

Lincolnshire
Safeguarding Adults
Board
Peer Challenge Report

October 2017

Final

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Report

Background

1. The Lincolnshire Safeguarding Adults Board (LSAB) requested that a peer challenge be undertaken by a partnership between the Local Government Association and East Midlands ADASS as a pilot site on behalf of the East Midlands Safeguarding Adults Network (EMSAN) and Safeguarding Adults Chairs Network in the Region. The work was commissioned by Barry Earnshaw, Independent Chair of the Lincolnshire Safeguarding Adults Board and Dave Culy the Board Manager, who were the clients for this work. They were seeking an external view on the effectiveness of the LSAB which included the relationships with the three statutory partners. LSAB intends to use the findings of this peer challenge as a marker on its journey of improvement. The specific scope of the work was:

Scope:

- *The aim of the Peer Review is to check out how Lincolnshire Safeguarding Adults Board is meeting its duties under the Care Act 2014 and helping to ensure that Making Safeguarding Personal [MSP] is being implemented by partner agencies in the County.*
2. A peer challenge is designed to help an organisation and its partners assess current achievements, areas for development and capacity to change. The peer challenge is not an inspection. Instead it offers a supportive approach, undertaken by friends – albeit ‘critical friends’. It aims to help an organisation identify its current strengths, as much as what it needs to improve. But it should also provide it with a basis for further improvement.
 3. The benchmark for this peer challenge was the Safeguarding Adults Board Improvement Tool (Appendix 1). Headings from this were used in the feedback with an addition of the scoping questions outlined above. The headline themes were:
 - Outcomes for, and the experiences of, people who use services
 - Leadership, Strategy and Working Together
 - Commissioning, Service Delivery and Effective Practice
 - Performance
 4. The members of the peer challenge team were:
 - **Bill Hodson**, Independent Chair of the Wakefield and District Safeguarding Adults Board
 - **Bill Nicol**, Deputy Director, Head of Adult Safeguarding, Derbyshire CCGs
 - **Louisa Butt**, Board Manager, Nottingham City Safeguarding Adults Board
 - **Jill Ryalls**, Group Manager, Adult Care County Safeguarding, Derbyshire County Council
 - **Marcus Coulson**, Challenge Manager Local Government Association

5. The team were on-site for three days from Tuesday 31st October to Thursday 2nd November 2017. The programme for the on-site phase included activities designed to enable members of the team to meet and talk to a range of internal and external stakeholders. These activities included:
 - interviews and discussions with councillors, officers and partners, especially those on the LSAB
 - reading documents provided by the LSAB and Council, including a self-assessment from LSAB
6. The peer challenge team would like to thank LSAB, staff, representatives of carers groups, partners, commissioned providers and councillors for their open and constructive responses during the review process. The team was made very welcome and would in particular like to thank Barry Earnshaw, Independent Chair and Dave Culy, Board Manager of LSAB for their invaluable assistance in scoping, planning and undertaking this challenge.
7. Our feedback to the LSAB on the last day of the challenge gave an overview of the key messages. This report builds on the initial findings and gives a detailed account of the challenge.
8. The Care Act 2014 has placed Safeguarding Adults Boards on a statutory footing. The Care and Support Statutory Guidance defines adult safeguarding as “protecting a person’s right to live in safety, free from abuse and neglect”. The Care Act requires that each local authority must:
 - make enquiries, or ensure others do so, if it believes an adult is, or is at risk of, abuse or neglect. An enquiry should establish whether any action needs to be taken to other appropriate adult to help them.
 - cooperate with each of its relevant partners (as set out in section 6 of the Care Act) in order to protect adults experiencing or at risk of abuse or neglect
9. Each local authority must set up a Safeguarding Adults Board (SAB). The main objective of a SAB is to assure itself that local safeguarding arrangements and partners act to help and protect adults in its area who meet the criteria. A SAB has 3 core duties:
 - it must publish a strategic plan for each financial year that sets how it will meet its main objective and what the members will do to achieve this. The plan must be developed with local community involvement, and the SAB must consult the local Healthwatch organisation. The plan should be evidence based and make use of all available evidence and intelligence from partners to form and develop its plan
 - it must publish an annual report detailing what the SAB has done during the year to achieve its main objective and implement its strategic plan, and what each member has done to implement the strategy as well as detailing the findings of any safeguarding adults reviews and subsequent action
 - it must conduct any safeguarding adults review in accordance with Section 44 of the Act.
10. The aims of adult safeguarding are:

- To prevent harm and reduce the risk of abuse or neglect to adults with care and support needs.
- To safeguard individuals in a way that supports them in making choices and having control in how they choose to live their lives.
- To promote an outcomes approach in safeguarding that works for people resulting in the best experience possible.
- To raise public awareness so that professionals, other staff and communities as a whole play their part in preventing, identifying and responding to abuse and neglect.

11. There are six key principles that underpin all adult safeguarding work:

- **Empowerment** – Personalisation and the presumption of person-led decisions and informed consent. “I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.”
- **Prevention** – It is better to take action before harm occurs. “I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.”
- **Proportionality** – Proportionate and least intrusive response appropriate to the risk presented. “I am sure that the professionals will work for my best interests, as I see them and they will only get involved as much as needed.”
- **Protection** – Support and representation for those in greatest need. “I get help and support to report abuse. I get help to take part in the safeguarding process to the extent to which I want and to which I am able.”
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. “I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together to get the best result for me.”
- **Accountability** – Accountability and transparency in delivering safeguarding. “I understand the role of everyone involved in my life.”

Key Message and recommendations

- Lincolnshire Safeguarding Adults Board is moving in a positive direction with a strong commitment from partners but is still in development and needs to put some essential building blocks in place
 - LSAB should agree fewer priorities in order to effectively deliver its objectives
 - When LSAB agrees fewer priorities ensure they are supported by SMART delivery plans with clear business planning
 - LSAB needs to act on its intention to agree and introduce a quality assurance framework to assure itself of the local safeguarding arrangements
 - In order to move forward on MSP the LSAB needs to be assured that the policies and procedures are in place, implemented and working
 - LSAB needs to adopt a coordinated multi-agency approach when implementing MSP
12. As a headline narrative and based upon what the peer review team read, heard and saw the Lincolnshire Safeguarding Adults Board is moving in a positive direction with a strong commitment from partners but is still in development and needs to put some essential building blocks in place in order to fully achieve its potential.
13. To give the work of the board greater clarity the peer review team recommend that the LSAB agree fewer priorities in order to effectively deliver its objectives. When it agrees these fewer priorities LSAB should ensure they are supported by SMART (Specific, Measurable, Attainable, Realistic/Relevant and Time Bound) delivery plans with clear business planning. LSAB is well resourced compared to other SABs with capacity that could be more clearly focused to achieve its goals.
14. LSAB needs to act on its intention to agree and introduce a quality assurance framework to assure itself of the local safeguarding arrangements that are being delivered by partners in a variety of settings and reported to the board. This will support the LSAB to achieve its main objective set out in the statutory guidance (14.133) “to assure itself that local safeguarding arrangements and partners act to help and protect adults in its area who meet the criteria” as defined by the Care Act.
15. In order to move forward on Making Safeguarding Personal (MSP) LSAB needs to be assured that the policies and procedures, about to be approved by LSAB, are in place at board level are implemented and working in each of the partner agencies.
16. To be successful LSAB needs to adopt a coordinated multi-agency approach when implementing MSP as it is a complicated, multi-faceted endeavour that requires changes to culture and practice to ensure it is being delivered well by a wide range of staff.

Leadership, Strategy and Working Together

Strengths

- Partnerships in Lincolnshire work well through an emphasis on good relationships
- LSAB is well attended with the right partners represented and there is optimism it is moving in the right direction
- Members understand the demands on their own organisations but are not so clear on what their integrated work together ought to be
- The Chair and Board Manager are very active and well respected and have a shared vision for improvement. The Chair meets regularly with core partners and has a strong personal commitment
- The issues of safeguarding adults are well represented on other strategic boards and the LSAB is well resourced
- Prevention is a key priority and recognised by all partners

Areas for Consideration

- Agree fewer priorities in order to effectively deliver its objectives
- LSAB needs to act on its intention to agree and introduce a quality assurance framework to assure itself of the local safeguarding arrangements
- The Prevention Strategy needs to be more clearly defined, scoped and resourced
- Governance appears complex and for some partners unclear, LSAB should consider whether the current structure supports effective decision making, delivery and accountability
- LSAB could be clearer about its common purpose and the roles and responsibilities of members to achieve it
- There is scope for LSAB to work more closely with the Health and Wellbeing Board on issues of joint interest

17. The peer review team heard from a number of sources that the way business is done in Lincolnshire is based on an emphasis on good relationships between key individuals. This appears to be a culture that is supported and reinforced over time and as individual representatives change in organisations. This makes for effective partnership working that seeks to overcome difficult issues as they arise.

18. As with all safeguarding adults boards, appropriate and effective membership is key to successful working. LSAB is well attended with the right partners

represented around the table and there is a shared optimism table that it is moving in the right direction.

19. When hearing from board members it was the case that the majority understand the demands on their own organisations of this work but are not so clear on what their integrated work together ought to be, which could be further explored, agreed and made clear to all.
20. Both Barry Earnshaw, the Independent Chair and Dave Culy the Board Manager are very active in the amount of energy and drive they put into the work of the board and are respected and have a shared vision for improvement. The Chair meets regularly with core partners and has a strong personal commitment, often working more days than he is contracted for. The Board Manager is seen as a key source of information, advice and guidance for new and experienced members and is known for his good humour and hard work.
21. The issues of safeguarding adults are well represented on other strategic boards such as the Public Protection and Community Safety Boards and the LSAB is well resourced both in financial terms and capacity of people working for it.
22. The prevention agenda is a key priority for LSAB, the Council and partners and is recognised as such.
23. To give the work of the board greater clarity the peer team recommend that the LSAB agree fewer priorities in order to effectively deliver its objectives. When it agrees these fewer priorities LSAB should ensure they are supported by SMART (Specific, Measurable, Attainable, Realistic/Relevant and Time Bound) delivery plans with clear business planning. LSAB is well resourced compared to other boards with capacity which could be more clearly focused to achieve its goals.
24. The Peer Review team were aware of the discussions which have taken place regionally to agree common strategic priorities of Prevention, Making Safeguarding Personal & Assurance for all Boards in the East Midlands Region, which align with the ADASS national priorities. LSAB may wish to consider these three strategic priorities when agreeing future strategic plans.
25. LSAB needs to act on its intention to agree and introduce a quality assurance framework to assure itself of the local safeguarding arrangements that are being delivered by partners in a variety of settings and reported to the board. Implementing the four-quadrant model outlined to the peer team during the initial briefing would provide LSAB with a range of qualitative and quantitative information, which would strengthen its assurance function.
26. To give the work of the LSAB greater focus the Prevention Strategy needs to be more clearly defined, scoped and resourced. The peer review team understood that the LSAB is leading the Prevention Strategy, but this was co-ordinated through the Public Protection Board and aligned with the Prevention Strategy for the Local Children's Safeguarding Board (LSCB) and the Community Safety Partnership (CSP). Ensuring that the objectives of the Prevention Strategy are clearly defined, and evidence based will enable the LSAB to target resources effectively. This should ensure that the work is focused on the right priorities,

can be delivered within available resources and has the greatest impact in protecting people from harm.

27. When hearing about the governance arrangements from key individuals and looking at the accompanying diagram it appears complex to the peer review team. This was reflected in the understanding of some partners who were unclear about the links between some of the sub-groups. LSAB should consider whether this current structure supports effective decision making, delivery and accountability. The current arrangements appear to risk duplication and lack of clarity about accountability and levels of decision-making. For some partners it was difficult to understand the key differences between the operational board (SAOB) and the Safeguarding Lincolnshire Together Steering Group. There was a lack of clarity about reporting and feedback arrangements between subgroups, for example whether or not new initiatives and data were all taken through the operational group before being presented for sign-off by the Strategic Board, and whether the operational board had feedback from or access to minutes from the strategic board to understand decisions taken. As the number of Board key priorities are likely to be streamlined then this could represent an opportunity to re-visit both governance arrangements and the Boards supporting network.
28. LSAB should consider how it could be clearer about its common purpose and the roles and responsibilities of members to achieve it. The current work plan and delivery plan are largely about inputs to the safeguarding system and lean heavily on support from the local authority. Major change programmes such as Making Safeguarding Personal and a Prevention Strategy will require a multi-agency approach with shared responsibilities. Some partners were clearly able to articulate their role and responsibility for safeguarding adults in their own organisation, but were less clear about their role on the Board. Therefore the LSAB could consider how effectively information and Board activity is shared and embedded across stakeholder organisations and also to ensure that their respective organisations are contributing effectively to sub-groups and committees.
29. In the view of the peer review team there is scope for LSAB to work more closely with the Health and Wellbeing Board (HWB) on issues of joint interest such as the place of safeguarding within the revised Joint Health and Wellbeing Strategy and the support to vulnerable adults in the county. Social isolation may be a theme that could be explored as part of the Board's Prevention Strategy, and would be aligned to the ADASS national safeguarding work plan. It was unclear to the peer review team why the Suicide Prevention Steering Group was subgroup of the LSAB, (rather than reporting to the HWB for example). It was also unclear what the reporting arrangements were between the Suicide Prevention Steering Group and LSAB. LSAB may wish to consider this if reviewing its governance structure.

Outcomes for and the experiences of people who use services

Strengths

- Recognition of the importance of MSP as the way safeguarding needs to be implemented
- Some of the partner agencies are doing work on MSP that could be further utilised
- LSAB recognises it needs to do more about user involvement and has made sensible steps through links with Healthwatch and relevant partnerships
- Plan for service user experience to contribute to the content of training

Areas for Consideration

- In order to move forward on MSP, LSAB needs to be assured that the policies and procedures are in place, implemented and working
 - There is an opportunity for LSAB to show strong leadership to ensure cultural change to implement MSP
 - LSAB needs to adopt a coordinated multi-agency approach when implementing MSP
 - There is an opportunity to work more closely with District Councils to engage with their communities and raise awareness of safeguarding adults
30. There is a clear recognition amongst all members of the LSAB about the importance of Making Safeguarding Personal (MSP) as the way safeguarding needs to be implemented for both staff in the various organisations as well as those who use services.
31. There was considerable evidence that some of the partner agencies are doing work on MSP that could be further utilised by LSAB through sharing with partners on what is being done, how and by whom so that others could learn how to implement it and how to deliver positive outcomes.
32. All LSAB members and those who run it recognise that it needs to do more about user involvement, which is a challenge common to many boards. A scoping exercise could be undertaken in order to identify public engagement groups and initiatives already in existence. LSAB should then have a clear series of options to promote its work, communicate and consult with service users and their representatives rather than develop another group. A sensible start has been made by links with Healthwatch and other relevant partnerships that can be built upon.
33. There is an opportunity for LSAB to work more closely with District Councils to further engage with their communities and raise awareness of safeguarding adults by linking into small, local community groups and regular consultation

exercises. In these settings it should be possible to be clear about what the public need to know by detailing what safeguarding adults' means, what their roles and responsibilities are, as well as, the relevant referral pathways people could use.

34. One way of developing user engagement would be for those who have a lived experience of safeguarding to contribute to the content of training and by attending the training itself as it brings a richness to the learning for participants.
35. In order to move forward on Making Safeguarding Personal (MSP) LSAB needs to be assured that the policies and procedures about to be approved by the LSAB are implemented and working in each of the partner agencies. This is essential if good progress is to be made on embedding MSP.
36. To successfully implement MSP the LSAB will need to show strong leadership to ensure there is a cultural change at board level and in the working of partner agencies. This could be delivered through champions and change agents at board level, amended policies and procedures and changes to culture and practice at an operational level. The effectiveness and impact of the new policies and procedures should be monitored by the LSAB through its assurance processes.
37. To be successful LSAB needs to adopt a coordinated multi-agency approach when implementing MSP as it is a complicated multi-faceted endeavour that is difficult to ensure is being delivered well by a range of partners.

Commissioning, Service Delivery and Effective Practice

Strengths

- There is a comprehensive training plan with partners engaged and a well-publicised website with 35000 registered learners across Adults and Children's Services
- There has been a very positive response to the e-learning package

Areas for consideration

- LSAB needs to be clearer about the timescales, responsibilities and resources needed to deliver their plans
- There is an opportunity to review the self-assessment framework and its effectiveness in 2018
- LSAB needs to receive qualitative data to assure itself of safeguarding arrangements within commissioned services
- Multi-agency case file audit could be strengthened to assure LSAB that activity is in line with strategic objectives
- LSAB to create a multi-agency training plan to support the implementation of the new policies and procedures, particularly around Section 42 enquiries

38. Members of the peer review team heard about the comprehensive training plan that is in place with partners who are fully engaged and a well-publicised website detailing the opportunities available. There are 35000 registered learners across Adults and Children's Services in the Lincolnshire area, which is highly commendable.

39. In support of this training offer there has been a very positive response to the e-learning package. By providing a varied training offer the Board ensures that there is a degree of consistency in content and that training can be accessed at a time and place convenient to staff.

40. LSAB is ambitious in terms of what it seeks to include in its agendas and the work it considers. However the plans it creates could be clearer about the timescales, responsibilities and resources needed to deliver them.

41. LSAB uses the Lincolnshire Assurance & Assessment Framework or LAAF self-assessment framework. The peer review team discussed its usefulness with a number of partners and as a result there is an opportunity to review the self-assessment framework and its effectiveness in 2018 and to consider whether other models may serve the board better. The peer review team heard that the LSAB had decided to continue to use the LAAF in order to be able to compare with previous years and track progress. Once the LAAF has been completed in 2018 the LSAB may wish to review whether the LAAF is the most effective tool for gathering assurance from partners. Furthermore there may also be an opportunity to work with partners in the region on this.

42. LSAB needs to receive qualitative data (in addition to the existing quantitative data) to assure itself of safeguarding arrangements within all commissioned services. This could be considered as part of developing the four quadrant quality assurance framework. LSAB may wish to consider what assurance it seeks directly from providers, and what assurance it seeks through commissioners.
43. The existing multi-agency case file audit should be strengthened to assure LSAB that activity is in line with strategic objectives and that MSP is being delivered effectively.
44. The implementation of the new policies and procedures will need to be supported by a comprehensive multi-agency training plan and the peer review team recommend that this gives as much clarity and consistency as possible about what constitutes a Section 42 enquiry, where the local authority has caused another organisation to make the enquiry on their behalf.

Performance

Strengths

- LSAB recognises the importance of performance data to target and prioritise its work together
- Creation of a tri-board performance and policy group will give scope for improved cross-agency working
- Investment in an audit and policy officer role will strengthen the LSAB capacity
- There is evidence that learning from SARs informs multi-agency safeguarding arrangements and the learning and development strategy

Areas for consideration

- When LSAB agrees fewer priorities ensure they are supported by SMART delivery plans with clear business planning
 - LSAB strategic priorities need to be better informed by evidence collected from activity by a variety of partners
 - The performance data LSAB collects need to reflect the diversity and complexity of changing communities
 - LSAB needs to assure itself that the resources are in place to complete SARs in a timely fashion and to benefit from the learning that comes from them
 - Continue to monitor the rate at which SARs are referred and the reasons for this
45. Together the members of LSAB and those who run the board are self-aware enough to recognise the importance of performance data to target and prioritise their work together.
46. The development of the Tri-Board (LSAB, LCSB & CSP) Quality and Performance Subgroup will support multi-agency working. Plans include monitoring actions plans, developing an audit plan and overseeing the LAAF. This will support the Board's assurance role.
47. There is a plan for an investment in an audit and policy officer role that will strengthen the LSAB capacity.
48. The peer review team saw and heard evidence that learning from Safeguarding Adults Reviews (SARs) informs multi-agency safeguarding arrangements and the learning and development strategy. This is illustrated by learning from TH19 around feeding into the work of the Safer Lincolnshire Together Steering Group.
49. The peer review team recommend that when LSAB agrees fewer priorities it should ensure they are supported by SMART (Specific, Measurable, Attainable, Realistic/Relevant and Time Bound) delivery plans with clear business planning.

LSAB is comparatively well resourced but that capacity could be more clearly concentrated on ensuring that key objectives are delivered on time. There was evidence which indicated that the LSAB needs to have a greater focus on delivery and ensuring implementation plans are completed.

50. The LSAB strategic priorities need to be better informed by evidence collected from activity by a variety of partners and this should be an iterative process to ensure priorities change over time to reflect local activity and demand. For example, in developing the objectives of the Prevention Strategy, the LSAB should review local data from a range of partners to identify local priorities and safeguarding risks and target resources effectively. Some partners believe that there could be a greater focus on what the data tells the LSAB, and what needs to be done as a result.
51. The performance data LSAB collects need to reflect the diversity and complexity of changing communities in and around Lincolnshire. Some partners suggest that at present it doesn't quite manage this.
52. LSAB needs to assure itself that the resources are in place to complete SARs in a timely fashion and to benefit from the learning that comes from them. The peer team heard that LSAB could do more to seek assurance that learning from SARs has been embedded and has made a difference to practice and systems. There was evidence that the SIRGA group were aware of this and seeking to address this.
53. The peer team recommend that LSAB continue to monitor the future rate at which SARs are referred and the reasons for this. The review team were told that the high level of SARs and DHRs were due to historical factors and some individual circumstances but a continuing high occurrence would suggest other causes need to be investigated. Currently, LSAB appears to be an outlier in respect of a higher number of SARs than other similar areas. Should this continue to remain high, LSAB may wish to consider whether this indicates a lower threshold for commissioning SARs, or whether there are wider systemic issues within its area which are contributing to a greater number of significant safeguarding incidents. If consistent causal factors can be identified it will make it easier to consider proactive preventative measures and give greater predictability to the resources and costs required to manage them.

Safeguarding Adults Board resources

1. LGA Safeguarding Adults resources web page

<http://www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/safeguarding-resources>

2. Safeguarding Adults Board resources including the Independent Chairs Network, Governance arrangements of SABs and a framework to support improving effectiveness of SABs

<http://www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/resources-safeguarding-adults-boards>

3. LGA Adult Safeguarding Knowledge Hub Community of Practice – contains relevant documents and discussion threads

<https://khub.net/web/adultsafeguardingcommunityofpractice>

4. Adult Safeguarding Peer Challenge

<http://www.local.gov.uk/our-support/peer-challenges/peer-challenges-we-offer/safeguarding-adults-and-adult-social-care>

5. Making links between adult safeguarding and domestic abuse

<http://www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/safeguarding-and-domestic-abuse>

6. Making Safeguarding Personal

<http://www.local.gov.uk/topics/social-care-health-and-integration/adult-social-care/making-safeguarding-personal>

7. Social Care Institute for Excellence (SCIE) pages on safeguarding.

<http://www.scie.org.uk/adults/safeguarding/index.asp>

Contact details

For more information about this Safeguarding Adults Board Peer Challenge at Lincolnshire please contact:

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Read the Adults Peer Challenge Reports here: <http://www.local.gov.uk/peer-challenges-adult-peer-reviews-reports>

Appendix 1 – Safeguarding Adults Board Improvement Tool

Overview

There are four key themes for the standards, with a number of sub-headings as follows:

Themes	Outcomes for, and the experiences of, people who use services	Leadership, Strategy and Working Together	Commissioning, Service Delivery and Effective Practice	Performance and Resource Management
Elements	<p>1. Outcomes</p> <p>2. People’s experiences of safeguarding</p> <p>This theme looks at what difference to outcomes for people there has been in relation to Adult Safeguarding and the quality of experience of people who have used the services provided</p>	<p>3 Collective Leadership</p> <p>4.Strategy</p> <p>5 Local Safeguarding Board</p> <p>This theme looks at:</p> <ul style="list-style-type: none"> • the overall vision for Adult Safeguarding • the strategy that is used to achieve that vision • how this is led • the role and performance of the Local Safeguarding Board • how all partners work together to ensure high quality services and outcomes 	<p>6. Commissioning</p> <p>7. Service Delivery and effective practice</p> <p>This theme looks the role of commissioning in shaping services, and the effectiveness of service delivery and practice in securing better outcomes for people</p>	<p>8. Performance and resource management</p> <p>This theme looks at how the performance and resources of the service, including its people, are managed</p>

Safeguarding Adults Board Improvement Tool here: <http://www.local.gov.uk/sites/default/files/documents/adult-safeguarding-improv-ddd.pdf>