

Safeguarding Adults at Risk Policy

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Contents

	Page
Purpose and scope of this policy	1
Policy	3
<ul style="list-style-type: none"> • Making a safeguarding referral to the local authority • Confidentiality and Information Sharing 	4 5
Definitions	5
Equality, Diversity and Inclusion	7
Data protection	7
Related legislation and regulations	7
Related policies and procedures	7
Customer engagement	7
Document revision history	8

Purpose and scope of the policy

This policy applies to you if you're a Moat customer or colleague who is also an 'adult at risk' (as defined below).

The purpose of this policy is to:

- set out our commitment to working in partnership to ensure that you can live in safety, free from abuse and neglect, and
- ensure that we respond appropriately and effectively to any allegations, reports or suspicions that you're being abused or neglected (including self-neglect).

As set out in the Care Act 2014, **you're an 'adult at risk' if you're an adult (person aged 18 or over) and:**

- a) You have care and support needs*
and**
- b) You're experiencing, or at risk of, abuse or neglect
and**
- c) You're unable to protect yourself from the abuse or neglect or risk of it
because of your care and support needs.**

* You're defined as having care and support needs if you need care and / or support to live as well as possible because of old age, physical frailty, ill health (including mental ill health), disability including learning disability, addiction, being in an abusive relationship or having been in care or in prison, or for another reason. This is regardless of whether your care and support needs are being met.

Abuse and neglect can include the following (please see Definitions section on page 5 for more detail):

- Physical abuse
- Domestic violence and abuse, including controlling and coercive behaviour and so-called honour-based violence, forced marriage and female genital mutilation
- Sexual abuse
- Psychological and emotional abuse
- Financial or material abuse
- Modern slavery and trafficking
- Discriminatory abuse
- Organisational abuse
- Neglect and acts of omission
- Self-neglect, including hoarding
- Cuckooing and exploitation by criminal gangs and organised crime groups
- Online abuse
- Influences of extremism leading to radicalisation.

Safeguarding is everyone's responsibility. At Moat, all of these people must act in accordance with this policy:

- All Moat colleagues (including those on temporary or fixed-term contracts), Board members, agency workers, consultants, volunteers, contractors and third-party partners.
- Any developers, contractors and sub-contractors who we're working with.

1. Policy

- 1.1 Safeguarding Adults is all about ensuring that adults at risk can live in safety, free from abuse and neglect. Safeguarding is everyone's responsibility. Every Moat colleague, contractor and volunteer has a role to play in safeguarding you, which means protecting your right to live in safety, free from abuse and neglect.
- 1.2 If you are (or think you might be) experiencing or at risk of abuse or neglect (including self-neglect) or are worried that another Moat customer might be, please report your concerns to an agency with statutory safeguarding responsibilities such as the relevant local authority adult safeguarding team or the police.
- 1.3 If any of the adult(s) you're concerned about (yourself or others) are living in a Moat home or connected to Moat in some other way (for example, accessing services provided by Moat), you can also report your concerns to us:
- by telephone: 0300 323 0011
 - by email: customer@moat.co.uk
 - on our online portal [myMoat](#)
 - on web chat: [Moat | Contact us](#)
 - in person
 - by writing to us at: Moat, Mariner House, Galleon Boulevard, Dartford, DA2 6QE
- 1.4 We'll safeguard you by doing everything we're required to do by safeguarding laws or regulations.
- 1.5 We'll work in partnership with other organisations such as local authorities (Adult Social Care), health and mental health services and the police to:
- Stop abuse or neglect wherever possible.
 - Prevent harm and reduce the risk of abuse or neglect.
 - Safeguard you in a way that improves your life and supports you to make choices and have control about how you want to live. We recognise that you have the right to make informed decisions about your life and situation, even if we think making a different decision would be better for you.
 - Raise awareness so that you and other people in the community can play your part in preventing, identifying, responding to and reporting abuse and neglect.
 - Provide information and support in accessible ways to help you and other adults to understand the different types of abuse, how to stay safe and how to report it or raise a concern.
- 1.6 We'll ensure that our recruitment policies and procedures support the safeguarding commitment set out in this policy and obtain Disclosure and Barring Service (DBS) checks for qualifying roles (Companies can only request DBS checks for roles which meet specified criteria).

- 1.7 We'll ensure that a Moat colleague or team of colleagues is / are identified as Moat's safeguarding lead(s) and champions and that this is communicated to all Moat colleagues and volunteers.
- 1.8 We'll provide Moat colleagues and volunteers with:
- Robust, appropriate and effective safeguarding procedures and training to ensure that they're able to recognise, respond, report and refer concerns about abuse or neglect.
 - Access to support and guidance which will include access to an appropriately trained safeguarding lead (or safeguarding leads), safeguarding champions and managers across the business who are also appropriately trained.
- 1.9 We'll work in partnership with our contractors, agents and partners to ensure that our joint working practices support our commitment to safeguarding you and other adults at risk.
- 1.10 We'll cooperate with all reasonable requests from local authorities to make and support safeguarding-related enquiries, provide safeguarding-related information, attend safeguarding meetings and contribute to Safeguarding Adult Reviews. We'll do all this promptly and with sensitivity and we'll follow Government-issued information sharing guidance to ensure that we share information where this is required to safeguard you or other adults at risk.
- 1.11 When required by relevant legal and regulatory requirements and / or where necessary to prevent harm and reduce the risk that you or others might experience abuse or neglect, we'll:
- Take any appropriate action available to us in relation to the person or organisation alleged to have caused harm in accordance with other relevant policies.
 - Make a referral to the Disclosure and Barring Service (DBS)
 - Make a referral to the Care Quality Commission (CQC).
- 1.12 We'll ensure that anything we do to safeguard you or other adults at risk is done in accordance with the six safeguarding principles set out in the Care Act 2014:
1. Empowerment – people being supported and encouraged to make their own decisions and informed consent.
 2. Prevention – It's better to act before harm occurs.
 3. Proportionality – the least intrusive response appropriate to the risk presented.
 4. Protection – support and representation for those in greatest need.
 5. Partnership – local solutions through services working with their communities.
 6. Accountability – accountability and transparency in delivering safeguarding.

2. Making a safeguarding referral to the local authority.

- 2.1 If we have concerns that you may be experiencing, or be at risk of, abuse or neglect (including self-neglect) we'll talk to you about our concerns if it's possible to do so and we don't think talking to you will put you or others at greater risk.

2.2 If we still have concerns, we'll ask for your consent (permission) to make a safeguarding referral to the local authority to make sure that appropriate action is taken to stop or prevent the abuse or neglect for you and / or others.

2.3 If you don't consent to us making the referral, we won't in most circumstances. However, in some cases, we'll make a safeguarding referral to the local authority even if you don't give your consent - please see section 3 below.

3. Confidentiality and Information Sharing

3.1 In general, we won't share any information about you without your consent. However, we can lawfully share information with organisations such as the local authority (Adult Social Care) and the police if it's in the public interest to do so – for example, to protect you or someone else from serious harm or to prevent crime and disorder.

3.2 In deciding whether to share information about you without your consent we'll consider:

- **Necessity** – whether sharing the information is likely to make an effective contribution to preventing the risk.
- **Proportionality** – whether the public interest in sharing the information outweighs the interest in maintaining confidentiality.

3.3 If you lack the mental capacity to give consent but we consider that it would be in your best interests, or the best interests of others at risk of harm, to share information we'll do so.

Definitions

Abuse - Abuse and neglect can include:

- **Physical abuse** – May include hitting, slapping, pushing, kicking, misuse of medication, misuse of restraint, or inappropriate sanctions.
- **Domestic violence and abuse**, including controlling and coercive behaviour and so-called honour-based violence, forced marriage and female genital mutilation – Please see Domestic Abuse Policy for full definition of domestic abuse.
- **Sexual abuse** – May include rape and sexual assault, or sexual acts to which the adult has not consented, or could not consent, or where pressure was applied to secure their consent.
- **Psychological and emotional abuse** – May include verbal abuse, emotional abuse, threats, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, isolation or withdrawal from services or supportive networks.

- **Financial or material abuse** – May include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Modern slavery and trafficking** – May include human trafficking, forced labour and domestic servitude.
- **Discriminatory abuse** – May include racist or sexist remarks or comments based on a person's impairment, disability, age or illness, and other forms of harassment, slurs or similar treatment.
- **Organisational abuse** – involves the collective failure of an organisation to provide an appropriate and professional service to adults with care and support needs. It includes a failure to ensure the necessary safeguards are in place to protect adults and maintain good standards of care in accordance with individual needs.
- **Neglect and acts of omission** – May include acts of omission, ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, food and drink and heating.
- **Self-neglect** – May include behaviours neglecting to care for one's personal hygiene, health or surrounding, includes hoarding.
- **Cuckooing and exploitation by criminal gangs and organised crime groups** – Cuckooing is the act of exploiting another person to use their home for illegal activity, such as:
 - Producing, storing, dealing or using illegal drugs and / or firearms
 - Using the home for sex work
 - Taking over the home as a place to live and / or financially abusing the person(s) who live there
- **Online abuse**
- **Influences of extremism leading to radicalisation** – This can be a type of process that causes someone to adopt radical positions on political or social issues.

Disclosure and Barring Service (DBS) – Helps employers make safer recruitment decisions.

Safeguarding Adult Review (SAR) – A Safeguarding Adults Review (SAR) is a multi-agency review which seeks to determine what relevant agencies and individuals involved could have worked differently, that could have prevented abuse or neglect or a death from taking place.

Equality, Diversity and Inclusion

This policy will be delivered in accordance with our Equality, Diversity and Inclusion Policy. An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

Data protection

This policy will be delivered in accordance with our Data Protection Policy. A Data Impact Assessment was completed for this policy and considered as part of the approval process.

Related legislation, Regulations and Guidance

- Care Act 2014 and Care Act Statutory Guidance
- Equality Act 2010
- Mental Capacity Act 2005

Related policies and procedures

- Safeguarding Procedure
- Antisocial Behaviour Policy
- Code of Conduct
- Data Protection Policy
- Disciplinary Policy
- Domestic Abuse Policy (Customers)
- Equality, Diversity and Inclusion Policy
- Hate Related Incidents Policy
- Hoarding Policy
- Homes Lettings Policy, Priority Move Policy and Housing Potentially Dangerous Offenders Policy
- Recruitment, Selection and Appointment Policy
- Whistleblowing Policy

Customer engagement

On 1 February 2024, we contacted our Customer Advocates to invite them to comment on a draft of this policy by completing a survey. The survey, which closed on 19 February 2024, asked the following questions and invited them to provide comments:

- Did you find the policy clear and easy to understand?
- We are keen to remove jargon and buzzwords wherever possible. Were there any words, phrases or sections that you feel we should change to ensure it is plain English?
- Thinking more generally about this policy, is there anything you would change?
- Would you support Moat's adoption of this policy?

Feedback, comments and suggestions provided by customers through the survey have been used to improve the policy.

Document Revision History (Record of any changes made to the policy)

Date	Changes approved by	Details of changes made