

Grainger Trust Limited ('GT') Safeguarding Policy – Vulnerable Adults

February 2025

1. Introduction & Statement of Intent

The purpose of this policy is to highlight that safeguarding vulnerable adults at risk of neglect and abuse is the responsibility of everyone. This policy highlights our obligations in the management and reporting of adult safeguarding, and it applies to all employees, Board members, contractors or managing agents who provide services to or on behalf of “GT”

This policy applies to the safeguarding of vulnerable adults at risk of neglect and abuse as defined under the Care Act 2014 (‘the Act’).

As part of our day to day activities there will be contact with vulnerable adults and “GT” as a Regulated Provider of Social Housing are required by law, by the Regulator of Social Housing, and by the Consumer Standards to have a clear policy and approach to safeguarding vulnerable adults, and to working in conjunction with local partnership agencies in relation to such vulnerable adults.

The Act states that local authorities must promote wellbeing when carrying out any of their adult care and support functions. Wellbeing is a broad concept and relates to areas which include protection from abuse and neglect, personal dignity, and control, physical, emotional, and mental health, suitable accommodation, and domestic and social wellbeing.

Local authorities have the lead responsibility for safeguarding adults. Their role is to ensure that there is a local Safeguarding Adult Boards (see below), that they provide services to people who need care and support and that they respond to concerns about harm and abuse. Adult services directors and lead councillors play a leadership role in safeguarding across councils, organisations, and communities.

Safeguarding Adult Boards (SABs) are the lead agencies with responsibility for coordinating safeguarding and conducting case management and reviews. They will have expertise in handling cases of abuse, providing support and counselling to victims and assisting the police with any criminal investigations.

The police and criminal justice system take a lead where a crime is suspected. The police also have a key role in promoting community safety (working with Community Safety Partnerships).

A vulnerable adult at risk may become at risk of abuse because of their needs for care and support and is experiencing, or at risk of, abuse and neglect. As a result of those needs, they are unable to protect themselves from either the risk of, or the experience of, abuse and neglect. This may include their ability to communicate or make known their wishes and needs.

Safeguarding means protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances (Care Act Statutory Guidance 2016).

As a Registered Provider, GT is not a statutory partner under this act but are obliged to:

- attend and provide information for Local Safeguarding Adults Boards if necessary (Housing providers will also be asked to participate in relevant Safeguarding Adult Reviews).
- co-operate with local authorities in enquiries of suspected adult safeguarding concerns
- have a Safeguarding Policy
- keep clear and accurate records of adult safeguarding allegations, responses, and actions, then share these with appropriate organisations when in the best interest of the vulnerable adult.
- have safe recruitment practices and training relevant to safeguarding.

2. Definitions

Sections 42-47 and 68 of the Act defines Safeguarding adults, provides a definition of adults at risk, and details the roles and responsibilities of a range of organisations and how they must work together to respond to adult safeguarding concerns. This includes Registered Providers.

The Act sets out a statutory basis for safeguarding adults and the legal duties that local authorities will have to fulfil in their lead and coordination roles. The supporting Statutory Guidance on adult safeguarding replaces previous 'No Secrets' official guidance.

GT takes its legal obligations in adult safeguarding seriously and recognises the need to meet its legal obligations to ensure, wherever possible, that a proactive approach to safeguarding is adopted.

3. Roles and Responsibilities

GT will aim to protect and maintain customers' safety and wellbeing through their approach to safeguarding vulnerable adults at risk. We will achieve this by working with partners to apply its policy standards to the six principles as defined in the Act 2014 Statutory Guidance (empowerment, prevention, proportionality, protection, partnership, and accountability) which underpin safeguarding work.

In undertaking its role to report and manage adult safeguarding, GT will:

- a. Ensure employees are aware of this policy and relevant procedures.
- b. Ensure employees are aware of the signs and indicators of abuse.
- c. While providing services to adults, identify abuse where it is reasonable to do so.
- d. Alert the appropriate agency where there is an adult safeguarding issue.
- e. Keep records of safeguarding concerns and appropriately supervise staff.
- f. Share information with other organisations in line with the Data Protection Act 2018 and UK GDPR using agreed protocols.
- g. Recruit staff appropriately.
- h. Review safeguarding cases and learn from these reviews to ensure that safeguarding is managed within a culture of continuous improvement.
- i. Put in place performance measures; and
- j. Raise awareness of safeguarding with customers

Whilst safeguarding responsibilities sit with all staff, the responsibility structure at GT is as follows:

- a. The GT Board has responsibilities for the scrutiny and oversight of adult safeguarding matters, including ensuring that “GT” policies and procedures and infrastructure are fit for purpose and are being followed. The “GT” Board will receive reports on and review incidents, and ensure lessons are learnt.
- b. All managers are responsible for ensuring that adult safeguarding matters are reported, and that adult safeguarding is effectively managed within their area of responsibility.
- c. Where there is a case involving death or serious harm of a service user or vulnerable resident, a Serious Case Review will be conducted to identify whether there were any failings on our part, and if so, establish what lessons could be learnt and any actions to rectify and failures. In these instances, the Board shall be informed and kept updated with regards to the outcomes of any reviews that take place.
- d. The Head of GT will report to the Board on an annual basis to highlight the general activities and highlight any concerns as and when appropriate.

4. Our approach

The operational delivery is the responsibility of the “GT” operations team, this includes:

- a. Ensure adult safeguarding procedures are regularly reviewed to ensure they remain appropriate and to ensure other procedures have regard to adult safeguarding as appropriate.
- b. Ensure that relevant staff record and report adult safeguarding cases in accordance with “GT” policies and procedures.
- c. Ensure that staff are appropriately supervised.
- d. Ensure that adult safeguarding is regularly discussed at team meetings and in one-to-one meetings.
- e. Provide updates to the Head of GT to ensure adult safeguarding is considered and reported through to the “GT” Board
- f. Attend external multi agency meetings representing “GT” and
- g. Promote adult safeguarding within the organisation.

All GT colleagues have a duty to record and report adult safeguarding concerns in accordance with the “GT’s” policy, procedures, and guidance. All concerns relating to adult safeguarding must be recorded in writing.

5. Training

All GT colleagues and those working on behalf of “GT” will receive training to ensure they have a clear understanding of adult safeguarding and enable them to fulfil the requirements of

policy procedures.

Training will be appropriate to individual roles and the requirements of these roles in relation to adult safeguarding. Training will be refreshed at least every two years or earlier if there are significant changes to legislation or good practice which result in a requirement to change our policy or procedures.

“GT” Board members, volunteers, and contractors as appropriate will be included in training and the “GT” Board will receive regular reporting on the completion of training.

6. Multi Agency Approach

“GT” recognises its role in adult safeguarding as one that supports the functions of statutory agencies, including local authorities and the Police.

“GT” will ensure that records are kept of appropriate referral agencies. These records will be reviewed regularly to ensure they are up to date.

“GT” will attend multi agency meetings to review adult safeguarding cases including the Safeguarding Adults Board (SAB) where appropriate to do so.

7. Contractors

Contractors delivering services to or on behalf of “GT” will be required to report concerns about adult safeguarding to “GT” and this will be included in the terms of their engagement by “GT”.

All contracts to deliver services to “GT” properties or other activities where there is contact with “GT” customers will contain clauses that oblige the contractor to adhere to this policy.

8. Information Sharing

GT will share information with other agencies appropriately and in accordance with the Data Protection Act 2018 and UK GDPR.

Information sharing agreements will be put in place and regularly reviewed to ensure that they are fit for purpose and legislatively compliant.

GT will only share information without an information sharing agreement being in place where there is an immediate risk of harm or criminal activity is taking place.

9. Perpetrators of Abuse

Where allegations are substantiated, GT will consider legal action and sanctions against perpetrators of abuse who are tenants. Abuse and neglect will not be tolerated.

Where appropriate, GT will refer perpetrators of abuse to the relevant support.

agencies.

10. Statutory Requirements

In observing this policy, GT will comply with all the legal and regulatory expectations, noting that there is a substantial amount of legislation, and this list is not exhaustive:

- Social Housing Regulation Act 2023
- Care Act 2014
- Equalities Act 2010
- The Modern Slavery Act 2015
- Deprivation of Liberty Safeguards (DoLs 2007)
- The Human Rights Act 1998
- Disclosure and Barring Service
- Family Law Act 1996
- Sexual offences Act 2003
- Female Genital Mutilation Act
- Domestic Violence Crime and Victims Act 2004
- Homelessness Act 2002
- Data Protection Act 1998
- General Data Protection Regulation 2016
- Anti-Social Behaviour, Crime and Policing Act 2014
- Care Standards Act 2000

Related internal policies include:

- Child Safeguarding Policy
- Anti-Social Behaviour Policy
- Domestic Abuse Policy
- Harassment and Hate Crime Policy
- Allocations and Lettings Policy
- Income Management Policy

11. Monitor and Review

This policy will be reviewed every two years or when there is a change in circumstances, in work practices or the introduction of new regulation or legislation.

An annual update on safeguarding to the GT Board

Document Owner and Approval

The Head of GT is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements.

A current version of this document is available to all members of staff on the corporate intranet.

Document History

Policy Owner	Head of Grainger Trust
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