Ekaya Housing Association
Safeguarding Adults Policy

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1. Introduction

1.1 This policy sets out Ekaya's commitment to the safeguarding and protection of all its service users, young people and vulnerable adults at risk. This policy applies to service users who are 18 years old and over. Ekaya has a separate Safeguarding Children Policy for service users who are under 18 years of age.

1.2 Ekaya is committed to providing a safe and secure environment, where service users feel safe and are kept safe and where all staff contribute to the culture of vigilance, which is embedded in our services. All staff form part of the wider safeguarding system for service users.

1.3 Ekaya Housing Association (EHA) believes that it is unacceptable for service users to experience abuse or neglect of any kind and recognises its responsibility for delivering safe services to service users with whom the organisation works with, and to protect them from harm. This policy sets out how Ekaya's services complies with statutory responsibilities relating to safeguarding and promoting the welfare of service users who receive accommodation and/or support from. Ekaya maintains an attitude of 'it could happen here' as far as safeguarding is concerned. When concerned about the welfare of a service user, staff members should always act in the best interest of the service user.

1.4 This document is intended to be read in conjunction with and refers to the 'Pan London' guidance which sets out procedures for organisations in all the London Boroughs to work together to safeguard adults at risk. (London Multiagency Adult Safeguarding Policy & Procedures ADASS, London 2025). This can be found on the ADASS website:

London-Multi-Agency-Adult-Safeguarding-Policy-Practice-Guidance-and-Procedures-November-2025.pdf

Since April 2015, the Care Act 2014 has provided the statutory framework for adult safeguarding. The Care Act introduced for the first-time specific statute for adult safeguarding activity. This legal framework supersedes the previous "No Secrets" statutory guidance (DH 2000). Chapter 14 of the Care and Support Statutory Guidance (updated October 2018) covers safeguarding adults in relation to Sections 42 to 46 of the Care Act. The Health and Care Act 2022 revoked Schedule 3 and amended Section 74 of the Care Act 2014 on 1 July 2022.

https://www.gov.uk/government/publications/care-act-statutory-guidance/care- and-support-statutory-guidance

The Care Act sets out six key principles which apply to all sectors. These principles inform the ways in which professionals and other staff work with adults:

Empowerment - People being supported, provided with information and encouraged to make their own decisions and informed consent

Prevention - It is better to take action before harm occurs

Proportionality - A proportionate and 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.

1.5 The Health & Social Care Act 2008 (Regulated Activities Regulations 2014) introduced the statutory duty of openness as well as fundamental standards of care for regulated providers. This forms the basis of CQC inspections and powers of enforcement. Regulation 13 of the fundamental standards relates to safeguarding service users from abuse and improper treatment.

Regulation 13: Safeguarding service users from abuse and improper treatment - Care Quality Commission

1.6 The regulator of Social Housing introduced the Neighbourhood and Community Standard as part of the Consumer Standard in April 2024, with requirements on Safety of shared spaces, Local cooperation, Anti-social behaviour and hate incidents, and Domestic abuse

April_2024_-_Neighbourhood_and_Community_Standard_FINAL.pdf

1.7 The government's Office of the Public Guardian (OPG) was established in 2007 to protect and safeguard vulnerable adults who may lack the mental capacity to make decisions for themselves. The Office of the Public Guardian's Safeguarding Policy (updated Jan 2023) is found here: https://www.gov.uk/government/publications/safeguarding-policy-protectingvulnerable-adults/sd8-opgs-safeguarding-policy

1.8 Ekaya's overarching aim is to reduce the likelihood of abuse in its services and ensure compliance with its policies and the law in response to cases of actual, suspected or alleged abuse.

1.9 All, Staff and Volunteers have a clear duty to report any concerns relating to abuse or suspected abuse of a service user to their line manager/accountable person. They will report it to the appropriate social work or multi- disciplinary team and the police if a crime is suspected or has been committed as many instances of abuse are criminal offenses.

2. Policy Statement

2.1 Ekaya aims to ensure the safety and wellbeing of all service users in the delivery of its Support Services by ensuring:

- All service users regardless of age, disability, gender, racial heritage, belief, sexual orientation, gender reassignment, marriage or civil partnership, pregnancy or maternity or identity, have the right to equal protection from all types of harm or abuse.

- All our service users are given information about what abuse is, how to prevent and report it, together with regular reminders at timely intervals.

- Ekaya's Policy & Performance Committee and Board receive regularly reports on all safeguarding matters. Safeguarding is also considered as a risk and is monitored by Ekaya's Audit & Risk Committee.

- All staff who are part of the Support Services Team complete safeguarding and child protection training and as part of their induction when joining the organisation, and at least annually as part of Ekaya's overall training programme. The local training on safeguarding will be updated at least every three years. In addition, Staff and Volunteers have training and guidance on the Code of Conduct, which includes a ban on friendships on social media between staff/ volunteers and service users. Staff are also trained on safeguarding procedures and know how to follow them if they witness or suspect an abusive situation, or w h e r e a disclosure is made of risk of/ actual abuse. Staff will know each Local Authority's guidelines and key contacts and will keep up to date with local procedures for the authorities they work in as they vary across authorities.

- Information is shared about our safeguarding procedures and good practice with staff, volunteers, commissioning bodies and other relevant agencies.

- Effective management is provided for staff and volunteers through supervision, support and training.

- Risk management systems are in place including service users risk assessments and risk management plans that are regularly reviewed. (Appendix 1).
- Incidents of safeguarding whether actual, suspected or alleged are logged and these logs are reviewed regularly to ensure lessons can be learned and revised ways of working adopted as indicated by these reviews.
- Ekaya is committed to promoting the welfare and wellbeing of children, young people and adults at risk. All employees have a duty to be alert to potential safeguarding concerns with service users. All staff are trained to be aware of and implement the Ekaya's Safeguarding policies and procedures and work in partnership with other agencies to help safeguard those at risk.
- Ekaya has a Designated Safeguarding Lead. The Designated Safeguarding Lead is the **Director of Operations**.

3. Scope of Policy

3.1 This policy applies to the Ekaya Housing Association only. Ekaya's subsidiary, Happy Nursery Days maintains a separate safeguarding policy.

3.2 This policy links with other core polices including Health and Safety, Equality and Diversity, Bullying & Harassment, Whistleblowing, Lone Working, Professional Boundaries, Managing Clients' Finances and Support Planning and Ekaya's commitment to the empowerment of its service users, and is based on ten core areas which, used together provide the essential framework to safeguard service users. These are:

1. Accountability of all, Staff and Volunteers for Safeguarding
2. Reporting concerns and working with statutory agencies
3. Audit and inspection
4. Safe recruitment
5. Learning and development
6. Risk Management
7. Recording and information sharing
8. Empowerment of service users
9. Supervision
10. Whistleblowing (Confidential Disclosure)

3.3 For adults the Policy should be used alongside the Care Act 2014 which updates 'No Secrets', the Pan-London-Multiagency-Policy and Procedures for Safeguarding Adult's and Local Safeguarding Board Policies for adults at risk.

3.4 Ekaya will work in partnership with all relevant agencies to tackle safeguarding such as the Local Authority Adult Safeguarding Board and the Police. Ekaya staff will take all abuse suspicions and allegations seriously, respond swiftly, and report suspected abuse to statutory agencies whilst taking appropriate action to

safeguard the victim. Ekaya staff will co-operate with the investigation, i.e. information sharing and in jointly developing and implementing safeguarding plans. If staff members or volunteers receive an allegation of alleged or suspected abuse, it will be investigated under Ekaya's disciplinary procedures in conjunction with the Local Authority and/or Police investigations.

4. Legal framework

4.1 The definition of a vulnerable adult defined in the Department of Health's "No Secrets 2006 Guidance" was further broadened by the Care Act *2014.* Since 2014 it added :

- *'Adults who have care and support and support needs (whether receiving them or not)*
- *Who are experiencing or at risk of abuse*
- *And, as a result (are) unable to protect themselves*

4.2 It gives Safeguarding Boards a statutory status, with clear lines of accountability (a duty to make enquiries, conduct reviews & report annually) and a stronger focus on partnership working with Police, NHS and other key agencies. It introduced designated Safeguarding Managers in local authorities who should conduct risk appraisals, focus on person centered outcomes, and take into account the victim's wishes (see 'Making Safeguarding Personal' April 2014) The Local Authority must offer independent advocacy to those unable to speak for themselves and can demand information be provided by other bodies.

4.3 London has a Multiagency Policy and Procedure to Safeguard Adults from Abuse, which all boroughs have signed up to. Some Safeguarding Boards have local protocols as well. Other relevant legislation for the protection of adults includes the Disability Discrimination Acts, the Mental Capacity Act 2005 (Online Safety Act 2023 amendments) the Equality Act 2010 (Worker Protection (Amendment of Equality Act 2010) Act 2023.)

5. Definitions of Abuse

Definitions of abuse for adults at risk set out in 'No Secrets'
https://assets.publishing.service.gov.uk/media/5a7af2a640f0b66a2fc03f4d/No_secrets__guidance_on_developing_and_implementing_multi-agency_policies_and_procedures_to_protect_vulnerable_adults_from_abuse.pdf

Examples of different types of abuse can include, but are not limited to: Physical, Sexual, Psychological, Modern Slavery, Financial or Material, Neglect and acts of omission, Self-neglect, Domestic violence, Discriminatory abuse, Organisational

5.1 More detailed definitions of all types of abuse are set out in the Safeguarding Procedure, w h i c h accompanies this Policy and should be used by Ekaya staff for all service users.

6. Local Authority Procedures

6.1 Ekaya Housing Association provides a range of services in a number of different London boroughs. Although all Local Authorities use Pan London Safeguarding Procedures, they may also have local reporting requirements in relation to Safeguarding. All front-line services and head office staff must be aware of and comply with local Safeguarding requirements as well as with Ekaya's internal policies and procedures and know where to get advice. Local contacts are outlined in the Safeguarding Procedure's appendices.

7. Training and Support to Staff and Others

7.1 Ekaya will ensure that all staff members undergo safeguarding training at induction. The training will be updated annually and is in line with advice from the Local Authority Safeguarding /Children Partnership. The performance in this area will be reported in the Policy and Performance Committee.

7.2 All staff members, volunteers and Board members will receive regular safeguarding updates (for example, via email, e- bulletins, staff and board meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard adults effectively. Opportunities are provided for staff to contribute to and shape safeguarding arrangements and Adult Safeguarding policy.

7.3 Staff should attend Local Authority specific training where available. Our service users will also be given information about what abuse is, how to prevent and report it and about organisations that can support them. Consultants and Contractors are made aware of their responsibilities to report suspected or actual abuse by clauses in their contracts.

7.4 The Designated Safeguarding Lead and any deputies will undergo training to provide them with the knowledge and skills required to carry out their role. Their training will be updated annually.

8. Designated Person for Safeguarding

8.1 Ekaya has appointed and maintains a Designated Person for Safeguarding with responsibility to inform the policy of the organisation, oversee its application, ensure compliance and report directly to Ekaya's Policy and Performance Committee. The Committee will consider regular reports of all Safeguarding matters and consider any 'lessons learned', which require policy changes to

prevent reoccurrences where possible. The designated person for Safeguarding in Ekaya Housing Association is the **Director of Operations**.

9. Confidentiality and Information Sharing

For further advice on Information Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers 2024

https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf

All staff will understand that protection issues warrant a high level of confidentiality, not only out of respect for the service user and out of respect for staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the Designated Safeguarding Lead or provider (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Service user information will be stored and handled in line with Data Protection Act 1998 and GDPR principles, which require that information is:

- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than necessary
- Processed in accordance with the data subject's rights
- Secure

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access, and sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen.

The Data Protection Act does not prevent staff from sharing information with relevant agencies, where that information may help to protect a service user. Ideally, information sharing will be done in writing so that there is an evidence trail however, there may be occasions in proceedings where this method is too slow. In cases where agencies ring the setting requesting information, staff will take a message, inform the Designated Safeguarding Lead immediately, they will ensure they can identify who is requesting the information before sharing, and then record what has been shared, when, why and with whom.

10. Safe Recruitment

10.1 Ekaya has adopted a Safe Recruitment approach for all staff employed in Support Services. Where an offer of employment is made the following will be received and reviewed before the prospective employee commences any work where they are in contact with service users:

A satisfactory Disclosure & Barring Service (DBS) check is received. There are 3 types of DBS checks:

- Standard: this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC), regardless or not of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out

- Enhanced: this provides the same information as a standard check, plus any approved information held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed

- Enhanced with barred list check: where people are working or seeking to work in regulated activity with children, this allows an additional check to be made as to whether the person appears on the children's barred list

All staff employed by Ekaya who work in in Support Services will be required to have an Enhanced DBS check. Where a member of staff is required, or may be required to work alone with a child, then an Enhanced DBS with barred list check will be required.

10.2 Ekaya will ensure that satisfactory references are received before employment commences.

10.3 Ekaya will verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website.

10.4 Ekaya will verify educational and professional qualifications, as appropriate.

11. Monitoring

Ekaya's Designated Safeguarding Lead will keep a log of safeguarding and child protection concerns and will review this regularly with the Head of Service to ensure that cases are being progressed and to identify any common issues.

Regular monitoring of safeguarding takes place through standard agenda items at all Ekaya Policy & Performance Committee and Board meetings.

12. Policy Approval

Staff consultation:	TBC
Approval Date:	28/10/2026
Approved by:	Policy and Performance Committee
Policy Owner:	Director of Operations
Next Review Date:	01/09/2027

NB – A separate Safeguarding Adults Procedure is being developed following the approval of this policy in September 2026.