SAFEGUARDING COUNCIL TENANTS AND LEASEHOLDERS POLICY

Approved July 2024

Contents

1 Introduction

1.1 The Council is required by The Children Act 2004 to safeguard and promote the welfare of children who may access or use Council services.

1.2 The Council has a duty under the Care Act 2014 to safeguard anybody aged 18 or over where it has reasonable cause to suspect that they have statutory care and support needs, are experiencing or at risk of abuse or neglect, and as a result of their vulnerability are unable to protect themselves against the abuse or neglect or the risk of it.

1.3 Safeguarding children and vulnerable adults is a priority for Haringey Council.

1.4 Haringey Council's Adult and Children's Social Care services oversee and have lead responsibility for safeguarding children and vulnerable adults in Haringey.

1.5 We believe that safeguarding is everyone's business, so safeguarding is also a core responsibility for everyone working in any capacity in or with any of our housing management teams.

1.6 This policy must be read alongside the Council's Safeguarding Policy which aims to ensure that an overarching approach to safeguarding is embedded within all our services. The Safeguarding Policy sets out the Council's statutory duties, responsibilities, and roles in relation to safeguarding. In all cases where we suspect that a child or vulnerable adult in the Council's housing stock needs safeguarding, we refer to that Safeguarding Policy and its associated policies and procedures.

2 Aim and scope of the policy

2.1 The aim of this policy is to prevent abuse and neglect of people in the Council's housing stock who are either:

- adults vulnerable within the meaning of the Care Act 2014
- children who have not yet reached their 18th birthday

2.2 To achieve that, this policy aims to ensure that the Council's overarching Safeguarding Policy is embedded and delivered specifically through our housing management services to ensure that we actively safeguard:

- Children aged under 18 in the homes of our Council tenants and leaseholders or the homes of our leaseholders' tenants
- Council tenants and leaseholders vulnerable within the meaning of the Care Act 2014
- Adults vulnerable within the meaning of the Care Act 2014 who are members of Council tenants' and leaseholders' households

- Adults vulnerable within the meaning of the Care Act 2014 who are tenants or lodgers of Council tenants and leaseholders
- Other adults vulnerable within the meaning of the Care Act 2014 in Council tenants' and leaseholders' homes.

2.3 This policy applies to all staff and contractors working with or on behalf of any part of the Council's housing management services. It aims to ensure that all staff and contractors providing housing management services understand that safeguarding is an everyday part of their jobs; and to ensure that they are empowered to identify, speak out about, and respond appropriately to any safeguarding concerns.

2.4 This policy **does not** apply to tenants and households placed by the Council in temporary accommodation or living in the Council's sheltered or supported housing. Their safeguarding needs are addressed within those services' specific policies and procedures.

2.5 This policy also applies to vulnerable adults and children staying in privately rented homes where the Council is the freeholder, and the landlord is a Council leaseholder. Although we are not directly providing those households with housing management services and our contact is therefore much more limited, we may still be in a good position to identify and respond to safeguarding concerns. When we use the term 'private renter in a leasehold property' in this policy, this is what we mean.

2.6 Where an adult is experiencing or at risk of abuse or neglect but does not have statutory care and support needs or otherwise does not meet the definition of vulnerability in the Care Act, we aim to support them and make them safe with reference to our Vulnerable Tenants and Leaseholders Policy.

3 Definitions and key terms

Concern Cards are a simple way to notify colleagues in housing management that a child, resident, visitor, or private renter may be vulnerable or that there are safeguarding concerns.

Disclosure and Barring Service (DBS) check is a record of a person's criminal convictions and cautions. It helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups. and replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA).

Haringey Safeguarding Children's Partnership (HSCP) is a statutory multi-agency partnership. The organisation brings together agencies who work to safeguard and promote the welfare of children.

Haringey Safeguarding Adults Board (HSAB)

Haringey Multi-Agency Solutions Panel (MASP)

Haringey's Multi-Agency Safeguarding Hub (MASH)

4 Staff training, support, and guidance

4.1　We empower and support staff working in housing management to take responsibility for showing professional curiosity to identify situations where a vulnerable adult or a child may require safeguarding; and for always raising any and all of their concerns and suspicions about safeguarding.

4.2　In housing management, we support the development of a positive learning environment around safeguarding at all levels to help break down cultures that are risk-averse and that seek to scapegoat or blame staff.

4.3　We believe that effective safeguarding depends on the skill, judgement, and knowledge of individual officers dealing with complex and sensitive issues alongside their roles' primary focus.

4.4　As set out in the Council's Safeguarding Policy, we work with Human Resources to ensure that we recruit staff at all levels who are able to contribute to effective safeguarding within their specific roles. We do this through the way that we draft Job Descriptions, Person Specifications, and Competency Frameworks; how we undertake selection and recruitment assessments, including by checking prospective employees' attitudes and behaviour around safeguarding; and by carrying out effective background checks including through the Disclosure and Barring Service (DBS). Haringey Council has a recruitment policy which must be followed for all relevant staff appointments.

4.5　We ensure that safeguarding is a core part of the induction of new housing staff and is then addressed regularly and effectively by managers and team leaders through individual and team objective-setting, individual supervision and informal support, and in team meetings.

4.6　All Council employees

- undertake the appropriate level of safeguarding training as decided by the Safeguarding Lead Officer. All training will be in line with standards set by HSCP and HSAB.
- are required to undertake mandatory training on understanding safeguarding every 18 months.

4.7   We work with Adult and Children's Services to provide additional training tailored to specific housing staff on safeguarding. The training includes identifying people with care and support needs, risk, and indicators of abuse, including domestic abuse; when and how to raise concerns through a safeguarding alert; arranging support for victims and protection planning; working together and understanding local information sharing protocols; understanding the key roles of partner staff and agencies; local knowledge and learning from mistakes.

4.8   We work with Adult's and Children's Services to provide all housing staff and contractors with easy access to effective and up-to-date resources and guidance materials around safeguarding.

4.9   Through these means we develop a 'safeguarding culture' within our housing management services, improving the focus on those most vulnerable to abuse and increasing the number of safeguarding alerts.

4.10   We ensure through our commissioning, procurement, and contract management processes that contractors carrying out work for the Council in and around tenants' and leaseholders' homes do not put children or vulnerable adult residents at risk of abuse and neglect, and that they can evidence that staff carrying out work for the Council receive regular supervision, guidance, and training appropriate to their role so that they identify and report any safeguarding concerns appropriately.

4.11   We work with Adult's and Children's Services to provide all contractors with easy access to effective and up-to-date resources and guidance materials around safeguarding.

5 How safeguarding concerns are identified

5.1   Safeguarding is an everyday part of all our jobs. Everyone working in any capacity in our housing management services is responsible for approaching safeguarding with professional curiosity. That means exploring and proactively trying to understand what is happening within a household or for an individual rather than making assumptions or taking a single source of information and accepting it at face value. It is a combination of looking, listening, asking direct questions, checking out and reflecting on all of the information received.

5.2   Housing management staff understand that it is normal to be uncertain or to have conflicting feelings about safeguarding concerns or suspicions, and that in these cases they must always discuss those concerns with their line manager or a duty manager as soon as possible.

5.3 Our staff understand that if they have concerns about safeguarding, they should not wait until a child or vulnerable person tells them directly that they are being abused or neglected. Instead, they should ask the child or vulnerable adult if everything is OK and/or discuss concerns with their line manager as soon as possible.

5.4 We are mindful that 67% of adult safeguarding cases in Haringey during 2021-22 were about abuse or neglect taking place in a vulnerable adult's own home. There are many circumstances in which as housing professionals we are in a particularly strong position to identify safeguarding concerns. These situations are covered in regular training and guidance sessions for our housing and landlord services staff and include 'Cuckooing', domestic abuse, financial abuse, self-neglect, and hoarding. This policy sets out the principles in relation to those situations in specific sections below.

5.5 Staff training is a key tool in the identification of neglect and abuse. As set out above, our staff training, supervision and guidance ensure that Council officers have good awareness of the possible signs that a child or vulnerable person may be experiencing or at risk of abuse and neglect. The Council's Safeguarding Policy and web pages provide additional guidance and resources on this.

5.6 Many of our tenants and leaseholders are older, or disabled, or experience long-term limiting illness, or have dependencies. While these factors do not in themselves make a person vulnerable, we know that they may result in a person having care needs and also increase their vulnerability to abuse or neglect.

5.7 Our Vulnerable Tenants and Leaseholders policy sets out that we consider our safeguarding duties whenever we assess a resident's vulnerability. The policy includes consideration of any children in the household.

5.8 We use three key sources of information for identifying vulnerability and therefore for considering whether an individual has safeguarding needs: internal data, responsive reports, and formal assessment. These approaches are often interlinked. We do not preclude other ways of finding out about safeguarding concerns. Our Vulnerable Tenants and Leaseholders policy sets out in greater detail how we identify vulnerability through these means.

Internal Council data

5.9 The Council holds data from multiple sources of contact with its residents. To ensure we can identify and support our vulnerable residents and children in vulnerable households we use data on people living in Council homes held by departments other than housing. In particular, we aim to use data held by our Adult and Children's services to alert us to children at risk and adults who have or have had care needs and may be at risk of neglect of abuse.

5.10 When we become aware through such data that a resident or their household may need extra consideration or help from a housing perspective, we contact them to carry out a formal assessment that includes an assessment of their safeguarding needs.

Responsive reporting

5.11 There are four main ways in which we aim to become aware on a responsive basis that a resident, child, or a vulnerable adult staying in their home, or a private renter in a leasehold property is vulnerable and at risk of or experiencing abuse of neglect:

- The resident or child tells us
- A neighbour, family member or friend tells us
- A professional such as a GP, social worker, or support worker tells us
- Council officers including repairs and caretaking staff or contractors identify that a resident or their visitor or a resident private renter may be vulnerable and informs us, generally through the 'concern card' system.

5.12 If a child or vulnerable adult tells us they are experiencing abuse, we reassure them that they have done the right thing in telling us. We make sure they know that abuse is never their fault. We never talk to the alleged perpetrator about the child's disclosure. We immediately make a child safeguarding referral following the procedures in the Council's Safeguarding Policy.

5.13 We proactively provide residents with information to keep themselves and children safe from abuse and to have the knowledge of where to seek support if needed. We encourage residents to alert the Council's housing staff to safeguarding concerns.

5.14 Where a safeguarding case has been identified or is being led by another agency, we become involved in our capacity as the landlord and are committed to active participation in partnership working around that adult or child in line with our approach to partnership and joint working, set out below.

5.15 We actively encourage contractors and officers from services across the Council to raise safeguarding concerns through the use of Concern Cards. Repairs and other staff using hand-held electronic devices linked to the repairs system are prompted to consider whether a Concern Card is necessary after each visit. Reports through Concern Cards are actioned and recorded by relevant housing management staff.

5.16 When we become aware through any channel of responsive reporting that a vulnerable adult resident, visitor, or private renter may need safeguarding support, we try to carry out a formal assessment. However, when we are unable to reach a resident to carry out a formal assessment, we draw conclusions about whether there are safeguarding requirements within relevant procedures.

5.17 When we become aware that a child may need safeguarding support, we make a safeguarding referral following the procedures in the Council's Safeguarding Policy.

5.18 If possible, we let third parties who have reported concerns know that we have acted on their concern. We are unlikely to be able to give full details, but when people know action has been taken, they are more likely to report in future.

Formal assessment

5.19 At key points, we formally assess whether a tenant or resident leaseholder is vulnerable and at risk of abuse or neglect. Those points include:

- At tenancy audit visits
- During conversations about arrears or other tenancy or leasehold management matters
- During the 'Right to Buy' process
- Whenever we are pursuing possession proceedings against a tenant, or considering forfeiture against a leaseholder, with a review of that assessment whenever we move from one stage of proceedings to another.
- Whenever we are investigating ASB or a hate crime
- Following identification of potential needs through data or responsive means

6 Raising and reporting safeguarding concerns

6.1 Everyone working in any capacity in our housing management teams is responsible for immediately raising any concerns or suspicions they may have about safeguarding. Delay could mean that the abuse or neglect carries on.

6.2 If a child or vulnerable adult needs immediate assistance from the Police or ambulance services, we immediately call 999.

6.3 The Council's Safeguarding Policy sets out the Safeguarding Reporting Procedure that our staff members or agents follow if they become aware of any Safeguarding concern, incident, or allegation.

6.4 We ensure that all housing staff and their organisations are clear about their roles and responsibilities around raising safeguarding concerns and referrals. In seeking to make a Safeguarding referral, staff have specific responsibilities. These responsibilities are set out in detail in accompanying procedures, but in general:

- **All Housing Management** staff are responsible for discussing concerns at the earliest possible opportunity with their line manager and for agreeing a plan of action with their manager about how to progress any safeguarding concerns

Referrals involving Concern Cards

- **Caretaking staff, estates staff, repairs and maintenance staff, and other council officers working in and around our tenants' and leaseholders' homes** are responsible for ensuring a safeguarding referral takes place by reporting their concerns through the Concern Card system to the Housing Managers in the Council's Tenancy & Community Service, and simultaneously notifying their own line manager.

- **Managers of these Council officers working in and around our tenants' and leaseholders' homes** are responsible when they become aware that their staff have raised a safeguarding concern for recording it and following up with to the Housing Managers in the Council's Tenancy & Community Service to ensure it has been received and actioned

- **Contractors and agents of the Council** are responsible for ensuring a safeguarding referral takes place by reporting their concerns through the Concern Card system to the Housing Managers in the Council's Tenancy & Community Service and simultaneously notifying their own management

- **Organisations providing contracted services to the Council** are responsible when their staff have raised a safeguarding concern for recording it internally, following up with the Council's Housing Managers to ensure it has been received and actioned, and reporting on all referrals during contract monitoring meetings

- **Housing Managers in the Council's Tenancy & Community Service** receiving a Concern Card - or being otherwise informed of safeguarding concerns - relating to a tenanted home, are responsible for working with the relevant Senior Housing Officer to ensure the case is allocated to a Housing Officer and then for monitoring the outcome of that allocation; and when the safeguarding concern relates to a leasehold home, for referring it to the Head of Home Ownership who then ensures that it is actioned appropriately.

- **Senior Housing Officers** are responsible for supporting **Housing Officers** to ensure that the concerns received are actioned including where appropriate by agreeing and making safeguarding referrals

6.5 Our responsibility for supporting a child or vulnerable resident does not end with making a safeguarding referral. After making a safeguarding referral, we support them in line with our Vulnerable Tenants and Leaseholders Policy and if the referral is accepted under the guidance of either Adults' or Children's Services.

6.6 Safeguarding referrals made by housing management officers follow discussion with their manager that results in an agreed plan of action. That plan of action includes steps that the housing management teams will take to support the child or vulnerable adult – including how we will support them during and after the referral process - and with reference to our Vulnerable Tenants and Leaseholders Policy. We consider and plan the interventions that could be made from our housing and landlord services perspectives to make the child or vulnerable adult safer.

6.7 If a Safeguarding case is deemed not to meet the thresholds required for statutory services, we support the vulnerable adult or child and try to make them safe in line with our Vulnerable Tenants and Leaseholders Policy.

7 Sharing information

7.1 We are committed to sharing information effectively and believe this is imperative to safeguard those that are at risk or pose a risk to themselves or another; and to prevent, detect and prosecute offences against children and vulnerable adults.

7.2 We follow the Council's approach and Seven Golden Rules for sharing information, as set out in the Safeguarding Policy.

7.3 We ensure that all staff and agents understand the importance of sharing safeguarding information and the potential risks of not sharing it, who safeguarding applies to, and how to report a concern.

7.4 Our landlord and housing services are signatories to the Safeguarding Adults Multi-Agency Information Sharing Agreement, and we are guided by its processes and principles for sharing information between each other, with the Haringey Safeguarding Adults Board, with other professionals, and with any other relevant parties.

7.5 The management interests of housing services or the Council do not ever override the need to share information to safeguard children or adults at risk of abuse.

8 Multi-agency partnerships

8.1 Our housing services look to create strong multi-agency partnerships that provide timely and effective prevention of and responses to abuse or neglect.

8.2 We prioritise building positive strategic and operational relationships around safeguarding with the local Police service.

8.3 We participate actively in networks of local Social Housing providers to develop and share good practice and operational learning on Safeguarding.

8.4 Senior Managers from our landlord and housing services attend and actively participate in Haringey Safeguarding Children's Partnership (HSCP) and Haringey Safeguarding Adults Board (HSAB) meetings and relevant subgroups and working groups. This ensures that our landlord services are informed and guided at a strategic and practical level by a partnership approach to safeguarding adults and children.

8.5 The Safeguarding Policy sets out the roles and responsibilities of the HSAB and HSCP.

8.6 We also participate in the Haringey Multi-Agency Solutions Panel (MASP). The aim of the MASP is to ensure that professionals working with people experiencing complex needs can access and offer creative problem-solving and advice in high-risk cases where the nature of the risk relates to other areas of work that may be addressed at other forums, for example MAPPA or MARAC. MASP supports work on complex and/or high-risk cases, including but not limited to hoarding, fire risk, and self-neglect and includes near miss fire risk.

9 Decision making and professional support

9.1 Many safeguarding situations - particularly those that are more complex - require housing management staff to seek the input and supervision of a social worker. Personal and family relationships within community settings can be too difficult for housing staff to assess and intervene in. The dynamics of personal relationships can be extremely difficult to judge and rebalance. And when abuse or neglect is suspected within a family or informal relationship, a social worker will be the most appropriate lead. In these circumstances we always seek advice and guidance from Adults' and/or Children's Care Services.

9.2 Where we require professional advice on safeguarding, we refer to the Council's Safeguarding Adults or Safeguarding Children webpages. They include a full list of points of referral indicating how to access support and advice at all times, whether in normal working hours or outside them.

9.3 We also make use of the Council's web pages listing organisations offering support with a comprehensive list of contact addresses and telephone numbers, including relevant national and local voluntary bodies.

10 Recording safeguarding concerns

10.1 Whatever the course of subsequent action, we record any safeguarding concern along with the subject's views and wishes, any action taken, and the reasons for those actions.

10.2 We keep these records on individual tenant and leaseholder files on the Council's tenant data management system, and also in a central Safeguarding log held confidentially within housing services.

11 Safeguarding in housing contexts

11.1 There are many circumstances in which as housing professionals we are in a particularly strong position to identify safeguarding concerns. This section sets out our policy positions and principles in relation to some of those situations. These situations are covered in regular training and guidance sessions. The focus here on these situations does not imply that safeguarding is not an issue or that staff should not be vigilant in other situations.

11.2 Our Housing Decisions Panel will consider cases that fall within the circumstances below for housing moves if appropriate.

Cuckooing

11.3 Cuckooing is the practice where somebody's home is taken over by another person, or by a group, for criminal purposes such as dealing or storing drugs, or for illegal sex work. The experience of being "cuckooed" has a hugely negative impact on the vulnerable people victimised, who often experience violence, psychological distress, substance addiction, and being indebted to criminal networks as a result. Female victims have been known to disproportionately experience the additional torment of sexual coercion and assault. Cuckooing victims are predominantly older, male, and almost always have some form of underlying vulnerability. Victims will almost always live alone and often will have either, or a combination of, substance misuse needs, learning disabilities and mental health needs.

11.4 Being professionally curious can help us to identify cuckooing, to gain clarity on the concern, and help to inform next steps.

11.5 We do not seek to apportion blame to the victim: we view cuckooing as abuse. Like many forms of abuse, the relationship of the victim to the abuser can be complex.

11.6 Where we believe that a vulnerable adult covered by this policy or any household with children has had their home taken over for criminal purposes, we always contact and work with the Police and at the same time make an urgent Safeguarding Referral. We actively take a partnership approach including by referring the case to a Strategic Partnership Panel such as the Haringey MASP.

11.7 In partnership with the Police, we aim to provide support to the cuckooed resident so that they get the help they need; and to prevent people entering addresses which are being used for cuckooing using formal enforcement action such as injunctions or closure orders.

11.8   We have a protocol in place with the Council's homelessness prevention services to ensure that in every case of cuckooing, we establish a partnership approach as early as possible.

11.9   Where a vulnerable resident covered by this policy has their home taken over for criminal purposes, our priority is that they are kept safe. This includes a commitment to ensure that victims of cuckooing are able to secure and sustain appropriate and safe accommodation – and to do so as quickly as possible.

11.10 We start from the principle that safety includes having a secure, safe, and sustainable home.

11.11 Where the vulnerable victim is a Council tenant, we are committed to ensuring that wherever possible they are able to retain their security of tenure. In many cases this will mean that we provide emergency or temporary accommodation, either keeping their existing tenancy until they can safely return to their home or ending that tenancy with no detriment and being urgently rehoused within the terms of the Housing Allocation Policy. In other cases, it may mean that we support the victim to end their tenancy consensually as part of a planned move to supported, sheltered or other more appropriate accommodation.

11.12 Where resident leaseholders are victims of cuckooing, we look to provide emergency or temporary accommodation until either they can safely return to their home, or they secure suitable alternative accommodation and sell their home.

11.13 Where private renters in Council leasehold properties are victims of cuckooing, we start from the assumption that their landlord has a duty to end the victim's tenancy as quickly as possible, and that as the responsible freeholder we ensure the leaseholder acts on that responsibility. Alongside that, we work in partnership with colleagues in homelessness prevention to ensure that the victim can secure appropriate alternative accommodation.

Domestic Abuse and VAWG

11.14 As set out in the safeguarding policy, Domestic Abuse includes an incident or a 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 member regardless of gender or sexuality. Domestic abuse is not just about partners but all family relationships.

11.15 Violence Against Women and Girls (VAWG) is defined as 'any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life'.

11.16 As a provider of housing services, we are well placed to recognise the signs of domestic abuse and other forms of violence against women and girls. We take all reports seriously and work positively with the victim to offer support. This is some of the most important work that we do as it keeps women and children safe and well, and free from fear.

11.17 We take a proactive approach to identifying and responding to domestic abuse and VAWG

11.18 Being professionally curious is a key part of that proactive approach: exploring and proactively trying to understand what is happening - looking, listening, asking direct questions, checking out and reflecting on all of the information received - can maximise the opportunity to identify domestic abuse and VAWG, to gain clarity on the concern, and help to inform next steps.

11.19 In all cases or suspected cases, we follow our Domestic Abuse and Violence against Women and Girls Policy. Amongst other things, it outlines how we take a proactive approach to our responses from a housing and tenancy management perspective.

11.20 Domestic abuse is also a safeguarding matter if the victim is either a child or a vulnerable adult with statutory care and support needs. We follow the Council's Safeguarding Policy and guidance if we believe a vulnerable adult or child is at risk due to an abusive relationship.

11.21 The key point of contact for domestic abuse support and refuge provision is Haringey MASH. We seek support from MASH at as early a stage as possible in any case and we work in partnership to ensure the right advice and safety measures are assigned and effectively in place.

Financial abuse

11.22 Financial Abuse includes the unauthorised, fraudulent obtaining and improper use of funds, property, or other resources. Signs of financial abuse can include an unexplained or sudden inability to pay bills, unexplained withdrawals of money from accounts, personal possessions going missing or unusual interest by a friend/relative neighbour in financial matters.

11.23 As such, our housing management teams are in a strong position to recognise Financial Abuse. This includes:
- Conversations with the person about debt, their rent, service charges or benefits
- Seeing rent or bank statements, income and expenditure assessments, or other financial documentation which highlights something worrying.
- Home visits

11.24 Being professionally curious can maximise the opportunity to identify financial abuse, gain clarity on the concern and help to inform next steps.

11.25 Financial Abuse is a safeguarding matter when the victim is a vulnerable adult with care and support needs. In these cases, we follow the Council's Safeguarding Policy.

11.26 When we become aware of financial abuse, we also follow our Vulnerable Tenants and Leaseholders Policy. Amongst other things, this policy sets out how we support residents experiencing financial problems from a housing management perspective.

Self-neglect and hoarding

11.27 The Care Act 2014 has clarified the relationship between self-neglect and safeguarding. It has made self-neglect a category of harm about which the Local Authority, in conjunction with local partners, has a duty to make enquiries and assess need with the promotion of well-being at the heart.

11.28 Self-neglect is an extreme lack of self-care that can cover a wide range of behaviours, hygiene, health, or surroundings and includes behaviour such as hoarding. Self-neglect is likely to be characterised by:

- 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 harm as a result of self-neglect
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs
- Being long standing and recurring
- Frequently putting themselves and others at high risk.

11.29 Hoarding is the persistent collecting of goods, objects or animals and being unable to discard of such possessions when the quantity has become excessive. Hoarding can vary from mild to severe cases whereby it may not impact on their life at all or could seriously affect their functioning on a day-to-day basis.

11.30 We provide specific training, supervision and support for staff dealing with people who hoard and self-neglect to help them understand the complexities of this area of work, the possibilities for intervention and the limitations.

11.31 The inclusion of self-neglect in the Care Act 2014 statutory guidance with regard to safeguarding does not mean that every adult who self-neglects needs to be safeguarded. Likewise, not all adults who hoard need to be safeguarded.

11.32 Safeguarding duties apply only where a child's welfare is affected, or where the adult has care and support needs (many people who self-neglect or hoard do not), and they are at risk of self-neglect, and they are unable to protect themselves because of their care and support needs.

11.33 Where we believe that an adult self-neglects or hoards and may meet those safeguarding thresholds, or that a child's welfare is affected by that self-neglect or hoarding, we always make a Safeguarding Referral. Working effectively with people who self-neglect and hoard can be extremely complex and we do not as housing professionals expect to lead that work.

11.34 Having made that referral, we aim to support the adult from a housing perspective as part of a coordinated interdisciplinary approach overseen by the Safeguarding Adults Board and including shared risk assessment and management.

11.35 Our hoarding policy and vulnerable tenants and leaseholders policy sets out our approach to supporting residents who self-neglect and/or hoard. That approach is based on risk management.

11.36 We aim to take all complex cases of hoarding or self-neglect to Haringey MASP.

11.37 Our role as housing professionals in such cases is likely to include tenancy sustainment support or the provision of repairs and maintenance services.

11.38 We only use enforcement action based on tenancy or leasehold breaches and environmental health or anti-social behaviour as a very last resort with people who self-neglect.

11.39 We use the threat of such enforcement only when a risk assessment indicates that we need to act, and then we initially use the threat of enforcement to encourage the vulnerable adult to accept help and support. Only when that route is exhausted, and in line with careful risk assessment, do we move to enforce.

12 Challenging safeguarding decisions

12.1 If housing staff believe after making a safeguarding referral that Adults' or Children's Services or the Police have made the wrong decision about accepting or responding to that referral, they raise this concern with their line manager and seek to ensure that there is a discussion between senior housing staff and the statutory services in question.

12.2 If an agreement cannot be reached, the relevant Assistant Director will consider further escalation. In any escalation process, we follow the Haringey Inter-Agency SAB Escalation Protocol. We are specific as to what the disagreement is about and clear on what we want to achieve.

13 Referrals to Adult Social Care

13.1 Safeguarding Referrals are only made where a vulnerable adult is being abused or neglected, or where they are at risk of abuse or neglect. Safeguarding referrals are not a shortcut to social care services.

13.2 Where we consider that an adult is vulnerable and may need support or care but is not experiencing abuse or neglect nor at risk of abuse or neglect, we make a referral to the relevant Adult Social Care team. Information about this is available on the Council's Adult Social Care and Health pages.

13.3 We refer to our Vulnerable Tenants and Leaseholders Policy whenever we consider that a resident may need additional support or help.

14 Safeguarding allegations against staff and contractors

14.1 The Council takes seriously any allegations or complaints about the conduct of housing management staff or contractors in respect of their contact with tenants, resident or children.

14.2 All allegations or complaints received by the Council will be investigated fully, and where applicable, action will be taken against the accused member of staff, via the disciplinary procedure.

14.3 We work with the Council's Human Resources team to ensure that we recruit staff at all levels who do not present a risk to our residents. We do this through the way that we draft Job Descriptions, Person Specifications, and Competency Frameworks; the way that we undertake selection and recruitment assessments, including by checking prospective employees' attitudes and behaviour around safeguarding; and by conducting effective background checks including through DBS checks.

14.4 We ensure that safeguarding adults and children is a core part of the induction of new housing staff and is then addressed regularly and effectively by managers and team leaders through individual and team objective-setting, individual supervision and informal support, and in team meetings.

14.5 All Council employees are required to undertake mandatory training on understanding safeguarding every 18 months.

14.6 We minimise the use of bank and agency staff but work with agencies to ensure that, where we do have a need for temporary staff, all relevant pre-employment checks are carried out before those staff are provided to us. Where we do use temporary staff, we ensure that adequate structures of induction and supervision are in place.

14.7 We encourage and enable residents and their networks to report any concerns about possible neglect or abuse by Council staff. We proactively provide residents with information and encourage residents to alert the Council's senior housing staff to any safeguarding concerns.

14.8 We ensure that housing staff are aware of their responsibilities to raise any concerns about colleagues in relation to safeguarding.

14.9 Haringey Council has a Whistleblowing Policy which should be read in conjunction with this policy.

14.10 All employees have a duty of care to draw attention to bad or poor practice in the workplace. This includes practice that may be abusive and/or neglectful. Members of staff who work with children and adults with needs for care and support needs have an individual responsibility to raise concerns with someone who has responsibility to take action.

14.11 The Council's Whistleblowing Policy encourages and enables employees to raise any serious concerns they may have, and to act upon their concerns about potential wrongdoing rather than overlooking a problem. Serious concerns include putting an individual's health or safety at risk including residents and members of the public.

14.12 The Council's Code of Conduct sets out clear expectations of all staff including clear expectations of what people should do and say, and what they must not. This helps raise awareness of illegal, unsafe, unprofessional, and unwise behaviour. Being clear about standards of behaviour is an important part of safeguarding. The Code of Conduct sets out behaviours that constitute Gross Misconduct and would therefore under the Council's Disciplinary Policy warrant dismissal with notice pay or summary dismissal.

15 Consent

15.1 We refer to and follow the Council's Safeguarding Policy when considering questions around consent. As set out in that Policy, we try in most cases to get consent from the vulnerable adult or, in the case of children, from parents or carers before making a safeguarding referral. The exception is when we believe that seeking consent could place somebody at risk of harm – for example, when the parent or carer is allegedly implicated in the abuse or neglect. In these circumstances, we seek further advice as set out in the Policy and associated appendices.

16 Governance and monitoring

16.1 We monitor our progress, make improvements, and work closely with partners to ensure that Safeguarding remains 'Everyone's business'.

16.2 The Council's Adult Services through the Haringey Safeguarding Adults Board (HSAB) oversee adult safeguarding cases in Haringey and ensure robust governance. As set out above, housing services actively participate in HSAB.

16.3 Haringey Safeguarding Children's Partnership (HSCP) brings together agencies who work to safeguard and promote the welfare of children to co-ordinate and oversee child protection in Haringey and ensure robust governance. As set out above, housing services actively participate in HSCP and sit on the leadership board.

16.4 We record all safeguarding cases and suspected cases on individual client records but also in a central Safeguarding Council Tenants and Leaseholders log. That log includes key actions and outcomes.

16.5 All individual cases and suspected safeguarding cases are discussed in appropriate detail during supervision sessions throughout the service structure including at senior leadership level.

16.6 The log of all safeguarding cases and suspected cases in housing services is reviewed quarterly by senior management to ensure that individual cases are being dealt with effectively, to identify potential improvements and learning opportunities, and to support the governance function of HSAB and HSCP.

16.7 The Council's relevant Safeguarding Leads and HSAB or HSCP as appropriate are made aware whenever an individual safeguarding case involving a resident covered by this policy results in either: serious harm; or involves an allegation against a Council employee or agent; or appears not to have been dealt with according to policy. If HSAB or Social Services do not carry out their own investigation, an internal investigation is carried out under the guidance of HSAB to collect all the relevant information on a matter. Where there is evidence of a policy breach, action is taken in line with the Council's policies and procedures.

17 Links to other policies and strategies

17.1 We want the commitments and principles set out in this policy to run through all our housing management policies. Housing management policies updated or produced after the adoption of this policy explain how we apply those commitments and principles to support vulnerable residents within each policy's service area.

17.2 Council policies that inform and relate to this policy include:

Housing Allocations policy	Housing income collection policy
Housing Arrears policy	Responsive Repairs policy
Data Protection policy	Translation and Interpretation policy
Feedback policy	Whistleblowing policy and procedure
Fire Safety policy	

17.3 Key strategies that inform and relate to this policy include:

- Haringey SEND strategy
- Haringey Adult Safeguarding Prevention Strategy
- Haringey's Young People at Risk Strategy
- Haringey Health and Wellbeing Strategy
- Haringey VAWG Strategy

18 Resident co-design and engagement

18.1 When did you discuss development of this policy with residents?
At a meeting of the Resident Voice Board on 16 November 2023 and 15 February 2024.

18.2 What did they tell you?
Board members told us that the policy should identify:
- A more proactive approach to identifying vulnerability
- That multidisciplinary working was central to delivering the policy
- That IT infrastructure was in place to deliver the policy
- The importance of staff training on safeguarding

18.3 How has what residents told us informed development of this policy?
- **A more proactive approach to identifying vulnerability**
  We have outlined the three ways that the Council identify vulnerability and therefore whether a resident has safeguarding issues.
- **That multidisciplinary working was central to delivering the policy**
- We have explained the range of Haringey multi-agency partnerships in place to support delivery of this policy.
- **That IT infrastructure is in place to deliver the policy**
  Digital change and IT services are core to the implementation of this policy.
- **The importance of staff training on safeguarding**

We ensure that safeguarding is a core part of the induction of new housing staff and is then addressed regularly and effectively by managers and team leaders through individual and team objective-setting, individual supervision and informal support, and in team meetings.

19 Equality Impact Assessment

19.1 An EQIA was carried out in the preparation of this policy. That EQIA found that the policy should have a positive impact for the protected characteristic of age and disability. It found no negative impact for those with other protected characteristics.

20 Reviewing the policy

20.1 We will review this policy every three years with the next review due in July 2027 unless earlier events or legislation require an earlier update to this policy.

21 Legislation

21.1 As the landlord, we will ensure that we carry out this policy in accordance with best practice and statutory requirements as follows:

- Anti-Social Behaviour, Crime and Policing Act 2014
- Care Act 2014
- Children Act 2004
- Children and Social Work Act 2017
- Data Protection Act 2018
- Equality Act 2010