabody apprenticeship schemes delivered by Academy colleagues and ensure each safeguarding issue is raised and responded to in accordance with best practice protocols.

2. Key terms and definitions

4.1 <u>Abuse and Neglect (within the context of safeguarding adults)</u>

Abuse refers to any action or lack of action that results in harm or distress to an adult at risk. This harm or distress may be caused intentionally or unintentionally. Abuse is a violation of an individual's human and civil rights by any other person or persons.

4.2 Abuse can take various forms. The 'Care and Support Statutory Guidance' identifies ten types of abuse. Increasingly other forms of abuse are recognised. Peabody commits to applying the latest definitions of abuse available. More information on the categories of abuse and types of harm can be found under 'Appendix A'.

4.3 Abuse cannot be excused for any cultural or religious reason and should always be reported.

4.4 Abuse may also include Violence Against Women and Girls which refers to crimes predominantly, but not exclusively, experienced by women and girls. A full definition is included in the VAWG guidance note.

4.5 <u>Adult at Risk</u>

An adult at risk is any person who is aged 18 years or over, and at risk of abuse or neglect because of their needs for care and or support.

The Care Act 2014 defines an adult at risk as someone who:

1. **Has care and support needs:** This could include individuals with physical, sensory, cognitive, or mental health impairments, or those with learning disabilities. It also encompasses individuals who are frail or elderly.

2. **Is experiencing, or at risk of, abuse or neglect:** Abuse or neglect can take various forms including physical, psychological (emotional), sexual, financial. It also includes neglect or acts of omission that may harm the individual's well-being. More information on the categories of abuse and types of harm can be found under 'Definitions'.

3. **Is unable to protect themselves against the abuse or neglect:** This aspect emphasises the vulnerability of the individual and the need for intervention to ensure their safety and well-being.

4.6 Care and Support needs (within the context of safeguarding adults/Care Act 2014)

This relates to individuals who require additional support to manage their day-to-day life and meet their basic needs. It may be more difficult for someone with care and support needs to protect themselves from being mistreated or meet their own needs without causing harm.

An adult with care and support needs may be:

- An older person,
- A person with a physical or learning disability or sensory impairment,
- Someone with mental health needs, including dementia or a personality disorder,
- A person with a long-term health condition,
- Someone who misuses substances or alcohol to the extent that it affects their ability to manage day to day living,
- A carer providing unpaid care to a family member or friend.

5. Key responsibilities

5.1 Reporting and responding to safeguarding concerns

All Peabody Group colleagues have a duty to act upon and report actual, suspected or allegations of abuse in line with the Peabody Code of Conduct.

We respond to safeguarding concerns, incidents and allegations promptly in a considered and proportionate manner.

We understand and work in line with Local Safeguarding Adults Board (LSAB) procedures, ensuring that safeguarding concerns are reported in line with local arrangements. For Care Quality Commission (CQC) registered services, allegations or incidents of abuse or neglect will also be reported to the CQC.

We do not assume that someone else will pass on information critical to keeping an adult safe and should share the information with relevant authorities when appropriate.

Where concerns persist or risks escalate, colleagues must demonstrate professional curiosity, appropriately challenge decisions and escalate concerns. Case closure should be supported by defensible decision-making (clear and recorded judgement about risk, based on the information available at the time, which can be explained and justified if reviewed) recognising that confirmation of partner agency actions may not always be available.

5.2 Partnership working

We work in partnership with lead agencies and relevant partners, to respond to suspicions or incidents of abuse or make safeguarding enquiries in accordance with statutory procedures. Where appropriate, Peabody colleagues will support and participate in Local Authority safeguarding investigations. Colleagues will also be supported to coordinate a lead response where necessary.

We investigate reported incidents ensuring we do not compromise Police or Local Authority investigations.

We understand information sharing, joint working and communication are essential in keeping people safe and we work to build and maintain good professional relationships to support the safeguarding process.

Where appropriate we will provide or refer the resident or customer to additional support services.

We support colleagues to ask questions and challenge referral decisions or actions they do not agree with.

5.3 Recording and sharing of information

We record incidents and allegations of abuse, harm or neglect, clearly, accurately and in a timely manner. We record and share information appropriately with other professionals and statutory agencies that safeguard adults, children and young people.

The wishes of the customer regarding what information is shared and with whom should be respected wherever possible. However, in line with the Data Protection Act 2018, personal data may be shared without consent where there is a lawful basis to do so, including where this is necessary to protect the vital interests of an individual or to meet safeguarding thresholds.

Where there is a concern that a resident or customer may be experiencing or at risk of abuse or neglect, their safety must be the overriding priority. Information must be shared with statutory authorities where there is any indication of abuse or neglect.

Where information is shared without consent, colleagues must clearly record the rationale, ensuring decisions are proportionate, risk-based, and capable of being explained and justified if reviewed.

We maintain accurate records of safeguarding activities to document actions taken to respond to actual, suspected or allegations of abuse, harm or neglect.

6. Mental Capacity

6.1 When an adult lacks capacity to make a decision, we always work in line with the Mental Capacity Act 2005. Peabody is committed to working in line with the 5 statutory principles of the Mental Capacity Act 2005. These are:

- A person must be assumed to have capacity unless it is established that they lack capacity.
- People should be supported to make their own decisions where possible.
- A person should not be treated as unable to make a decision just because others regard the decision made as being 'unwise'.
- A person making decisions on behalf of someone lacking capacity must do so in their best interests.
- Decisions made on behalf of someone lacking capacity should always be the option which is least restrictive on their basic rights and freedoms.

7. Prevent

7.1 The Government Prevent programme highlights that some adults may be vulnerable to radicalisation and involvement in terrorism. Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works with individuals and communities by using voluntary early intervention to encourage them to challenge extremist and terrorist ideology and behaviour.

7.2 Peabody recognises that it plays a key role in supporting residents and customers who may be at risk of radicalisation. We believe that community engagement is essential, and we will work closely with local voluntary and community groups as well as Local Authorities and the Police to meet their duties under the Counter Terrorism and Security Act 2015 to prevent people from being drawn into terrorism.

8. Safeguarding Learning

8.1 Raising awareness is a key part of our approach to preventing abuse and neglect from occurring. Peabody utilise a range of approaches to raise awareness, amongst colleagues, residents and customers, with regards to safeguarding issues and action they should take if they have concerns. This includes awareness campaigns and communications through various channels, training and cascading good practice.

8.2 Robust mandatory training on safeguarding adults is provided to ensure colleagues are aware of indicators of abuse or neglect and how to raise and respond to safeguarding concerns. This is in place to ensure colleagues have the skills and knowledge required to effectively safeguard adults at risk of harm, abuse or neglect.

Safeguarding training is mandatory for all colleagues working at Peabody. A layered approach is taken to ensure relevant and proportionate training is delivered to colleagues and managers across the organisation. This is based around the competencies required for each role.

Safeguarding awareness is also included as part of inductions to target new colleagues as they join the organisation. The completion of mandatory safeguarding training is regularly monitored for compliance. Training is supported by Management.

8.3 Peabody is committed to learning from safeguarding incidents to continuously improve our safeguarding practice. Good practice and lessons learned are shared regularly across the organisation to strengthen systems, processes, and frontline practice.

This is supported by operational colleagues who act as Safeguarding representatives across Peabody. A central register of internal safeguarding concerns and external alerts raised under multi-agency procedures is maintained and overseen by Designated Safeguarding Leads. Learning from this activity is used to identify risks and inform improvements to policies, procedures, and service delivery.

8.4 We recognise complaints as a valuable source of safeguarding intelligence and use them to identify risks, improve practice, and inform service improvements.

8.5 Regular reporting to the Board on safeguarding activity includes analysis of patterns and emerging themes to inform practice, policy, and procedure review. This includes the use of safeguarding data and case information to identify key risks and trends, such as self-neglect, domestic abuse, and mental health-related concerns, to support early intervention and continuous improvement.

9. Equality, Diversity and Inclusion

9.1 Peabody recognises that, in some circumstances, people who have protected characteristics may be at greater risk of abuse or neglect, or of experiencing barriers to being able to access the right support. Adults who are at risk, children and young people have the right to be protected from abuse, no matter what their background, circumstances or personal characteristics.

9.2 Our approach to safeguarding prevents discrimination and disadvantage by ensuring that a person's value, beliefs and culture are considered. This ensures no individual is discriminated against on the grounds of race, colour, nationality, ethnic origins, sex, disability, sexual orientation, gender reassignment, martial or civil partner status, pregnancy, unrelated criminal activities, illness or any other matter that may cause a person to be treated with prejudice.

9.3 We provide all residents, customers and other stakeholders with the information they require, in a format to meet their individual needs, using clear language which is easy to understand.

9.4 This policy impacts on our most vulnerable customers, many who will have protected characteristics under the Equality Act 2010. Therefore, we have completed an Equality Impact Assessment to ensure that any action we take does not discriminate, is the least restrictive and enables the person as much choice and control over decisions as is possible.

10. Whistleblowing

10.1 Peabody have a robust Whistleblowing Policy in place for colleagues to use if they suspect a resident or customer is being abused by a Peabody colleague, where there is a failure to respond appropriately to allegations of abuse, or where staff have concerns that a colleague or superior is responsible for the abuse. There are clear lines of reporting for whistleblowing concerns, including routes to use if colleagues feel unable to report directly to their line manager or if they are concerned that appropriate action has not been taken in relation to a concern already raised.

10.2 We ensure that allegations regarding inappropriate conduct of colleagues, in or outside the workplace, are investigated thoroughly and with urgency, through the Disciplinary and Grievance policies and the policies of the Local Safeguarding Adults Board.

10.3 We will provide support and supervision for employees, creating a safe environment in which they feel able to report safeguarding issues, including where they have concerns about the behaviour of another Peabody employee in line with our Whistleblowing Policy.

10.4 Dealing with allegations against colleagues or volunteers.

If an allegation relates to the action or inaction of a Peabody colleague or volunteer, we respond in a way that is fair to the individual allegations have been made, but we prioritise the safety of the adult at risk of abuse, harm or neglect, or child or young person. We meet our legal responsibilities as an employer, to refer any colleague or volunteer who poses a threat to adults at risk of harm or children or young people to the relevant authority.

11. Safe Recruitment

11.1 We will meet our responsibilities in the safe recruitment, selection and vetting of colleagues by using the Disclosure and Barring Service and undertake any other pre-employment screening checks as appropriate.

12. Legislation and Regulation

- Counter Terrorism and Security Act Prevent Duty 2015
- Care Act 2014
- Mental Capacity Act 2005
- Modern Slavery Act 2015
- Modern Slavery and Human Trafficking: National Referral Mechanism
- London Multi-Agency Adult Safeguarding Policy & Procedures
- Local Adult Safeguarding Board policies
- Data Protection Act and General Data Protection Regulation

Approval

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Appendix A: Other definitions

Physical Abuse - This involves causing actual physical harm or injury to an individual. It can include hitting, kicking, burning, restraining, or any other form of physical violence. Signs may include unexplained injuries.

Financial (& Material) Abuse – This involves controlling or exploiting a person's financial affairs, assets, or possessions for personal gain. It can include theft, fraud, coercion to sign over property or benefits, misuse of power of attorney, or restricting access to money and essentials. Signs may include sudden financial difficulties, missing belongings, or unexplained changes in legal or financial documents.

Sexual Abuse – This involves any non-consensual sexual act or behaviour, including sexual assault, coercion, or unwanted sexual contact. It also includes situations where a person is manipulated, exploited, or pressured into sexual activity. When involving a child, it includes grooming—where an abuser builds trust to exploit them sexually. Signs may include distress, secrecy, avoidance, or sudden changes in behaviour.

Neglect – This is when a person's basic needs, such as food, shelter, medical care, or personal hygiene, are ignored by those responsible for their care. This can result in malnutrition, poor living conditions, or declining health and wellbeing.

Psychological Abuse - Regular use of language & non-physical actions used to harm a person mentally & emotionally. Includes the use of threats, humiliation, manipulation, or intimidation. It can include gaslighting, verbal abuse, isolation, or persistent criticism. The impact can lead to anxiety, low self-esteem, withdrawal from social interaction and in some cases suicidal ideations.

Self-Neglect – This is when a person is neglecting their own basic needs such as personal hygiene, health care, or living conditions. It may result from mental health issues, substance misuse, or an inability to access support. Signs include extreme uncleanliness, malnutrition, or hoarding.

Modern Slavery - Slavery, Servitude, forced & compulsory labour & human trafficking. This includes slavery, forced labour, human trafficking, debt bondage and servitude, where individuals are exploited through coercion, threats, or deception. Victims may be trapped in exploitative working conditions, domestic servitude, or sexual exploitation, often under restricted movement or control.

Organisational Abuse - This refers to widespread neglect, poor care, or harmful practices within a care setting, such as hospitals, care homes, or supported accommodation. It can result from inadequate policies, a lack of oversight, or a culture of neglect, leading to mistreatment of individuals.

Discriminatory - Unequal or unfair treatment of a person on the basis of a protected characteristic - age, disability, gender, sexual orientation, race, or religion. It may include verbal abuse, exclusion, harassment, or denial of services.

Domestic Abuse - Pattern of abusive behaviours perpetrated by partner, ex-partner, or family member. This includes patterns of controlling, threatening, or violent behaviour, physical violence, emotional abuse, coercive control, financial exploitation, or sexual abuse. The relationship to the perpetrator will dictate whether it is safeguarding, or domestic abuse.

Digital & Online Abuse - Technology, including social media, messaging, other digital platforms, to harass, threaten, exploit, or manipulate individuals. Can include cyberbullying, online grooming, financial scams, or the non-consensual sharing of images.

Cuckooing:
This is where a person befriends an individual before using the property for exploitative and often illegal purposes. This may include drug-taking/dealing, sexual prostitution, or simply preventing access to parts of the accommodation to the tenant. Intimidating and aggressive behaviour which impacts a person's ability to access their property is also considered a type of cuckooing.

Radicalisation:
Radicalisation is the process by which a person comes to adopt increasingly extreme political, social, or religious ideals. This can, in extreme cases, result in support of terrorism. Extremism covers vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

County Lines:
Criminal exploitation and drug trafficking involving exploitation of vulnerable adults, children and young people who are coerced and manipulated into criminal activities involving the movement of illegal drugs.

Coercive control:
A purposeful pattern of behaviour which takes place over time in order for one individual to exert power, control or coercion over another. The perpetrator chooses to carry out these behaviours. It is a form of domestic abuse.

Hoarding:
A type of self-neglect. It is the excessive collection and retention of any material to the point that it impedes day-to-day functioning and access to core household facilities such as washing, cooking and sleeping.

Mate Crime:
When a person is harmed or taken advantage of by someone they thought was their friend. People with learning disabilities, autism, mental ill health and some elderly people are particularly vulnerable to 'mate crime'. It may not be an illegal act but still has a negative effect on the individual.

Elder abuse:
A single or repeated act or lack of appropriate action, occurring within any relationship where there is an expectation of trust (and), which causes harm or distress to an older person. It may include physical abuse, financial abuse, neglect, psychological abuse and/or sexual abuse.

Female Genital Mutilation (FGM):
This involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act 2003 makes it illegal to practice FGM in the UK, or to take girls who are British Nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in another country. UK communities at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. Those from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.

Self-harm:

Self-harm is when a person hurts themselves intentionally. This is often a way of coping with difficult feelings or situations, painful memories or trauma. Self-harm can present in many forms including cutting, pinching, burning, hitting or punching oneself and hair pulling (not an exhaustive list). Excessive use of alcohol and/or drugs and people putting themselves into harmful situations, where they may be subjected to physical or sexual abuse, can also be considered a type of self-harm.

Suicide:
Suicide involves a person intentionally ending their own life. Suicidal feelings can range from a person having fleeting or general thoughts of ending their own life, right through thinking of or planning ways to end their own life.

Think Family:
Think Family recognises and promotes the importance of a whole-family approach with services working with both adults and children to take into account family circumstances and responsibilities. Look beyond the immediate person that concerns relate to take the wider family dynamic into consideration.