



Safeguarding Practice Customer Scrutiny Review Findings and Recommendations Thursday 17 September 2026

Overview of the Scrutiny Review

This scrutiny review examined safeguarding practices recognising the growing role housing providers play in identifying vulnerable adults and children, and protecting those at risk. Previous scrutiny work found more customers require support at a time when local authority and partner service capacity is under pressure, increasing the importance of housing providers to be vigilant in identifying and responding to safeguarding concerns. The review focused on how safeguarding responsibilities are delivered through current arrangements and day-to-day practice.

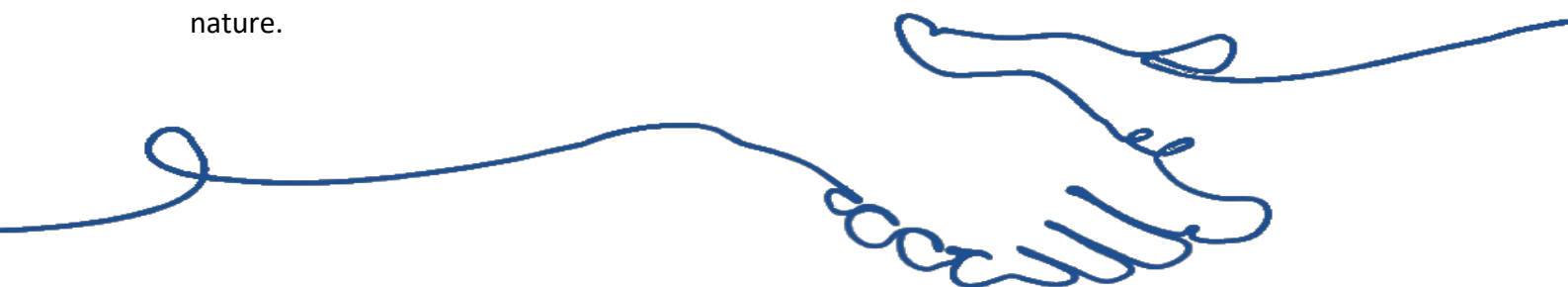
Our proposed recommendations based on the evidence reviewed are set out in **Appendix One** along with agreed actions.

Purpose of the Scrutiny Review

To explore the safeguarding responsibilities and assess how safeguarding arrangements operate in practice, including how concerns are identified, reported and managed, and how effectively the organisation works with partner agencies to help keep customers safe. To gain assurance safeguarding arrangements are effective and colleagues have the information and support required to keep customers safe and respond to concerns.

Scope

We examined safeguarding policies, procedure guidance, training, support and communications to assess how effectively they help colleagues identify, respond to and manage safeguarding concerns. Customer insight was not included, as it would not have been appropriate to contact customers, also feedback is not routinely gathered due to the sensitive nature.



Safeguarding investigations were out of the review scope, as responsibility sits predominantly with local authorities. Housing providers support this process by identifying, reporting, and referring concerns where appropriate.

Our approach

To achieve our aim, we gathered evidence through a range of review activities, including:

- Met with the Head of Independent Living (HOIL) and Safeguarding Partner (SP) to gain an overview of safeguarding arrangements and agree the scope of the review.
- Reviewed key documentation including the safeguarding policy, procedure guidance notes, training materials, case data, and other relevant service information.
- Spoke with an Area and a Neighbourhood Service Manager (ASM / NSM) to understand operational safeguarding practices and challenges.
- Met with the Service Excellence Group (SEG), Chair and SP to understand governance arrangements, ongoing improvement work, any emerging themes and recommendations.
- Joined a Tenancy Coach (TC) team meeting to understand their experiences working to support customers where safeguarding concerns had been identified.

This approach enabled us to gather evidence from a range of sources and perspectives to inform its findings and recommendations.

Headlines

We were assured a strong safeguarding framework is in place, which is supported by clear accountability and oversight arrangements. The policy, procedure guidance notes and training material align providing a clear approach to safeguarding. Our discussions with colleagues showed good understanding of guidance, and how it is applied in practice, providing confidence colleagues understand their safeguarding responsibilities and take appropriate action to support customers when concerns arise.

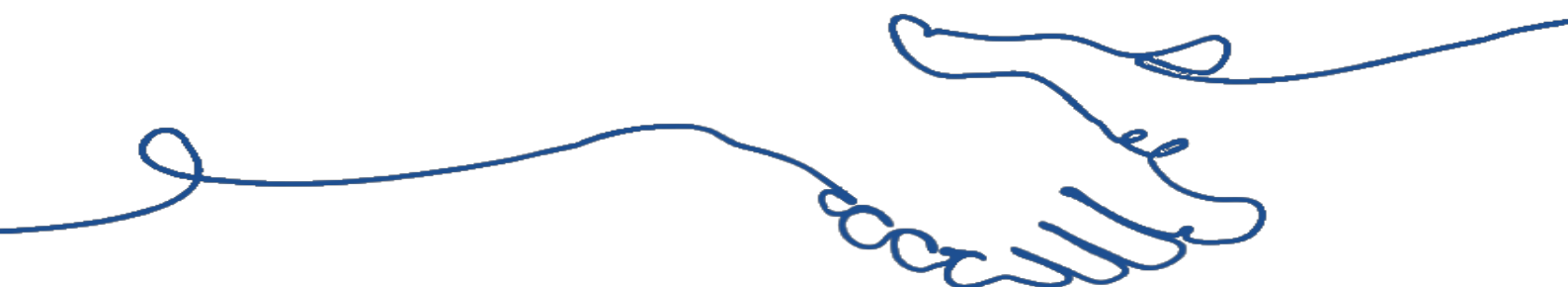
- **Continuous Improvement**

We fully support the work of the Safeguarding, SEG. The group's comprehensive review work identified strengths and areas for improvement, which provided us assurance that safeguarding arrangements are subject to ongoing review and development.

- **Opportunities for Enhancement**

We identified an opportunity to strengthen existing practice by providing more specific guidance for colleagues on:

- Making referrals to local authorities.
- Appropriate next steps when referrals are challenged or declined.



We also felt there is an opportunity to share relevant information with customers to:

- Raise awareness of issues which may identify as a safeguarding concern.
- Clarify the landlord role and responsibilities.
- Demonstrate transparency in how safeguarding concerns are managed.

Observations and Key Supporting Information

We found the **Safeguarding Policy** provides a clear framework for identifying, reporting and managing safeguarding concerns. It sets out responsibilities, reporting processes and expectations clearly, and demonstrates a strong commitment to safeguarding through training, DBS checks, partnership working, monitoring and continuous improvement.

The **Procedure Guidance Notes** support the policy translating requirements into practical actions, with clear guidance for colleagues to help recognise, report, record and review any concerns, this sits alongside defined roles, responsibilities and escalation routes. We valued the three-page **Quick Guide** style of the document which provided an accessible and practical reference which we felt would be useful for both existing colleagues and new starters.

An opportunity to strengthen guidance would be to include more role-specific examples and case studies to help colleagues identify safeguarding concerns, respond appropriately and know when to escalate them. Examples tailored to housing and repairs roles may improve clarity and confidence, reinforcing use of PDAs by repair operatives to report concerns to neighbourhood teams.

Our review of the **Safeguarding Level 1 Training** gave assurance it aligns with the Policy and Procedure Guidance Notes. It provides a strong foundation, while supporting a positive culture. Strengths we noted included:

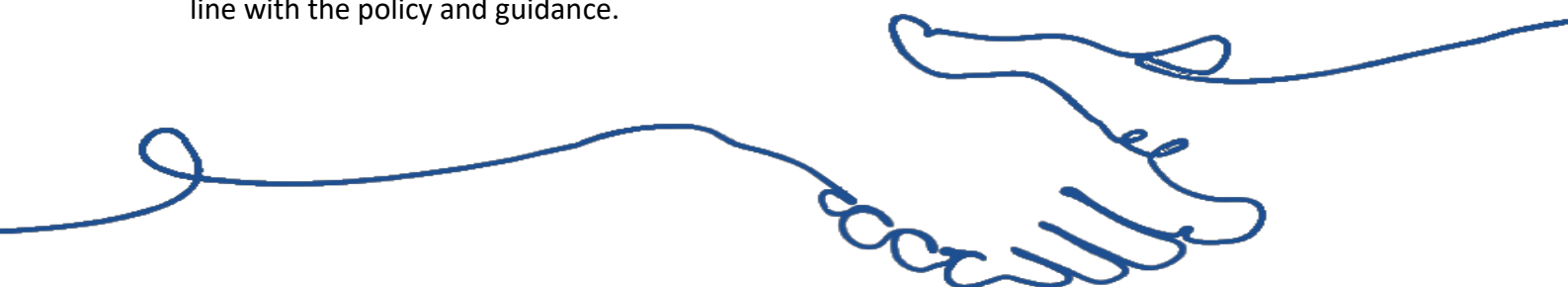
- A focus on practical application through realistic scenarios, helping colleagues develop professional curiosity and identify concerns that might otherwise be overlooked.
- Promotion of a strong safeguarding culture through key messages such as "If you see it, share it", "What if I am right?" and "No decision in isolation".

Suggested opportunity to further strengthen existing practice:

- Increase visibility of customer outcomes so colleagues can better understand the positive impact of timely reporting and effective safeguarding action.
- Include more local referral examples and practical scenarios to build confidence in making referrals, understanding thresholds and contributing to multi-agency discussion.

The suggested improvements are enhancements to build colleagues' learning and understanding, rather than addressing any significant gaps in the content.

Discussions with **Operational Teams** offered a practical understanding of roles and responsibilities providing further assurance that safeguarding duties are being carried out in line with the policy and guidance.



One example shared involved an operative attending a repair appointment and finding an extremely distressed customer. After seeking advice, and raising a concern, the operative advised the customer he would complete the repair and an NSM would visit during that day. The NSM carried out a crisis assessment and worked with the customer to identify the right support, gave relevant advice and help with next steps. We felt this showed how colleagues work together to ensure customers receive appropriate support when concerns are identified.

We joined the **Tenancy Coach** team to learn about safeguarding through real customer case studies. The session gave valuable insight into the challenges of securing the right support and interventions, it also highlighted colleagues' dedication to helping customers. We heard examples of good cross-department working, and professionalism. Key challenges raised was limited capacity within local authorities to accept referrals, the impact of work-related stress on colleagues, and difficulties engaging some customers due to the complexity of their needs. We were assured provision is in place to support colleagues. The session was valuable and increased understanding, whilst demonstrating the positive impact colleagues can have on customers' lives.

The **Safeguarding Excellence Group (SEG)** presentation emphasised strong partnership working and a clear commitment to using a range of data and lived experiences to inform and drive improvement. We heard about the findings from three deep dive reviews and felt assured by the evidence and data presented in relation to:

- Early Help and Prevention
- Open 60 + Days, Case Data Findings, and
- Mental Health

Findings showed customers generally receive effective support through strong partnership working, proactive intervention and good professional practice. Record keeping was largely of a high standard, with clear evidence that customers experiencing mental health issues were being identified and supported. Several areas were identified for improvement these included increasing consistency across services, improving customer contact and management oversight, an aim to reduce case drift, improving recording practices, and providing greater clarity around roles and responsibilities of landlord and local authorities.

A key improvement identified was the need for a clearer Early Help and Prevention process to distinguish preventative support from safeguarding activity. We support this recommendation because as we heard evidence showed the current process can result in early support work being recorded as safeguarding activity. A clear process would improve consistency, strengthen the quality of information available, and help ensure people receive the right support at the right time. Overall, we felt the findings reflected a caring and committed service, while highlighted opportunity to improve.

A recurring theme throughout our scrutiny was the increasing variation in local authorities' willingness and capacity to accept referrals. Colleagues reported that intervention thresholds are often high and can change over time.



When requests for support were declined without feedback, colleagues expressed they often felt frustrated and uncertain about both the rationale for the decision and the route for challenge. As a result, housing providers are increasingly required to fill support gaps and manage risks for customers whose needs do not meet the threshold for statutory intervention. A SEG review finding suggested there is a need for greater clarity regarding responsibilities between Great Places colleagues and local authority safeguarding teams, which reflects the concerns raised by operational colleagues.

Case drift was identified as a challenge during our scrutiny in the deep dive review of 60+ days cases. Feedback suggested that clearer review and escalation processes could help reduce delays and improve outcomes. We support these improvements to strengthen existing partnership working, accountability, and help customers receive a more coordinated support service.

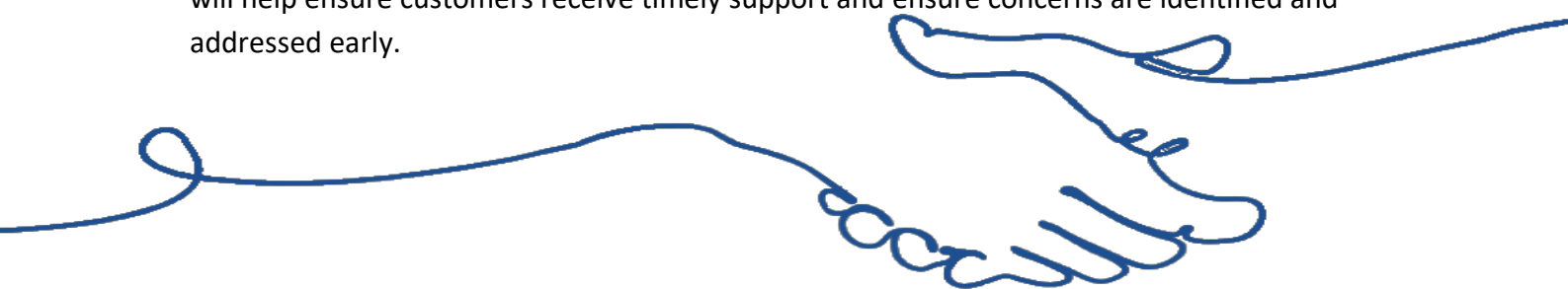
Insight is assured safeguarding arrangements presented by the Safeguarding SEG showed effectiveness and that customers are being supported appropriately. The recommendations provide a positive opportunity to further strengthen services, improve accountability and support continuous improvement across the organisation. Our research observed the website currently contains information to support customers; it doesn't provide content relevant to safeguarding concerns. We feel customer-facing safeguarding information may help some customers to identify abuse, neglect, and risk. The purpose is to raise awareness of safeguarding by explaining what it means, list signs of harm, outline how the landlord acts, and provide clear contact paths to report concerns, while emphasising that local authorities have lead responsibility for safeguarding.

Overall Conclusion

Based on the evidence reviewed, we are assured safeguarding arrangements are effective and supported by a strong framework, clear accountability, committed colleagues, and a culture of continuous improvement. The review found a good understanding of safeguarding responsibilities across teams, positive partnership working with external organisations, and effective oversight through the Safeguarding SEG. This gives confidence customers are being appropriately supported when concerns are identified. Our review also identified opportunities to strengthen existing current practice in the following areas:

- improve safeguarding information available to customers;
- enhance role-specific guidance and learning resources for colleagues;
- provide clearer support and training on referrals, thresholds, and escalation processes;
- continue delivery of the SEG improvements including development of an Early Help and Prevention approach.

The actions will support better decision-making, increase colleague confidence to respond to concerns, and strengthen partnership working. Building on existing good practice, they will help ensure customers receive timely support and ensure concerns are identified and addressed early.



Appendix One - Scrutiny Action Plan and Recommendations

	Recommendation & Outcome	Team Response – action	Lead	When
1	Customers - explore ways to provide customers with clear easy-to-understand information to help recognise safeguarding concerns early, know how to report them, and understand what could happen next. Information to be open and clear about the landlord's role and responsibilities, when concerns are identified, including how these will be investigated, managed, and passed to specialist agencies.	Agreed: - Insight members to review example provider websites and provide feedback - Following this feedback, the Safeguarding Partner to work with Communications to provide relevant information relating to Safeguarding on Great Places website. - The Safeguarding Partner to work with Communications Team to upload an abridged Safeguarding Policy to Great Places website, for customer and partner agency information - The Safeguarding Partner to coordinate a working party with the Safeguarding SEG and Customer Support SEG to review provision of information on Great Places website, including the customer support offer (e.g. adaptations, Domestic Abuse, ASB, Financial Resilience, Employability, Safeguarding etc)	Insight Safeguarding Partner Safeguarding Partner Safeguarding Partner	28 August 26 October 2026 October 2026 March 2027
2	Guidance - strengthen support available to colleagues to provide practical, role-specific guidance, examples and case studies that help them recognise, respond to and escalate safeguarding concerns with confidence. Continue to offer regular learning and development opportunities, such as toolkits so colleagues feel clear about their responsibilities, and have opportunity to discuss concerns to build confidence in decision-making, experience, and support a culture of continuous learning and improvement.	Agreed: Safeguarding Partner to develop a practitioner framework outlining expected safeguarding practice to include: - Local Authority responsibilities and remit - Risk management expectations - Decision-making and professional judgement - Referral review, case ownership and reassignment following referral decline - Escalation routes and safeguarding thresholds - Good practice examples and case studies Safeguarding Partner to work in collaboration with Tenancy Coach Manager and Customer Support SEG to provide further guidance for colleagues on Early Help and Intervention	Safeguarding Partner Safeguarding Partner	March 2027 March 2027

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3	Training – explore ways to provide clearer guidance for colleagues to help prepare referrals that clearly evidence eligible needs and meet Care Act criteria, ensuring a strong and consistent case for support. Provide toolkits, which if referrals are declined will assist colleagues to strengthen evidence, challenge decisions, and to escalate where appropriate, or identify alternative support options to progress cases confidently.	Agreed: Safeguarding Partner to review training offer to provide clear examples of Safeguarding thresholds (Vs early help and prevention), making referrals, Professional Challenge and risk management. Revised training to include: • Case studies of customer outcomes for colleagues to better understand the positive impact of timely reporting and effective safeguarding action. • Include more local referral examples and practical scenarios to build confidence in making referrals, understanding thresholds and contributing to multi-agency discussions.	Safeguarding Partner	November 2026
4	Safeguarding, SEG recommendations - we support the SEG's proposed review improvements, particularly the development and implementation of a process to record early preventative action to help demonstrate the proactive support provided to customers, to measure outcomes and the impact for customers.	Agreed: SEG action plan will be monitored by the Safeguarding SEG Chair, reported to Strategic Safeguarding Group, with actions to be carried out by Safeguarding Partner and Head of Independent Living	Safeguarding SEG Chair	In Progress