

Adult Safeguarding Policy



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Relevant National Standards or Regulations	• Care and Support Statutory Guidance (Department of Health and Social Care) • Regulator of Social Housing – Transparency, Influence and Accountability Standard; Safety and Quality Standard • Local Safeguarding Adults Board (SAB) Multi-Agency Procedures • Housing Ombudsman Complaint Handling Code • Social Care Institute for Excellence (SCIE) safeguarding principles and guidance • Domestic Abuse Housing Alliance (DAHA) framework (as relevant to safeguarding housing responses) • Disclosure and Barring Service (DBS) referral duty under safer recruitment
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Relevant Legislation	• Care Act 2014 • Mental Capacity Act 2005 • Human Rights Act 1998 • Safeguarding Vulnerable Groups Act 2006 • Public Interest Disclosure Act 1998 • Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) • Domestic Abuse Act 2021
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Adult Safeguarding Policy



1. Purpose

This policy sets out how Harbour Light Assisted Living CIC protects adults at risk from abuse, neglect, or harm in our supported housing. It explains the responsibilities of our staff in identifying and responding to safeguarding concerns and outlines the procedures for reporting and managing those concerns. As a Community Interest Company and Registered Provider of social housing, we adopt this policy as a best practice standard (not a statutory requirement) expected by our commissioners and regulators. It aligns with the multi-agency safeguarding duties under the Care Act 2014, promoting partnership working with local authorities, health services and police to keep people safe. We are committed to a culture of zero tolerance towards abuse and to acting swiftly and appropriately whenever safeguarding issues arise.

2. Scope

This policy applies to all employees, volunteers and contractors of Harbour Light Assisted Living CIC, and covers all adult tenants (aged 18 and over) in Harbour Light's supported housing. Our tenants include adults with mental health needs, learning disabilities, autism, and other care and support needs. We do not provide services to under-18s or families, and we do not house adult tenants who live with children. However, staff may occasionally encounter children (for example, a tenant's visiting family member). In such cases, although those children are not within our direct care, any concerns for their welfare must still be addressed as described in this policy (see **Section 5.6** on child safeguarding).

For the purposes of this policy, an "adult at risk" (sometimes referred to as a vulnerable adult) is any person aged 18 or over who has needs for care and support and **is or may be** unable to protect themselves from abuse or neglect as a result of those needs. All references to "adults" in this policy mean adults with care and support needs who could be at risk of harm. This policy covers safeguarding in all settings where our work takes place, including tenants' homes, communal areas, and any off-site visits or interactions involving our staff and tenants. It also supports compliance with the expectations of our regulators – the Regulator of Social Housing (RSH), the Housing Ombudsman, and the CIC Regulator – regarding the safety and well-being of our tenants.

Housing providers like Harbour Light are key partners in the multi-agency safeguarding system and must have robust safeguarding arrangements. All staff and associated personnel are required to follow this policy to ensure that adults in our accommodation are safe from abuse and that any safeguarding issues are managed in a coordinated, lawful, and caring manner.

3. Responsibilities

Board of Directors / Senior Management: The Board and senior leaders are responsible for overseeing the implementation of this policy and ensuring the organisation's compliance with all safeguarding obligations. They appoint a competent **Designated Safeguarding Lead (DSL)** to coordinate adult safeguarding across the organisation. Senior Management must foster a culture that prioritises safeguarding, allocate sufficient resources for training and prevention, and review serious incidents to improve practices. They also ensure that safeguarding practices meet the standards expected by regulators and commissioners.

Designated Safeguarding Lead (DSL): The DSL (and any Deputy DSL, if appointed) holds lead responsibility for adult safeguarding within Harbour Light. The DSL's duties include: providing advice and support to staff on safeguarding matters; receiving and handling internal reports of safeguarding



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concerns; deciding when to refer a concern to external agencies (e.g. the local authority Safeguarding Adults team or police); liaising with those agencies and participating in multi-agency meetings; and ensuring all safeguarding activities are properly documented. The DSL keeps up to date with safeguarding legislation and local Safeguarding Adults Board procedures and updates this policy and related procedures as needed. The DSL also arranges regular staff training and promotes good practice in line with the six safeguarding principles in the Care Act 2014: Empowerment, Prevention, Proportionality, Protection, Partnership, and Accountability.

Line Managers and Supervisors: Managers are responsible for the day-to-day oversight of safeguarding in their teams. They must ensure their staff are aware of and understand this policy and related procedures. If a staff member reports a safeguarding concern, the manager must take it seriously, ensure immediate safety actions are taken, and inform the DSL promptly. Managers support the DSL in gathering initial information, ensure that the concern is documented, and provide support to any staff or tenants affected. They also monitor staff compliance with safeguarding procedures and address any shortcomings (for example, by arranging additional training or guidance). In cases of an allegation against a staff member, the manager (in consultation with senior management and the DSL) is responsible for removing the individual from duties that involve contact with tenants, pending investigation, to ensure others' safety.

All Staff and Volunteers: Safeguarding is everyone's responsibility. All employees and volunteers of Harbour Light Assisted Living CIC have a duty to be vigilant for signs of abuse or neglect and to act when they have any concern about an adult's welfare. Staff must familiarise themselves with this policy, attend required safeguarding training and follow the procedures for reporting concerns. Every staff member is responsible for: **spotting** potential indicators of abuse or neglect (even if subtle or uncertain), **responding** appropriately (for example, ensuring immediate safety if urgent and reporting the concern), and **recording** and **sharing** information on the concern as directed in this policy. Staff should always act in a timely manner; delaying or failing to report a concern is a breach of their responsibilities. Additionally, staff and volunteers are expected to maintain professional boundaries and adhere to our Code of Conduct to prevent situations that could lead to harm. Any staff member who is unsure about a situation should seek advice from their line manager or the DSL without delay.

The Organisation (Harbour Light CIC): As a housing provider, the organisation itself commits to fulfilling its safeguarding responsibilities in line with law and good practice. We will:

- **Appoint Safeguarding Leads and Procedures:** Maintain an up-to-date safeguarding policy and procedure and designate a Safeguarding Lead to oversee implementation.
- **Multi-Agency Cooperation:** Cooperate fully with local authorities and Safeguarding Adults Boards in any safeguarding enquiry or review. This includes attending multi-agency meetings, providing information as requested, and participating in Safeguarding Adult Reviews (SARs) if a case involves our tenants.
- **Information Sharing and Record-Keeping:** Keep clear, accurate records of all safeguarding allegations, concerns, and actions taken. We will share relevant records and information with appropriate external agencies where it is in the best interests of the adult at risk to do so. All information sharing will follow applicable data protection laws and safeguarding guidance on confidentiality (see Section 5.5).
- **Safe Recruitment and Training:** Ensure robust recruitment practices for roles that involve contact with tenants, including conducting Disclosure and Barring Service (DBS) checks and verifying references in line with our Safer Recruitment procedures. We will also provide safeguarding training (and refreshers) to all staff appropriate to their role.

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- **Regulatory Compliance:** Comply with relevant regulations and standards set by the Regulator of Social Housing, Housing Ombudsman, and other bodies regarding tenant safety and wellbeing. We will report significant safeguarding incidents to commissioning authorities or regulators as required and cooperate with any audits or reviews of our safeguarding practices.

By assigning these responsibilities, Harbour Light Assisted Living CIC ensures that safeguarding is embedded at every level of the organisation and that we meet our obligations to protect our tenants.

4. Legislation and Regulations

This Adult Safeguarding Policy is informed by and complies with the following legislation, regulations, and guidance (UK law and best practice):

- **Care Act 2014** – Establishes the statutory framework for adult safeguarding, including the duty of local authorities to make safeguarding enquiries (Section 42) and to lead multi-agency Safeguarding Adults Boards. The Care Act and its statutory guidance outline the roles and responsibilities of organisations (including housing providers) in safeguarding adults.
- **Care and Support Statutory Guidance (Department of Health, 2014)** – Provides detailed guidance on implementing the Care Act. It emphasises the six principles of adult safeguarding and expects all agencies (even those not statutorily mandated) to collaborate in safeguarding processes.
- **Mental Capacity Act 2005** – Protects individuals who may lack mental capacity to make decisions. It is relevant in safeguarding to ensure we assess an adult's capacity to understand and consent to interventions. Any action taken on behalf of someone who lacks capacity (e.g. sharing information or making a referral) must be in their best interests, in line with this Act.
- **Human Rights Act 1998** – Guarantees basic rights such as the right to life (Article 2), freedom from torture or inhuman treatment (Article 3), and right to private and family life (Article 8). Safeguarding interventions must respect these rights; for example, protecting someone from abuse upholds their Article 2 and 3 rights, while any decision to override an individual's wishes (for safety reasons) must consider their Article 8 rights and be proportionate.
- **Safeguarding Vulnerable Groups Act 2006** – Establishes the framework for vetting and barring people who work with vulnerable adults and children. Under this law, we have a duty to make a referral to the Disclosure and Barring Service (DBS) if we remove an employee/volunteer from a "regulated activity" role due to harm or risk of harm to adults.
- **Public Interest Disclosure Act 1998** – Protects whistleblowers who raise concerns about wrongdoing, including abuse or safeguarding failures. Staff who report safeguarding concerns in good faith are legally protected from harassment or victimisation by their employer (see Section 5.5 on Whistleblowing).
- **Data Protection Act 2018 and UK GDPR** – Governs the handling of personal information. In safeguarding cases, we will share information with relevant agencies on a "need to know" basis in line with these laws. The law permits sharing information without consent in certain safeguarding situations to protect individuals from harm, but any such sharing must be justified, documented, and proportionate.
- **Domestic Abuse Act 2021** – Recognises children as victims of domestic abuse in their own right and improves support for all victims. While our tenants are adults, this Act underscores the need to respond to domestic abuse situations (which can also involve or impact children). Our staff should be aware that domestic abuse is a form of adult abuse and that housing providers have a role in supporting and safeguarding tenants experiencing domestic abuse.
- **Regulator of Social Housing Standards** – As a registered social housing provider, we adhere to the RSH Regulatory Framework (e.g. the Transparency, Influence and Accountability



Standard and the Safety and Quality Standard), which expects providers to address tenant safety, support vulnerable tenants, and manage risks, including risks from abuse or neglect.

- **Housing Ombudsman Scheme** – We are a member of the Housing Ombudsman Scheme, which means tenants can escalate complaints about how we have managed any issue (potentially including safeguarding concerns) to the Ombudsman. Our policy and procedures aim to resolve safeguarding concerns properly to avoid service failures.
- **Local Safeguarding Adults Board Policies** – We follow the multi-agency safeguarding procedures of the local authorities in which we operate. Each local Safeguarding Adults Board (SAB) issues guidance on how to report concerns and work together; our staff and DSL will consult and comply with those local protocols in addition to this internal policy.

Note: This list is not exhaustive. We also have internal policies (e.g. Code of Conduct, Whistleblowing Policy, Data Protection Policy, Tenancy Agreements) that relate to safeguarding and should be read in conjunction with this document. All applicable laws and guidance will be observed, and in case of updates to legislation, this policy will be revised accordingly.

5. Procedures

This section describes how we prevent, identify, and respond to safeguarding concerns. All staff must follow these procedures if they suspect abuse or neglect, or if an allegation is made. We emphasise a **person-centred approach** (putting the adult at risk at the heart of decisions) and a **multi-agency approach** (collaborating with external partners) throughout our response. **Important:** If at any point there is an immediate risk to someone's life or safety, staff should call the emergency services (999) without delay.

5.1 Recognising Abuse and Neglect

What to look for: Abuse and neglect of adults can take many forms. Staff should be alert to any sign or disclosure of the following types of abuse (as identified in the Care Act 2014 statutory guidance):

- **Physical abuse:** Inflicting physical pain, injury, or force (e.g. hitting, shaking, misusing medication, restraint or inappropriate physical sanctions).
- **Domestic abuse:** Incidents of controlling, coercive or threatening behaviour, violence, or abuse between intimate partners or family members. This includes psychological, physical, sexual, financial, or emotional abuse, and so-called "honour-based" violence.
- **Sexual abuse:** Any sexual activity with an adult who has not given or cannot give consent. This includes rape, sexual assault, sexual harassment, or forcing someone to witness sexual acts.
- **Psychological (Emotional) abuse:** Acts that cause mental anguish, fear or substantial distress. Examples are threats, intimidation, coercion, harassment, verbal abuse, cyber-bullying, isolation or withdrawal of support.
- **Financial or Material abuse:** Misuse or theft of money or possessions, fraud, exploitation, coercion in relation to financial affairs (e.g. abuse of a power of attorney, or pressuring someone about wills, property or inheritance).
- **Modern Slavery:** Exploitation of a person for personal or commercial gain. Encompasses slavery, human trafficking, forced labour and domestic servitude. Victims can be of any nationality and may appear scared, malnourished, or under someone's control.
- **Discriminatory abuse:** Harassment, slurs or unfair treatment based on the individual's race, gender, age, disability, religion, sexual orientation or any other protected characteristic. This includes hate crimes.



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- **Organisational (Institutional) abuse:** Poor care or abuse that occurs within a facility or service, due to its routines and systems. In our context, this could include neglect or improper practices in any setting we manage, like ignoring a tenant's needs or enforcing rigid rules that cause harm.
- **Neglect and Acts of Omission:** Failing to meet an adult's basic needs. For instance, ignoring medical, emotional or physical care needs, failing to provide necessary support, or withholding essentials like food, medication, or heating.
- **Self-Neglect:** When an adult neglects their own health or well-being, such as not attending to personal hygiene, health, or living conditions. Hoarding behaviour is an example that can fall under self-neglect.

Staff should also be aware of emerging or less obvious forms of harm, such as **exploitation** (e.g. "cuckooing" where drug gangs take over the home of a vulnerable tenant), **mate crime** (abuse by someone pretending to be a friend), or **radicalisation** (where an adult is groomed into extremist ideologies). Any **unexplained changes** in a tenant's behaviour, appearance, finances, or mood could be an indicator of abuse or neglect. **Listening to tenants** is crucial – if an individual says or hints that something is wrong, always take it seriously.

Adults' consent and choice: We recognise that adults with capacity have the right to make their own choices, even if those choices may seem unwise. Empowerment is a key principle – wherever possible, we will involve the adult in decision-making about their own safety. However, this does not mean tolerating abuse; rather, it means we will seek the adult's views on what they want done and consider their wishes alongside our duty to protect them. If an adult has **limited or no mental capacity** to understand the risk, staff should be even more vigilant and report concerns, as such individuals may be especially vulnerable. Always keep in mind: suspecting abuse is enough reason to act – do not wait for proof.

5.2 Reporting an Adult Safeguarding Concern

Duty to report: If any staff member or volunteer **suspects** that an adult is being abused or neglected, or an allegation of abuse is made, they **must report it immediately**. It is better to raise a concern that turns out to be unfounded than to miss an opportunity to protect someone. Do not assume someone else will report it. Even if the issue seems minor, reporting allows the DSL to assess the situation in context.

How to raise a concern (step-by-step):

1. **Ensure Immediate Safety:** If the person appears to be in immediate danger or in need of urgent medical attention, call the emergency services (999) right away. This could include situations of serious physical assault, urgent medical crisis, or if a crime is in progress. Ensure the person is as safe as possible until help arrives (for example, stay with them if appropriate). Then, as soon as it is safe, proceed with the next steps.
2. **Inform Management Quickly:** As soon as practicable, report the concern to your line manager **and** the Designated Safeguarding Lead. This should be done the same day, ideally immediately by telephone or in person, and followed up in writing (email or a safeguarding report form) before the end of the day. Provide all relevant details: who is involved, what you observed or were told, when and where it happened, and why it raised your concern. If you cannot reach your line manager or the DSL, escalate to another manager or a senior leader. **Do not delay** reporting – if the first point of contact is unavailable, move to the next.



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3. **Record the Details:** Make a factual record of the concern as soon as possible after witnessing the incident or receiving the disclosure. Use the person's own words where applicable. Include the date, time, people present, and exactly what happened or was said. Sign and date your record. If there is physical evidence (e.g. bruises, environmental hazards), note those observations in detail – **do not** take photographs of injuries due to privacy concerns, unless instructed by authorities. Keep any written notes secure and hand them to the DSL or manager.
4. **Preserve Evidence (if applicable):** In cases of physical or sexual abuse, or financial exploitation, there may be evidence that needs to be preserved (for example, clothing, documents, CCTV footage). Do not disturb or clean up anything that might be evidence. Advise the victim not to bathe or change clothing if a sexual assault is alleged, until police advice is obtained. Similarly, for financial concerns, do not tamper with records or devices. The DSL/manager will coordinate with the Police on evidence handling.
5. **Maintain Confidentiality:** Share information about the incident only with those who need to know (your manager, DSL, or authorities). Do not discuss it casually with colleagues or others. The matter should be treated sensitively to protect the privacy and rights of all involved (see Section 5.5 on confidentiality).
6. **Follow Further Instructions:** The DSL or manager may instruct you on the immediate next steps, such as monitoring the situation or gathering any additional basic information. Cooperate fully and promptly. Once you have reported, your role is to support any enquiry as needed. If the situation does not appear to be addressed, or if you are told not to report but you still have concerns, you should escalate the issue (for example, contact a more senior manager or use whistleblowing channels as described in Section 5.5). Never simply drop the concern without ensuring that it has been properly acknowledged and acted upon.

What not to do: Do not confront the alleged perpetrator or attempt to investigate the matter yourself. It is not your role to prove that abuse is happening – doing so could alert the suspect or put the adult at greater risk. Do not promise the adult at risk or the person reporting (if different) that you will “keep this secret.” You must explain that you have a duty to tell the appropriate people who can help. However, reassure them that the information will only be shared with people who need to know and will be managed discreetly.

Supporting the adult: When an adult discloses abuse, listen carefully and calmly. Reassure them that they did the right thing by telling you, and that they are not to blame for what has happened. Don't press them for more information than they volunteer, and avoid asking leading questions (let the person explain in their own words). Let them know you are going to report it to people who can help keep them safe, and that someone will be in touch to support them further. If they are upset or in shock, ensure they have support (family, friend, or professional) and are not left alone if they do not want to be. Document exactly what they shared with you as noted above.

5.3 Responding to and Managing Safeguarding Concerns

Once a concern is reported, the following steps will be taken by the Designated Safeguarding Lead or manager in charge:

Initial Assessment: The DSL will first ensure the immediate safety of the adult at risk (and any other potential victims). Next, they will review the information provided and conduct a preliminary assessment of the concern. This may involve speaking to the reporting staff member for clarification, checking any relevant records, or having a discreet conversation with the adult at risk (if appropriate and without alerting any alleged abuser). The purpose at this stage is *not* to investigate, but to gather



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enough information to decide on the appropriate next action, such as whether an external referral is required. The DSL will also consider the known wishes of the adult at risk: for instance, have they expressed that they do or do not want the issue reported to outside authorities?

Decision to Refer Externally: Harbour Light Assisted Living CIC follows the multi-agency safeguarding procedures of the local authority. If the concern meets the criteria for a safeguarding case (for example, the adult is experiencing or at risk of abuse/neglect and cannot protect themselves), the DSL will refer the matter to the local **Safeguarding Adults Team** of the relevant local authority **without delay**. This is typically done by contacting the local authority's safeguarding hotline or online referral system and providing the necessary details. We do not wait for proof or complete our own investigation before referring – as soon as we suspect abuse that meets the threshold, we inform the authorities empowered to investigate. The Care Act 2014 requires local authorities to make enquiries or request others to do so in such cases, and as a housing provider, we are expected to cooperate and share information.

If the DSL is unsure whether the threshold is met, they may consult with the local authority's Safeguarding team informally for advice (without necessarily giving personal details initially) or refer anyway to allow the experts to decide. We err on the side of caution and *report rather than miss something*. In all cases, the DSL will document the rationale for whether or not to refer externally.

Consent and Capacity Considerations: Ideally, the adult at risk will be informed about and involved in the decision to refer. If the adult has **capacity** and strongly objects to an external referral, the DSL will weigh that wish carefully. There are situations where we may still share information without consent: for example, if others are at risk of harm, if a serious crime has occurred or is likely (which the police should know about), or if the person is being coerced and unable to freely consent. The DSL will make a professional judgement in line with safeguarding guidance and the Mental Capacity Act. If the adult lacks **mental capacity** to consent to the referral, the DSL will proceed in their best interests (after, if possible, consulting with any Power of Attorney or advocate involved). In any event, the DSL will record whether consent was obtained, and if not, why the referral was still necessary (citing the relevant legal grounds for overriding consent).

External Safeguarding Enquiry: Once a referral is made, the local authority will lead the safeguarding enquiry (investigation). They may involve the police if a crime is alleged, and other agencies as needed (e.g. health services). Our organisation's role is to support this enquiry. The DSL (or a delegate) will: provide any further information requested, attend strategy meetings or case conferences when invited, and carry out any actions assigned to us in a multi-agency safeguarding plan. We recognise that we are a "partner" in safeguarding and **will be actively involved under the local authority's coordination**. For example, we might be asked to check on other tenants, secure a property, or support the adult to access services. We will fulfil these requests where feasible and legal.

During an enquiry, staff must continue to maintain confidentiality internally, only informing those who need to know (e.g. a support worker who will help the tenant day-to-day, or a maintenance staff member if they need to repair a security issue related to the case). All actions we take as part of the enquiry must be documented.

If the local authority decides the concern does *not* meet the threshold for a formal safeguarding enquiry, the DSL will consider alternative actions. This could include arranging support for the individual (like referring them to other services, e.g. mental health support, domestic abuse advocacy, or our own tenancy support measures) or monitoring the situation more closely. We will always seek



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to address the issue in some way, even if it's not via a statutory safeguarding route, to uphold the well-being of our tenants.

Protective Measures: In some cases, immediate protective measures might be necessary. Depending on the situation, these could include: changing locks or securing a tenant's home (if an abuser has unauthorised access), moving the tenant to a safe temporary location (with consent, or if extreme risk, involving emergency services to facilitate safety), providing an emergency alarm or phone, or arranging increased support visits. The DSL and management will plan such measures in line with the adult's wishes and the advice of authorities. We will also consider the needs of other tenants or staff if the incident poses a wider risk (for example, if an abuser is targeting multiple people in the community).

Aftermath and Support: Safeguarding situations can be distressing. The organisation will ensure that any adult who has experienced abuse (or alleged abuse) is offered appropriate support. This may include helping them access medical care, counselling, victim support services, or help from advocacy organisations. With the person's consent, we might involve their family or other support networks if that will help their recovery. Staff members who have been involved in reporting or handling a difficult case will also be offered support or debriefing, as dealing with abuse can be emotionally challenging.

Finally, the DSL will evaluate each safeguarding case after resolution to determine if any changes are needed in our practices. Lessons learned will be used to improve our prevention measures or staff training, reinforcing a cycle of continuous improvement in keeping our tenants safe.

5.4 Handling Allegations or Concerns Against Staff

There may be instances where the person alleged to have committed abuse is an employee, volunteer, or contractor of Harbour Light Assisted Living CIC. These situations are especially sensitive, as we have a dual responsibility to protect our tenants and to ensure a fair process for our staff. The following procedure applies if a tenant (or anyone) accuses one of our staff members of abusive or inappropriate behaviour, or if we suspect a staff member may have harmed an adult at risk:

Immediate Action: If a staff member is suspected or accused of abuse, that individual must be immediately removed from any duties involving contact with tenants or other vulnerable people, pending further investigation. A manager (or senior on duty) has the authority to instruct this; it may involve suspending the staff member or reassigning them to non-frontline work temporarily. This is a precaution to ensure safety and is not in itself a disciplinary penalty or presumption of guilt.

Report and Record: The allegation must be reported to the DSL and senior management without delay (if the initial report came through a different route, ensure the DSL is informed). Document the allegation in detail, including the identities of those involved, what is alleged to have occurred, and when/where. This report should be kept confidential and only shared with those managing the response.

External Notification: The DSL will contact the local authority's Safeguarding Adults team to report that a safeguarding allegation has been made against a staff member. Even though, as a housing provider, we are not regulated by the Care Quality Commission (CQC), it is still important to involve the local authority in adult safeguarding allegations. The local authority may guide the next steps, which could include a strategy meeting involving the police if a crime is alleged (e.g. assault or theft). We will also inform any relevant commissioning authority if required (for example, if the tenant is funded or referred by a local council or health service, they may need to know). If the staff member is



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registered with a professional body (e.g. a social worker or nurse), the DSL/management will consider whether that body needs to be informed.

Investigation: We will cooperate with the Police and external agencies in their investigation. To avoid contaminating evidence, our internal fact-finding will be limited initially. We won't interview the accused staff member or potential witnesses until we have clearance from the authorities, especially if the police are involved. Once external agencies indicate we can proceed, our organisation will conduct an internal investigation (usually through our HR department in line with our disciplinary policy). The staff member will have an opportunity to respond to the allegations as part of a fair process. They may be accompanied by a union rep or colleague in any formal meetings, per our HR procedures.

Support for those involved: The staff member accused will be treated with dignity and given appropriate information about the process. We recognise the stress such allegations cause and will offer support (excluding any discussion of case details), such as access to confidential counselling. The alleged victim (tenant) will also receive support as described earlier – ensuring they feel safe (which may involve ensuring the accused staff member has no contact with them) and providing updates as appropriate on the investigation's progress (while maintaining confidentiality of the staff member's employment details).

Outcome and Actions: After investigation, a decision will be made about the allegation's substantiation. If the allegation is substantiated (proven or on balance likely true), the organisation will take appropriate disciplinary action against the staff member, up to and including dismissal. In addition, we have a legal duty to refer the individual to the **Disclosure and Barring Service (DBS)** for consideration of barring them from working with vulnerable adults, if they have harmed or pose a risk of harm to adult tenants. We will also report to any relevant professional bodies as needed. If the allegation is not substantiated or is unfounded, we will consider how to reintegrate the staff member and address any workplace tensions; malicious allegations (found to be made with the intent to harm without basis) by staff or others would be dealt with through appropriate actions as well.

Throughout this process, confidentiality is crucial. Details of the allegation and the identities are shared only on a need-to-know basis. Managers and the DSL will handle communications carefully to protect the privacy of both the accuser and the accused. Learning from such cases will be reviewed once concluded, to identify any improvements in how we prevent or detect misconduct.

5.5 Whistleblowing and Confidentiality

Open culture and reporting: Harbour Light Assisted Living CIC strives to maintain an open and transparent culture where staff feel confident to raise any concerns about malpractice, wrongdoing, or any aspect of our operations that might put people at risk. Safeguarding is an area where speaking up is absolutely vital. All staff have the right – and are encouraged – to “blow the whistle” if they feel that concerns are not being addressed, or if they suspect abuse and feel unable to report through normal line management.

We have a separate Whistleblowing Policy which provides guidance on how to raise concerns outside of the normal chain of command, including the option to report issues anonymously or directly to senior leadership or external authorities. Examples of when whistleblowing might be needed in a safeguarding context include: a staff member feels their manager or DSL is not taking a report seriously or is covering it up; or the staff member believes there is a pattern of abusive behaviour being ignored within the organisation.



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Staff who whistleblow in good faith are legally protected from retaliation under the **Public Interest Disclosure Act 1998**, and Harbour Light explicitly assures staff that they will not face reprisal or detriment for reporting genuine concerns. Any form of harassment or victimisation of a whistleblower is a serious disciplinary offence. If a staff member feels they have faced negative consequences for reporting, they should report this to the Board or an external authority. We would rather receive ten false alarms than miss one real issue, so all concerns are welcome and will be handled objectively.

When raising a concern, staff may choose to go outside the organisation if necessary. Relevant external channels could include the local Safeguarding Adults Board, the Housing Ombudsman, the Regulator of Social Housing, the police, or the NSPCC helpline (the latter particularly for child protection concerns). Our Whistleblowing Policy provides contact details for some of these options. However, we encourage internal reporting first, so we have a chance to address the issue promptly – unless there is a good reason to believe internal reporting will be ineffective or result in a cover-up.

Confidentiality of information: All information related to safeguarding cases must be treated as confidential. This means it should be shared only among those directly involved in managing or investigating the concern (e.g. the DSL, relevant managers, and external agencies like social services or police). Even within the organisation, details should not be discussed with colleagues who are not involved. Breaching confidentiality can compromise an investigation and damage trust.

We store safeguarding records securely, separate from general tenant records, with restricted access. Digital records are password-protected or in secure systems, and paper records (if any) are kept in locked cabinets. When sharing information with external partners, we follow data protection principles: only share what is necessary for the purpose of safeguarding, and ensure it is sent securely.

Consent and information sharing: It is best practice to obtain the consent of the adult at risk before sharing their personal information with other agencies. However, there are circumstances in which it is lawful and ethical to share information without consent – for example, if seeking consent could put someone at further risk, or if a crime is suspected, or if the adult lacks capacity to consent. The Care Act statutory guidance and GDPR allow for such judgments in the public interest of protecting individuals. When we do share without consent, we will record the reasons.

Staff should never promise absolute confidentiality to anyone who divulges a safeguarding concern. Instead, they should explain that they will keep the information as confidential as possible but will need to tell the DSL/manager and perhaps authorities who can help protect the person. This transparency helps maintain trust while meeting our obligations.

Anonymity: If a staff member reports a concern and wishes to remain anonymous (either as a standard report or a whistleblower), we will respect that as far as possible. However, they should be aware that in some cases their identity might become apparent or need to be disclosed (for example, if an investigation leads to legal proceedings, the whistleblower might be asked to provide evidence). We will endeavour to protect the identities of reporters and will never reveal a whistleblower's identity without their consent unless it's unavoidable for the investigation.

In summary, Harbour Light fosters an environment where raising concerns is encouraged and safe. Confidential handling of sensitive information is paramount. By protecting whistleblowers and maintaining confidentiality, we aim to identify and address problems early, while respecting the privacy and rights of all individuals involved.

5.6 Safeguarding Children (Incidental Contact)



Adult Safeguarding Policy

While our core service is providing accommodation to adults, our staff may occasionally encounter children or young people in the course of their work – for instance, a tenant might have a child or grandchild visiting, or staff might visit a property where children are present. Harbour Light Assisted Living CIC has a responsibility to be alert to the welfare of any children we come into contact with incidentally, even though we do not directly provide services to them. **Any concern about the safety or well-being of a child must be taken seriously and acted upon.**

When a child is at risk: The types of concerns to look out for with children are similar in nature to those for adults (abuse, neglect, witnessing domestic abuse, etc.), but the response is governed by different procedures (Working Together to Safeguard Children guidance). If a staff member suspects that a child is being abused or neglected, or a child discloses something concerning, they should respond as follows:

- **Immediate danger:** If a child appears to be in immediate harm or in need of urgent protection, call 999 without delay (police and/or ambulance). Examples include severe physical abuse, sexual abuse where the perpetrator may have ongoing access to the child, or a child left alone in dangerous circumstances. Ensure the child is not left alone if possible until help arrives.
- **Report internally:** Inform your line manager and the DSL *immediately* about the concern, just as you would with an adult safeguarding issue. Even though it's a child-related concern, the DSL can assist in ensuring it gets reported to the right external agencies.
- **External reporting:** The DSL (or the staff member, if appropriate) will contact the relevant **Local Authority Children's Services** or **Multi-Agency Safeguarding Hub (MASH)** to report the concern. Every local area has a process for reporting child protection concerns, which usually involves calling a dedicated line or submitting a referral form. Provide as much detail as possible about the child (name, age, address) and the nature of the concern. If the child is connected to one of our adult tenants, also provide that context.
- **Inform the child's support network:** If the child has an assigned social worker, support worker, or is known to be under a child protection plan, ensure that person or agency is informed. The DSL can help identify if we have any records of the child or through the tenant (e.g. a note that a tenant's child has a social worker). If known, alert that professional to the new concerns. If not known, the referral to Children's Services will trigger the necessary follow-up.
- **Follow the advice of Child Protection professionals:** Once the concern is handed over, Children's Services will take the lead. They may instruct us to provide certain information or possibly to monitor the situation. We will cooperate fully, recognising that the local authority and possibly the police have statutory powers and expertise in child protection.
- **Do not investigate yourself:** As with adults, do not question the child extensively or try to investigate. Also, **do not confront the parent or tenant** (if, for example, you suspect a tenant of abusing their visiting child). This could escalate the risk. The authorities will handle any necessary investigation or family contact. Our role is to report and then support as requested.
- **Record and confidentiality:** Document the concern and actions taken and keep this record secure. Note that our adult tenants have a right to family life; we do not involve ourselves in their parenting except for the purpose of raising a concern if a child is in danger. We will treat information about child safeguarding with the same level of confidentiality and need-to-know sharing as we do for adults.

We also train our staff to be aware that **domestic abuse** in our tenants' households can affect any children, even if they are not directly harmed. Under UK law, if a child sees or hears domestic abuse, it is considered harmful to the child. So, if, for example, a tenant's child is present in a home where domestic violence is occurring, that child's situation should be reported.



Adult Safeguarding Policy

After reporting: Once we have reported a child protection concern to the authorities, the matter will typically be taken forward by a child protection social worker or team. They may contact us for further information or to coordinate a strategy (especially if it involves one of our tenants). The DSL will handle ongoing liaison. It is important that staff who initially reported remain observant – if the situation with the child or family continues or worsens, and you notice, inform the DSL or authorities of the new information. We should not assume that someone else has resolved everything; continue to watch for the child's welfare when you encounter them.

Finally, staff should be aware that while our primary focus is adult safeguarding, **every member of society has a responsibility to protect children**. Our organisational stance is that no child's suffering should go unreported just because it falls outside our direct service remit. By including this section, we affirm that any incidental contact with children still invokes a duty to act if something seems wrong. Staff will be supported fully by the organisation when they report child protection concerns, just as with adult cases.

Note: We deliberately use narrative procedures in this policy rather than flowcharts. Any decisions and referral steps should follow the written guidance above and be documented in writing as part of the case record. (Flowchart diagrams have been excluded for simplicity; staff should rely on the detailed steps and checklists provided in text form and refer to local authority flowcharts if needed for external processes.)

6. Review and Updates

This Adult Safeguarding Policy will be reviewed every two years or sooner if required by changes in legislation, regulatory guidance, or significant organisational changes. Updates may also be made if we identify improvements through learning from safeguarding cases or audits.

- **Next scheduled review: 1 October 2028 (two years from the effective date).**
- **Responsible owner for review:** Designated Safeguarding Lead (or assigned policy owner) will lead the review process, consulting with staff and relevant external guidance to ensure the policy remains current and effective.

Any revised version of the policy will be approved by senior management and the Board and then communicated to all staff (with training or briefing on changes as necessary). All staff are required to keep themselves updated on policy revisions. The version history and approval records will be maintained to document the evolution of this policy.

By maintaining and regularly updating this policy, Harbour Light Assisted Living CIC reaffirms its commitment to the safety and dignity of the adults we support, ensuring that our safeguarding approach remains robust, lawful, and in line with best practices.