

POVA & Safeguarding Policy & Procedure

1. Policy Statement

HPLC is committed to ensuring the safety and wellbeing of all residents within our sheltered housing schemes and our grant recipients. We recognise our responsibility to protect vulnerable adults and children from all forms of abuse and neglect. Our approach is rooted in dignity, respect, and the promotion of individual rights.

Safeguarding is a shared responsibility. All staff, volunteers, and contractors are expected to uphold this policy and act promptly on any concerns.



2. Purpose

The purpose of this policy is to:

- Protect vulnerable adults from abuse, harm, and neglect.
- Provide clear guidance for recognising and responding to safeguarding concerns.
- Ensure that safeguarding is embedded in all aspects of our services.
- Comply with relevant legislation and local safeguarding procedures.



3. Scope

This policy applies to all trustees, employees, volunteers, contractors, and anyone working on behalf of HPLC.



4. Legal and Policy Framework

This policy aligns with the following legislation and guidance:

- Care Act 2014
- Mental Capacity Act 2005
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006

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- Working Together to Safeguard Adults (Local Authority Guidance)
- Local Safeguarding Adults Board (SAB) procedures
- Sexual Offences Act 2003

5. Definitions

- **Safeguarding (under the Care Act 2014)** refers to the formal statutory response when specific legal criteria are met, triggering a Section 42 enquiry:
 - The adult has needs for care and support and
 - is experiencing, or at risk of, abuse or neglect.
- **Safeguarding (general)**: General concerns about an individual's wellbeing and safety.
- **Abuse**: A violation of a person's human and civil rights by another person or persons.
- **Adult at Risk / Vulnerable Adult**: A person aged 18 or over who needs care and support and may be unable to protect themselves from harm or exploitation.
- **Child at Risk**: A person under the age of 18 who is suspected to be suffering, or likely to suffer, significant harm. This can include harm from abuse, neglect, or exploitation, whether inside or outside the home or online. The term emphasises the need for early intervention and protection, even if actual abuse or neglect has not yet occurred.



6. Types of Abuse

The main categories include:

- **Physical Abuse** – hitting, pushing, restraint
Signs to look out for:
 - Unexplained injuries such as bruises, burns, bites or fractures, especially if these are recurrent or have a pattern (e.g. handprints, belt marks)
 - Injuries inconsistent with the information given
 - Flinching or shrinking away from physical contact
 - Wearing clothes to cover injuries, even in hot weather
- **Emotional or Psychological Abuse** – intimidation, threats, isolation
Signs to look out for:
 - Withdrawal, depression or anxiety
 - Sudden changes in behaviour or personality
 - Low self-esteem or excessive fears

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- Being overly passive, compliant or eager to please
- Difficulty forming or maintaining relationships
- Self-harm or unexplained paranoia
- **Sexual Abuse** – unwanted sexual contact or exposure
Signs to look out for:
 - Difficulty in walking or sitting
 - Unexplained bruising, particularly to the thighs, upper arms or neck
 - Incontinence not linked to a medical diagnosis
 - Sudden change in behaviour, aggression or withdrawn
 - Reluctance to be alone with certain people
 - Unexplained gifts or money
- **Financial or Material Abuse** – theft, fraud, pressure over money
Signs to look out for:
 - Unexplained loss of money or valuables
 - Sudden inability to pay bills or afford essentials
 - Carers showing unusual interest in financial affairs
 - Unexplained withdrawal from bank accounts
- **Neglect and Acts of Omission** – ignoring needs, withholding care
Signs to look out for:
 - Poor personal hygiene or wearing dirty/inadequate clothing
 - Malnutrition, unexplained weight loss, or dehydration
 - Untreated injuries, medical problems, or pressure sores
 - Accumulation of untaken medication or missed medical appointments
 - Uncharacteristic withdrawal or reluctance to engage socially
 - Deterioration in physical or mental health without appropriate response from carers
- **Self-Neglect** – not caring for one's own health or surroundings
Signs to look out for:
 - Very poor personal hygiene: not washing, neglect of hair and nails
 - Unkempt appearance: wearing dirty or inappropriate clothing for the weather
 - Lack of essential food, clothing or shelter
 - Malnutrition and/or dehydration
 - Hoarding
 - Living in squalid conditions

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- Inability or unwillingness to manage personal affairs
- Social isolation: becoming increasingly reclusive

NB: There are separate policies for dealing with Domestic Abuse or Hate Crime. Please refer to those policies if applicable.



7. Roles and Responsibilities

Responsibility for the implementation of this policy in full lies at all levels of the Charity.

- **Trustees** are responsible for ensuring that the Charity has a policy which adequately provides protection for vulnerable people in receipt of its services and for the regular review of this policy in the light of changes to legislation, or new legislation or regulation.
- **Chief Executive and Head of Operations (as appropriate)** are responsible for:
 - Identifying those services and posts that are likely to have an involvement with vulnerable people.
 - Ensuring that those people whose normal duties involve working with vulnerable people or having contact with children are appropriately qualified and/or trained.
 - Where appropriate ensuring that Disclosure and Barring Service (DBS) checks are undertaken.
 - Ensuring that all necessary procedures and practices are in place not only to provide adequate protection for the vulnerable individuals but also protection for the employees involved with them.
 - Ensuring that external contractors delivering services to the charity are aware of their responsibilities and abide by the standards of behaviour expected of the Charity's own employees, and follow the HPLC Code of Conduct.
 - Ensuring that this policy is made available to families of those who are vulnerable and/or relevant referral/support agencies on demand.
 - Ensuring that proper records are kept of any incidents occurring within the service and that these are held securely, in accordance with legislation.

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- Working with other associated agencies to ensure the proper transfer of information relating to dealings with vulnerable people in accordance with legislation.
- Ensuring that recruitment procedures are robust and that information pertinent to working with vulnerable people is obtained during the recruitment procedure, in accordance with legislation.
- **Safeguarding Lead** is responsible for:
 - Acting as the main point of contact; receiving and assessing safeguarding concerns.
 - Overseeing the logging, investigation and management of safeguarding cases, ensuring records are accurate and confidential.
 - Liaising with local safeguarding teams, adult social care and other relevant agencies.
- **Employees working with vulnerable people** are responsible for:
 - Ensuring that they are familiar with and understand the policies and procedures relating to their work with or in the vicinity of vulnerable adults and/or children.
 - Ensuring that they feel confident in working within this environment and working with their managers to ensure that they have the knowledge and skills to carry out their tasks in this context.
 - Treating all people with whom they come into contact while carrying out their work, equally and with respect.
 - Reporting to the Safeguarding Lead any concerns they may have about abuse or a lack of care from other staff, from carers, parents or those in loco parentis.
- **Volunteers, contractors and other workers** are responsible for:
 - Working with employees of the Charity, to the same standard, in ensuring the safety and well-being of children and/or vulnerable adults within their scope.
 - Participating in any training or development opportunities offered to them to improve their knowledge and skills in this area.



8. Confidentiality and Information Sharing

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Information about safeguarding concerns will only be shared with those who need to know and only for the purpose of protecting the person at risk. All records will be stored securely and handled in accordance with data protection laws (UK GDPR and Data Protection Act 2018).



9. Training and Awareness

All staff and volunteers complete safeguarding training on induction and attend refresher sessions annually. Role-specific training is provided where necessary.

10. Procedure Checklist

- **Disclosure or Concern (immediate actions)**
 - ☐ Listen carefully; do not promise confidentiality but explain you must report it.
 - ☐ Reassure the person they have done the right thing.
 - ☐ Dial 999 if the person is in immediate danger.
 - ☐ Document observations or disclosures using the person's own words, including date, time, location, names involved, and actions taken.
 - ☐ Immediately inform Safeguarding Lead, Head of Operations, or Chief Executive.
- **Action by Safeguarding Lead with Chief Executive / Head of Operations:**
 - ☐ **If safeguarding concern meets Care Act 2014 criteria** and person agrees or is at risk, report to appropriate agency as listed below.

Sandwell Safeguarding Adults Board:
Office Hours: 0121 569 2266
Emergency Duty Team: 0121 569 2355

Birmingham Safeguarding Adults Board:
Office Hours: 0121 303 1234
Out of Hours: 0121 464 9001

- ☐ Keep detailed and confidential records.

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- ☐ Cooperate with investigations as required.
- ☐ Support the individual throughout the process.
- ☐ Ensure ongoing protection and safety planning.
- ☐ **If safeguarding concern does not meet Care Act 2014 statutory threshold** (non-statutory concern), record the concern in the safeguarding log, noting it does not meet statutory threshold.
- ☐ Safeguarding Lead to monitor and reviewing the situation for changes in risk.
- ☐ Signpost to community or voluntary sector agencies, if necessary.
- ☐ Liaise with health or social care professionals, subject to consent.
- ☐ Review the concern at support meetings to identify patterns or persistent issues.
- ☐ Remain vigilant and report any escalation or new concerns that may meet the statutory threshold.



This procedure will be regularly reviewed to ensure it remains effective in protecting the welfare of vulnerable individuals, promoting a culture of vigilance, and ensuring that all concerns are addressed with the utmost care and urgency."

