

Safeguarding Policy (Vulnerable Adults)

Linthouse Housing Association

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Section 1: Introduction

- 1. Safeguarding Policy (Vulnerable Adults)
- 1.1.1 Linthouse Housing Association believes that individuals or families accessing services have the right to live their lives free from any form of abuse. We expect employees to know what course of action to take if they observe or suspect abuse or if abuse is reported to them.
- 1.1.2 The purpose of this policy and procedure is to ensure that LHA staff members know how to support vulnerable individuals to keep them safe from harm and respond appropriately to concerns and actions which may involve the abuse of individuals or families accessing our services.
- 1.1.3 **Note:** In this Policy, Linthouse Housing Association is referred to as "we", "us" or "our".

1.2 Scope

1.2.1 This policy applies to all LHA staff and volunteers, where there are any concerns about the potential or actual abuse of an individual who they come into contact with via our services or projects. This includes all circumstances where abuse may not have been intended but the outcome was abusive

1.3 Equality and Diversity

- 1.3.1 We are committed to providing fairness and equality of opportunity in order to prevent discrimination in both the workplace and wider society. The Safeguarding Policy (Vulnerable Adults) will be applied in line with our Equality and Diversity Policy to ensure that no person is discriminated on the grounds outlined in the Equality Act 2010.
- 1.3.2 We will ensure our approach to safeguarding vulnerable adults takes into account the individual needs of our tenants and their households. Where required, appropriate arrangements will be made for communicating with our tenants.

1.3.3 This complies with the section of the Scottish Government's Scottish Social Housing Charter dealing with equalities which states that social landlords must perform all aspects of their housing services so that:

"Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services." (Outcome 1: Equalities).

1.4 Our Mission

1.4.1 The Safeguarding Policy (Vulnerable Adults) forms part of our mission to:

"deliver high quality and cost-effective housing services designed to meet the needs of existing and future customers. To work in partnership with others to create thriving communities that people want to live and work in".

1.5 Our Vision and Values

- 1.5.1 Our vision is the creation and sustainment of lasting, unique, vibrant homes in stable, popular and ambitious urban communities. Our vision is underpinned by four core values which we apply to all areas of our business. These are to be:
 - i. Customer Driven
 - ii. Honest
 - iii. Accountable
 - iv. Transparent

1.6 Our Organisational Culture

1.6.1 Our C.H.A.T values as outlined, form the foundation of our Listen, Hear, Act (L.H.A) customer excellence and organisational culture programme. All staff receive training at induction on customer service standards and the organisational culture we promote. This includes reference to our Equality and Diversity Policy and a requirement to treat colleagues, tenants, contractors, service users, and any other stakeholders with dignity and respect.

- 1.6.2 The organisational culture we promote is based on finding solutions to suit customer needs regardless of individual differences We will:
 - Listen We are committed to listening to those we do business with, be that our customers, staff, stakeholders, regulators or funders, to ensure that our responses are reflective of what people are saying to us.
 - **2. Hear -** Once we listen and understand the need/demand/offer that is presented, we will ensure that we fully understand what is being said.
 - Act Whilst we will think about what we do, we want to be known for acting swiftly to deliver solutions and for always keeping our promises.
- 1.6.3 Our Customer Service Standards aim is to ensure all of our service users receive an excellent standard of service. The Standards helps define what our customers can expect when contacting or engaging with the staff in our office. It is available on our website, direct from the office, or in other formats as required.

Section 2: Specific Considerations

2.1 Definitions

2.1.1 Who is a vulnerable adult?

In this policy "adult" means a person aged sixteen years or over. The Adult Support and Protection Act 2007 gives greater protection to adults at risk of harm or neglect. The act defines adults at risk as those aged 16 years and over who:

- are unable to safeguard their own wellbeing, property, rights or other interests
- and are at risk of harm
- and because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected

This includes young people (aged 16 - 18 years old) where there is a need for consideration, particularly when a young person is deemed to be vulnerable due to their circumstances such as being looked after and accommodated in a care setting or being looked after at home or this could be a young person who is on a supervision order.

2.1.2 What is meant by 'harm'?

As per the Adult Support and Protection (Scotland) Act 2007, 'harm' includes all harmful conduct and, in particular, includes:

- conduct which causes physical harm;
- conduct which causes psychological harm (e.g. by causing

fear, alarm or distress);

- unlawful conduct which appropriates or adversely affects property, rights or interests (e.g. theft, fraud, embezzlement or extortion); and
- conduct which causes self-harm.

2.1.3 Who may be the abuser?

Adults may be harmed or abused by a wide range of people, including relatives and family members, professional staff, paid care workers, volunteers, other service users, neighbours, friends and associates and people who deliberately exploit vulnerable people and strangers.

There is often particular concern when abuse is perpetrated by someone in a position of power or authority, who uses his or her position to the detriment of the health, safety, welfare and general well-being of a vulnerable person.

Agencies not only have a responsibility to all vulnerable adults who have been abused but may also have responsibilities towards agencies/people with whom the perpetrator is employed or works as a volunteer.

The roles, powers and duties of the various agencies, in relation to the perpetrator, will vary depending on whether the latter is:

• A member of staff

- A member of a recognised professional group
- A volunteer or member of a community group such as a place of worship or social club
- A service user
- A spouse, relative or member of the person's social network
- A paid care worker or carer
- A neighbour, member of the public or stranger
- A person who deliberately targets vulnerable people in order to exploit them

Section 3: Principles, Purposes and Standards

3.1 Principles

- 3.1.1 LHA will adopt the following principles to tackle all forms of abuse:
 - Give paramount consideration to the welfare of individuals or families supported by services or projects to keep them safe from harm
 - Act to safeguard the right of every person to have safety and adequate physical, emotional and social support
 - Require every staff member who suspects or has evidence that a person is suffering, or is likely to suffer harm, to report the matter to their Line Manager
 - Require repair contractors to report any indications of abuse or harm to a member of the Customer Service or Asset Management Team
 - Take whatever steps are necessary to protect the person and such action will take priority over all other work
 - Work within the guidelines issued by and give every assistance to Local Authority Social Work Services and all other agencies on matters of abuse
 - Work with all relevant agencies to develop and maintain a shared understanding of aims, objectives and standards of practice
 - Recognise the right of every person using a service to have their needs understood and their views taken into account and an individual approach taken when planning for their future welfare

- Ensure that when the right to an independent lifestyle and choice is at risk the individual concerned receives appropriate help, including advice, protection and support from relevant agencies e.g. independent advocacy
- Actively work within ethical principles to provide services which promote: dignity, privacy, choice, safety, realizing potential, equality and diversity

3.2 Standards

- 3.2.1 The following standards are expected to ensure the protection, welfare and safety of all individuals using our service
 - all staff and service users have access to this policy
 - all services must have a clear understanding of the relevant Glasgow City Council adult protection guidelines (see <u>https://www.glasgow.gov.uk/index.aspx?articleid=17207</u>)
 - Staff clearly understand the circumstances which would justify the involvement of the police or any other external agency
 - Reporting, recording of incidents is prompt, accurate and impartial and follows the procedures contained within this policy
 - Staff must be aware of the types of abuse and the signs of potential abuse
 - Staff should be aware of the good practice standards
 - 3.2.2 Staff will promote and encourage the independence of service users while protecting them as far as possible from danger or harm. This includes:
 - Promoting the independence of service users and assisting them to understand and exercise their rights
 - Using established processes and procedures to challenge and report dangerous, abusive, discriminatory or exploitative behaviour and practice.
 - Following practice and procedures designed to keep staff, customers and other people safe from violent and abusive behaviour at work

- Informing your line manager (or a senior leader if more appropriate) where the practice of colleagues may be unsafe or adversely affecting standards
- Assisting service users and carers to make complaints, taking complaints seriously and responding to them or passing them to the appropriate person
- Recognising and using responsibly the power that comes from your work appropriate with service users and carers

Section 4: The Legal Framework

4.1 The Adult Support and Protection (Scotland) Act 2007

4.1.1 This Act introduces measures to identify and protect adults at risk from harm. It defines 'adults at risk' and 'harm'. Where it is known or suspected that an adult is being harmed, the Act places a duty on councils to make the necessary enquiries to establish whether or not further action is required to stop or prevent harm occurring. A general principle on intervention in an adult's affairs requires action which is the least restrictive to the adult whilst providing benefit to him or her. Protection orders include assessment orders, removal orders and banning orders, which require approval by a sheriff.

4.2 The Human Rights Act 1998

- 4.2.1 The Human Rights Act requires all organisations to act compatibly with the act. The relevant elements related to abuse are:
 - The right to freedom from inhuman or degrading treatment, which could be relevant to conditions in a residential care facility (Article 3)
 - The right to a fair hearing
 - The right to the protection of property

4.3 The Data Protection (Scotland) Act 2018

4.3.1 Service providers hold information about service users, which would normally be regarded as confidential. Linthouse Housing Association has a Privacy Policy in place along with safeguards about sharing information. However, concern about the abuse of vulnerable adults provides sufficient grounds to share information on a 'need to know' basis and/or if it is in the public interest. Unnecessary delays in sharing information should be avoided.

4.3.2 The purpose of adult protection is to secure or return the vulnerable adult's autonomy. If the adult has ability to make informed choices and they are not being unduly pressurised or intimated they may ask you to intervene. Their wishes should be respected but this does not remove your responsibility to report any concerns, and where appropriate, for an investigation to be carried out in any situations where other vulnerable adults may be at risk. In order to be sure that the vulnerable adult is deciding for himself/herself it may be necessary to create a safe place to consult the person about their wishes

4.4 Adults with Incapacity (Scotland) Act 2000

- 4.4.1 This should assist tenants who lack capacity to give informed consent. In such circumstances this Act should be applied, in terms of good practice.
- 4.4.2 This act uses the following definitions:

'Adult' means a person who has attained the age of 16 years

'Incapable' means incapable of:

- Acting
- making decisions
- communicating decisions
- understanding decisions
- retaining the memory of decisions

A person shall not fall within this definition by reason of lack or deficiency in a faculty of communication if that lack or deficiency can be made good by human or mechanical aid.

4.4.3 The Act has five basic principles:

- There should be no intervention in the affairs of an adult unless such an intervention will benefit the adult
- The principle of minimal intervention
- The vulnerable adults wishes should be taken account of at all times

- There should be consultation with relevant others, including the adult's carers, any guardian and any other relevant person
- The vulnerable adult should be encouraged to exercise whatever skill she or he has.
- 4.4.5 Where a vulnerable adult is clearly able to make choices, he/she must be advised of the options available and his/her wishes respected, unless, exceptionally, a statutory responsibility to intervene arises. If intervention is necessary to prevent further risk, actions should be pursued in a way that causes the least disruption for that individual's way of life

4.5 The Mental Health (Care and Treatment) (Scotland) Act 2015

- 4.5.1 The Mental Health (Care and Treatment) (Scotland) Act 2015 covers a wide range of issues including:
 - Compulsory powers setting out when people can be legally required to go into hospital, or to accept services or treatment that they may not want;
 - The Mental Health Tribunal which will hear cases under the Act
 - Powers of the Mental Welfare Commission;
 - It places a range of duties, and gives a range of powers, to organisations involved in mental health law, including mental health service providers, the Mental Welfare Commission and the new Mental Health Tribunal for Scotland;
 - It defines clear procedures for decision making on the compulsory treatment and/or detention of people with a mental disorder. Its sets criteria which have to be met before compulsion can be authorised;
 - It amends existing criminal justice legislation to give courts more effective ways of assessing and dealing with a person with mental disorder who comes before them. And, it defines procedures for the review of orders made by a court in relation to a person with a mental disorder;
 - It provides a range of new rights for people with a mental disorder, such as a right of access to independent advocacy services; and,
 - it provides safeguards on the use of certain medical treatments.

4.6 The Protection of Vulnerable Groups (Scotland) Act 2007

- 4.6.1 This Act introduces a new vetting and barring scheme that will replace and improve upon the current disclosure arrangements for people who work with children or 'protected adults'. The adults who use our services would in most cases be considered to be 'protected adults' under this law.
- 4.6.2 The Act's definition of 'harm' includes physical and psychological harm, as well as harm to an individual's property, rights or interests through unlawful conduct. It covers intent to harm, incitement to harm, encouraging an individual to self-harm, and includes a general provision on conduct that "otherwise causes, or is likely to cause" harm to another person.

4.7 The Sexual Offences (Scotland) Act 2009

4.7.1 The Act defines a person as incapable where, due to mental disorder, they are unable to understand what a sexual act is, to decide whether to take part in the sexual act, or, communicate such a decision. Incapacity should therefore not be assumed without ensuring the person has had the opportunity to access appropriate information and education and assistance in understanding this information and its relevance to them. Capacity is however not the only test. When a person has capacity to consent to sexual relations but is at risk and likely to come to serious harm, the Local Authority may have responsibilities under the Adult Support and Protection (Scotland) Act 2007.

4.8 The Equality Act 2010

The Act legally protects people from discrimination in the workplace and in wider society by making it unlawful to discriminate against anyone because of the following 'protected characteristics':

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

Section 5: Implementation

5.1 Recognition and Response to Abuse

5.1.1 All harm and abuse is serious, needs to be recognised, and an appropriate response made.

LHA recognises that there are many forms of abuse, including emotional,

financial, misuse of medication, neglect, physical, racial, sexual, verbal etc.

The following tables, though not exhaustive, lists several types of abuse:

Neglect and Acts of Omission
Abandonment
 Deprivation of basic needs: water, food, housing, heat, clothing, or medical care
 Failure to provide access to appropriate health, social care or educational services

Physica	Physical Abuse	
Hitt	ting	
Pus	shing	
Car	using unnecessary pain	
Interior	entional misuse of medication	
Ca	using Injury	
■ Una	authorised restraint	

Sex	Sexual Abuse	
	Inappropriate exposure to pornographic material	
	Inappropriate sexual advances	
	Inappropriate sexual contact	
	Sexual Exploitation	
	Rape	

Em	Emotional or Verbal Abuse	
	Humiliation	
	Name calling	
	Threats of harm or abandonment	
	Isolation	
	Non-Communication	
	Intimidation	

Financial Abuse or Misuse of Material Responses

- Pressure to sign or hand over property or money
- Misuse of property, possessions or welfare benefits

 Theft, fraud or embezzlement
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- Undue influence to change legal documents
- Pressure to sign or hand over property or money
- Misuse of property, possessions or welfare benefits

Institutional Abuse

Not being treated as an individual
Routines or regimes that fail to recognise service user's individuality
Being restrained physically or through medication
Derogatory nicknames
Taking away independence
Disrespect for private space

Information Abuse
Denial of information/advice
 Failure to provide adequate or accurate information
 Being misinformed

Cyber	Abuse
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Cyb	Cyder Aduse	
	Behaving in a bullying or threatening manner using the following	
	Email	
	Social networking	
	Mobile phone	
	Interactive gaming	

Any or all of these types of abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.

In all cases of abuse, it is important to alert your line manager or give them an opportunity to engage in discussion and decision making.

Abuse which is a criminal offence must be addressed appropriately with other agencies, including the Police Scotland if necessary.

5.1.2 Signs and Symptoms

Aspects of Definitions of Abuse

This section is included as a basis for understanding the nature of abuse and to assist staff in appreciating the issues that will be considered by the Local Authority. They are not a definitive guide to the recognition of abuse but more a guide to how awareness should be triggered, i.e. indications, to prompt thinking about action.

The descriptions of abuse which follow clearly signify that abuse covers not only acts of commission of violence, but also acts of omission on the part of the carers. Abuse can be both active and passive. When accidents are reported, consideration should be given as to whether the person was deliberately or consciously put in the way of danger.

5.1.3 Recognition of Abuse

Many of the symptoms in the following lists might have an alternative cause, other than abuse, but they should lead any professional person to at least consider whether the person has been abused. Suspicions of adult abuse or neglect can come to light in a number of ways. The clearest indicator is a statement or comment by the adults themselves, by their regular carer or by others disclosing or suggesting abuse or neglect.

Such statements invariably warrant further action, whether they relate to a specific incident, and a pattern of events or a more general situation.

There are many other factors which may indicate abuse or neglect. Indicators which could give rise to suspicion include:

Physical Neglect		
Weight - significant loss, failure to maintain weight		
Loss of skin `bloom' plus chronic dirt; smell; patchy baldness; poor hair texture		
Where incontinence pads are used, severe rash caused by failure to care		
Padooeqr uaskitne		
Skin sores with infected areas		
Inadequate or inappropriately poor clothing		
Smell: chronic stale smell often associated with urinary incontinence		
Scavenging or stealing food		
Sudden increases in confusion e.g. dehydration produces toxic confusion		
Emotional Neglect		
 Silent, watchful, frozen awareness 		
Head rocking or banging		
Slowness of response to stimulation		
Poor interaction		
Weight loss		

Physical Abuse

Any bruise, which does not have an adequate explanation, especially:
 Small circular bruise to the facial area, the distribution of which indicates

firm gripping of the cheeks with an adult hand

Bruising to the lips and gums

■ Torn fraenulum (on the underside of the tongue) - particularly important with people who cannot feed independently.

Bruising to cheeks, ears and forehead caused by finger marks

Bruising to any limb that goes all the way round

Special attention should be taken of any bruising which is obviously of differing ages.

Other skin marks, in particular burns or bites:

• With any burn or scald, special attention should be made to

the history as to whether the explanation is plausible.

More severe injuries, especially fractures, should always be taken as an indication of abuse, unless there is clear evidence that the injury has resulted from an accident

- Neglected injuries: lacerations, abrasions
- Bruises resulting from the clenched fist or from the use of a weapon
- Burns and scalds, including assault with a cigarette
- Lack of hygiene and clothing

Diseases now rarely seen due to lack of nutrition, e.g. scurvy, rickets (note that within ethnic minority families this could be the innocent result of a diet

• Unusual or unexplained behaviour of carers including a delay in seeking advice, dubious or inconsistent explanations of injuries and

• A prolonged interval between illness/injury and presentation for medical

.

Difficulty in sitting still.
Over-displaying sexualised behaviour or verbalization
Sleep disturbance
Other signs (non-specific physical complaints):
 Under-eating, weight loss
 Overeating, obesity
Excessive preoccupation with sexual matters
Frequent genital touching
Re-enactment of the abuse with friends
Drinking, sometimes leading to intoxication
Overdose
Deliberate self-harm
Depression
Physical signs are rare unless aggressive rape has occurred but be alert
to signs of bruising on the upper arms and thighs
Involvement with pornography, paedophilia
Sexually explicit art/drawings
Sexually transmitted disease or pregnancy in someone unable to give consent
'New' sexual words acquired without an alternative explanation, e.g. a
sex-education course
Sudden fear or marked dislike of a particular man/woman

Emotional Abuse		
Behavioural disorders		
Temper tantrums		
Prolonged crying		
Petty theft		
Telling untruths		
Lack of co-operation		
Running away		
 Disruptive, aggressive behaviour 		
Poor feeding habits - too much, too little		
Lethargy and depression		
o Tiredness		
 Loss of appetite 		
 Lack of vitality 		

Consider abuse as a possibility if there are signs of stress such as:

- Return to earlier behaviours such as bed-wetting and soiling
- Mood swings
- Withdrawal
- An onset of or an increase in difficult behaviour
- Crying

Financial Abuse

- A change in the ability of a service user to pay for goods/ services
- Unexplained debt
- Reduction in assets
- Sudden unexplained lack of funds/ withdrawal of money from accounts
- Unusual interest in another's finances
- Unexplained disappearance of possessions

Institutional Abuse

- Shared bedrooms
- Shared clothing and linen
- No respect for dignity and privacy
- Medication given and withdrawn as punishment

Misuse of Medication

- Not administered as prescribed
- Over-medication resulting in apathy, drowsiness, slurring of speech, lack of sleep, continual pain etc
- Under-medication resulting in lack of sleep, continual pain etc
- Using medication to control or reward

Also Consider		
	Over frequent or inappropriate contact/referral to outside agencies	
	Demonstration of fear by service user to another person/also demonstration of fear of going home	
-	Difficulty in speaking to service users eg another adult unreasonably insists on being present	
	Pressure exerted by families or professionals to have someone committed to care	
	Staff with a history of moving jobs without notice or has inadequate references	

5.2 Roles and Responsibilities

5.2.1 Roles and Responsibilities of All Staff

There are a number of responsibilities that are common to all staff and volunteers within Linthouse Housing Association irrespective of their function within individual services and the wider organisation. These are:

- ensure they are aware of the importance of the Safeguarding Policy (Vulnerable Adults) good practice guidelines
- ensure that they are aware of the types of abuse
- ensure that they are aware of the signs of potential abuse
- ensure that they know how to respond quickly and appropriately if abuse is suspected, witnessed or reported
- ensure that the environment is safe and secure and enables service users to confide in staff
- ensure that staff are aware of the Whistleblowing Policy
- ensure that they are clear of the good practice standards of conduct
- ensure implementation of this policy
- ensure that they are aware of local authority reporting procedures

5.2.2 The Support Staff will:

- act in accordance with Roles and Responsibilities of All Staff, 5.2.1 above
- be aware of the signs which indicate potential abuse
- respond appropriately to disclosures of and incidents of abuse
- record the incident on the Concerns Incident Form
- seek guidance from their line manager or senior manager if more appropriate

5.2.3 The Line Manager will:

• act in accordance with 5.2.1

- support and advise staff in dealing with all incidents relating to abuse
- monitor and report incidents of abuse
- be aware of protocols to follow and who to contact in the event of a disclosure of abuse

5.2.4 The Senior Manager will:

- act in accordance with 5.2.1
- implement, monitor and review this policy
- support and advise staff in dealing with all incidents or concerns relating to abuse
- ensure that staff are trained in the recognition, prevention and reporting of abuse
- arrange specialist training where appropriate
- ensure that staff are aware of the procedures to follow in the event of abuse being witnessed, reported or suspected
- require that all staff who suspect or have evidence that a service user is suffering, or is likely to suffer harm report the matter to a line manager
- ensure that staff are aware of the good practice standards expected by the organisation
- ensure suitably qualified and competent staff in appropriate numbers are deployed to ensure the welfare and safety of service users
- highlight any learning requirements of this policy
- implement, monitor and review this policy
- be aware of local authority guidelines and protocols in relation to abuse and protection of vulnerable adults
- report to the Board on the subject of vulnerable adult abuse on a regular basis.

Section 6: Complaints

6.1 General Complaint Handling Procedure

- 6.1.1 Our complaint handling procedure was established by the Scottish Public Services Ombudsman (SPSO).
- 6.1.2 In accordance with housing law, we provide our tenants with thorough information pertaining to our complaint handling process. Moreover, we also advise all service users on their right to complain.
- 6.1.3 A complaint is defined as:

"An expression of dissatisfaction by one or more members of the public about the housing association's action or lack of action, or about the standard of service provided by or on behalf of the housing association".

4.1.4 Our complaints handling process includes explicit reference to customer complaints relating to equalities issues. In addition, we have a regulatory requirement to provide information to the Scottish Housing Regulator on the number of customer complaints we receive that relate to equalities issues in the Annual Return on the Charter.

Section 7: Review of Policy

7.1 This policy will be reviewed every 3 years to ensure that the appropriate amendments are made. All staff and relevant third parties will be informed. Continuously subjecting our Policy to review will ensure that its effectiveness is maintained, and that feedback can be acted upon in a reasonable time frame.

Appendix 1: Equalities Impact Statement

TITLE OF POLICY:	Safeguarding Policy (Vulnerable Adults)
Strategic Outcome:	To identify and protect adults at risk from harm.
What is the purpose of the proposed Policy?	To ensure LHA staff members know how to support vulnerable individuals to keep them safe from harm and respond appropriately to concerns and actions which may involve the abuse of individuals or families accessing our service.
Protected Characteristic Groups affected by the Policy	 Vulnerable adults and young persons and any of the following protected characteristics: age gender reassignment being married or in a civil partnership being pregnant or on maternity leave disability race including colour, nationality, ethnic or national origin religion or belief sex sexual orientation
Who is the target audience of this policy or who is intended to benefit from the proposed policy and how? (ie. employees, service users, management committee etc.)	All LHA service users, other customers, staff and volunteers, including Management Committee members
List any existing documents, evidence, research which have been used to inform the EqIA (this must include relevant data used in this assessment)	None
Has any consultation involvement been undertaken with the Protected Characteristic Groups to inform this assessment? (please provide details of who and how consulted)	None
What is the actual likely impact?	Positive impact Raised awareness in staff to safeguarding issues Procedures for raising concerns Raised awareness in staff to work with partner agencies to protect the wellbeing of vulnerable adults

How have you, or will you, put the Policy into practice, and who is or will be responsible for delivering it?	HBS and partner agencies to provide staff training on implementation of the Policy
How does the Policy fit into our wider or related policy initiatives?	The Policy fits into our Equalities and Diversity Policy to ensure we provide fairness and equality of opportunity in order to prevent discrimination in both the workplace and wider society and that no person is discriminated on the grounds outlined in the Equality Act 2010
Do you have a set budget for this work?	No