

Safeguarding and Vulnerable Adults Policy and Procedure

2025-2027

THIS D	THIS DOCUMENT IS TO BE READ IN CONJUNCTION WITH:				
1.	Tenancy Sustainability Strategy				
2.	ASB Policy				
3.	Tenancy agreement				

REVISION HISTORY					
Revision date	Previous	Summary of Changes	Changes	Version	
	revision date		marked		
13/03/2025		Policy revision and review (approved KF & DB)	Yes	2	

DOCUMENT MANAGEMENT	
Approved by: EMT	Next Review Date: March 2027
Date of approval: 24.05.2022	Version 2
Contact: (Duty Holder)	
Head of Tenancy Support: Kelly Fitzgerald	
Contact: (Responsible Person) Tenancy Support Manager: Andrea Tear	

INTRODUCTION

Northamptonshire Partnership Homes (NPH) takes the Safeguarding of children and vulnerable adults seriously and is committed to helping to protect them from abuse, neglect, exploitation, or harm.

We recognise our responsibility to safeguard and promote the welfare of all children, young people and vulnerable adults by a commitment to a practice that protects them.

NPH will ensure through its recruitment and selection policy suitable people are selected for working with children and vulnerable adults. Additionally, NPH will undertake DBS checks on staff when required for customer facing roles.

NPH will take any concern raised by employees or its agents and contractors about Safeguarding seriously and sensitively.

NPH will work in cooperation with West Northants Council. It will comply with all relevant Safeguarding Boards and their procedures and will respond positively to any recommendations they make.

As an organisation, NPH commits to:

- Work together to resolve issues where the individual may not be eligible for social care support, refuses support or self-neglects
- Ensure links between public protection forums such as safeguarding boards, multiagency risk assessment conferences (MARACs), multi-agency public protection arrangements (MAPPAs), health and wellbeing boards and community safety partnerships
- Help partner agencies to understand the role of housing staff in safeguarding
- Develop a common understanding of language and definitions regarding people with care and support needs and safeguarding
- Provide clarity for staff on the law relating to sharing information, confidentiality and data protection
- Ensure inclusion of housing staff in strategy meetings and investigations, internally within the organisation and with our partners.
- Processes will be in place for keeping referrers informed of progress on safeguarding referrals.
- Ensure all staff receive safeguarding training as part of their induction. All existing staff must complete a regular, mandatory safeguarding e-Learning module. g

AIMS and OBJECTIVES.

NPH employees are well placed to identify people at risk of abuse during their day-to-day work whilst visiting people in their homes. The Northamptonshire Safeguarding Children's Board have issued the following guidance: -

https://nctrust.co.uk/wp-content/uploads/2024/02/NSCP-Thresholds-Guidance-review-FINAL-11-4-2022.pdf

This document can help officers clarify the referral process regarding Children.

When the term "children" is used this includes young people and young persons. The phrase "children, young people and vulnerable adults" refer to:

- a) Anyone under the age of 18 years or
- b) A person aged 18 years or over who may be unable to take care of themselves, or protect themselves from harm or from being exploited

This Policy supports NPH's commitment to assisting vulnerable people in line with the Tenancy Sustainability Strategy. All our processes will ensure that vulnerable people can be identified a housing allocation offer is made by West Northamptonshire Council when there are difficulties in an existing tenancy. NPH support services will continue to remain in place for key functions such as rent arrears collection and dealing with anti-social behaviour.

All introductory, secure and fixed term tenancy agreements set out the tenants responsibilities. Some tenants will require additional support to maintain these responsibilities.

If a tenant is supported, then they have a much higher chance of sustaining their tenancy and NPH will focus on four main themes:

- Early identification of potential problems, both at pre-tenancy stage and once a tenancy has been signed. Risk assessments will be completed, when required, to ensure any support requirements or risks are captured.
- Help tenants and applicants to gain the skills necessary to manage their tenancy once support stops.
- Ensure timely referrals are made to statutory agencies where appropriate.
- Assist tenants and applicants to link into services which can help them to improve their ability to sustain their tenancies and quality of life.

KEY PRINCIPLES OF THE POLICY

- The welfare of children and vulnerable adults is paramount
- All children and vulnerable adults (whatever their background and culture, maternity or
 pregnancy status, age, disability, gender, racial origin, religious belief, sexual orientation
 and/or gender identity) have the right to participate in society in an environment which is
 safe and free from violence, fear, abuse, bullying and discrimination.
- All children and vulnerable adults have the right to be protected from harm, exploitation and abuse and to be provided with safe environments to live and play
- Working in partnership with children, their parents, carers and vulnerable adults and other agencies is essential in promoting children and vulnerable people's welfare

- NPH has a duty to promote the well-being of children and young people and to cooperate with the Council in delivering its safeguarding duties
- NPH is responsible for establishing appropriate policies and procedures to ensure that
 its activities promote the safety and wellbeing of children and vulnerable adults, e.g.,
 safe recruitment policies, safe working practices

WHO MIGHT BE AT RISK?

- The elderly
- A person with a physical disability or cognitive impairment
- A person with a learning disability
- A person with mental health needs which can include dementia
- A person with a long-term illness or condition
- Those misusing substances or alcohol
- Carers, including young people providing unpaid care to a family member or friend
- Those unable to demonstrate the capacity to make decisions as defined by the Mental Capacity Act and needs care and support.

Assessment before a Tenancy starts

Applicants who apply to West Northamptonshire Council's housing register and have been identified as being a potentially vulnerable person/household will be referred to the Lettings and New Tenancy team who will complete an assessment to identify the applicant's needs and any areas where support will be required once a property is offered. These assessments will concentrate on:

- Discussing with the applicant the skills they will need to successfully manage their tenancy
- Assessing any risks to the customer and business
- Referring to statutory services where appropriate
- Ensuring the right person is allocated the right home that is appropriate for their needs by way of its size, type of dwelling, requirement for adaptions, location and affordability
- Promoting the importance of rental payments

The officer will consider the specific needs of the applicant when completing the assessment and how much engagement is required whilst they are waiting for the offer to be made.

The applicant will be supported in all areas of the rehousing process including how to place bids and advice on how to maximise their opportunities of being successfully housed.

A plan will be drawn up prior to the applicant taking up the offer to assist them in the moving process. Helping a new tenant to set up their new home is a good tenancy sustainment opportunity. Assisting people through the rehousing process and supporting them in areas that could cause them difficulties can reduce the number of new tenancies failing.

Where the customer has been identified as having very low support needs, the Assessment Officer will provide a 6-week re-settlement period before closing the case.

Where longer term support needs are identified, the case will be referred to a Housing Support Officer who will conduct a joint visit with the Assessment Officer within the 6-week period to draw up a Support Plan.

Tenants managed by NPH

For existing tenants requiring support, a support plan will be drawn up and agreed areas of support identified. The tenant will be expected to engage in that support and the Support Officer will engage in partnership working where other agencies are involved. Additionally, the Support team engage in monthly meetings with Social Services to discuss best practice, to discuss potential incoming safeguarding cases and any potential barriers.

Tenants who have moved into older persons accommodation will receive contact from the Welfare Team to install and set up a 'lifeline' system. Officers will make sure that the tenant understands the equipment that is available to them and where appropriate, show them how to self-test. In cases where the tenant is frail or is physically unable to self-test, the Welfare Officer will arrange to test the equipment and complete the required checks.

Referrals and concern cards received for vulnerable tenants will be considered from all other areas of the business and outside agencies. Referrals should be made as soon as a tenant is identified as vulnerable and where they may be in need of support.

Serious Case Panels

NPH has two panels designed to discuss and plan cases of concern.

- The Domestic Abuse Panel discusses cases where Domestic Abuse is the primary vulnerability. Plans will be agreed, in line with the Domestic Abuse Policy and a register kept
- The Complex Case Panel will discuss cases where there is a concern regarding the tenant's wellbeing or a risk to staff. Actions will be agreed, and a register kept

The panels are attended by officers from the Support, Welfare, Lettings and Tenancy Management Teams. This allows a joined-up approach to managing risk, and to provide the most appropriate outcome for the tenants or applicants.

In addition to the above panels, the Tenancy Compliance Manager and team also attends a monthly Cuckooing meeting with external agencies and West Northamptonshire Council to discuss those tenants currently identified as victims of cuckooing, or those likely to be at risk of Cuckooing.

Hoarding/Serious Neglect

Hoarding has been identified as being a growing problem with serious and costly implications for housing providers. The risks include risk management challenges, health and safety concerns, escalating legal costs and safeguarding issues. Hoarding disorder is a complex psychological problem that has been recently classified as a diagnosable mental health disorder.

A procedure for dealing with tenants who have this disorder is covered in the Hoarding Policy.

GUIDANCE FOR FRONTLINE HOUSING STAFF AND CONTRACTORS

All employees of NPH have a responsibility in the 'safeguarding' of vulnerable adults and children. Everyone should ensure they have read and understood the Policy and undertake when required on-line refresher training.

Identifying if a child or person is at risk is not always easy to spot, but there are some signs to look out for:

- Poor appearance and hygiene
- Signs of physical injury
- Children left alone in the house with no adult present
- Changes in behaviour over a period of time
- Signs of controlling, coercive or threatening behaviour from one person to another within a household
- Locks on the outside of bedroom doors
- Unexplained spending/lack of finances/rent arrears
- Unwanted people staying in a property
- Hoarding
- Abuse can include any, but is not limited to, some of the following:
- Physical this can include hitting, shaking, throwing, burning or causing deliberate ill
 health to another person
- Mental and Emotional this can include feeling frightened, in danger, unloved, inadequate and persistent ill treatment
- Sexual this can include being forced to take part in sexual activities, to behave in sexually inappropriate ways or sexual exploitation
- Bullying which can include deliberately causing harm
- Financial this can include the deliberate withholding of finances or stealing from a child, young adult or vulnerable person
- Neglect this can include lack of bathing, care or clothing

WHAT SHOULD YOU DO IF ABUSE IS SUSPECTED?

- 1. In an emergency, and where there is an immediate risk of abuse call 999
- 2. Report your concerns to the Safeguarding inbox (safeguarding.nph@nph.org.uk). For trades employees ensure that a concern card is completed immediately.

Concern card process – Concern cards are completed by trade employees only and have been set up to ensure all safeguarding risks are being effectively captured and managed by NPH.

The concern card has two levels of risk, the first relates to safeguarding, domestic abuse and other high-risk situations. The second is related to tenancy and environmental related issues which have a much lower risk.

Concern cards completed that relate to potential high-risk situations such as suspected Domestic Abuse or other safeguarding matters should be sent directly to the safeguarding mail in box. Safeguarding.nph@nph.org.uk. This box will be managed by the Housing Support Manager. The trades operatives will be contacted by the Support Manager within 48 hours to discuss in further detail what the operative has seen and the concerns that they have. The operative should ensure they are able to be contacted within the 48 hours following the submission of a high-risk concern card.

The Housing Support Manager will record the safeguarding concern via REACT (case management system), and will outline what actions they will take, or have already been taken for example: making a safeguarding referral, contacting the MASH team etc. These cases will continue to be monitored by the Housing Support Manager until a resolution is reached, or confirmation is received from the Safeguarding team/Social Services that the case can be closed. Due to GDPR regulations, outcomes of referrals cannot be shared with the reporting individual.

Concern cards completed that relate to low-risk situations, such as poor condition of tenancy, low level concerns around tenant welfare, fire safety breaches in communal areas, should be sent directly to the Tenancy Management inbox: neighbourhoods.nph.@nph.org.uk.

These concerns will then be reviewed by the Tenancy Area Managers. If further information or follow up is required, contact will be made with the officer who completed the card. Often these concerns will be followed up by the Housing Officer who will complete a follow up visit. Due to GDPR regulations, outcomes of referrals cannot be shared with the reporting individual.

All employees should make a safeguarding referral to West Northamptonshire Council agencies.

For Safeguarding Adults, please call 0300 126 7000(for emergency cases only) or visit the 'report a concern' page on West Northamptonshire website (Reporting a concern about an adult | West Northamptonshire Council).

For Safeguarding Children (MASH) hub, please call 0300 126 7000, or visit the 'report a concern' website for the NC Trust (Report a concern or request support | Northampton Children's Trust).

What should you do if a tenant or third party discloses abuse?

Assure the person that the matter will be taken seriously. Listen and be non-judgmental.

Explain the process for reporting the allegation.

Don't promise confidentiality – explain how and why the information might need to be shared.

Don't question the person, other than for clarification – formal enquiries and investigations will allow the person to give a full account of their concerns.

Safeguarding Leads:

Kelly Fitzgerald – Head of Tenancy Support – Kelly.Fitzgerald@nph.org.uk

Andrea Tear – Tenancy Support Manager – Andrea.Tear@nph.org.uk

Equality and Diversity

We monitor all those with protected characteristics to ensure that we can identify service delivery quality to all.

Policy Review

The Policy will be monitored by the Director of Customers with regular updates provided to Operations and Resources Committee.

Community Impact Assessment 1. About your review

		at your review					
Name of the		olicy, process, or servi	ce under review:				
Safeguarding Policy							
Is the proje	Is the project, strategy, policy, process, or service: (remove nonapplicable)						
	CURRENT	<mark>REVISED</mark> NEW					
Which customer groups will be impacted? Detail if specific customer groups or areas are impacted e.g., Tenants in Spring Fields area, tenants with young families, tenants on Housing Benefits etc	Any tenant that has been identified as being vulnerable or at risk	Any leaseholder that has been identified as being vulnerable or at risk	STAFF Staff who identify customers that may be at risk or considered vulnerable, or any staff who themselves are identified as being at risk or vulnerable	OTHERS (name) e.g., Traveller Licensee, Garage Licensee, CIC customer Any person that has an interaction with NPH staff and have been identified as being vulnerable or a risk			
Summary of the project, new or revised strategy service:	, policy, process, or		CIA carried out by:				
Policy to educate and inform all staff on the cr safeguarding concerns and highlighting NPH's customers	Lettin	Lead officer/Staff: April West gs and New Tenancy Mar	ager				
	Docume	ent Management					
SMT Next rev		view date: Contact Officer: (Name/Job title) eview date: Kelly Fitzgerald ch 2025 Service area:		gerald			
Date of approval:	sion: 2	Tenancy S					

2. Relevant Equality Monitoring Data

Use this section to give as much information as possible about helpful customer data. Think about: customer profiling, complaints, compliments, satisfaction surveys and census data.

Equality Data Monitoring					
What internal equality data do you use to monitor this policy?	Internal or external data?	Engagement?			
Data from Capita (Open Housing)	Internal				
Complaint's data	Internal				
Data from REACT software	Internal				
Information from MDT/MAPPA/MAM meetings	External	DA panel, Cuckooing meetings, MAPPA meetings, MARAC,			
Data from contractors	External				
West Northants Homelessness (Jigsaw)	External				

3. Analysis of Impact on Equality

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relationships with protected groups. Consider how this project, strategy, policy, or service review will achieve these aims.

	<u> </u>	1 3 7 5771 17		
Protected	Which groups	Impact	Risks	Mitigations / Recommendations
Characteristics	would be affected	(Positive/Negative/Neutral)		
Race and ethnicity	Yes	Positive	Access to services	Translation/interpreter services
				available during visits
Disability	Yes	Positive	Access to services	Referral / signpost to other agencies
Sex	Yes	Positive	Domestic Abuse	NPH Domestic Abuse policy and panel

Age	Yes	Positive	Reduced	Welfare Team supporting Older People,
			visibility/reluctance	Assessment Officers supporting Leaving
			to report	Care/Young people
Religion or Belief	Yes	Positive	Domestic	NPH Domestic Abuse policy and panel
			Abuse/Honor	
			Based Violence	
Gender Reassignment	Yes	Positive	Domestic	NPH Domestic Abuse policy and panel,
			Abuse/Harassment	NPH Hate Incident Policy
Sexual Orientation	Yes	Positive	Harassment	NPH Hate Incident Policy, NPH Equality
				and Diversity Strategy
Pregnancy and Maternity	Yes	Positive	Domestic	NPH Domestic Abuse policy and panel
			Abuse/Honor	
			Based Violence	
Marriage and Civil	Yes	Positive	Domestic	NPH Domestic Abuse policy and panel
Partnership			Abuse/Honor	
			Based Violence	

Evidence Base: (Evidence used / likelihood / size of impact)

How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision?

E.g., Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.

4. Analysis of Impact on Well-being

Well-being — Use this section to determine how the project, strategy, policy, process, or service will impact on a customer's health and wellbeing, and whether the proposal will impact on the demands for, or access to our services.

Category Area	Which groups could be affected	Impact (Positive/Negative/Neutral)	Risks	Mitigations / Recommendations
Mental Health and Wellbeing	Yes	Positive	Awareness of potential safeguarding concerns may negatively impact mental health due to lack of awareness	Staff training (internal, external and refresher e-Learning), Support Manager recording outcomes from safeguarding referrals, Support Officers/Welfare Officers offering case support, referrals to external mental health services

NPH Safeguarding Policy

Healthy Lifestyles	Yes	Positive	Customers may not recognise unhealthy habits or be unwilling to engage	Staff training (internal, external and refresher e-Learning), Support Manager recording outcomes from safeguarding referrals, Support Officers/Welfare Officers offering case support, referrals to external mental health services, education around services and what they can provide
Accidents and Falls Prevention	Yes	Positive	Customers may not want to engage through fear of losing independence, for example, customer struggling to occupy a property with stairs	Welfare service/lifeline service provided in all older person's accommodation
Access to referral of other services/partners	Yes	Positive – see above under mental health and wellbeing	Customers may not want safeguarding referrals to be submitted	Reiteration of the offer of a referral, education of what services can provide
Independent Living	Yes	Positive	Isolation, vulnerable to being coerced, customer may struggle to live independently if vulnerable	Welfare service/lifeline service provided in all older person's accommodation, pre-tenancy assessment and support, ongoing tenancy support service
Safeguarding	Yes	Positive	Some members of staff may not be equipped to recognise the underlying issues and act appropriately.	Staff training (internal, external and refresher e-Learning)
Other	No			

Evidence Base: Evidence used / likelihood / size of impact)

How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision?

E.g., Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.

5. Analysis of Impact on Community

Use the following template to highlight the impacts of your proposal on each of the following categories: The Economy, the Environment, and Localities/Communities.

Community Impact Assessment – A Community Impact Assessment (CIA) helps us make sure our policies, strategies and projects do not discriminate against anyone in respect of disability, gender, and racial equality.

projects do not discriminate against anyone in respect of disability, gender, and racial equality.						
Impact and groups that	Impact	Risks	Mitigations / Recommendations			
could be affected	(Positive, neutral,					
	negative)					
Impact to the Economy: •	Neutral	Damage to property due to neglect, domestic abuse	3-5 yearly tenancy property updates to capture condition of property and review household needs/vulnerabilities			
Impact to the Environment: •	Neutral	Neglect of internal and external tenanted areas, excessive noise nuisance, 'undesirable' locations causing higher void turnaround	3-5 yearly tenancy property updates to capture condition of property and review household needs/vulnerabilities, offer of community drop in sessions, Welfare Officers assigned to all older persons accommodation			
Impact to localities / communities: • E.G., disadvantaged groups, for example, carers, veterans, and military staff, homeless, rurality, low income etc.	Positive	Vulnerable customers can be targeted	Housing Officers having a regular presence in their local communities, 3-5 yearly tenancy property updates to capture condition of property and review household needs/vulnerabilities, offer of community drop in sessions, Welfare Officers assigned to all older persons accommodation			
Other:						

Evidence Base: (Evidence used / likelihood / size of impact)

How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision?

E.g., Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.

6. Taking action

A Community Impact Assessment cannot be signed off until negative outcomes are addressed. What actions you have taken or plan to take to remove and/or reduce negative outcomes?

Actions identified from CIA	Target completion date	Responsible Officer	Is this action identified in any other monitoring framework?	Comments

7. Assessment Review and Sign Off

	Assessment Review completed by: April West – Lettings and New Tenancy Manager and Kelly Fitzgerald – Head of Tenancy Support					
	Comments:					
	Next review date: April 2027					
Name:	Date:					
Directorate	ate: Signature:					