

Pathways

Safeguarding for Adults Policy



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Scope

This policy sets out how Citra Pathways Limited (Pathways) will respond to and support safeguarding concerns. This policy refers to safeguarding adults. There is a separate policy for safeguarding children and young people.

This policy applies to:

- Pathways customers including their family, other household members and visitors
- Pathways and Lloyds Living staff (colleagues)
- Pathways Board members
- Anybody delivering a service to Pathways including any other Lloyds Banking Group entity or other third party.

Policy statement

We are committed to safeguarding the welfare, rights and dignity of adults at risk and we will take all reasonable steps to protect individuals from abuse, neglect, exploitation and harm.

This policy is based on the key principles for adult safeguarding from the Care Act 2014:

- **Empowerment** – people are supported to take control of their own lives and their consent is required for decisions and actions designed to protect them
- **Prevention** – raise awareness and support people to protect themselves, so that our processes protect and minimise the risk of abuse
- **Proportionality** – least intrusive response appropriate to the risk presented
- **Protection** – provide support and protection for those who are experiencing abuse, neglect or harm including representation for those unable to make decisions about their own safety
- **Partnership working** – work with local authorities and partner agencies and co-operate with investigations
- **Accountability** – be accountable and transparent in our role in delivering safeguarding.

Pathways takes all safeguarding concerns seriously. We will investigate concerns promptly and will address in accordance with our safeguarding procedures.

With all safeguarding suspicions or allegations, Pathways will provide a report to the appropriate agency for further investigation.

We will continuously monitor and improve our safeguarding practices.

Policy aims and objectives

The aims of this Safeguarding policy are to:

- Outline Pathways approach to dealing with safeguarding issues
- Raise awareness to prevent harm by creating environments and practices that reduce risks
- Protect individuals by identifying and responding to concerns about abuse or neglect
- Promote welfare by supporting individuals to achieve positive outcomes and well-being
- Outline how we will report and work with partner agencies to support safeguarding concerns by ensuring clear procedures for raising and addressing safeguarding issues.

Communication and support

A safeguarding concern should be made to the Safeguarding Reporting Officer or a representative in their absence.

We will ask whether the police have been contacted. If anyone is at risk of immediate harm, and it is safe to do so, we will advise contacting the police without delay.

There is no requirement to take action or contact the police before we offer support.

Support will include, as appropriate, regular contact, a clear explanation of the scope of our involvement, and an action plan with defined responsibilities.

Reporting a concern

Safeguarding concerns can be reported by email, phone, letter, online or any other method stated in our customer service policy.

- By email hellopathways@lloydsliving.co.uk
- By phone 0345 030 6546
- In writing to Customer Service Pathways, c/o Lloyds Living, X+Why, 100 Embankment, Cathedral Approach, Salford, M3 7FB
- Online via our [website](#).

Please do not include any sensitive information.

In an emergency

If you feel that you or someone else is in imminent danger, you should always contact the Police (999). If you are unable to speak, the Silent Solution system is a crucial service that allows you to signal for help. You should dial 999 and if you cannot speak, press 55 when prompted by the Operator. [Click here](#) for more information. For non-emergencies call 101.

Contact details for all methods of reporting safeguarding concerns will be provided to all customers when the shared ownership lease is granted/assigned.

We want people to feel confident in coming forward with information. Where people wish to remain anonymous, we will investigate, but our ability to take effective action may be limited.

Partnership working

In our primary role as alerter, we will report safeguarding concerns to the Designated Safeguarding Officer at the local authority and/or to the appropriate agency.

Pathways will work with partners and agencies responsible for safeguarding those at risk as required. This recognises that Pathways does not carry out a statutory safeguarding function for relevant local authorities or other support services.

Pathways will engage constructively and fully in case reviews when invited by relevant partners and agencies.

We will maintain ongoing communication with partners and agencies regarding case progress to ensure a coordinated approach, especially where actions taken may affect their clients and the support they require.

Confidentiality, data protection and information exchange

Whilst we respect privacy and confidentiality and are mindful of our legal obligations under the Data Protection and GDPR legislation, safeguarding people at risk will require robust information exchange between agencies. We will agree specific protocols for information sharing with agencies or the Police.

We will share information with other agencies where it is lawful to do to help us to support safeguarding concerns to protect the individual.

Victims may request confidentiality for various reasons, such as fear of retaliation. The policy is to seek their permission before disclosing their identity to others, including the alleged perpetrator or legal representatives. If anonymous evidence could reveal someone's identity, this will be discussed with them. However, in some cases, information may need to be shared with other agencies for lawful purposes, such as crime prevention, even if anonymity was requested.

Definition

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

An adult is any person aged 18 years or over.

Adults at risk within the Care Act 2014 are referred to as people with care and support needs. Safeguarding duties apply to:

- An adult who has needs for care or support
- Is experiencing abuse or neglect
- At risk of experiencing abuse or neglect
- Unable to protect themselves from abuse or neglect.

Related legislation and regulation:

Pathways has legal obligations to safeguard adults. This policy aims to meet the requirements of the Regulator of Social Housing regulatory standards, in particular the Neighbourhood and Community Standard.

This policy is drafted with consideration of relevant legislation, including but not limited to the Care Act 2014, Mental Capacity Act 2005 and Human Rights legislation, as well as other acts appropriate to this policy.

Related policies:

Separate policies set out our approaches to:

- Safeguarding Children and Young People
- Anti-Social Behaviour and Hate Incidents Policy
- Domestic Abuse
- Complaints.

Service standards

We will take prompt action to all reports of safeguarding concerns and will acknowledge receipt within one working day and refer onto the local authority or agency without delay.

We will keep accurate records on all reports of safeguarding and cases opened.

Customer feedback and complaints

Customer complaints about safeguarding concerns will be handled in line with our complaints policy.

Complaints relating to safeguarding will be monitored and used, individually and in aggregate, to refine and improve our services and performance.

We will report against the Tenant Satisfaction Measures prescribed by the Regulator of Social Housing, as well as indicators developed for internal use by colleagues in conjunction with customers.

Performance indicators will be reported to the Pathways Board and to our customers via our website.

Monitoring and compliance

We will monitor the delivery of our service and report to operational colleagues including the senior leadership team, the Pathways Board, and our customers.

Key performance indicators will be used to monitor and report performance, as well as complaints and compliments received. This allows us to be accountable for our service delivery, identify any trends which require intervention, and focus on delivery of the objectives stated above.

Policy control and review schedule

This policy will be reviewed every three years or more frequently as a result of an incident occurring, feedback obtained, internal/external audits and change in legislation/regulatory requirements. This process ensures the policy's continuing suitability, adequacy, and effectiveness.

The Pathways Chief Strategy Officer has responsibility for this policy, and ultimate responsibility for performance and compliance sits with the Pathways Board.

Current version	Date approved	Date for review	Document owner
1.1	16.12.2025	By 16.12.2028	Craig Luttman

For more information, please visit:

www.lloydsliving.co.uk/pathways

This policy relates to Pathways only.

Citra Pathways Limited is a Private Limited Company. Registered in England and Wales No. 15662072.

It is a for-profit registered provider of social housing and registered with the Regulator of Social Housing (No. 5221).

Citra Pathways Limited registered office: X+Why, 100 Embankment, Cathedral Approach, Salford, M3 7FB.

Citra Pathways Limited is a part of Lloyds Banking Group. It is a wholly owned subsidiary of Citra Living Limited.

Lloyds and Lloyds Living are trading names of Citra Living Limited. Registered office: X+Why, 100 Embankment, Cathedral Approach, Salford, M3 7FB. Registered in England and Wales No. 13120129. Citra Living Limited is part of Lloyds Banking Group but is not regulated by the Financial Conduct Authority or the Prudential Regulation Authority.



Appendices

Appendix 1 - Responsibilities

We recognise our responsibilities under the terms of the Care Act 2014 and the Mental Capacity Act 2005. As a registered provider, we are not a statutory party under these acts but it is our responsibility to:

- Have a safeguarding officer. They are responsible for dealing with disclosures confidentially and reporting to the relevant authority
- In our primary role as alerter, report safeguarding concerns to the local authority and/or appropriate agency
- Support local safeguarding adult boards and reviews as required
- Cooperate with local authorities in enquiries of suspected adult safeguarding concerns, this could result in taking action to protect an adult from any actual or risk of abuse or neglect
- Have a Safeguarding policy and procedure
- Keep clear and accurate records of adult safeguarding allegations, responses and actions and share with appropriate organisations when in the best interest of the adult at risk
- Provide relevant training for colleagues and board members.

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