



HOUSING MANAGEMENT
SAFEGUARDING POLICY
August 2026
August 2029

Policy on:	Safeguarding Policy
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Compliant with the Scottish Social Housing Charter:	Charter Outcome Ref No 1: Equalities Social Landlords perform all aspects of their housing service 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". Charter Outcome Ref No 2: Communication Social landlords manage their businesses so that: "tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides." Charter Outcome Ref No 6: Estate management, anti-social behaviour, neighbour nuisance and tenancy disputes Social landlords, working in partnership with other agencies, help to ensure as far as reasonably possible that: "tenants and other customers live in well-maintained neighbourhoods where they feel safe." Charter Outcome Ref No 11: Tenancy Sustainment Social Landlords make sure that: "Tenants get the information they need on how to obtain support to remain in their home and ensure suitable support is available, including services provided directly by the landlord and by other organisations"
Compliant with New Regulatory Framework:	Regulatory Standards of Governance and Financial Management: Standards 3 and 4
Compliant with Connected Communities/Customer Involvement Strategy	Yes
Compliant with Equalities and Diversity:	YES, Equalities Impact Assessment completed.
Compliant with Business Plan:	Responsive Services
Date Approved:	August 2026
Date for Review :	August 2029

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1.Introduction

This Policy is intended to represent the Association's philosophy and practice in relation to safeguarding the safety of vulnerable people that we encounter while carrying out our duties.

The Association considers it the duty of all those employed or involved with the organisation to safeguard vulnerable people who they encounter, whether cause of the vulnerability is by the actions of themselves or others. This includes reporting any abuse discovered or suspected.

This policy outlines how to respond where there is concern that a vulnerable person (adult or child) may be at risk of harm.

2.Existing policies

This policy should be read in line with the following policies, which provide more detail to specific situations:

- *Child Protection Policy*
- *Domestic Abuse Policy*
- *Hoarding and Self Neglect Policy*

Where a specific action is demonstrated in one of these policies, that relates to the harm then the relevant policy should be followed.

3.Aims of the Policy

The aim of this policy is to make all Paisley HA staff aware of their responsibilities for safeguarding in regards to vulnerable adults and children, and the actions that should be taken in managing situations which arise.

4.Definitions

For the purposes of this policy;

4.1 Definition of Safeguarding

Safeguarding means recognising when to be concerned about their safety and understanding when and how to share these concerns.

4.2 Definition of a Child

A child/young person means anyone under 16 years of age. This definition also extends to young people between the ages of 16-18 if they are subject to a supervision requirement by a Children's Hearing.

Where this definition applies then the Child Protection policy should also be followed.

4.3 Definition of an Adult at Risk

Adults at Risk are defined as persons aged 16 or over who:

- Are unable to safeguard themselves, their property, rights, or other interests,
- 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.

All three elements of this definition must be met for a person to be considered as an adult at risk. The Association's staff will share appropriate information with the Social Work Department and/or Police Scotland, and it is their responsibility to investigate and determine if the person is an adult at risk.

5.Equal Opportunities/GDPR

We are committed to the principles of equal opportunities and good practice.

We acknowledge the Scottish Social Housing Charter (2012): 1 Equalities, which states; "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".

Accordingly, PHA promotes equal opportunities and will not discriminate between persons on grounds of gender or marital status, on racial grounds, or on grounds of disability, age, sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.

PHA is committed to ensuring the secure and safe management of data held by them in relation to customers, staff and other individuals. PHA staff members have a responsibility to ensure compliance with the terms of the Data Protection Act 2018, which includes the General Data Protection Regulation (EU) 2016/679 (the GDPR) and PHA's Privacy Policy, and to manage individuals' data in accordance with the procedures outlined in the policy and documentation referred to herein.

If you need any information to be in a different format/language please let us know - we may be able to help.

6.Scottish Social Housing Charter and Legal Framework

The Association in preparing this policy and any related procedures has given consideration to and sought compliance with;

Scottish Social Housing Charter, as defined by The Scottish Housing Regulator – the regulatory body for Housing Associations. The Relevant Charter Outcome Numbers 2,3, 6 and 11 state:

2. Communication: Social landlords manage their business so that:

“Tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the service it provides”

3.Participation: Social Landlords manage their business so that:

“Tenants and other customers find it easy to participate in and influence their landlord’s decisions at a level they feel comfortable with”

6. Estate Management, anti-social behaviour, neighbour nuisance and tenancy disputes:

Social Landlords working in partnership with other agencies, help to ensure as far as reasonably possible that: “Tenants and other customers live in well-maintained neighbourhoods where they feel safe”

11. Tenancy Sustainment, Social Landlords ensure that:

“Tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations”.

7.Legal Framework

The Acts of the Scottish Parliament which relate specifically to adult protection are:

- **Adults with Incapacity (Scotland) Act 2000**
- **Mental Health (Care and Treatment) Scotland Act 2003**
- **Adult Support and Protection (Scotland) Act 2007**
- **Children (Scotland) Act 1995**
- **Protection of Children (Scotland) Act 2003**
- **Children and Young People (Scotland) Act 2014**
- **Human Trafficking and Exploitation (Scotland) Act 2015**
- **Children (Equal Protection from Assault) (Scotland) Act 2019**
- **Housing Scotland Act (2025)**

Social Work Services are responsible for making enquiries and carrying out investigations to establish whether or not a person is at risk from harm and, if so, which, if any, of the protective measures available in terms of the legislation are most appropriate to an adult at risk's individual circumstances.

Police Scotland are responsible for investigating when a crime has or is suspected to have occurred. Investigations can be carried out jointly by Social Work and the Police.

Employees should familiarise themselves with the **Adult Support and Protection (Scotland) Act 2007: Code of Practice (updated 2022) and National Guidance for Child Protection Scotland 2021 (updated 2023)**. These can be accessed via the **Scottish Government website**.

Paisley HA staff's role is to report suspected or actual harm immediately to the relevant statutory bodies.

8. Confidentiality

Essential to a collaborative approach, and the protection of vulnerable persons, is the sharing of information and concerns. If there is reasonable concern that a person may be at risk of significant harm this will always override the professional agency requirements to keep information confidential (Scottish Executive 2004)

Generally, it is considered best practice to be open and honest with parents/ carers and where appropriate, vulnerable adults, children & young people, about our intention to share concerns about their situation, except in exceptional circumstances e.g. if it would put a person in danger. Where staff are in any doubt they should seek advice from their line manager.

9. Indicators of Risk

9.1. What does “at risk of harm” mean?

Someone is at risk of harm, if another person's conduct is causing, or is likely to cause harm, or the person is engaging, or likely to engage in conduct which causes or is likely to cause harm.

Someone may also be at risk of harm through either conduct or omission which may cause harm or neglect. In this instance this policy would apply where the definitions in section 4 are met.

9.2. Types of Harm

There are various types of harm such as:

- Physical abuse

- Emotional abuse
- Financial or material abuse
- Sexual abuse
- Neglect and acts of omission
- Discriminatory abuse
- Information abuse
- Self Neglect or Harm

Below are indicators of risk:

9.3. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a person.

Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a person whom they are looking after.

9.4. Emotional Abuse

Emotional abuse is where persistent emotional ill treatment of a person causes severe and persistent adverse effects. It may involve conveying to a person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on a person.

It may involve causing a person frequently to feel frightened or in danger, or exploited. Some level of emotional abuse is likely present in all types of ill treatment of a person, though it may occur independently of the other forms of abuse.

9.5. Financial or Material Abuse

Financial or material abuse involves someone else controlling your spending or access to cash, assets and finances. This can leave you feeling isolated, lacking in confidence and trapped. This can be recognised by the police as coercive or controlling behaviour, which is also a criminal offence.

Financial or material abuse can take different forms and can happen to anyone of any age. Abusers can be partners, ex-partners, family members or others, such as carers. It is often part of wider economic abuse.

This kind of abuse can also include

- stopping you from going to work, college or university,
- causing you to lose out on benefits by not letting you go to appointments at the Jobcentre or apply for jobs, and

- controlling your access to essential things, such as food, clothing or transport

9.6. Sexual Abuse

Sexual abuse involves forcing or enticing a person to take part in sexual activities, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts.

They may include non-contact activities, such as involving the person in looking at, or in the production of, pornographic material or in watching sexual activities, using sexual language towards a person, where they do not consent. Or to behave in sexually inappropriate ways.

9.7. Neglect or acts of omission

Neglect is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of the person's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, to protect a person from physical harm or danger, or to ensure access to appropriate medical care or treatment.

9.8. Discriminatory abuse

This is when someone treats you unfairly because they think you are different from them. This can be because of your:

- age
- sex
- gender reassignment
- religion or belief
- pregnancy and maternity
- disability / ability
- sexual orientation
- race

Discriminatory abuse can happen anywhere or at any time.

9.9. Information abuse

Is the misuse of personal information, often in the context of domestic abuse or online harassment, where technology is used to monitor, stalk, harass, threaten, control, or impersonate another person. This can involve social media monitoring, sharing intimate images without consent, or using spyware to track someone's location.

9.10. Self Neglect or Harm

Self Neglect and Harm, is the act, or omission of an action, taken by the individual which places them at risk of harm. This could arise from an act directed by the person towards themselves or the failure to perform acts, which are likely to result in harm.

The safeguarding policy will only apply where the person meets the definition of a child or vulnerable adult.

10. Responsibilities

The Board is responsible for approving the policy.

The Director of Housing & Communities is responsible for reviewing the policy and for identifying suitable training for staff.

All staff have the responsibility for implementing the policy with line managers acting to provide guidance for staff prior to referrals being made to Social Work.

PHA staff regularly come into contact with vulnerable persons through:

- carrying out house visits to tenants/ housing applicants
- people visiting our office
- carrying out property & estates visits
- people attending public meetings/events

10.1. Identifying Harm

There are many signs of harm. It is important to consider any changes to the well-being of a person at risk. Some examples are:

- unexplained or unusual injuries
- misuse of medication, e.g., not giving medicines properly
- unexplained changes of behaviour, e.g., becoming anxious and withdrawn, fear of another person
- unexplained debt, not paying bills for services
- the use by another person of the adult's possessions, bank account or property without his or her informed consent
- pressure by family or professionals(s) to have someone moved into or taken out of care
- hostile or unkind behaviour by a caregiver
- the person at risk is not receiving appropriate care, which would protect them from harm
- unexplained deterioration in health or appearance
- a long delay between illness/injury and the person getting appropriate treatment
- the deprivation of basic needs, such as adequate food or heating

- prejudicial actions or remarks to the adult at risk about age, gender, disability, race, colour, sexual or religious orientation
- failure to provide adequate information, not being informed of rights, or being misinformed

Information regarding the signs to look out for and the importance of reporting concerns can be found on the Child Protection Scotland website <https://www.childprotection.scot/>

Further information can be found on Renfrewshire Council's website <http://www.no-worries.org.uk/>

10.2. Referrals to Social Work

If a staff member has concerns about an adult or child, they must without delay discuss this with their line manager.

After discussion/ agreement with their line manager, the staff member must then immediately report their concerns by telephone call to the duty social worker at the local area team, followed up on the same day, with a written referral.

On receipt of the referral, Social Work will decide how to proceed.

As the referrer, SW will send a written response outlining their actions within 5 working days from receipt of the referral form.

A copy of the referral form and Social Work response should be given to the area Housing Officer.

If we are unhappy or disagree with the Social Work Department decision, we should raise our concerns with their Head of Services.

If no further action is agreed and further concerns emerge, a further referral should be made.

10.3. Recording of Information

The Association is regulated by the [UK General Data Protection Regulation \(UK GDPR\)](#) and the [Data Protection Act 2018](#). As such our customers can request access to the personal information we hold on them. It is the responsibility of our staff to ensure all written information is accurately recorded and reported in a suitable format for public scrutiny.

Any significant incidents or changes subsequent to a referral being made should be reported to Social Work who is the lead agency for child protection records.

11. Staff Training

We will ensure that all staff are aware of this policy and receive appropriate training.

Joint training with Renfrewshire Council/ Social Work will be carried out through partnership working.

12. Complaints

Although we are committed to providing high levels of service, we accept that there may be occasions where customers may not be satisfied with the service received from us. We value all complaints and use this information to help us improve our services. Our complaints policy details our complaints procedure and how to make a complaint.

13. Policy Review

This policy will be reviewed every 3 years or earlier if required to respond to a change in legislation or good practice.

14. Telephone Numbers/websites for services

- ChildLine 0800 11 11
- NSPCC – Scotland 0808 800 5000
- Social Work 0300 300 1199
- Social Work out of hours 0300 343 1505
- Police 101 or 999 *in a case where there*
- *an ongoing crime being committed e.g.*
- *assault*
- www.no-worries.org.uk

Strategic Linkages

Policy / Strategy	Paisley Housing Association – Child Protection Policy Paisley Housing Association – Domestic Abuse Policy Paisley Housing Association – Hoarding and Self Neglect Policy
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