



Safeguarding Vulnerable Adults Policy and Procedure

1.0 Introduction

- 1.1 Pivotal is committed to ensuring the safety, wellbeing, and protection of all vulnerable adults who engage with its services. We operate a zero-tolerance approach to abuse, neglect, or exploitation in any form. This policy aligns with the Care Act 2014, the Care and Support Statutory Guidance, and supports compliance with the Regulator of Social Housing's Tenant Involvement and Empowerment Standard and the Home Standard. All staff, volunteers, and contractors share responsibility for safeguarding those at risk and must act promptly on any concerns.

2.0 Scope

- 2.1 Safeguarding is everyone's responsibility. This policy applies across Pivotal. It applies to Pivotal Board members, all Pivotal employees, bank workers, contractors, volunteers and all those managing or providing services for or on behalf of Pivotal.
- 2.2 This policy is specifically for the purpose of safeguarding vulnerable adults at risk of neglect and abuse as defined in the Care Act 2014.

3.0 Definition of Terms

For the purposes of this policy, the following definition of terms is adopted:

Pivotal - 'Pivotal' will be used throughout this document to refer to all Pivotal Group companies, including Pivotal Housing Association, unless otherwise specified.

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect.

Wellbeing - The "wellbeing principle" is a guiding principle placed at the heart of The Care Act 2014 in respect of every persons care and support. Wellbeing is acknowledged by the Care Act Guidance (updated 2022) as a broad concept. It is described therein (s.1.5), and therefore adopted for the purposes of this policy, as relating to the following areas in particular:

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

- personal dignity (including treatment of the individual with respect);
- physical and mental health and emotional wellbeing;
- protection from abuse and neglect;
- Control by the individual over day-to-day life (including over care and support provided and the way it is provided);
- participation in work, education, training or recreation;
- social and economic wellbeing;
- domestic, family and personal;
- suitability of living accommodation;
- the individual's contribution to society.

Types and indicators of abuse:

Category	Type of abuse
Physical	Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable (e.g. opening a window and removing blankets), involuntary isolation or confinement, misuse of medication (e.g. over-sedation), forcible feeding or withholding food, unauthorised restraint, restricting movement (e.g. tying someone to a chair), domestic violence or abuse.
Sexual	Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing of sexual acts, indecent exposure.
Psychological or emotional	Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying.
Financial or material	Theft of money or possessions, fraud, scamming, preventing a person from accessing their own money, benefits or assets, employees taking a loan from a person using the service, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care home. Misuse of benefits or direct payments in a family home, someone moving into a person's home and living rent free without agreement or under duress, false

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

	representation, using another person's bank account, cards or documents, exploitation of a person's money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy, appointee-ship or other legal authority, rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.
Modern slavery	Human trafficking, forced labour, domestic servitude, sexual exploitation e.g. escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to.
Discriminatory	Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010), verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic, denying access to communication aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic, substandard service provision relating to a protected characteristic.
Neglect or acts of omission	Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure to administer medication as prescribed, refusal of access to visitors, not taking account of individuals' cultural, religious or ethnic needs, not taking account of educational, social and recreational needs, ignoring or isolating the person, preventing the person from making their own decisions, preventing access to glasses, hearing aids, dentures etc., failure to ensure privacy and dignity.
Self-neglect	Lack of self-care to an extent that it threatens personal health and safety, neglecting to care for one's personal hygiene, health or surroundings, inability to avoid self-harm, failure to seek help or access services to meet health and social care needs, inability or unwillingness to manage one's personal affairs.
Domestic	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.
Organisational or institutional	Discouraging visits or the involvement of relatives or friends, run-down or overcrowded establishment, authoritarian management or rigid regimes, lack of leadership and supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or assistance with eating, not offering choice or promoting independence, misuse of medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence or communication, failure to respond to complaints.

4.0 Legislation and Regulation

4.1 As service providers, Pivotal will respect the views, feelings, beliefs and wishes of the individuals they support.

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

4.2 The Care Act (Section 42-47) defines Safeguarding adults, gives a definition of adults at risk, the roles and responsibilities of a range of organisations and how these organisations must work together in response to adult safeguarding concerns. The Act lays down the statutory basis for safeguarding adults and the legal duties local authorities must fulfil in their lead and coordination roles.

4.3 The Statutory Guidance on Care and support was updated in 2023.

5.0 Policy Statement

5.1 This policy reflects the requirements of the Care Act 2014, Mental Capacity Act 2005, Domestic Abuse Act 2021, Modern Slavery Act 2015, and Data Protection Act 2018. Pivotal recognises that the Deprivation of Liberty Safeguards (DoLS) are being replaced by the Liberty Protection Safeguards (LPS).

5.2 The Care Act 2014 sets down the requirements placed on local authorities to promote wellbeing when undertaking their adult care and support functions to help improve people's independence and wellbeing and Pivotal will work to its remit. This includes protection from abuse and neglect, personal dignity and control, physical, emotional and mental health, suitable accommodation and domestic and social wellbeing.

5.3 Whilst Pivotal is not a statutory partner, the organisation recognises its legal obligations and takes adult safeguarding seriously. Pivotal will, as required by law and regulation and in alignment with its mission, vision and values, have clear safeguarding and whistleblowing policies and procedures.

5.4 Local authorities take the lead responsibility for safeguarding adults and ensuring they provide services to people in need of care and support, and that they respond to concerns relating to harm and abuse. Adult services directors and lead councillors provide a leadership role in safeguarding across councils, organisations and in communities.

5.5 With their expertise in managing cases of abuse, and providing victims of abuse with support and counselling as well as assisting with police investigations, Safeguarding Adult Boards (SABs) are responsible for co-ordinating safeguarding and carrying out reviews.

5.6 The police are statutory members of the SAB and Police and Crime Commissioners work to ensure their force is effective in offering protection and access to justice where adults are in need of care and support. Where crime is suspected, the criminal justice system and the police will lead.

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

- 5.7 The police also play a key role in the promotion of community safety and work with Community Safety Partnerships to identify vulnerable adults at risk of abuse due to their need for care and support. They do this whether or not needs are being met by the Local Authority where someone is at risk of abuse and neglect and, as a result of their needs, they are not able to protect themselves from the risk or experience of it.
- 5.8 Working with its partners, Pivotal will, at all times, aim to protect and maintain customer safety and wellbeing by:
- ensuring colleagues are aware of the signs and indicators of abuse;
 - identifying abuse where it is reasonable to do so as part of providing services to adults;
 - alerting partner agencies as appropriate where there is an adult safeguarding issue;
 - maintaining records of safeguarding concerns;
 - recruiting and supervising colleagues appropriately;
 - in line with the Data Protection Act and UK General Data Protection Regulation, use agreed protocols;
 - reviewing safeguarding cases to ensure lessons are learned from reviews and that safeguarding is managed within the Pivotal culture of continuous improvement;
 - establishing performance measures;
 - raising awareness of safeguarding with customers;
 - providing appropriate safeguarding training to colleagues.
- 5.9 Pivotal will work with local agencies to ensure the safeguarding of vulnerable adults and children (see the Pivotal Safeguarding Children Policy) at all times in all aspects of its operations and practices, and to ensure compliance will:
- appoint a Safeguarding Strategic and Operational Lead for the organisation. The Safeguarding Strategic and Operational Lead will be the Chief Executive Officer;
 - ensure Pivotal has in place a safeguarding policy and procedure;
 - ensure robust recruitment practices and training include safeguarding considerations;
 - maintain clear and accurate records of all adult safeguarding allegations including the responses made and actions taken, sharing the information as appropriate when this is in the best interests of a vulnerable adult;
 - attend Local Safeguarding Adults Boards (SABs) if necessary, although this is not a legal requirement, provide information to them, and participate in relevant safeguarding adult reviews as requested;
 - co-operate with local authority enquiries where suspected adult safeguarding concerns are raised and, where outcomes require it, protect the adult from actual, or risk of, abuse or neglect as part of a safeguarding plan;
 - review all safeguarding incidents and adopt a lessons-learned approach to inform future practice.

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

- 5.10 Safeguarding is about people and organisations working in partnership to prevent and stop the risks and experience of abuse or neglect. Synonymous with this, and building on the Mental Capacity Act, they must ensure an adult's wellbeing is promoted. In addition, and, where appropriate, the views, wishes, feelings and beliefs of a person must be given due regard in deciding on actions and it must be assumed that the person receiving care and support best knows their own desired outcomes, goals and wellbeing regardless of their medical condition or disability. Assumptions should not be made as to what matters most to the person.
- 5.11 Pivotal will work in alignment with the Mental Capacity Act which requires an assumption that people have capacity and can make decisions for themselves. Unless otherwise established, every adult has the right to make his or her own decisions in respect of his or her care and support, and must be assumed to have capacity to do so unless it is proved otherwise. It must not be assumed that someone cannot make a decision for himself or herself just because they have a particular medical condition or disability (see 10.60 of the Statutory Guidance on Care and support, updated April 2022).

6.0 Procedures for reporting concerns

- 6.1 All safeguarding concerns must be reported immediately to the Designated Safeguarding Lead. In the absence of the Designated Safeguarding Lead, a member of SLT should be contacted for the purposes of escalating safeguarding matters.
- 6.2 A colleague who becomes aware that a safeguarding concern has arisen has a duty to inform the local safeguarding teams of that concern. Ideally, it would be best practice to discuss this referral with their line manager before making a referral, but it is recognised that this is not always possible.
- 6.3 Any colleague can raise a safeguarding alert and must do so either on the appropriate form stored in the safeguarding area of the P Drive or using the direct access form on the Local Authority website. A copy of the form must be given to the colleague's Line Manager and Pivotal's Head of Services. Night colleagues must include the relevant day colleague managers. In an out of hours' situation, a colleague may need to contact the out of hours On-Call Manager.
- 6.4 Where a Local Authority database has been used to complete a referral, a copy of that referral should be taken and emailed to the relevant Line Manager and Designated Safeguarding Lead. If it is not possible to take a copy of the referral, then a separate internal form should be completed and emailed out in the same way. The safeguarding form should be stored at the agreed location in the safeguarding area of the P drive once the referral has been completed.

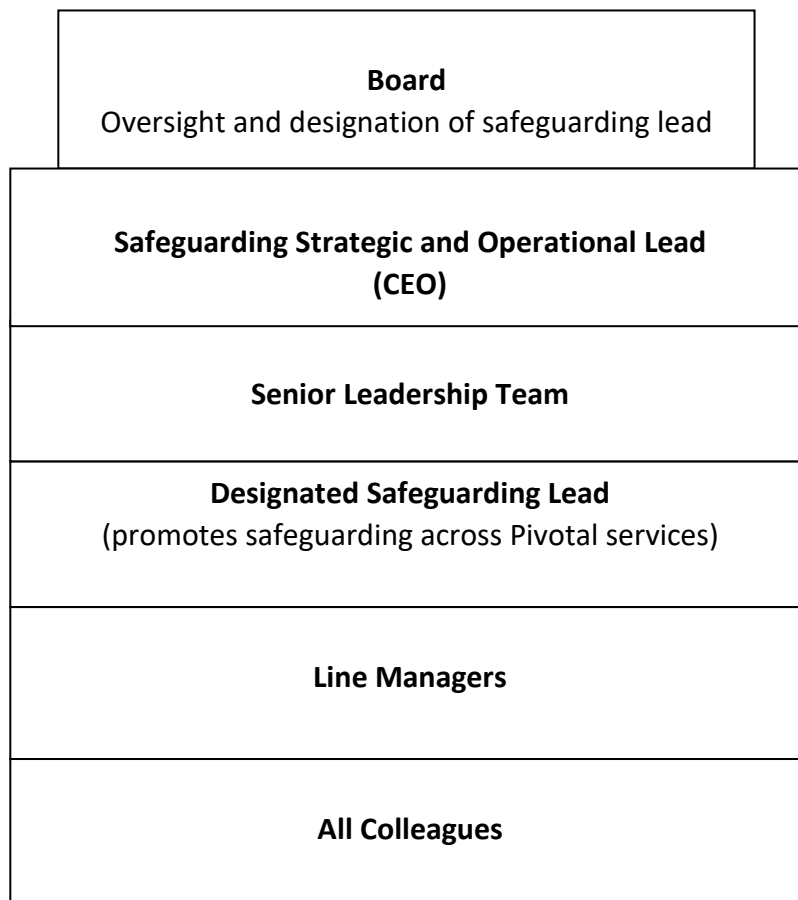
Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

- 6.5 If a Local Authority triage team have been contacted to discuss a safeguarding concern and a decision has been taken by the Local Authority not to progress the referral, a Pivotal safeguarding form should be completed recording the decision to end the concern at that point. The form should then be emailed to the Head of Services.
- 6.6 Where colleagues are aware that a current customer of Pivotal has an allocated safeguarding practitioner and a new safeguarding concern is raised, the safeguarding practitioner should be contacted and asked whether a new referral is required or an existing referral should be updated. Where an update to an existing referral is required, the safeguarding practitioner must, then, be notified in writing. Pivotal records must also be updated.
- 6.7 Within 24 hours of a safeguarding referral being emailed to the local authority, a follow-up phone call must be made to the relevant authority to ensure the referral has been logged. If an issue arises where the referral has not been logged, the referral must be re-sent and followed up with an immediate telephone call to the local authority to establish receipt. Follow up calls should be recorded on the central register for safeguarding.
- 6.8 Any Manager, upon being notified of the safeguarding concern will:
1. if required, attend the property where the safeguarding concern has occurred to ensure the safety of customers and colleagues;
 2. where required, ensure that any additional statutory organisations are notified of the safeguarding concern, and ensure that any actions required as a result of the referral are completed in a timely manner;
 3. on being notified of the safeguarding concern, update the central register and ensure any actions outlined in the report have been completed;
 4. regularly review the case and ensure any updates are recorded.
- 6.9 For the purpose of Pivotal records, the safeguarding case is considered closed when notified by the local authority that the case is closed.
- 6.10 When a safeguarding concern is highlighted which includes allegations against a Pivotal colleague, the Whistleblowing Policy should be adhered to. The Safeguarding Strategic and Operational Lead should be made aware (unless the concern raised is about the Safeguarding Strategic and Operational Lead, in which case the Director of People should be made aware) and they will nominate a manager to raise the safeguarding concern with the relevant Local Authority.
- 6.11 The safeguarding referral should be stored in the sensitive data folder. A blank referral should be stored in the usual way with a direction to the sensitive data folder which is password protected.

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

7.0 Roles and Responsibilities

- 7.1 The responsibility for safeguarding rests with every Pivotal colleague and Pivotal Board members. The following Pivotal structure applies (see below):



- 7.2 The role of the Strategic and Operational Lead, this being the Chief Executive Officer is to:

- act as the Safeguarding Strategic and Operational Lead;
- monitor any changes to legislation or good practice and advise Directors of corresponding updates required to Pivotal policy and procedures;
- work with Directors/Senior Leadership Team to review the adult safeguarding policy on an annual basis and ensure that other policies have regard to adult safeguarding as appropriate then submit to the Pivotal boards for approval;
- with regard to value for money, ensure sufficient resources are in place to provide adequate and up to date training and supervision of colleagues in respect of managing and/or reporting safeguarding concerns with appropriate induction and update training programmes in place;

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

- report to Pivotal Boards annually and, in the event of a serious case review inform them of this;
- report quarterly to the Senior Leadership Team on the number of safeguarding cases and any issues of note;
- lead internal quarterly review meetings with Heads of Department and maintain records of this;
- promote and raise awareness and understanding of safeguarding across Pivotal services;
- work with external organisations as appropriate in relation to adult safeguarding and ensure statutory agencies including local authorities and the police and adult safeguarding boards in its areas of operation are aware of this;
- write and review adult safeguarding policy and procedures and ensure other procedures have regard to adult safeguarding as appropriate;
- oversee safeguarding cases and ensure that adult safeguarding cases are recorded and reported in accordance with procedures.

7.3 Pivotal's Designated Safeguarding Lead will:

- promote safeguarding within and across all Pivotal operations;
- ensure safeguarding is regularly discussed at team meetings and as part of one-to-one meetings;
- ensure the appropriate supervision of colleagues as part of the Line Management process;
- attend quarterly safeguarding review meetings held by the Pivotal Strategic and Operational Lead for safeguarding;
- attend external multi agency meetings representing Pivotal as required;

7.4 The Senior Leadership Team will audit safeguarding records on a monthly basis.

7.5 Managers and all colleague responsibilities

Safeguarding responsibilities lie with all colleagues and everyone has a duty to report all safeguarding incidents to the Local Authority. Colleagues must:

- report concerns promptly in line with the safeguarding procedure;
- maintain a record of all referrals;
- be alert to signs and symptoms of abuse;
- cooperate with any Local Authority enquiries;
- support any protection plans put in place;
- if institutional abuse is suspected, report immediately to the local authority.

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

8.0 Learning Lessons

- 8.1 Pivotal participates fully in Safeguarding Adults Reviews (SARs) led by Local Authorities in accordance with section 44 of the Care Act 2014. Following any safeguarding incident or concern, internal reflective reviews will be conducted to identify learning, improve practice, and strengthen organisational safeguarding culture.
- 8.2 Where service failings are identified, the lessons that can be learned will be established by the local authority in a serious case review and appropriate actions will be taken to rectify areas of failure. In such instances, the Board(s) shall be informed and regularly updated in respect of the outcomes of any reviews that take place and Pivotal will act in accordance with any recommendations.

9.0 Taking a Multi-Agency Approach

- 9.1 In acknowledgement of its role in supporting the functions of statutory agencies, including local authorities and the police in the safeguarding of adults, Pivotal will ensure it maintains appropriate, up to date records to enable appropriate information sharing. The Pivotal Safeguarding Strategic and Operational Lead will ensure adult safeguarding boards in its areas of operation are aware of this.
- 9.2 Pivotal recognises its role in adult safeguarding as one of supporting the functions of statutory agencies, including local authorities and the police and will maintain and review records regularly as part of their commitment to joined-up working.
- 9.3 As required, a Pivotal representative will attend multi-agency meetings to review adult safeguarding cases including the Safeguarding Adults Board (SAB) where it is invited and is appropriate to do so.
- 9.4 Where appropriate, Pivotal will complete MARAC (Multi Agency Risk Assessment Conference) referrals and DASH (Domestic Abuse Stalking and Honour Based Violence) assessments as part of a comprehensive multi-agency approach.

10.0 Information Sharing

- 10.1 Pivotal employees must, at all times, comply with the employee handbook and Pivotal's Data Protection Policy and Information & Communications Technology (ICT) Policy requirements relating to information shared, transmitted or accessed via email or the Internet.

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

- 10.2 Pivotal will share information with other agencies appropriately and in accordance with the Data Protection Act and the UK General Data Protection Regulation. Information sharing agreements may be put in place.
- 10.3 Pivotal will only share information without an information sharing agreement where there is an immediate risk of harm, or criminal activity is taking place.
- 10.4 Pivotal may have to disclose unconfirmed third-party information and/or reports of the potential abuse of a child and/or vulnerable adult, in circumstances where it could be considered organisationally negligent not to do so.

11.0 Recording and Reporting

- 11.1 All concerns relating to safeguarding must be reported to local authority safeguarding teams and recorded as per Pivotal Company reporting procedures.
- 11.2 All Pivotal colleagues have a duty to record and report adult safeguarding concerns in accordance with the organisation's best practice guidance on reporting and recording.

12.0 Training

- 12.1 Pivotal will ensure all colleagues having contact with Pivotal customers will receive safeguarding training, providing them with an understanding of safeguarding and enabling them to fulfil the requirements of Pivotal policy and procedures.
- 12.2 Training will be tailored and appropriate to individual roles and the requirements of these in respect of adult and child safeguarding.
- 12.3 Refresher training will be provided at least annually to all colleagues having contact with Pivotal customers and sooner if any significant changes to legislation or good practice affecting Pivotal policy and procedures arises.
- 12.4 Board members will be provided with safeguarding training as part of the Board induction process and refresher training at least bi-annually and advised of any legislative and regulatory changes by the Safeguarding Strategic and Operational Lead as they arise.
- 12.5 Pivotal volunteers will be provided with safeguarding training as and when this is deemed appropriate.
- 12.6 Colleagues will be provided with guidance and training on professional boundaries when working with adults with care and support needs.

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

13.0 Safeguarding and Human Resources

- 13.1 The Pivotal Director of People will ensure the appropriate recruitment of colleagues to new roles and will ensure relevant role recruitment procedures are adhered to and include Disclosure and Barring Service (DBS) checks. DBS checks will be repeated every three years.
- 13.2 The HR team will provide support to any colleague dealing with safeguarding cases as necessary. This will include providing access to confidential counselling.
- 13.3 If an allegation about a colleague is received, and it constitutes an adult safeguarding issue, investigations will be conducted in accordance with the Pivotal disciplinary policy and procedure. A safeguarding referral will be made to the appropriate local authority. In cases where an allegation of this nature is received, the colleague may be suspended pending the outcome of the investigations.
- 13.4 In cases where an allegation against a colleague is proven, Pivotal will update Local Authority safeguarding teams, inform the police and make a referral to the DBS.
- 13.5 In respect of allegations made by concerned colleagues about the conduct of a colleague, contractor or board member, the Pivotal Whistleblowing Policy will be followed.

14.0 Contractors and Partners

- 14.1 Contractors operating on behalf of Pivotal will be obliged to adhere to the Pivotal safeguarding policy as part of their contractual agreement.
- 14.2 Contractors will be obliged to report concerns about adult safeguarding to Pivotal in accordance with their contract of engagement.
- 14.3 Pivotal main contractors who have access to Pivotal customers' homes will be responsible for ensuring that their employees are trained in safeguarding and are appropriately DBS checked as per Pivotal DBS Policy and Procedure.
- 14.4 Where Pivotal works with partners, they will be required to have and follow their own safeguarding policies and procedures. This will be checked as part of the due diligence process.

15.0 Perpetrators of Abuse

- 15.1 Abuse and neglect will not be tolerated. Pivotal will take a risk management approach including considering legal courses of action and sanctions against perpetrators of abuse who are Pivotal customers.

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

- 15.2 Perpetrators of abuse and neglect will be referred to appropriate support agencies as and when this is deemed relevant to a situation.

16.0 Raising Awareness of Safeguarding

- 16.1 Pivotal is committed to raising safeguarding awareness among colleagues, volunteers, and customers. This includes displaying safeguarding information in communal areas, providing accessible leaflets and induction materials, and delivering awareness sessions in partnership with local agencies. Customers are encouraged to speak up about any concerns, knowing they will be listened to and supported.

17.0 Referral to the Local Authority

- 17.1 All alerts for adult protection issues must be referred to the local authority in whose area the alleged incident or abuse occurred.

18.0 Monitoring and Review

- 18.1 This policy will be monitored by Pivotal Boards. The Strategic and Operational Lead will review cases with the Senior Leadership Team on a quarterly basis and report to the Audit and Risk Committee and Pivotal Boards.
- 18.2 Pivotal Boards will have oversight of any required amendments following lessons learnt and legislative or regulatory changes.
- 18.3 Following Serious Case Reviews, outcomes, lessons learned and recommendations accepted for changes to ensure continuous improvement and best practice will be agreed and implemented by the Safeguarding Strategic Operational Lead and Senior Managers.
- 18.4 The Head of Services will audit safeguarding referrals on a monthly basis and report to the Senior Leadership Team and Safeguarding Strategic and Operational Lead.
- 18.5 In line with Charity Commission requirements, this policy will be reviewed annually.

Legislation, Regulation and Guidance Informing this Policy

Pivotal acknowledges the considerable amount of legislation regarding safeguarding and will continue to monitor legislation and guidance in respect of this. From the existing legal framework, the following is reflected in this policy:

Anti-Social Behaviour, Crime and Policing Act 2014

Care Act 2014

Care Standards Act 2000

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026

Cornwall and Isles of Scilly Adult Safeguarding Board Adult Safeguarding Policies, Standards and Guidance (as updated 15.08.2019. Accessed 13.11.2019)

Data Protection Act 2018

Disclosure and Barring Service (for safe recruitment)

Deprivation of Liberty Safeguards 2007 (as part of the Mental Capacity Act 2005)

Domestic Violence Crime and Victims Act 2012

Domestic Abuse Act 2021

Equalities Act 2010 (as amended)

Family Law Act 1996

Female Genital Mutilation Act 2003

Safeguarding Vulnerable Groups Act 2006

UK General Data Protection Regulation

Homelessness Act 2002

Homelessness Reduction Act 2018

Human Rights Act 1998

Mental Capacity Act 2005 (as amended)

Modern Slavery Act 2015

Sexual offences Act 2003

Statutory Guidance on Care and support (updated 2018)

Social Care Institute for Excellence (Types and indicators of abuse)

<https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse#physical>

Statutory Guidance on Care and support (updated April 2021).

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

Related Pivotal Policies and Procedures

Related Policies and Procedures include but are not limited to:

Child Safeguarding Policy & Procedure

Antisocial Behaviour Policy & Procedure

Domestic Abuse Policy

DBS Policy & Procedure

Lettings & Allocations Policy

Data Protection Policy

Information Sharing Protocol

Disciplinary & Appeals Policy and Procedure

Grievance Policy & Procedure

Student Placement Policy

Volunteer Policy

Recruitment & Selection Policy and Procedure

Whistleblowing Policy and Procedure

Code of Conduct

Policy	Safeguarding Vulnerable Adults Policy & Procedure
Policy owner	CEO
Agreed by	Senior Leadership Team
Version	7.0
Issue date	October 2025
Review date	October 2026