

1.0 Introduction and Context.

- 1.1 Sapphire Independent Housing ('Sapphire') is dedicated to ensuring safe housing and services for all residents. Safeguarding is a collective responsibility, and Sapphire is committed to promoting the welfare of anyone at risk. We expect all colleagues, contractors, and third-party partners to uphold this commitment.
- 1.2 The protection and safety of residents (and others) who come into contact with the organisation and may be at risk is everybody's responsibility.
- 1.3 All staff must recognise this and must report any concerns about the well-being of anybody identified at risk.
- 1.4 Sapphire recognises its responsibilities to safeguard and promote the welfare of those who are at risk. This requires us to:
 - Provide effective management for staff, through supervision, support and training.
 - Continuous risk assessment with our work with residents and service users.
 - Develop and maintain effective information sharing with statutory services and other key partners.
 - Vet any staff and volunteers and ensure the vetting of external contractors.
- 1.5 We will aim to visit residents at least annually as part of our commitment to safeguarding and guarding against neglect.

2.0 Objectives

- 2.1 The objectives of the policy are:
 - To explain the responsibilities the organisation and its staff have in respect of vulnerable adult protection.
 - To provide staff with an overview of safeguarding and a clear procedure to be implemented when issues arise.
 - To develop a culture that does not tolerate abuse and which encourages people to raise concerns.
 - To ensure that safeguarding concerns and referrals are handled sensitively, professionally and in ways that support the needs of the resident and service user

3.0 Definitions

3.1 Safeguarding

Safeguarding means protecting people's health, well-being, and human rights, and enabling them to live free from harm, abuse and neglect. The Care Quality Commission (CQC) defines Safeguarding adults as:

Protecting the rights of adults to live in safety, free from abuse and neglect. People and organisations working together to prevent and stop both the risks and experience of abuse or neglect. People and organisations making sure that the adult's wellbeing is promoted, including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action.

Safeguarding includes recognising that adults sometimes have complex

interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances, and therefore potential risks to their safety or wellbeing.

3.2 Abuse

Abuse is an act, or a lack of appropriate action, which causes harm or distress and occurs within a relationship where there is an expectation of trust. Abuse can be:

- A crime;
- Perpetrated by anyone;
- The result of neglect, omission, or failure to act;
- Unintentional or a result of a lack of knowledge;
- Consists of single or repeated acts; or
- Occurring in any relationship.

As defined in the **Care Act 2014**, types of abuse can include:

- Physical abuse;
- Domestic Violence;
- Sexual Abuse;
- Psychological abuse;
- Financial or material abuse;
- Modern slavery;
- Discriminatory abuse;
- Organisational abuse;
- Neglect and acts of omission; or
- Self-neglect.

3.3 At risk

At risk includes those who are unable to take care of or protect themselves, and whose independence and well-being are at risk without support because they are vulnerable through:

- Age;
- Having a long-term limiting illness or condition;
- Being in an abusive relationship;
- Having a physical, learning or mental health disability;
- Lacking mental capacity;
- Frailty; or
- Having been in care, prison or other institution.

3.4 Adults

An adult under this policy means any person aged 18 or older. An adult at risk may need community care services for, for example, a physical or mental disability, a learning difficulty, reduced capacity and dependency on drugs, alcohol or medication. They may also be unable to take care of themselves or protect themselves against significant harm or exploitation.

3.5 Children

Safeguarding children and child protection guidance and legislation applies to all Children. Children under this policy means all children up to the age of 18 including an unborn child.

Sapphire recognises the difference between Adults at Risk and Children when it comes to the approaches used in safeguarding. Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. This means:

- Protecting children from abuse and maltreatment or neglect;
- Preventing harm to children's health or development, ensuring children grow up with the provision of safe and effective care; and
- Taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures, which detail how to respond to concerns about a child.

3.6 Mental capacity

People must be assumed to have the capacity to make their own decisions and be given all practicable help before they are considered not to be able to do so. If there is a concern that an adult may lack the capacity to make a specific decision, a referral must be made to the relevant local authority Adult Social Care Department. Where an adult is found to lack capacity, then any action taken, or any decision made for, or on their behalf, must be made in their best interests.

4.0 Key policy principles

4.1 The following principles shape Sapphire's approach to safeguarding.

- We recognise that the majority of our residents have the capacity to keep themselves safe and make informed choices and decisions. We will not assume someone is vulnerable to abuse because of their support needs. We will always act to support clients and assist them in seeking protection from abuse.
- We will make arrangements to have regard to the need to safeguard and promote the welfare of children and vulnerable adults.
- It is our duty to train staff to recognise the signs of abuse. Sapphire is expected to make colleagues familiar with the principles of safeguarding, train colleagues to be vigilant, recognise signs of abuse and know what to do if they witness those signs.
- We will only recruit and employ customer-facing staff who have undergone DBS (Disclosure and Barring Service). We will share information on staff found to be unsuitable to work with people at risk by referring their details to the DBS. All relevant customer-facing employees will be subject to the relevant Disclosure and Barring Service (DBS) check and supervision and support will be used to assess and manage any risk issues relating to employees. Where required, DBS checks will be renewed as appropriate.

4.2 Accurate, clear, and concise record-keeping is essential for safeguarding, in accordance with our GDPR policy.

4.3 Safeguarding is a multi- agency approach which depends on effective joint working. Housing providers have a duty to co-operate with local authorities in implementing their statutory duties around safeguarding. This may include carrying out 'enquiries' into incidents, information sharing, and participating in statutory local Safeguarding Boards.

- 4.4 Sapphire recognises the 'referrer' role as a provider of social housing, and where appropriate, we will support Local Authorities with their enquiries and share appropriate information with them. Local authorities may carry out Section 42 Enquiries, which may involve Sapphire sharing information, attending meetings, putting protection measures to protect an adult from abuse and/or neglect and in some cases, perhaps leading on an enquiry.
- 4.5 Sapphire will comply with obligations highlighted within the Care Act 2014 in relation to Section 42. Sapphire understands that Section 44 Safeguarding Adult Reviews will be undertaken by a local authority in the event of a tragedy or near miss. The objective of the review is to learn lessons and not to apportion blame. Sapphire will co-operate with the local authority in carrying out its statutory obligations under Section 44 of the Care Act 2014.
- 4.6 We will endeavour to obtain consent from the subject or the subject's parents (where the subject is under 18) before raising a safeguarding alert where appropriate. In the event consent cannot be obtained, or it would be inappropriate to do so, this will be communicated to the Local Authority when the alert is raised.

5.0 Staff

- 5.1 As above, Sapphire will ensure all relevant customer-facing employees will be subject to the relevant DBS checks to prevent unsuitable people from working or volunteering with people at risk.
- 5.2 All staff and volunteers will complete mandatory safeguarding training as part of the induction process. This will be repeated at appropriate intervals appropriate to the individual's role.
- 5.3 Where staff members' responsibilities include direct contact with people at risk, these individuals will attend training sessions appropriate to their role.
- 5.4 Sapphire recognises the emotional impact on staff working with people who have or are experiencing trauma or have a vulnerability. Staff are encouraged to use our confidential employee assistance programme or to seek support through clinical supervision.

6.0 Contractors

- 6.1 Contractors and service providers for frontline services on our behalf need to make sure their staff:
- Are suitable to provide frontline services
 - Have appropriate DBS checks in place
 - Comply with contractual requirements
 - Are aware of who to contact with any safeguarding concerns.
- 6.2 Contractors must also:
- Notify us of all safeguarding concerns •
 - Fully co-operate with any investigation into received allegations
 - Have adequate systems in place to take appropriate disciplinary action.

7.0 Legal Framework

- 7.1 The following legislation and guidance apply to safeguarding adults:

- Safeguarding Vulnerable Groups Act 2006
- Mental Health Act 2005 and Mental Health Act 1983
- Data Protection Act 2018
- Care Act 2014
- Human Rights Act 1988
- Domestic Abuse Act 2021

7.2 The following legislation and guidance apply to safeguarding children:

- Children Act 1989
- Children Act 2004
- Children and Social Work Act 2017
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Digital Economy Act 2017
- Adoption and Children Act 2002
- Female Genital Mutilation Act 2003
- Children and Adoption Act 2006
- Children and Young Persons Act 2008
- Borders, Citizenship and Immigration Act 2009
- Apprenticeships, Skills, Children and Learning Act 2009
- Education Act 2011
- Public Interest Disclosure Act 1998
- Equality Act 2010
- Anti-social Behaviour, Crime and Policing Act 2014
- Care and Support Statutory Guidance – available at <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

8.0 Cross References

8.1 This policy should be read in conjunction with other policies for the organisation, including:

- Complaints Policy
- Disciplinary Policy
- Data Protection and Confidentiality Policy
- GDPR Policy and Procedure
- Equality & Diversity and Inclusion Policy
- Professional Boundaries Policy
- Assessment, Support Planning and Key Worker Policy and Procedure
- Serious Incident Reporting
- Whistleblowing Policy
- Domestic Abuse Policy
- ASB policy
- Hoarding Policy.

9.0 Identifying and preventing abuse

9.1 Safeguarding issues may be brought to the attention of staff directly by residents, neighbours, contractors, or other agencies in contact with residents or their families. In addition, housing management staff working with residents or entering residents' homes to carry out visits, repairs, inspections, or interviews may encounter situations causing concerns for someone's welfare. We consider any of the following to present

a safeguarding concern, but this is not an exhaustive list:

- Adults at risk whose care needs appear to be neglected or appear to be subjected to deliberate mistreatment.
- Adults are at risk of financial abuse, which may be indicated by a lack of heating, clothing or food, inability to pay bills / unexplained shortage of money, unexplained withdrawals from an account, unexplained loss/misplacement of financial documents, the recent addition of authorised account holders/signatories or unexplained changes in a will or other financial documents.
- Signs of self-neglect such as hoarding, unsanitary conditions or alcohol or substance misuse.
- Repeated instances of poor health or neglectful care by health and social professionals or workers.
- Neglect of a person's needs because those around them are unable to be responsible for their care, for example, signs that a carer may have difficulties caused by poor health, debt, alcohol, or mental health problems.
- Difficulties in maintaining tenancy, such as arrears or neighbour problems or harassment, which may be linked to learning difficulties or mental health problems and giving rise to exploitation, financial abuse or harassment.
- Where there is known or suspected domestic abuse.
- Adults who say they are being abused.

10.0 Reporting

- 10.1 All colleagues and third parties have the responsibility to report concerns of abuse or disclosures made to them promptly, as detailed in this policy. Safeguarding incidents will be included in performance information to the Board.
- 10.2 A safeguarding concern should be raised if a member of staff, agent or contractor either witnesses, receives a disclosure, has reason to suspect, or can simply answer 'yes' to the question "Am I worried about this person's safety or wellbeing?"
- 10.3 If there is a risk of serious or imminent danger/harm to the individual, the person witnessing the event must dial 999 and ask for the appropriate emergency service.

11.0 Review

- 11.1 This policy will be reviewed every three years or sooner, subject to legal, regulatory changes or if internal changes, including in the event of a serious incident, require it.

Policy Name:	Date Created:	
Safeguarding Policy		
Approved By: Sapphire Board	Date Approved:	
	21 st July 2026	
Department Director:	Last Review Date:	July 2026
Chief Executive		
Linked Policies and Procedures:	Next Review Due:	July 2029
' Assessment, Support Planning and Key Working Policy and Procedure. Policy, ASB and Hate Policy	(3 years)	
<i>In-Cycle Amendments:</i>	<i>In-Cycle Amendment Date:</i>	