

Safeguarding Adults Policy - Housing and Property Management

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1. Purpose

This policy sets out the approach of Camden’s housing and property management services to safeguarding adults who are experiencing or at risk of abuse or neglect, in line with the Care Act 2014.

2. Scope

This policy applies to all Camden employees, volunteers, and agency workers responsible for carrying out housing and property management services. This applies to all residents, regardless of tenure type.

This policy also applies to all contractors and third-party providers working on behalf of any part of housing and property management services.

3. Definitions

For the purposes of this policy and related policy, the following definitions apply:

Adult at risk: As set out in the Care Act 2014, an ‘adult at risk’ is an adult (person aged 18 or over) who has:

- a) Care and support needs and
- b) Is experiencing, or at risk of, abuse or neglect and
- c) Is unable to protect themselves from the abuse or neglect or risk of it because of their care and support needs.

Abuse: There is no statutory definition of abuse. It can be described as the intentional or unintentional maltreatment of an individual, leading to harm or a risk of harm. Abuse can take many forms; it may be a single or repeated act, often involving a misuse of power and resulting in a breach of trust. People can experience abuse from one or multiple perpetrators.

Types of abuse can include, but are not limited to:

- Psychological and emotional abuse
- Physical abuse

- Domestic violence and abuse
- Sexual abuse
- Financial or economic abuse
- Modern-day slavery and trafficking
- Discriminatory abuse
- Organisational or institutional abuse
- Neglects and acts of omission
- Self-neglect, including hoarding
- Cuckooing and exploitation by organised crime, including gangs
- Online abuse
- Influences of extremism leading to radicalisation

See **Appendix I** for full definitions.

Co-occurring conditions: refers to the situation where an individual experiences two or multiple needs at the same time, i.e., both mental health and substance use needs.

Care and support needs: A person is defined as 'having care and support needs' if they need extra care and support to live well and independently because of old age, physical frailty, ill health (including mental ill health), disability including learning disability, addiction, being in an abusive relationship or having been in care or in prison, or for another reason. This applies whether or not their care and support needs are being met.

Disclosure and Barring Service (DBS) check: A UK criminal record check used to help employers safely recruit people for roles involving children or vulnerable adults.

Hoarding: Hoarding disorder is a recognised psychiatric condition in the **DSM 5**, and is often linked to trauma. It is considered a form of self-neglect and characterised by the over-accumulation of objects or animals, combined with difficulty in discarding items, which results in excessive clutter.

Multi-Agency Risk Assessment Conference (MARAC): Refers to a confidential meeting where representatives from various agencies share information and create a coordinated safety plan for high-risk victims of domestic abuse.

Safeguarding Adults Reviews (SARs): SARs is a multi-agency review process mandated by the Care Act 2014, to determine what lessons can be learned when an adult with care and support needs has died or experienced serious abuse or neglect, and there is concern about how agencies worked together to safeguard them.

Safeguarding: The Care Act (2014) defines safeguarding as protecting an adult's rights to live in safety, free from abuse and neglect.

Section 42 enquiry: Section 42 of the Care Act 2014 requires that each local authority must make enquiries, or cause others to do so, if it believes an adult has care and support needs, and believes the adult is experiencing or is at risk of, abuse or neglect and, as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

Person-centred approach: This means seeing everyone as an individual, with their own needs, strengths, barriers, and hopes. It means ensuring a person is at the centre of any decisions which relate to their life.

Vulnerability: Refers to a situation in which a resident or household faces barriers to accessing our housing and property management services, which could lead to disadvantage. Vulnerability may not be a fixed state.

4. Roles and responsibilities

ROLE	RESPONSIBILITY
Director of Housing and Director of Property Management	<p>As a local authority and housing provider, housing and property management have a duty to identify and respond to all adult safeguarding concerns that may come to the attention of our service, in line with the Care Act.</p> <p>Directors are responsible for ensuring we have clear policies and procedures in place for all members of staff, contractors, and third parties who deliver services on our behalf. This policy sets out the ways we offer support and what you can expect from us.</p>
Housing Designated Safeguarding Leads	<p>The Housing Designated Safeguarding Leads (DSL) are the strategic leads for safeguarding matters within housing and property. DSLs represent the organisation in strategic partnership boards, and have oversight of safeguarding policies and procedures, ensuring policy compliance and effective implementation. DSLs are notified of serious safeguarding concerns.</p>

Director of Adult Social Services (DASS)	The Director of Adult Social Services (DASS) is responsible for ensuring that the Council carries out its statutory duties in relation to Adult Safeguarding; that safeguarding systems are effective and that arrangements are in place to ensure that adults at risk of abuse and harm are protected.
Director of Operations (Deputy DASS)	<p>The Director of Operations (Deputy DASS) is responsible for the effective delivery of safeguarding duties and practice in the Adult Social Care Operational Teams.</p> <p>This includes ensuring that ASC staff can respond appropriately to safeguarding concerns and enquiries where an adult with care and support needs may be at risk of or experiencing abuse or neglect.</p>
The Director of Strategy and Commissioning (Deputy DASS)	<p>The Director of Strategy and Commissioning (Deputy DASS) is responsible for the safe and effective management of the Camden market of providers that deliver care, support and preventative services for residents.</p> <p>The role ensures that the council has adequate oversight of any provider risks, issues or concerns, that these can be monitored effectively to seek swift improvement, and to share information with practitioners, other local authorities and the CQC as required.</p>
Safeguarding Adults Partnership Board	Responsible for effective multi-agency cooperation and undertaking Safeguarding Adults Reviews (SARs) when necessary.

5. Policy statement

Camden Council is committed to safeguarding its community, ensuring residents can live safely, independently, and well. We aim to prevent abuse and neglect, promoting a person-centred approach that improves lives.

Safeguarding is everyone's responsibility. We recognise that housing and property management teams play a vital role in identifying and supporting residents at risk, and we will form robust multi-agency partnerships to provide effective care.

We put individuals at the heart of decisions affecting their wellbeing, in line with our [Vulnerability Policy](#). The support we provide aligns with our responsibilities as set out in the London Multi Agency Adult Safeguarding Procedures 2025, the Care Act 2014, and the Mental Capacity Act 2005.

The six core principles of Safeguarding set out in the Care Act 2014 underpin our response:

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

6. Our adult safeguarding response

6.1 Identifying a safeguarding concern

In 2024- 2025, 54% of adult safeguarding cases in Camden related to abuse or neglect that took place in an adult at risk's home. This means that as a housing and property management service, we are well-positioned to identify safeguarding concerns. Signs of safeguarding concerns that may come to the attention of housing and property management may include:

- Indicators of self-neglect, such as hoarding
- Tenancy-related issues, such as rent arrears or anti-social behaviour
- Domestic abuse or gender-based violence
- Residents who frequently refuse access or struggle to maintain contact
- Financial difficulties and irregularities
- Adults or children whose needs are being mistreated by a carer or professional.

We encourage our staff to be professionally curious when in conversation with residents or attending the home. This means that they will look beyond the surface and actively explore any concerns about someone's wellbeing.

We take all disclosures of abuse or neglect seriously. We will respond to any concerns sensitively and rapidly, ensuring that safety is always prioritised.

6.2 Raising a safeguarding alert

Our staff and contractors will raise a safeguarding alert where there is **reason to believe** that an adult:

- Has needs for care and support
- Is experiencing, or is at risk of, abuse and neglect, and
- There are concerns that they are unable to protect themselves from the abuse or neglect or the risk of it.

Where there are concerns for a child's welfare or signs that they are at risk of abuse and neglect, we will raise a **child safeguarding alert**. For more information see our [Children's Safeguarding Policy](#).

6.3 Safeguarding enquiry and response

Once a safeguarding referral has been made, Adult Social Care are responsible for carrying out a Section 42 enquiry (Care Act 2014) to investigate concerns of abuse or neglect towards an adult with care and support needs.

Effective safeguarding requires multi-agency collaboration. Housing and property Management teams will support safeguarding enquiries and lead on housing-led actions, such as helping a tenant access home safety measures.

If a Safeguarding referral does not meet the thresholds required for statutory support from Adult Social Care, we will continue to work with the adult at risk in line with our [Vulnerability Policy](#).

6.4 Recording a safeguarding concern

Information about safeguarding cases will be recorded on the individual resident's file. This will include details of any concerns, rationale for decisions, and any actions taken.

Where others are better placed to assess risk, we will signpost to and be led by the expertise of specialist services, such as domestic abuse services.

7. Working in partnership with others

Camden housing and property management recognises that effective safeguarding requires multi-agency collaboration at both strategic and operational levels.

Strategically, the Housing Designated Safeguarding Leads are core members of the [Safeguarding Adults Partnership Board](#) and the [Safeguarding Children Partnership Board](#). Housing representatives also attend specialist boards, such as the Violence Against Women and Girls Board.

Operationally, housing and property management staff work in a multidisciplinary way and participate in a range of multi-agency safeguarding conferences and forums, such as MARAC. They will also attend and coordinate multidisciplinary meetings to manage risk, for example, Team Around Me (TAM).

This includes working closely with partners who provide out-of-borough or temporary accommodation where there is a safeguarding concern and encouraging them to contribute to raising safeguarding alerts where necessary.

7.1 Co-occurring diagnosis and multi-agency working

People experiencing co-occurring mental health and substance misuse can experience significant barriers to living well and independently, including challenges navigating multiple treatment services and complex and overlapping symptoms, which can hinder diagnosis. Together, this can lead to a delay in help-seeking and an escalation of risk.

In line with National Institute for Health and Social Care (NICE) guidance, housing and property management professionals should be alert to any multiple needs and consider the difficulties in accessing services that the individual might face when responding to any safeguarding needs.

We are committed to a person-centred and trauma-informed approach to responding to co-diagnosis, collaborating closely with specialist mental health and substance misuse services to enable effective care and treatment.

8. Information sharing and data protection

Information sharing is an essential element of safeguarding. It enables professionals to assess risks effectively, make informed decisions, and provide timely support to individuals at risk of harm.

Information about suspected or actual abuse or neglect cannot be ignored. We are duty-bound to report concerns about adults at risk, and we share information for the purposes of safeguarding in accordance with our duties as set out in the Care Act 2014 and General Data Protection Regulations 2018.

Where safe and appropriate, we try to involve the adult at risk and explain why we need to make a referral.

We ensure that all housing and property management staff are guided to understand the importance of information sharing, in line with [Camden's multi-agency information sharing agreement](#).

9. Enabling our staff to safeguard

Camden's housing and property management services understand the critical role that we play in delivering an effective, multi-agency safeguarding offer to our

residents. We aim to achieve this through ongoing management and supervision of staff and contractors, performance monitoring, and promoting an active learning culture.

9.1 Recruitment and retention, and training

Safeguarding is a key consideration in the selection and recruitment processes for all Camden staff, contractors, and agencies. All potential and existing staff will be subject to Disclosure and Barring Service (DBS) checks where eligible in their role, in line with [government guidance](#).

All staff are required to complete a mandatory safeguarding e-learning training and review our core safeguarding documents as part of their induction. This training is repeated annually; staff must complete this to qualify for pay progression or recognition awards.

We provide third-party contractors providing a service on behalf of Camden with a copy of safeguarding policies, which they are required to adhere to when engaging with residents. Commissioned organisations have their own safeguarding policies and processes aligned to the statutory framework.

9.2 Supervision, support and staff safety

Housing and property management staff receive regular supervision that supports effective safeguarding in line with this policy and localised procedures.

Staff who raise safeguarding concerns should never be subject to violent, threatening or abusive behaviour.

9.3 The Housing Designated Safeguarding Leads

The Housing Designated Safeguarding Leads (DSLs) play a crucial role in safeguarding adults at risk within Camden's housing and property management services. Housing DSLs are responsible for representing the organisation in strategic partnerships and ensuring compliance with policy and guidance.

Housing DSLs are notified in all cases where a safeguarding incident results in serious harm; or involves an allegation against a Council employee or agent; or appears not to have been dealt with according to policy.

The details of our Housing Designated Safeguarding Leads can be found on our [housing leadership team webpage](#).

9.4 Allegations against staff or contractors

Camden Council takes seriously any allegations or complaints about the conduct of staff or contractors. All allegations and complaints received by the Council will be investigated fully, and where applicable, action will be taken against the accused member of staff.

Our [Whistleblowing Policy](#) 2023 encourages and enables employees to raise any serious concerns they have and to act on those concerns. Staff are duty-bound to report any concerns, and failure to do so could result in disciplinary action.

9.5 Complaints

If a resident is not satisfied with or has concerns about our safeguarding response, they can make a complaint under [Camden' complaints process](#).

10. Mental capacity

The Mental Capacity Act 2005 provides a statutory framework for acting and making decisions on behalf of individuals aged 16 and over who lack the mental capacity to make specific decisions for themselves. Under the act, a person lacks capacity in relation to a matter if, at the time, they are unable to decide for themselves in relation to that matter because of an impairment of, or a disturbance in the functioning of, the mind or brain. The Act is designed to protect and restore power to people at risk who lack capacity.

All decisions about a person's capacity will be made with reference to the Mental Capacity Act 2005 and its core principles. Capacity is time and decision-specific, so our staff will also work to proactively confirm capacity before decision-making takes place, such as during tenancy enforcement action.

11. Self-neglect

Self-neglect may result from a number of behavioural conditions in which an individual neglects to attend to their basic needs. For example, a lack of self-care, a lack of care for their personal environment, and/or a refusal of support that would mitigate the above harm. Self-neglect is often linked with trauma and can be an indicator of mental health issues, personality disorders, cognitive impairment, or other risk factors.

Our staff will work in accordance with the London Multi-agency Adult Safeguarding Policy and Procedures to identify whether self-neglect requires safeguarding intervention. This involves finding a balance between respecting the adult's autonomy and their duty to protect adults at risk.

For more information and guidance on self-neglect, please see the [Camden Safeguarding Adults Partnership Board's Multi-Agency Self Neglect Toolkit](#).

11.1 Hoarding

As a social housing provider and statutory homelessness service provider, we acknowledge that some of our residents will require support with hoarding.

Hoarding is a serious safeguarding concern and can pose significant health and safety and fire risks. Hoarding can also have an impact on those who live near or people with hoarding behaviour, and as such is a serious concern where children or adults at risk are staying with the people with hoarding behaviour.

We will respond to hoarding in a disability inclusive and trauma-informed way; we only use tenancy enforcement action based on breaches, environmental health concerns or anti-social behaviour in relation to hoarding when all other options have been exhausted.

12. Community awareness

We know that community groups and voluntary and charity sector organisations can be the first point of contact for residents who disclose vulnerability, abuse, or neglect. We are committed to raising awareness within the communities we serve so that they are informed and supported in responding to safeguarding concerns.

This Policy is actively visible and available to all partners, organisations, and the public via the Camden Council website.

Where a member of the public is concerned about an adult, they should call Adult Social Care 020 7974 4000 and select option 1, or email adultsocialcare@camden.gov.uk.

13. Diversity, inclusion, and holistic services

Our safeguarding policy is built on the fundamental principles of diversity, inclusion, and collaboration. We recognise that safeguarding is most effective when it addresses the unique needs and experiences of all.

We believe that all individuals, regardless of their age, disability, gender, gender identity, sexual orientation, race, ethnicity, religion, belief, socio-economic status, or any other characteristic, have an equal right to be safe from harm, abuse, and neglect.

Every member of housing and property management shares the responsibility for upholding these principles. We are committed to ongoing training, regular policy review, and continuous learning and development in our safeguarding practices to ensure they are truly inclusive and effective for all.

An equality impact assessment has been carried out as part of policy development.

14. Review

This policy will be reviewed every five years, and if required by changes in legislation, regulation, or the service, it will be reviewed more frequently.

The next review is scheduled to take place in 2030.

15. Related documents

Legal framework: Our safeguarding policy is underpinned by the following legislation and guidance:

- **Children Act 2004:** Establishes a framework for integrated safeguarding and promoting the well-being of children.
- **Working Together to Safeguard Children 2023:** Statutory guidance that sets out how all agencies and individuals should work together to help, support, and protect children.
- **Care Act 2014:** This legislation imposes a legal duty on local authorities to safeguard adults with care and support needs from abuse and neglect.
- **Crime and Disorder Act 1998:** Introduces measures to tackle crime and disorder at a local level, including the establishment of Youth Offending Teams and various orders to address anti-social behaviour.
- **Human Rights Act 1998:** This Act incorporates the rights set out in the European Convention on Human Rights into UK law, making it unlawful for public bodies to act incompatibility with these rights.
- **Domestic Abuse Act 2021:** Provides a comprehensive legal framework to tackle domestic abuse, including a statutory definition of domestic abuse and new powers to protect victims.
- **Anti-Social Behaviour, Crime and Policing Act 2014:** Consolidates and streamlines powers for dealing with anti-social behaviour, provides new police powers, and introduces measures to tackle crime and improve local policing.
- **Children and Social Work Act 2017:** This act introduces reforms to children's social care, including new duties for local authorities to promote children's well-being and a framework for local safeguarding arrangements.
- **Data Protection Act 2018:** This act updates UK data protection law to align with the General Data Protection Regulation (GDPR), which sets out how personal data must be processed and protected.
- **Equality Act 2010:** Mandates that the process is carried out without any discrimination and that tenants with disabilities or health problems receive appropriate support.

Further related **London Borough of Camden policies and documents:**

- London Multi Agency Adult Safeguarding policy and procedures (June 2019)

- Camden’s Multi-Agency Information Sharing Agreement
- Camden Safeguarding Adults Partnership Board’s Multi-Agency Self Neglect Toolkit (2020)
- Whistleblowing Policy 2023
- Complaints Policy 2024
- Camden’s Privacy Notice
- Vulnerability Policy 2025
- Anti-Social Behaviour Policy 2025
- Housing Domestic Violence and Abuse Policy 2025
- Housing Allocations Scheme
- Dignity at Work Policy

16. Information and version control

16.1. Information

Title	Housing and Property Management Safeguarding Adults Policy	
Document number	1	
Authors	Hannah Slydel and Lydia Roberts	
Responsible officer	Glendine Shepherd Director of Housing	
	Gavin Haynes Director of Property Management	
Audience	Public	
Policy Area	Housing and Property Management	
Consultation requirements	Internal	Not required
	External	Not required
Impact Assessment requirements	Equality Impact Assessment (EIA) completed on	1/10/2025
	Data Protection Impact Assessment (DPIA) completed on	Not required No new method of collecting or

	If an EIA or DPIA was not completed, please state why this was not required	processing data implemented
Next review date	2030	
Approved by	Dan Hawthorn, Executive Director of Homes and Communities	
Approval date	04/02/2026	
Effective date	09/02/2026	

16.2. Version control

Version	Date	Summary of Changes	Actioned by (role)
1	04/02/2026	Policy development	Housing Policy and Change Lead

17. Appendix I: Definitions of abuse

Physical abuse, including assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions.

Domestic violence and abuse occurs when someone experiences abuse from someone they are 'personally connected' to, i.e., a current/former partner and/or a family member. This includes controlling and coercive behaviour and so-called honour-based violence, forced marriage and female genital mutilation. Further information can be found in our Housing and Domestic Abuse Policy.

Sexual abuse, including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual photography, subjection to pornography, or witnessing sexual acts, indecent exposure, sexual assault, sexual acts to which the adult has not consented.

Psychological and emotional abuse, including threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, unreasonable and unjustified withdrawal of services or supportive networks.

Financial or material abuse, including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, the misuse or misappropriation of property, possessions or benefits.

Modern slavery and human trafficking, including forced labour and domestic servitude, traffickers and slave masters using whatever means they have at their

disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse, including slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation; and religion.

Organisational abuse, referring to neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home

Neglect and acts of omission, referring to ignoring medical, emotional or physical care needs; failure to provide access to appropriate health care and support or educational services; and the withholding of the necessities of life, such as medication, adequate nutrition and heating

Self-neglect, including hoarding. This covers a range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Cuckooing and exploitation by criminal gangs and organised crime groups, refers to refers to the practice where such groups take over a person at risk's home through force, fraud, or coercion, typically to use the property for criminal activities, whilst exploiting the occupant.

Online abuse, refers to any type of abuse or harmful behaviour that occurs using digital technologies and the internet, causing distress, harm, or a risk of harm to an individual