

Policy name: Safeguarding Adults Policy	
Section:	Housing
Exec responsible:	Director of Housing
Review by:	Director of Housing, Housing & Customer Engagement Manager (Safeguarding Lead), Executive Team
Tenant review:	No
Authority to amend:	Chief Executive
Frequency of review:	Every three years
Last review:	October 2025
Next review:	October 2028
Responsibility for delivery:	All frontline staff
Strategy:	Customers and Community Strategies
Associated risk ID:	8. Inadequate and ineffective customer service and/or engagement. 9. Health and safety failure or neglect
Health & safety:	This policy outlines how we will safeguard adults and support staff that witness, report or are otherwise involved in safeguarding matters. Staff personal safety is also safeguarded through the appropriate undertaking of this policy in conjunction with the Code of Conduct.
Equality & diversity:	Residents and victims will be treated as individuals with fairness and respect, in line with our Equality and Diversity Policy.
Associated costs and value for money:	This policy ensures we provide a robust service.
Associated documents:	

VERSION CONTROL			
Version Number	Sections Amended	Date of update	Approved by
1.0	First issue in new template	January 2016	Housing Manager
2.0	Full review (previously combined with children)	March 2019	Executive Team
3.0	Periodic review as required	June 2022	Chief Executive
4.0	Full Review	October 2025	Executive Team

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1. OBJECTIVE

The overall objective of this policy is to highlight our safeguarding responsibilities and our approach to preventing harm to adults. This includes how we will identify adults at risk of harm and how we will respond when they are experiencing, or are at risk from, abuse or neglect.

We will be vigilant about adult safeguarding concerns' and our practice will be underpinned by the six key principles outlined in The Care Act 2014.

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** - It is better to take action before harm occurs.
- **Proportionality** - The least intrusive response appropriate to the risk presented.
- **Protection** - Support and representation for those in greatest need.
- **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** - Accountability and transparency in delivering safeguarding.

2. DEFINITIONS

Definition of 'adults' covered by this policy

This policy applies to adults (persons aged 18 years and over) who:

- have needs for care and support (whether or not the local authority is meeting any of those needs)
- are experiencing, or at risk of, abuse or neglect
- as a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Reason to believe that the person may lack capacity to make their own decisions.

Not all adults with care and support needs are vulnerable to abuse but they may become so at any point due to worsening health, old age, a new disability or other factors such as poverty or anti-social behaviour. A person with care and support needs may:

- be elderly, with poor health, a physical disability or cognitive impairment
- have learning disabilities
- have a physical disability and/or a sensory impairment
- have mental health needs including dementia or a personality disorder
- have a long-term illness/condition
- be dependent on substances or alcohol to an extent that it has a serious impact on their ability to cope with day-to-day living.

Some adults may be at greater risk because they are:

- socially isolated which may provide an opportunity for exploitation
- unsure of who to trust
- dependent on others to manage their finances or to withdraw or collect money for themselves
- unable to escape abuse or they tolerate it due to their reliance on the abuser, adapted accommodation or the lack of suitable alternative accommodation and care provision.

Definition of abuse

Abuse is a violation of a person's human and civil rights by any other person or person, 10 types of abuse under the Care Act 2014 are:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse

- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

Other types of abuse not defined under the Care Act 2014 are:

- Neglect by others
- Stalking
- Online abuse

Signs of abuse can often be difficult to detect. Appendix 1 is a list of different types of abuse and possible indicators that abuse is occurring. Any one indicator should not be taken on its own as proof that abuse is occurring; however, it should alert staff to report their concerns. Cornerstone employees have a legal duty to report concerns directly to the appropriate agencies.

The lists are not exhaustive and people may be subject to a number of abuse types at the same time. All staff are need to familiarise themselves with the different types of abuse and possible indicators that abuse is occurring. Support to discuss concerns can be obtained from Cornerstones safeguarding lead.

All employees will read the Adult Safeguarding Policy and confirm that this has been completed as part of their induction to Cornerstone.

3. PREVENTION AND PROTECTION

We have a designated 'Safeguarding Lead' who will act as a champion for vulnerable adults and provide advice, training and support for other staff. They will also act as a link with the Safeguarding Adults Board and other multi- agency public protection forums.

Once reports of suspected abuse are received the Safeguarding Lead will complete an Internal Safeguarding Report which is designed to establish the facts of the case and the wishes, views and feelings of the adult involved.

If the report requires escalation consent will be sought from the adult by the Safeguarding Lead, they will take the time to explain why they feel a report needs to be escalated and offer reassurance.

If the adult won't consent AND they don't feel they have grounds to override their consent then the Safeguarding Lead will discuss the case with the Director of Housing & Human Resources and/or seek advice on a hypothetical basis from the Devon Safeguarding Adults Board.

Where possible, we will identify housing applicants at risk of abuse at the point of allocation and keep our records updated regarding vulnerabilities that may put them at risk of abuse during their tenancy. Our aim is to help people make informed choices and support them to manage any risks.

Within our communities, we will use information and advice to raise awareness of abuse using different channels of communication. This will help our residents to inform them on how to report it and how tenants can protect themselves from it.

We will work in partnership with lead agencies and relevant partners, to prevent and respond to suspicions or incidents of abuse or make safeguarding enquiries in accordance with statutory procedures.

Incidents of abuse are a criminal offence and the person witnessing this must be report this to the Police. If you are there at the time the incident is happening you will need to call '999', otherwise log via '101' or by reporting via the Police's online reporting form [Report a crime | Devon & Cornwall Police](#)

4. CAPACITY

We will only make safeguarding referrals with consent from the adult at risk, unless they lack capacity, (known condition, brain injury, Dementia, Alzheimer's, mental health conditions or there is an overriding public interest consideration. Where someone is judged as not having capacity to make an informed decision about their own wellbeing, referrals will be made on their behalf in accordance with the requirements of the Mental Capacity Act 2005, and in liaison with the necessary statutory services and agencies.

5. SUPPORTING VICTIMS

Victims of abuse and their carers will be referred for support from social services, voluntary support agencies and health agencies as appropriate.

6. STAFF TRAINING AND CONDUCT

It is everyone's responsibility to safeguard, we will provide our staff with training that is appropriate to their role so that they understand their roles and responsibilities in relation to safeguarding and are aware of, can identify, and report the signs of abuse.

Cornerstone will ensure that contractors comply with their contractual obligations, working in partnership with or instructed by Cornerstone. We will ensure contractors we work with have their own safeguarding policy in place and provide access to training should there be an identified need.

The Safeguarding Lead will ensure that Housing Officers are advised on multi-agency policies and procedures.

We will develop and implement internal procedures for staff that establish clear lines of accountability, responsibility and processes for reporting safeguarding concerns.

We will provide support and supervision for staff, creating an environment in which they feel able to report safeguarding issues, including where they have concerns about the behaviour of another member of staff. This information should be given to the safeguarding lead who will manage this confidentially and take appropriate action as per the policy.

Any suspected abuse by our own staff will be addressed through formal statutory investigative procedures and our own internal disciplinary procedures. Our Whistleblowing Policy can be used if a member of staff has concerns about how a safeguarding issue is being dealt with.

In order to protect themselves from allegations of abuse, or situations that could be misunderstood, our staff will maintain strong professional boundaries as outlined in our Code of Conduct.

7. INFORMATION SHARING & DATA PROTECTION

We will seek consent to share information wherever possible, but where consent is not given or not possible, we will share information in accordance with the Data Protection Act 2018, the UK GDPR and our own Privacy Policy. We will comply with our statutory duty to supply information where requested, for the purpose of safeguarding. We will always report safeguarding concerns as health and safety of residents and colleagues sits outside of data protection.

Data we may hold regarding safeguarding concerns can be sensitive personal data; it will be processed in accordance with the Data Protection Act 2018, the UK GDPR and our own Privacy Policy.

8. RECORDING AND MONITORING

We will keep accurate and up to date records of safeguarding concerns and monitor their progress through supervisions and multi-agency meetings, where appropriate.

Appendix 1 - Types and indicators of abuse

(Source: Social care institute for excellence (SCIE) last updated April 2018)

Key messages

People with care and support needs, such as older people or people with disabilities, are more likely to be abused or neglected. They may be seen as an easy target and may be less likely to identify abuse themselves or to report it. People with communication difficulties can be particularly at risk because they may not be able to alert others. Sometimes people may not even be aware that they are being abused, and this is especially likely if they have a cognitive impairment. Abusers may try to prevent access to the person they abuse.

Signs of abuse can often be difficult to detect. This at a glance briefing aims to help people who come into contact with people with care and support needs to identify abuse and recognise possible indicators. Many types of abuse are also criminal offences and should be treated as such.

Types of abuse:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect
- Stalking
- Online abuse

Evidence of any one indicator from the following lists should not be taken on its own as proof that abuse is occurring. However, it should alert practitioners to make further assessments and to consider other associated factors. The lists of possible indicators and examples of

behaviour are not exhaustive and people may be subject to a number of abuse types at the same time.

Physical abuse

Types of physical abuse:

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)
- Involuntary isolation or confinement
- Misuse of medication (e.g. over-sedation)
- Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g. tying someone to a chair)

Possible indicators of physical abuse:

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

Domestic violence or abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- psychological
- physical
- sexual
- financial
- emotional.

Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' -based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- acts of assault, threats, humiliation and intimidation
- harming, punishing, or frightening the person
- isolating the person from sources of support
- exploitation of resources or money
- preventing the person from escaping abuse
- regulating everyday behaviour.

Possible indicators of domestic violence or abuse:

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

Sexual abuse

Types of sexual abuse:

- Rape, attempted rape or sexual assault
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure

Possible indicators of sexual abuse:

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases

- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships
- Fear of receiving help with personal care
- Reluctance to be alone with a particular person

Psychological or emotional abuse

Types of psychological or emotional abuse:

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

Possible indicators of psychological or emotional abuse:

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

Financial or material abuse

Types of financial or material abuse:

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – eg. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Possible indicators of financial or material abuse:

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

Modern slavery

Types of modern slavery:

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

Possible indicators of modern slavery:

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

Discriminatory abuse

Types of discriminatory abuse:

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic

Possible indicators of discriminatory abuse:

- The person appears withdrawn and isolated
- Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

Organisational or institutional abuse

Types of organisational or institutional abuse:

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

Possible indicators of organisational or institutional abuse:

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

Neglect and acts of omission

Types of neglect and acts of omission:

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity

Possible indicators of neglect and acts of omission:

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction
- Inappropriate or inadequate clothing

Self-neglect

Types of self-neglect:

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Indicators of self-neglect:

- Very poor personal hygiene
- Unkempt appearance

- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding
- Collecting a large number of animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury

Stalking

Stalking can be defined as persistent and unwanted attention that makes you feel pestered and harassed. It includes behaviour that happens twice or more, directed at or towards you by another person, which causes you to feel alarmed or distressed or to fear that violence might be used against you. What makes the problem particularly hard to cope with is that it can go on for a long period of time, making you feel constantly anxious and afraid. Sometimes the problem can build up slowly and it can take a while for you to realise that you are caught up in ongoing abuse. The problem isn't always 'physical' — stalking can affect you psychologically as well. Social media and the internet are often used for stalking and harassment, and 'cyber-stalking' or online threats can be just as intimidating. If you think you might be experiencing harassment or stalking:

Online abuse

Online abuse is any type of abuse that happens on the internet, for example through social media, or mobile phones. Online abuse covers a wide range of behaviours and technologies. Some examples of online abuse can include:

- trolling
- stealing someone else's identity
- cyber-stalking
- [cyberbullying](#)

It can be obvious when someone is being abusive online but the boundary between expressing a point of view and being abusive isn't always clear.

A good way to look at it is to apply the same standards of behaviour online as you would in person. If someone says something that would be unacceptable face-to-face, it doesn't make it acceptable just because it is online. Additionally, online abuse could be a criminal offence, and should be reported to the police. Some examples of this could include:

- Sending messages online that are grossly offensive or of an indecent, obscene or menacing character.
- Publishing private sexual images online without consent. This is more commonly known as 'revenge porn'.