

# Safeguarding Adults

Group Policy

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## 1. Purpose

- 1.1 In England and Wales, safeguarding adults is defined in the 'Care Act, Care and Support Statutory Guidance' as *"protecting a person's right to live in safety, free from abuse and neglect."* Riverside work with a range of adults who may be at risk of abuse or neglect and so it is essential that we have mechanisms in place to minimise the risks of harm and abuse occurring and, where concerns exist, to ensure that appropriate action is taken to address them. Legislation such as the Care Act 2014 (and associated guidance) and Human Rights Act 1998 inform our approach to safeguarding adults across the business.
- 1.2 We are committed to protecting the right of adults to live in safety and be free from abuse or neglect. The purpose of this Policy is to set out Riverside's approach to safeguarding adults, preventing abuse and neglect and responding to concerns or allegations of abuse and neglect where these arise.

## 2. Scope

- 2.1 This policy applies to all colleagues working within The Riverside Group and all its subsidiaries, including One Housing, with the exception of Riverside Scotland which has a separate policy. This includes those working in both a paid and voluntary capacity, members of the governance community and those working for Riverside as a contractor or sub-contractor. This policy also applies to customers of Riverside and members of the public who may have concerns which fall under the remit of this policy.
- 2.2 This policy covers the safeguarding of adults (aged 18 years and above). All instances of suspected or actual abuse or neglect of adult customers will be managed in accordance with this policy and associated procedure(s). There is a separate policy and associated procedure(s) which relate to safeguarding children.
- 2.3 All associated policies and procedures are available:
- Riverside – on the Riverside Information Centre (RIC),
  - One Housing – SharePoint.

## 3. Principles

### Adult at Risk of Abuse

- 3.1 An adult at risk is any person who is aged 18 years or over, and at risk of abuse or neglect because of their needs for care and or support. The Care Act places a statutory duty on all Local Authorities to safeguard any adult who has care and support needs (whether or not the local authority is meeting any of those needs) and:
- Is experiencing, or at risk of, abuse or neglect,
  - As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

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- 3.2 An adult with care and support needs may be:
- An older person,
  - A person with a physical or learning disability or sensory impairment,
  - Someone with mental health needs, including dementia or a personality disorder,
  - A person with a long-term health condition,
  - Someone who misuses substances or alcohol to the extent that it affects their ability to manage day to day living,
  - A carer providing unpaid care to a family member or friend.
- 3.3 Riverside recognises that not everyone within the identified groups listed above will be at risk of abuse or neglect, similarly, there will be other people who do not fall into these groups who could be at risk of abuse or neglect.
- 3.4 In cases where the adult at risk of abuse is pregnant, consideration needs to be given to the risk of harm to the unborn child. Please refer to the Safeguarding Children Policy.
- 3.5 Abuse can take a number of forms, and it may be the case that two or more types of abuse are occurring simultaneously. The 'Care and Support Statutory Guidance' identifies ten types of abuse; physical abuse, domestic violence or abuse, sexual abuse, psychological or emotional abuse, financial or material abuse, modern slavery, discriminatory abuse, organisational or institutional abuse, neglect or acts of omission, and self-neglect. More information on the categories of abuse and types of harm can be found under '[Definitions](#)'.
- 3.6 The abuse may be the result of a direct act, or omission of an act, or both. Riverside colleagues will not be constrained in their view of what constitutes abuse or neglect and will always consider the circumstances of the individual case when deciding on whether there is a safeguarding concern.
- 3.7 Adults can suffer abuse by a range of possible perpetrators including relatives, carers, friends, acquaintances, 'trusted adults' (for example a professional who works with them), neighbours, other customers, and strangers.
- 3.8 Patterns of abuse vary and include:
- Serial abusing in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse and cuckooing sometimes falls into this pattern as do some forms of financial abuse.
  - Long-term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations, or persistent psychological abuse.
  - Opportunistic abuse such as theft occurring because money or jewellery has been left lying around.
  - Abuse can take place online as grooming, domestic, sexual, discriminatory, financial and psychological abuse.

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## Making Safeguarding Personal – The Six Safeguarding Principles

- 3.9 Riverside ensure that the six safeguarding principles, which are enshrined within The Care Act, underpin our approach to safeguarding across the organisation. These are:
- **Empowerment** – Personalisation and the presumption of person led decisions and informed consent. Customers will be supported and encouraged to make decisions regarding what outcomes they want from safeguarding interventions and to give informed consent.
  - **Prevention** - It is better to act before harm occurs. Customers will receive clear and accessible information to help them to understand what abuse is, recognise signs of abuse and know how to seek help.
  - **Proportionality** - Proportionate and least intrusive response appropriate to the risk presented. Colleagues will work in the best interests of customers and any safeguarding interventions will be the least intrusive response possible based on the customer’s wishes and identified risk.
  - **Protection** – Support and representation for those in greatest need. Customers will receive help and support to report abuse and to allow them to take part in safeguarding processes to the extent that they want and are able to.
  - **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. Colleagues will treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. We will work together to get the best results possible for our customers.
  - **Accountability** - Accountability and transparency in delivering safeguarding. Customers will be involved in and fully informed about safeguarding processes and will be supported to understand the roles of everyone involved.

### Raising Awareness

- 3.10 Raising awareness is a key part of our approach to preventing abuse and neglect from occurring. Riverside utilise a range of approaches to raise awareness, amongst colleagues and customers, with regards to safeguarding issues and action they should take if they have concerns. This includes awareness campaigns and communications through various channels, training and cascading good practice.

### Safe Recruitment and Selection

- 3.11 Riverside is committed to safe recruitment and employment practice. We have comprehensive recruitment and selection procedures in place which reduce the risk that adults who may be vulnerable to abuse encounter people who are unsuitable to work with them. These procedures cover employees, contractors, sub-contractors and volunteers who work directly with customers and include requirements around relevant qualifications and experience, receiving satisfactory references and Disclosure & Barring Service (DBS) checks.

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- 3.12 Riverside expects all colleagues to abide by the Code of Conduct. Colleagues are expected to:
- Avoid situations where their actions could be mistakenly interpreted and perhaps lead to allegations of abuse.
  - Ensure their actions are sensitive to customer needs.
  - Avoid placing themselves in positions that may cause customers to feel uncomfortable or which could lead to questions and/or false accusations of abuse.
- 3.13 When entering a formal arrangement with an external contractor or managed agent to provide services to our customers, Riverside will ensure that those agents have in place their own policies and procedures for the support and safeguarding of adults. These policies and procedures should be in line with legislative requirements and regularly reviewed.

### **Empowerment – Making Safeguarding Personal**

- 3.14 Riverside actively promote the empowerment and well-being of adults by ensuring, where appropriate, that they are given information about their rights, the options available to them that could protect them from abuse, and how to report abuse.
- 3.15 Riverside recognises that, in some circumstances, people who have protected characteristics may be at greater risk of abuse or neglect, or of experiencing barriers to being able to access the right support. We ensure that these risks are acknowledged, and that support provided reflects each customer’s specific goals, risks and needs in relation to safeguarding.
- 3.16 Riverside respect and support the right of the individual to lead an independent life based on self-determination and personal choice even where this may involve an element of risk. We ensure that such risk is acknowledged and understood by all concerned and minimised wherever possible. Riverside take a positive approach to risk management, recognising the benefits of autonomy and choice and being able to make decisions which may sometimes involve risk and then supporting customers to manage this risk.

### **Training and Awareness**

- 3.17 Robust mandatory training on safeguarding adults is provided to teams to ensure that colleagues are aware of indicators of abuse or neglect and how to raise and respond to safeguarding concerns. Training is provided through a mixture of e-Learning and tutor led workshops and is based around the competencies required for each role. Most Local Authority Safeguarding Boards run Safeguarding Adults training which is delivered locally and can often be accessed free of charge. The completion of mandatory safeguarding training is regularly monitored.
- 3.18 All Riverside colleagues working with adults will be trained to:

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- Recognise the signs of abuse and behaviours which should give cause for concern.
- Where appropriate, assess the risk of abuse to customers and ensure measures are in place to minimise this as part of assessment and support planning.
- Respond to abuse in accordance with this policy and the relevant Safeguarding Adults Procedure.
- Refer cases of abuse to the local authority Adult Safeguarding Team and relevant Internal Team Safeguarding Teams.

## Whistleblowing

- 3.19 Riverside promote an open culture in which colleagues are encouraged to raise concerns relating to the safety of customers who use our services. We have a robust Whistleblowing Policy in place for colleagues to use if they suspect that a customer is being abused by a Riverside colleague, where there is a failure to respond appropriately to allegations of abuse, or where staff have concerns that a colleague or superior is responsible for the abuse. There are clear lines of reporting for whistleblowing concerns, including routes to use if colleagues feel unable to report directly to their line manager or if they are concerned that appropriate action has not been taken in relation to a concern already raised.

## Prevent

- 3.20 The Government Prevent programme highlights that some adults may be vulnerable to radicalisation and involvement in terrorism. Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works with individuals and communities by using voluntary early intervention to encourage them to challenge extremist and terrorist ideology and behaviour.
- 3.21 Riverside recognises that it supports customers who may be at risk of radicalisation. We believe that community engagement is essential, and we will work closely with local voluntary and community groups as well as Local Authorities and the Police to engage with and co-deliver support to customers who might be at risk of radicalisation.

## Partnership Working / Information Sharing

- 3.22 Riverside work actively within a multi-agency framework with agencies such as Social Services, health professionals and the Police to prevent, assess and investigate allegations of abuse or neglect. Where appropriate, Riverside colleagues will support and participate in Local Authority safeguarding investigations.
- 3.23 The wishes of the customer in relation to what information should be shared, and with whom, should be respected where possible. However, Riverside will work in line with the Data Protection Act 2018, which allows for disclosure (or withholding) of personal data without consent where there is a good reason to do so, and this is necessary to protect the vital interests of an at-risk individual. Where there is a concern that the customer may be suffering or is at risk of abuse or neglect, their safety must be the

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over-riding priority. Information must be shared with statutory authorities where there is any indication of abuse or neglect.

- 3.24 Due attention must always be paid to confidentiality when working with customers. All colleagues must be familiar with Riverside policies relating to confidentiality and information sharing.

## Recording, Reporting and Performance

- 3.25 Riverside ensure that there are robust processes in place in relation to the recording and reporting of allegations of or concerns about abuse across the business. This includes concerns relating to individuals who may not be a customer of Riverside, but where colleagues come into contact with them whilst carrying out their role e.g. visitors. These processes are set out in the Safeguarding Adults Procedure.
- 3.26 We ensure that allegations regarding inappropriate conduct of colleagues, in or outside the workplace, are investigated thoroughly and with urgency, through the Disciplinary and Grievance policies and the policies of the Local Safeguarding Adults Board. Cases such as this are also reported to the Riverside Safeguarding Lead.
- 3.27 Riverside takes concerns relating to self-harm and suicide seriously and understand the need to ensure that protective and supportive action is taken, and incidents are reported appropriately:
- Where a customer has harmed themselves and this has resulted in medical intervention being needed, this will be reported as a safeguarding concern.
  - Where a customer discloses that they have had thoughts of suicide or made attempts to end their life, this will also be reported as a safeguarding concern.
- 3.28 Teams understand and work in line with Local Safeguarding Adults Board (LSAB) procedures, ensuring that safeguarding concerns are reported in line with local arrangements. For Care Quality Commission (CQC) registered services, allegations or incidents of abuse or neglect will also be reported to the CQC.
- 3.29 To ensure that all safeguarding concerns are managed effectively and transparently, Riverside has robust governance and monitoring arrangements in place which provide oversight at all levels of the business. This includes regular reporting to the Executive Team, organisational governance committees and the Group Board.
- 3.30 Good practice and lessons learned from safeguarding incidents will be shared regularly across the group. Safeguarding groups have been set up to support in this.

## Duty of Candour

- 3.31 In line with Regulation 20: Duty of Candour of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Riverside will provide all relevant information to persons who have or may have been harmed in the provision of our services. The Duty of Candour will apply to safeguarding incidents that have resulted in significant avoidable harm or death to a customer. It will not apply to other incidents, but these incidents will still be reported to the customer if appropriate as set out above.

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## Mental Capacity Act 2005

- 3.32 The Mental Capacity Act (MCA) places emphasis on supporting and empowering people to make decisions for themselves wherever this is possible and provides a legal framework for acting and making decisions on behalf of people who lack mental capacity to make decisions for themselves. The MCA therefore acts as an important safeguard to people who may experience difficulties in making decisions for themselves. Riverside is committed to working in line with the 5 statutory principles of the MCA. These are:
- A person must be assumed to have capacity unless it is established that they lack capacity.
  - Individuals should be supported to make their own decisions where possible – a person should not be treated as unable to make their own decision unless all practicable steps have been taken to support them to make the decision for themselves.
  - A person should not be treated as unable to make a decision just because others regard the decision made as being ‘unwise’.
  - A person making decisions on behalf of someone lacking capacity must do so in their best interests.
  - Decisions made on behalf of someone lacking capacity should always be the option which is least restrictive on their basic rights and freedoms.
- 3.33 Riverside has comprehensive procedures in place to ensure that we are working in line with the MCA. These also cover our approach to deprivation of liberty in line with legislation, guidance and relevant case law.

## 4. Further Information & Support

### Legal and regulatory context and framework

- 4.1 The following acts and guidance documents are relevant in developing safeguarding policy and procedure:
- The Family Law Act 1996
  - The Protection from Harassment Act 1997
  - The Police Act 1997
  - The Data Protection Act 2018
  - The Crime & Disorder Act 1998
  - The Human Rights Act 1998
  - The Freedom of information Act 2000
  - The Care Standards Act 2000
  - The Sexual Offences Act 2003
  - The Domestic Abuse Act 2021
  - The Serious Organised Crime and Police Act 2005
  - The Mental Capacity Act 2005 and Code of Practice
  - Deprivation of Liberty Safeguards Code of Practice
  - The Safeguarding Vulnerable Groups Act 2006

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- The Mental Health Act 1983 (amended 2007)
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Care Quality Commission (Registration) Regulations 2009
- CQC Fundamental Standards
- The Anti-social Behaviour Act 2014
- Criminal Justice and Courts Services Act 2015
- Modern Slavery Act 2015
- The Serious Crime Act 2015
- General Data Protection Regulation
- The Care Act 2014
- Adult safeguarding for housing staff guidance (SCIE 2014)
- Care and Support Statutory Guidance, DoH

4.2 This policy should be read in conjunction with other relevant policy and procedures on:

- Safeguarding Children
- Safeguarding Adults (Procedures)
- Volunteering
- Risk Assessments
- Recruitment
- Whistleblowing
- DBS (including DBS Roles and Schemes Lists)
- Disciplinary
- Grievance
- Privacy Statement
- Housing of Sexual Offenders
- Domestic Abuse
- Aids and Adaptations
- Anti-Social Behaviour
- Hate Crime and Harassment
- Lone Working
- Mental Capacity Act
- Managing Performance
- Equality and Diversity
- Duty of Candour
- Code of Conduct

## 5. Roles and Responsibilities

5.1 The Lead Director(s) and Policy Owner(s) for this policy are:

- Liz Turner, Head of Quality and Compliance (Riverside),
- Charlotte Smith – Head of Community Safety & Safeguarding (One Housing),
- Amy Crocker - Assistant Director of Business Development and Compliance (One Housing)

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- 5.2 This policy will be fully reviewed every 3 years, with an annual update to reflect change to legislation or guidance.

## 6. Risk Thresholds

- 6.1 Riverside's risk appetite in relation to safeguarding adults is low. It is fundamental to our values, the reputation of the organisation, and the risks associated with customer wellbeing and safety that we meet legislative, regulatory and good practice guidance around safeguarding adults.
- 6.2 The risks that we are mitigating by having this policy are:
- Risks of harm to our customers that may occur if safeguarding concerns are not recognised, reported and addressed appropriately.
  - Risks of non-compliance with key safeguarding legislation, for example, the Care Act 2014.
  - Risks of non-compliance with regulatory requirements in our CQC registered services which could result in reduced quality ratings or enforcement action being taken by the regulator.
  - Risk of reputational damage that may occur through not following key legislation and guidance in relation to safeguarding.

## 7. Equality, Diversity and Inclusion

- 7.1 Riverside is committed to Equality, Diversity & Inclusion. We strive to be fair in our dealings with all people, communities and organisations, taking into account the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with Riverside's [Equality, Diversity and Inclusion Policy](#) and has been subject to an Equality Impact Assessment.

## 8. Definitions

Key Word / Phrase	Definition
Abuse	Abuse is a violation of an individual's human and civil rights by any other person or persons (No Secrets, DoH, 2000)
Abuse / Neglect (CQC Registered Services)	Regulation 13 of the CQC Fundamental Standards, as outlined in the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 defines abuse as: <ul style="list-style-type: none"> <li>• Any behaviour towards a service user that is an offence under the Sexual Offences Act 2002(a),</li> <li>• Ill-treatment (whether of a physical or psychological nature) of a service user,</li> <li>• Theft, misuse or misappropriation of money or property belonging to a service user,</li> <li>• Neglect of a service user.</li> </ul>

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<p><b>Types of Abuse</b> – ten different types of abuse are referenced in the Care and Support Statutory Guidance. This is not a definitive list, and our teams will always consider the individual circumstances of cases that arise when deciding if an act or incident may be abuse.</p>	
Discriminatory Abuse	This includes forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
Domestic Violence	Any incident or 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 members regardless of gender or sexuality.
Financial or Material Abuse	This includes 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, or the misuse or misappropriation of property, possessions or benefits.
Modern Slavery	This encompasses slavery, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
Neglect or Acts of Omission	This can include ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating and self-neglect.
Organisational or Institutional Abuse	This includes 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. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
Physical Abuse	This includes assault, hitting, slapping, pushing, misuse of medication or inappropriate physical sanctions. Unlawful or inappropriate use of restraint or physical interventions may fall under this category.
Psychological or Emotional Abuse	This includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
Sexual Abuse	This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

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Self-Neglect	This covers a wide range of behaviour including (but not limited to) neglecting to care for one's personal hygiene, health or surroundings. It can include hoarding or other behaviours which may cause harm to the individual such as not eating or alcohol or substance misuse.
<i>Other specific sources of harm which colleagues need to be aware of and will fall into one of the categories detailed above are:</i>	
Hate Crime	This is defined as 'any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic, or due to a person's religion, belief, gender identity or disability.
Disability Hate Crime	This is any criminal offence, which is perceived, by the victim or any other person, to be motivated by hostility or prejudice based on a person's disability or perceived disability.
Forced Marriage	This describes a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse.
Female Genital Mutilation (FGM)	This involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act 2003 makes it illegal to practice FGM in the UK, or to take girls who are British Nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in another country. UK communities at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. Those from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.
Honour Based Violence	<p>This is an umbrella term for a collection of practices which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. It is important to flag any Honour Based Violence at the first instance, so it is managed properly.</p> <p>Honour Based Abuse is more prevalent within communities from South Asia, the Middle East, and North and East Africa. Reports come from Muslim, Sikh, Hindu, Orthodox Jewish and occasionally traveller communities. It is not determined by gender – both perpetrators and victims can be male or female. However, cultural tradition does not mean Honour Based Abuse is acceptable.</p>
Human Trafficking	Traffickers exploit the social, cultural or financial vulnerability of the victim and place huge financial and ethical obligations on them. They control almost every aspect of the victim's life, with little regard for the victim's welfare and health.

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Mate Crime	This is when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.
Cuckooing	This is where a criminal befriends an individual who lives on their own. The criminal then moves in and uses the property to operate unlawful activity.
Sexual Exploitation	This involves exploitative situations, contexts and relationships where adults at risk (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. People who are sexually exploited do not always perceive they are being exploited.
Radicalisation	Radicalisation is the process by which a person comes to adopt increasingly extreme political, social, or religious ideals. This can, in extreme cases, result in condonation or support of terrorism. Extremism covers vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Every case is different, but the following are possible indicators that someone might be at risk: <ul style="list-style-type: none"> <li>• Desire for status,</li> <li>• Victim of or experience of discrimination or racism,</li> <li>• Going through a transitional time of life,</li> <li>• Being influenced or controlled,</li> <li>• Feelings of grievance or injustice,</li> <li>• Experiencing a traumatic event,</li> <li>• A desire for political or moral change,</li> <li>• Struggling with a sense of identity, meaning, and belonging or questioning their place in society.</li> </ul>
Self-harm	Self-harm is when a person hurts themselves intentionally. This is often a way of coping with difficult feelings or situations, painful memories or trauma. Self-harm can present in many forms including cutting, pinching, burning, hitting or punching oneself and hair pulling (not an exhaustive list). Excessive use of alcohol and/or drugs and people putting themselves into harmful situations, where they may be subjected to physical or sexual abuse, can also be considered as self-harm.
Suicide	Suicide involves a person intentionally ending their own life. Suicidal feelings can range from a person having fleeting or general thoughts of ending their own life, right through thinking of or planning ways to end their own life.

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**Change Category (Internal Use ONLY)**

Category of Change	Tick Box
Minor Changes (Non-Strategic)	✓
Major Changes (Re-Write)	
<b>Summary of Changes Made</b>	
<p>The Riverside and One Housing Policies have been combined to form this document. Changes made to layout and subheadings. Minor additions made to reference changes to legislation. Addition of information relating to Prevent and Duty of Candour. Additions made to 'Definitions'.</p>	

**Quality Assurance and Approval (Internal Use ONLY)**

Consultation and Approval	Tick Box	Date
Associated Documents Reviewed		
Consultees: <i>Safeguarding Working Group (including colleagues from across the Riverside Group)</i> <i>Individual colleagues from Business Development, People Services, Customer Services and Asset Services.</i> <i>RCVE – via e-mail</i>	✓	November / December 22
EIA complete and submitted with policy for approval	✓	November 22
DPIA complete submitted with policy for approval (if necessary)	n/a	

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