

Adult Services Policies, Procedures & Guidance

Senior Managers' Signing Off Front Page							
Title of Document			Cheshire East Council Protocol for Managing Concerns in regards to People in Positions of Trust with Adults who have Care and Support Needs				
Purpose of Document			This document seeks to assist staff in responding appropriately to concerns made against people, who, whether an employee, volunteer, or student, paid or unpaid, works with or cares for adults with care and support needs.				
Author/s			Anr	nette Lomas			
Intended Audience			All Social Care and Health Staff				
Key changes from previous versions			Not applicable				
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Version	Date	Autho	r	Reviewers	Reason		
Sign Off							
Owner (Name and Post)			Jill Broomhall				
Signed			Shoone				
Date			20.326				
Review							
Review Date			March 2026				

Adult Services Policies, Procedures & Guidance

Introduction

This Protocol should be read in conjunction with the North West Policy for Managing Concerns around People in Positions of Trust with Care and Support Needs and Cheshire East Safeguarding Procedures http://www.stopadultabuse.org.uk/professionals/policies-and-procedures.aspx.

The Care Act 2014 requires the Local Authority, relevant partners (as set out in section 6(7) of the Care Act) and those providing universal care and support services to have clear policy and practice guidance in line with those from the Safeguarding Adults Board, for dealing with allegations and concerns against people who work, in either paid or unpaid capacity, with adults with care and support needs. Such policies should make a clear distinction between an allegation, a concern about the quality of care, or a complaint.

This Protocol is for Cheshire East Council staff to assist in responding appropriately to concerns made against people, who, whether an employee, volunteer or student, paid or unpaid, works with or cares for adults with care and support needs. These individuals are known as a Person in a Position of Trust (PiPoT).

Cheshire East requires their partner agencies to be individually responsible for ensuring they adopt the principles of the North West policy and maintain clear organisational procedures for dealing with PiPoT concerns. Partner agencies should also identify a designated PiPoT lead or contact to oversee the delivery of responsibilities in their organisation.

The partner agency (or organisation commissioned by them to provide a service) who first identifies or becomes aware of a concern will be the primary Data Controller and will have first responsibility for responding, and disclosure, in accordance with the policy and protocol.

Partner agencies and the service providers they commission are individually responsible for ensuring that information relating to PiPoT concerns are shared and escalated outside of their organisation in circumstances where this is *required*, *proportionate* and *appropriate*. They are responsible for making the judgment that this is the case in each instance where they are the

data controller.

Each partner agency, in their annual assurance statement to the Cheshire East Safeguarding Adults Board (CESAB), will be required to provide assurance that the PiPoT arrangements within their organisation are functioning effectively. The CESAB will in turn maintain oversight of whether these arrangements are considered to be working effectively between and across partner agencies in the borough. Appropriate cross organisational challenge is an important part of this.

The Protocol is designed to ensure that if information is shared or disclosed it is done so in accordance with the law but in such a way that allows appropriate and proportionate enquiries to be made that ensures adults with care and support needs are protected and public confidence in services is maintained.

This Protocol is not a substitute for, but may be used in conjunction with, other formal legal processes; for example Multi-Agency Risk Assessment Conference (MARAC), Multi-Agency Public Protection Arrangements (MAPPA) etc.

Acknowledgement

Cheshire East Council would like to thank Sefton Council and Liverpool City Council for their work in this area which has been of great assistance to us in the development of our own protocol.

Scope

This Protocol relates to allegations concerning incidents that happen **outside** of the professional role and workplaces. Thus, instances where staff are alerted to information that may affect the suitability of a professional, or volunteer to work with adults who have care and support needs where such information has **originated from activity outside their professional or volunteer role and place of work.** The alleged victim, in such circumstances, does not have to be an adult at risk, for example, it could be their partner or child.

The processes relate to people who have allegedly:

- Behaved in a way that has harmed or may have harmed a child and/ or an adult with care and support needs.
- Possibly committed a criminal offence against, or related to, a child or an adult with care and support needs.
- Behaved towards a child or an adult with care and support needs in a

- way that indicates s/he is unsuitable to work with children or adults with care and support needs.
- Behaved in a way which questions their ability to provide a service to an adult with care and support needs which must be reviewed e.g. conviction for grievous bodily harm against someone who is not an adult with care and support needs but the person works in a residential home.

These processes should be used if there are concerns about:

- A person's behaviour with regard to his/her own children
- The behaviour of a person's partner, family member, or other member of their household in their private or community life
- Whether a person has been abused and as a consequence may find that their ability to provide a service to adults with care and support needs may be affected

Examples of these include:

- A worker/volunteer is accused of domestic abuse. The person works in the acute trust
- A worker has been accused of abuse of a child and works in adult day services
- A son has been accused of financially abusing his mother and works in domiciliary care.

Children - whilst this Protocol is concerned with potential harm to adults with care and support needs, if the allegation is such that there is a concern that the person may also pose a risk to children, then Children's Services including the Local Authority Designated Officer (LADO) must be informed. It is everyone's duty to refer any current and historical allegations of abuse against children to Children's Services, whether the alleged perpetrator is a PiPoT or not. Concerns about children should be referred to Childrens Social Care on 0300 123 5012.

What is excluded? If an allegation relates to the action of a professional, or volunteer which involves the abuse or neglect of a person with care and support needs and this amounts to a safeguarding enquiry, then such an allegation should be dealt with by following the Cheshire East Safeguarding Procedures.

Practice Guidance

HOW MIGHT A CONCERN ABOUT A PIPOT BE IDENTIFIED?

Concerns about a PiPoT's behaviour may be identified by the following people/ procedures:

- Police intervention or investigation
- Whistleblowing disclosure
- Safeguarding adult's enquiry
- Safeguarding children investigation
- Complaints
- Reports from members of the public
- Providers alerting commissioners of services
- Commissioner's contract monitoring activity
- Any other source of disclosure, eg MARAC cases

WHOSE RESPONSIBILITY IS IT TO RESPOND WHEN A PIPOT CONCERN IS IDENTIFIED?

The partner agency (or service provider they commission) who first becomes aware of an allegation or concern will be the **Primary Data Controller**, or owner of the information. It is their responsibility to risk assess the information and decide whether or not to disclose the allegation/concern to employer.

Examples of these include:

- The Police become aware of domestic abuse and the alleged perpetrator of the abuse works in a care home. The Police are the data controller and are responsible for making the decision whether or not to disclose the allegation to the care home provider.
- A relative reports to Cheshire East adult social care that a family member abuses drugs and is also a domiciliary care worker for a provider agency. Cheshire East adult social care is the data controller and is responsible for deciding whether to disclose the information to the worker's employer.
- A social worker from children's services of another Local Authority has been allocated a case of alleged child abuse where the father, the alleged perpetrator, works in supported living for adults. This Local Authority is the data controller and is responsible for the decision making regarding the disclosure. N.B. Where a concern has arisen following an assessment by CEC children's team, then they are the data controller and must decide through their assessment whether to disclose to the employing organisation.

Exceptional circumstances: It is acknowledged that some PiPoT disclosures may be made to Voluntary or Faith organisations and in such circumstances, it may be more appropriate for the Local Authority to take the lead and make decisions about disclosure to Employers. The Safeguarding Lead in the Voluntary or Faith organisation will raise a Safeguarding Concern to the Local Authority in the normal way.

WHAT SHOULD THE RESPONSE BE?

Where Cheshire East adult social care is the data controller the PiPoT referral should be sent (see appendix 1 for pathway) without delay to the Head of Adult Safeguarding (PiPoT Lead) at adultsafeguardingproviderteam@cheshireeast.gov.uk.

In their absence, referrals will be managed by another Head of Service or Director of Adult Social Care (Operations). The information will be screened and actioned accordingly.

The PiPoT Lead will keep a detailed record of the allegation or concern and steps taken in response to the referral. The Lead should give careful consideration when ascertaining if the situation is a position of trust concern and what information should be shared with employers (or student body or voluntary organisation) so that a suitable response is made. Any PiPoT about whom there are concerns must be treated fairly and honestly. Employers have a duty of care towards them and must consider what support and advice is made available to them. People need to consider that malicious concerns can be made (See Appendix 2 for Factors to Consider Chart as a suggested tool to help in this process).

If a PiPot is removed, either by dismissal or permanent redeployment to non-regulated activity because they pose a risk of harm to adults with care and support needs, the employer (or student body or voluntary organisation) has a legal duty to refer the person to the Disclosure and Barring Service (DBS). Employers should also consider if they need to report workers to statutory and other bodies responsible for professional regulations such as Social Work England, General Medical Council or the Nursing and Midwifery Council.

If the PiPoT attempts to leave employment through resignation in efforts to avoid disciplinary or investigatory action the employer (or student body or voluntary organisation) is entitled not to accept the resignation and conclude whatever process has been instigated with the evidence before them. Dependent on the investigation outcome the employer can dismiss the employee or volunteer and make a referral to the DBS and relevant registration body.

Where a conclusion is reached that the concern *does not* meet the definition of a PiPoT concern, the PiPoT Lead will make a record of the discussion and decision and the reasons for this conclusion. These details could be drawn upon if further concerns come about in relation to a PiPoT.

INFORMATION SHARING

Both the GDPR and the Data Protection Act 2018 (DPA 2018) identify statutory obligations and gateways when sharing a data subject's information. In particular DPA 2018 Schedule 8 provides that the conditions for sharing information are met if sharing is based on safeguarding and to protect the vital interests of the data subject or of another individual.

In all cases, decisions on sharing information must be justifiable and proportionate, based on the potential or actual harm to adults or children at risk and the rationale for decision making should always be recorded.

The default position should be that the owner of the information about a PiPoT should not share it without the PiPoT's knowledge and permission so they are given the opportunity to share the information with their employer first. If the PiPoT declines to share it with their employer for whatever reason, this does not mean the information cannot be shared by the data controller.

If the PiPoT asks the data controller not to share the information, a decision must be made by the data controller, in line with the principles contained within this Protocol, whether to agree. If it is agreed that information will not be shared, this must be qualified since it may be the case that more detail comes to light to change this decision. If a decision is made at a later date to share information, the PiPoT should be consulted again and given a further opportunity to disclose the information him or herself if it is appropriate to do so. Again, the data controller could, following the principles for disclosure in this section (Section 6) decide to share the information even if the PiPoT decides not to. All decisions to share or not share information, and their rationale should be clearly recorded.

In each case involving an allegation against a PiPoT, a balance has to be struck between the duty to protect people with care and support needs from harm or abuse and the effect upon individuals of information about them being shared (for example, upon the person's Article 8 Human Rights (the right to private and family life).

For these reasons each case must be considered on its own merits and personal data shall be processed in accordance with the principles contained in the DPA 2018 and article 5 of the GDPR.

Due regard must be had to Article 8 of the European Convention on Human Rights, which states that:

Everyone has the right to respect for his private and family life, his home and his correspondence.

and

There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

When deciding whether to interfere with a person's Article 8 rights, each case must be judged on its own facts. The issue is essentially one of proportionality. Information is to be disclosed only if there is a "pressing need" for that disclosure. In considering proportionality, consideration must be given to the following general principles¹:

- The legitimate aim in question must be sufficiently important to justify the interference
- The measures taken to achieve the legitimate aim must be rationally connected to it
- The means used to impair the right must be no more than is necessary to accomplish the objective
- A fair balance must be struck between the rights of the individual and the interests of the community; this requires a careful assessment of the severity and consequences of the interference ².

"There is a general presumption [which is not absolute] that information should not be disclosed, such a presumption being based upon a recognition of (a) the potentially serious effect on the ability of [in this case convicted people] to live a normal life; (b) the risk of violence to such people and (c) the risk that disclosure might drive them underground."

Before actually disclosing information to a third party, there is a need to

¹ R (on the application of H) v A City Council [2011] EWCA Civ 403

² Huang v Secretary of State for the Home Department, Kashmiri v Same [2007] UKHL 11, [2007] 2 AC 167, para [19]²

³ R v Chief Constable of North Wales Police and Others (ex parte Thorpe and Another) [1999] QB 396, p409

consult with the person whose information is to be disclosed and to give them an opportunity of making representations before the information is disclosed⁴. "[T]he imposition of such a duty is a necessary ingredient of the process if it is to be fair and proportionate."⁵

Information may be shared by an individual or an agency in the expectation that it will not be shared with others; i.e. it will be kept confidential. Often, a person will preface the disclosure with 'I am telling you this in confidence' or, after making the disclosure, will say 'you won't tell anyone will you?' However, no blanket agreement not to share information with others must be given. Confidential information can be shared if it is justified as being in the public's interest (e.g. for the detection and prevention of crime and for the protection of vulnerable persons, i.e. children or adults with care and support needs at risk of harm or neglect). It is a matter for professional judgment, acting in accordance with information sharing protocols and the principles of the DPA to decide whether breaching a PiPoT's confidentiality is in the public's interest.

If after following the above principles, and weighing up the information available, a decision is made *not* to tell the PiPoT about the concern about them and ask their permission to share it with their employer, (because doing this would place any adults or children at increased risk of harm), then this decision and the reasons for it should be recorded. However, the PiPoT planning process must identify the earliest opportunity for them to be informed

ROLES AND RESPONSIBILITIES

First Point of Contact:

- Determine if information requires a PiPoT referral or an alternative pathway and, if Cheshire East is the data controller
- Complete PiPoT referral form (see appendix 4) ensuring all information is recorded
- Interrogate information systems to determine if adult social care holds any other relevant information to the PiPoT concern
- Send PiPoT referral to Head of Adult Safeguarding, adultsafeguardingproviderteam@cheshireeast.gov.uk
- If PiPoT referral requires immediate action contact Head of Adult Safeguarding directly. If not available, contact another Head of Service within Adult Social Care.

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 $^{^4}$ R (L) v Commissioner of Police of the Metropolis (SoS for the Home Department intervening) [2010] 1 AC 410

⁵ Ibid per Lord Neuberger (para [84]

PiPoT Lead

- The PiPoT referral will be screened and ascertain if immediate action is required.
- Reporting systems interrogated for additional relevant information
- Meeting scheduled with Legal and relevant others to risk assess available information and determine whether or not to disclose allegation/ concern to the worker's / volunteer's employer utilising the Guidance and templates in appendices.
- Where this allegation concerns the worker's / volunteer's own health, consideration should be given to engaging appropriate services with the consent of the individual
- PiPoT issues and outcomes to be recorded in a secure folder. Details to include referrer, PiPoT, concern, actions taken and decisions taken. Records to be kept in accordance with GDPR.
- In the event of a decision being reached to disclose to the employer, a letter is to be sent by the data controller to the individual to advise of the proposed actions, allowing sufficient time for the individual to personally disclose to the necessary parties (see appendix 6).
- In the event of a decision to disclose to the individual's employer but NOT to inform the individual, the data controller must send a letter to the Chief Executive / Director of the individual's work (see appendix 7).
- PiPoT concerns should be managed in a timely way. Timescales should be identified at the planning stage. Regular monitoring is essential to ensure due process is followed and risks are managed. Additional meetings can take place at any time as deemed necessary.
- It is important that the PiPoT is provided with appropriate advice and support during this process, including information about counselling services. For example: CWP Mental health crisis line 0800 145 6485 and/ or the Samaritans Confidential emotional support for people who are experiencing feelings of distress or despair. Helpline: 116 123, 24 hours a day, 7 days a week. All resources can be found at self-harm and suicide prevention and support (cheshireeast.gov.uk)
- PiPoT activity data to be reported to the CESAB.
- Evaluate findings from PiPoT concerns to identify themes or system
 wide issues within organisations; ensure appropriate action is taken to
 ensure learning from past events is applied to reduce the risk of harm
 to adults with care and support needs in the future.

 Where the DATA CONTROLLER is from a Partner Organisation (i.e. Police, Health, Childrens Services), the CEC PiPoT Lead will seek confirmation from them about their decisions to disclose, to whom and when disclosure was made.

MANAGING OFFICERS will:

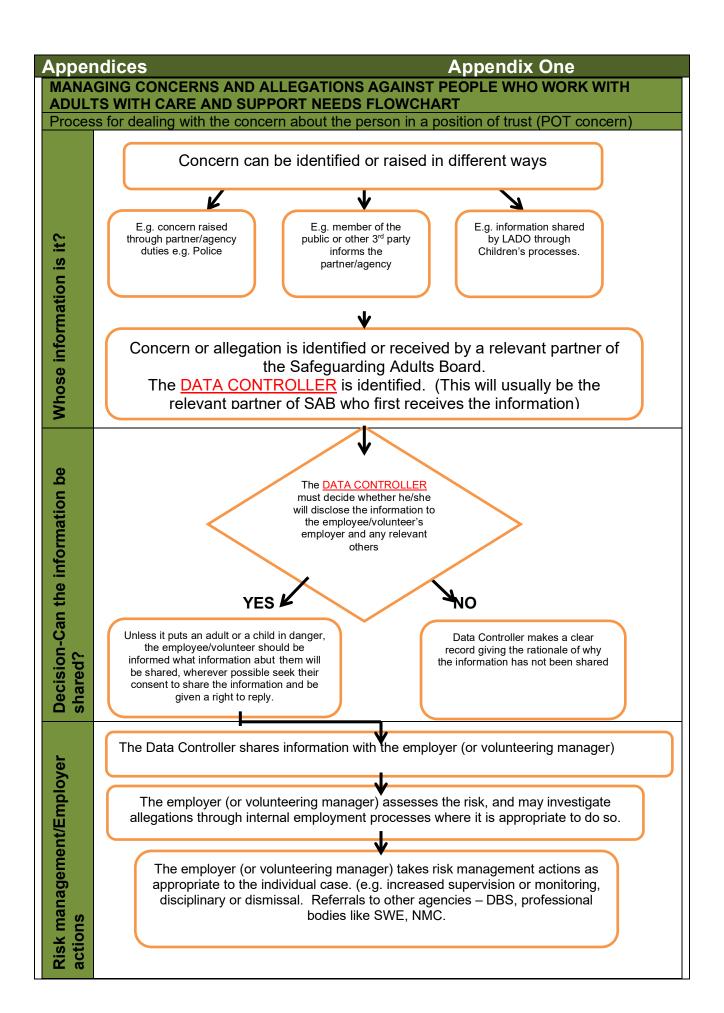
(The Managing Officer is the Local Authority representative who is coordinating any Adult Safeguarding Enquiry, so this section applies in circumstances where the Local Authority is responding to an adult safeguarding concern where a PiPoT issue is also present)

- Inform the PiPoT Lead in all cases where a PiPoT is involved so local recording arrangements can be followed.
- Where there is no concurrent Police investigation, be responsible for deciding what information should be shared with whom and on what basis, bearing in mind the contents of this Protocol. Ensure accurate recording.
- Liaise with LADO as appropriate
- Liaise with other Local Authorities where there are cross border issues

If a decision is made to disclose special category personal data (defined in article 9 GDPR), to the employer, the disclosure must be provided using a secure method in accordance with the Local Authority Data Protection Policy https://centranet.cheshireeast.gov.uk/how-do-i/data-protection-and-security/data-protection-quide/data-protection-principles-and-policy.aspx.

RECORDING OF PIPOT CONCERNS

- Accurate record keeping is essential in all PiPoT cases
- Individuals responsible for investigation and management of PiPoT concerns must as far as is practicable, contemporaneously document a complete account of events, actions and decisions with full rationale.
- Records of actions taken to investigate PiPoT concerns found to be without substance MUST be retained in order to build up history
- Individuals, including a PiPoT subject of the recording, are entitled to access of their personal records whether stored electronically or manually. It is critical all information recorded is fair, accurate and balanced
- All records must be kept in accordance with DPA 2018.



Factors to consider in relation to PiPOT notifications Appendix Two						Appendix Two	
Questions No cause for cond		Some cause for concern requiring investigation		Cause for concern			
The person has behaved in a way that has harmed or may have harmed an adult with care & support needs?		No harm or potential harm		So	me harm or potential harm	Serious harm or potential harm	
2.	offence aç	committed criminal gainst or related to with care & support	No		SL	to an adult with care & ipport needs but the offence is serious	Yes
3.	Otherwise behaved towards an adult/s with care & support needs or in a way that indicates s/he is unsuitable to work with adult/s with care & support needs.		No			Yes	
4.	Has the person behaved in a way that has harmed children or may have harmed children which means their ability to provide a service to adult with care & support needs must be reviewed?			No		Yes	
5.	themselve ability to p adult/s wit	ubject to abuse es which means their erovide a service to th care & support st be reviewed	NO			YES	
6.	questions provide a with care which must conviction harm who	n a way which their ability to service to an adult & support needs st be reviewed – e.g. for grievous bodily is not an adult with oport needs.	NO			YES	
				L GREEN NOT EGUARDING OI PIPOT	R	MORE THAN TWO AMBER OLLOW PIPOT PROCEDURE	ONE OR MORE RED FOLLOW SAFEGUARDING PROCEDURES

Person in a Position of Trust Referral Form Appendix Three

PERSON IN POSITION OF TRUST REFERRAL FORM					
DATE OF REFERRAL					
NAME OF REFERRER					
JOB TITLE & ORGANISATION					
CONTACT DETAILS	TEL:	EMAIL:			
RELATIONSHIP OF REFERRER TO PERSON IN A POSITION OF TRUST (PiPoT)					
NAME OF PIPOT					
D.O.B OF PiPoT (if known)					
ADDRESS OF PIPOT & CONTACT DETAILS (if known)					
PLACE OF WORK (Company name & address in CE)					
IS COMPANY CQC REGISTERED?	YES/NO				
JOB ROLE (works with adults with care & support needs)					
CURRENT EMPLOYMENT STATUS					
DOES PERSON IN POSITION OF TRUST HAVE PROFESSIONAL REGISTRATION? IF YES, PLEASE STATE	YES/NO				
DOES THE PERSON IN POSITION OF TRUST KNOW YOU ARE MAKING THIS REFERRAL? IF NO, PLEASE STATE (e.g. may place adult with care & support needs at greater risk)	YES/NO				
DOES THE CONCERN/ALLEGATION					

INVOLVE CHILDREN? IF YES, HAS CHILDREN'S SERVICES BEEN INFORMED?	
	le a factual detailed chronology about the riteria, what has been alleged, who was the
HAVE BOLIOE BEEN	VE0/NO
HAVE POLICE BEEN INFORMED/AWARE OF CONCERNS (if so please add the police log number)	YES/NO
DETAILS OF ANY ACTIONS CONTACT T	EAM HAVE COMPLETED
NAME OF PERSON COMPLETING FORM	
TO BE COMPLETED BY PIPOT LEAD	DATE:
ARE THERE IMMEDIATE SAFEGUARDING CONCERNS? IF YES,	YES/NO
STATE ACTIONS OUTCOME OF REFERRAL	
-NFA	YES/NO
-REQUEST FURTHER INFORMATION	YES/NO
-REFER TO OTHER PIPOT LEAD -REFER TO LADO	YES/NO YES/NO
-INITIATE PIPOT PROCESS RATIONAL FOR DECISION	YES/NO
DATE OF DECISION:	

Person in a Position of Trust Meeting Agenda Template Appendix Four

Chair	Date/Time	
Venue	Minute Taker	
Person in a	Employer and	
Position of Trust	role	

Confidentiality Statement

Those present are reminded that this meeting is strictly confidential. Discussions should not be shared outside of the meeting. All agencies should develop procedures to ensure that the minutes are retained in a confidential and appropriately restricted manner. The minutes will aim to reflect that all individuals who are discussed at the meetings should be treated fairly, with respect and without discrimination. All decisions undertaken at the meetings will be informed by a commitment to equal opportunities and effective practice issues in relation to race, gender, sexuality and disability.

Minutes of this meeting could be shared as part of criminal, civil, disciplinary proceedings, or as part of investigations concerning whether an individual should be barred from working with children or adults with care and support needs.

If further disclosure is considered to be appropriate, permission must be sought from the chair. The minutes should not be photocopied or shared without the agreement of the chair.

Purpose of the meeting

This meeting is held under the CEC Protocol for managing concerns regarding people in positions of trust with adults who have care and support needs (2019) to:

- Share information
- Risk assess
- Agree actions to be taken, by whom, and by when

Agenda

- 1/ Introductions and confidentiality statement
- 2/ Detail of the allegation/concern (to include current and previous allegations)
- 3/ How this is relevant to their employment/volunteering activity with adults with care and support needs
- 4/ Relevant information from attendees
- 5/ Risk assessment
- 6/ Where relevant agree support to person in position of trust
- 7/ Planning the management of the allegation/concern, decision & rationale
- 8/ Consider strategy for media enquiries if relevant
- 9/ Agree feedback mechanism to the referrer (who, what, when)
- 10/ Next steps including actions to be taken by who and when, details of further meetings if required
- 11/ AOB

Person in a Position of Trust Meeting Template Appendix Five

Chair	Date/Time	
Venue	Minute Taker	
Person in Position	Employer and	
of Trust	role	

Present	
Apologies	
Non-Attendees	
Confidentiality statement read	
Allegation/concern details	
How is this relevant to their employment/volunteering with adults with care & support needs	
Relevant information from attendees	
Risk assessment	
Support required for PiPoT	
Plans for management of allegation, feedback to PiPoT, decision to disclose/not disclose & rationale	

Media Strategy if				
required				
Agreed	Agreed mechanism for			
	ck to referrer			
A.O.B.				
	Actions		By whom	By when
1				
2	2			
3	3			
4				
5				

This record is issued in the belief that it accurately reflects the meeting. Please contact the chair within 7 days of receipt to record any inaccuracies or omissions. This record is confidential and is not to be reproduced or copied to others without the chair's approval.

LETTER TO PIPOT

Appendix Six



Adult Social Care and Health Cheshire East Council Second Floor, Westfields C/O Municipal Buildings Earle Street CREWE CW1 2BJ

Name of recipient House name Street name City Postcode

Date

Dear

I am writing to advise you that I will be writing to your employer to inform them that we have received the following information:

Xxxxx

The letter will be sent to your employer (allow 14 days) in line with Cheshire East Council's Protocol for managing concerns in regards to people in positions of Trust with adults who have care and support needs. This period will allow you the opportunity to disclose the information to your employer

Yours sincerely

Head of Adult Safeguarding

Letter to Employer

Appendix Seven



Adult Social Care and Health
Cheshire East Council
Second Floor, Westfields
C/O Municipal Buildings
Earle Street
CREWE
CW1 2BJ

Name of recipient House name Street name City Postcode Date

Dear

Re:

In line with Cheshire East Council's Protocol for managing concerns in regards to people in positions of trust with adults who have care and support needs, I am writing to you to inform you that we have received information about the person named above which has given us cause for concern.

We have been informed: xxxx

We are concerned that xxxxx works with adults who may be at risk. It is expected that you will take appropriate action in relation to a risk assessment in order to ensure the safety and protection of the people in your care. We would welcome feedback following any actions you have taken.

Yours sincerely,

Head of Adult Safeguarding