



HISTORIC ROYAL PALACES

HRP Policy Safeguarding Vulnerable Adults

April 2026

Key Facts and Purpose

- This policy applies to all staff and volunteers within Historic Royal Palaces (HRP), the staff of HRP employed in partner organisations including Chapels Royal.
- The purpose of this policy is to provide a framework for all staff and volunteers within Historic Royal Palaces (HRP), the staff of HRP employed in partner organisations including Chapels Royal, when dealing with safeguarding issues. It should be used in conjunction with the Vulnerable Adults Safeguarding Procedures to prevent and reduce the risk of abuse to all vulnerable adults who may be at risk, and who visit or engage with Historic Royal Palaces or come into contact with staff or volunteers. The policy is HRP's guidance document to contractors and partners, where the expectation is that contractors/partners wholly adopt HRP's policies or procedures or can demonstrate to HRP that they have equivalent policies and procedures. HRP reserves the right to make this a contractual condition.

2021-05-10_Vulnerable_Adults_Safeguarding_Policy_Final			
Policy Owner	Tom O'Leary Director	Policy Reference	FHS.02
Policy Author	Alison Lightbown	Most Recent Approval Date	April 2026
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HISTORIC ROYAL PALACES

1. Introduction

1.1 Background and need

This policy and its associated procedure are mandatory for all staff including temporary, agency, freelance, (hereafter referred to as ‘staff’) trustees, volunteers, including those referred to above in partner organisations and contractors as they must be aware of their individual and collective roles and responsibilities in safeguarding vulnerable adults from abuse and neglect.

At Historic Royal Palaces we are guided by the *The London Safeguarding Adults Board London Multi Agency Policy, Practice Guidance and Procedures 2025*, the *Care Act 2014*, the *DOH Care Act factsheet 7: (Safeguarding)* and the *Care and Support Statutory Guidance issued under the Care Act 2014*. Copies of this guidance are available in the Governance Workspace Safeguarding Folder on Sharepoint [Legislation and government guidance](#)

1.2 Link to Our Cause and Principles

At HRP we are a team of people who love and look after six of the most wonderful palaces in the world.

We create space for spirits to stir and be stirred. We want everyone to feel welcome and accepted. We tell stories about the monarchs you know, and the lives you don’t. We let people explore and we set minds racing.

This welcome to ‘everyone’ includes children, young people, and vulnerable adults. We want their experience of engaging with our palaces and their stories to be meaningful, enjoyable, and safe. This can only be attained if children, young people, and vulnerable adults are safeguarded and protected from abuse and neglect and, where appropriate, prevented from becoming at risk of abuse.

The *Safeguarding Procedures: Vulnerable Adults* that accompany this policy states our responsibilities, obligations, and standards.

1.3 Outcomes

As a result of the policy and associated procedure being followed, vulnerable adults at risk will be better protected from the impact of abuse and neglect. Staff, volunteers, trustees and contractors will take the necessary steps to safeguard and protect vulnerable adults, where necessary, following the process set out in the procedures, contacting statutory agencies and/or, if appropriate, discussing concerns with the adult at risk (and on occasions when appropriate their family/carers or advocates).

2. Key Principles

- This policy, and corresponding procedures, aims to achieve a culture within Historic Royal Palaces in which a proactive approach is taken to safeguarding, promoting, and protecting the rights of vulnerable adults.

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- All adults that work, volunteer, or use Historic Royal Palaces services have the right to live a life free from abuse, harm, and neglect regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity.
- All allegations, concerns or suspicions of abuse or neglect are taken seriously and responded to within the steps laid out in the corresponding procedures.
- To collaborate with local Safeguarding Adults Boards and comply with the local multi-agency Safeguarding Adults Procedures, as appropriate.
- All staff have a responsibility to ensure they are informed, trained, and understand their duty to operate within this policy and procedure and to cascade these policies and procedures to volunteers and contractors who may be working with vulnerable adults.
- All staff; contractors, Trustees, volunteers, and partners have a shared responsibility to take appropriate steps to protect adults at risk.

3. The Policy Statement

- Historic Royal Palaces is committed to the prevention of, and protection from, abuse and neglect of all adults at risk of abuse or neglect who come into contact with the organisation through its staff, volunteers, or representatives, in whatever capacity that contact occurs.
- Historic Royal Palaces is committed to taking all necessary steps to stop abuse happening, whether that abuse is perpetrated by staff, volunteers, contractors and partner organisations or members of the public.
- Historic Royal Palaces is committed to its duty of care to all adults it has contact with. If there are concerns about staff or volunteers perpetrating abuse, it will facilitate any action required to address this without delay. This will include actions required to address abusive behaviours and attitudes. On occasions when staff have been dismissed because of concerns about abuse or neglect, they will be referred by Historic Royal Palaces to the Disclosure & Barring Service (DBS) and, where applicable, to professional and regulatory bodies.
- Historic Royal Palaces is committed to ensuring that adults at risk of abuse or neglect are given information, advice, and support in a form that they can understand.
- Historic Royal Palaces will publish online, and on the intranet, the *Vulnerable Adults Safeguarding Policy*.
- Historic Royal Palaces has a duty to contact the local authority Adult Social Care department if there are concerns that an adult at risk is being or may be being abused.
- Historic Royal Palaces is committed to ensuring that the right staffing and reporting structure is in place to enable safeguarding concerns to be dealt with effectively and to ensure the correct processes are followed as detailed in the procedure. This includes the escalation of concerns posing a significant risk being reported to senior staff within HRP.

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HISTORIC ROYAL PALACES

4. Roles to Support Safeguarding:

Designated Safeguarding Lead (DSL) – has the lead responsibility for all safeguarding and protection matters at the site or within the area allocated (HR, Commercial, Public Engagement) and to escalate concerns to the Safeguarding Sponsor and where appropriate make referrals to **statutory** bodies such as police. As a group they champion safeguarding, raise awareness, and ensure safeguarding training is delivered. They work together to make recommendations to the Safeguarding Sponsor, update policies and procedures every two years, communicate changes, and keep information up to date on the intranet and HRP website.

They attend a minimum of two safeguarding workshops/meetings per year where cases are reviewed, lessons shared, and any resulting actions agreed.

Each of the DSLs has responsibility for responding to concerns about the abuse of vulnerable adults when these are raised with them. Once procedures have been followed the DSLs will escalate concerns that pose a significant risk to the **Safeguarding Sponsor**. The **Chief Executive** has overall responsibility for all safeguarding matters within the charity as a whole.

Site/Area	DSL Name	Contact Details (ext & email)
Commercial	Susan Huntingdon	020 3166 6094 / 07964 534472 susan.huntingdon@hrp.org.uk
Chapel Royal, Hampton Court Palace	Rachel Mackay	020 3166 6502 / 07391 016373 rachel.mackay@hrp.org.uk
Hampton Court Palace	Rachel Mackay	020 3166 6502 / 07391 016373 rachel.mackay@hrp.org.uk
	Ciar Brennan	020 3166 6509 / 07776 660 682 ciar.brennan@hrp.org.uk
Hillsborough Castle	Victoria Hatwell	028 9268 1376 / 07736 169139 victoria.hatwell@hrp.org.uk
HR	Jacki Gray	020 3922 1182 jacki.gray@hrp.org.uk
HR (Volunteers)	Paul Stephenson	07350 367928 Paul.Stephenson@hrp.org.uk
Kensington Palace and the Banqueting House, Whitehall	Rob Brand	020 3166 6125 / 07388 994862 rob.brand@hrp.org.uk
Kew Palace	Cat McFall	020 3166 6421 / 07776 592924 catherine.mcfall@hrp.org.uk
	Emma Dearing	020 3166 6144 / 07795 027770 emma.dearing@hrp.org.uk
Public Engagement	Alison Lightbown	020 3166 6692 / 07964 433487

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HISTORIC ROYAL PALACES

	(Safeguarding Manager) <i>Lotty Englishby (on maternity leave)</i> Chloe O’Hara (maternity cover for Lotty Englishby)	alison.lightbown@hrp.org.uk 020 3166 6758 / 07500 603177 lotty.englishby@hrp.org.uk Chloe: 07896 275720 chloe.ohara@hrp.org.uk
Tower of London	Anna Kimber Phillip Palmer	07785 954549 anna.kimber@hrp.org.uk 07879 589416 phillip.palmer@hrp.org.uk
Safeguarding Sponsor	Tom O’Leary	020 3166 6363 / 07941 342927 tom.oleary@hrp.org.uk
Safeguarding Trustee	Sir Gordon Messenger	c/o Alison Lightbown or Tom O’Leary
<i>Cathy Spalding (Digital Engagement) and Juliette Cutting (Vetting) are members and support the Safeguarding Working group</i>		

If you are unable to contact your site/area DSL, please contact another DSL on the list.

The Safeguarding Sponsor is a senior member of staff, who provides support to the DSLs when cases that pose significant risk are escalated. They meet the DSLs a minimum of twice a year to review activity, take measures to improve systems and practices where necessary, ensure training is sufficient and that all staff are aware of the policies and procedures which are easily accessible. The Sponsor will brief the CEO and Executive Board annually on safeguarding matters including volume of activity, location, trends, risks, and actions taken. An update on safeguarding activity will also be shared with the Safeguarding Trustee and the Board of Trustees on an annual basis.

The Safeguarding Trustee is a member of Historic Royal Palaces’ Board of Trustees, who provides support to the Safeguarding Sponsor and Designated Safeguarding Leads when cases that pose significant risk are escalated. They will be familiar with HRP’s safeguarding policy and procedures and attend training as appropriate.

The Safeguarding Trustee will meet the Safeguarding Sponsor a minimum of once a year to review activity and ensure appropriate policies, procedures, and other necessary measures are in place to promote effective safeguarding practice and awareness amongst trustees, staff, volunteers, and contractors.

- **Historic Royal Palaces will ensure staff and volunteers** are carefully recruited and necessary checks are made in line with the Safer Recruitment and Vetting Policies.

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- **Historic Royal Palaces** is committed to working with the police and Safeguarding Adults Boards/local authorities in which the palaces are located, especially if there are perceived risks or concerns about staff, contractors, Trustees, or volunteers.
- **Historic Royal Palaces** is committed to ensuring all staff and volunteers, including those with designated responsibilities, have received appropriate levels of up-to-date safeguarding training. This will be a minimum of every two years for the DSLs.
- **The Executive Board** is responsible for reviewing the policy every two years.

5. Risk Assessment

Should this policy and associated procedure be ignored or disregarded, the possible outcomes are:

- **For vulnerable adults at risk of abuse or neglect** – placed at further risk of harm and neglect.
- **For staff and volunteers** – potentially subjected to inquiry, investigation internally or externally for failing to take appropriate steps, which may then lead to a disciplinary process.
- **For the Designated Safeguarding Leads, Safeguarding Sponsor, the Chief Executive and Board of Trustees** – possible inquiry and report from the Charities Commission and regulators or recommendation from local authorities to regulators.
- **For Historic Royal Palaces** – possible risk of public scrutiny and ultimately risk of prosecution.

All of the above can lead to negative media attention and damage to the reputation of Historic Royal Palaces. The visiting public may lose confidence in HRP as an organisation resulting in fewer visitors and therefore failure to deliver our charitable and corporate objectives.

6. Definitions

Safeguarding Adults at risk of abuse or neglect: means protecting an adult's right to live in safety, free from abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

The Safeguarding duties apply in law to an adult who is 'an adult at risk,' which is defined as:

- Has needs for care and support (whether or not a local authority is meeting any of those needs); and
- Is experiencing, or at risk of, abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

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Historic Royal Palaces welcomes over 4 million visitors each year. It is therefore inevitable that some of our visitors will be defined as a vulnerable adult and may be at risk of abuse or neglect, generally, though not always, as a result of a lack of capacity within the meaning of the *Mental Capacity Act 2005* (see the procedures for information on the Mental Capacity Act).

Abuse and Neglect: Refers to: ‘ill-treatment (including sexual abuse and forms of ill treatment that are not physical); the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, emotional, social or behavioural development.’ (*Who Decides?*” Law Commission, 1997)

Abuse was defined by ‘*No Secrets*’ (2000, DH and Home Office) as: ‘...a violation of an individual’s human and civil rights by any other person or persons’.

7. Legislation, Regulatory Requirements and Guidance.

HRP has adopted the following legislation in order to provide a framework and guidance for our *Vulnerable Adults Safeguarding Policy and Procedures*.

- The principle source (since 2015) is the *Care Act 2014* (section 42). This **defines particular types of abuse** and sets out the statutory duties and the institutional responsibilities for those duties.
- The (*Care Act*) *Care and Support Statutory Guidance* (which is updated by Government periodically) provides the detail in relation to both the meaning of wellbeing and safeguarding. Chapter 14 sets out in detail the duties found in sections 42 to 46 of the Care Act, including definitions of the aims and objectives of Adult safeguarding activity and a representative range of types of adult abuse and neglect.
- Safeguarding and Protecting People for charities and trustees (The Charity Commission, last updated June 2022)
- Disclosure and Barring Service guidance leaflets

Name & Job Title	Role (Author, Reviewer, Approver)	Date	Version	Comments (E.g. Approved, amended names, Updated links)
Alison Lightbown Head of Schools & Communities	Author	October 2017	V1	
Alison Lightbown Head of Schools & Communities	Author	12/04/2021	V2	Approved revisions from Safeguarding Consultant Andy Lusk, added role of Safeguarding Trustee into the Safeguarding Management structure
Lotty Englishby Public Engagement Operations Manager	Reviewer	23/04/2021	V2	Reviewed edits, updated DSL names, added new HRP branding
Tom O’Leary	Approver	10/05/2021	V2	Has reviewed and approved amendments to the policy.

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Public Engagement Director				
Alison Lightbown Head of Schools & Communities	Author	16/01/2024	V3	Approved revisions from Safeguarding Consultant Andy Lusk, updated DSL contact details.
Lotty Englishby Public Engagement Operations Manager	Reviewer	16/01/2024	V3	Reviewed edits.
Tom O’Leary Public Engagement Director	Approver	16/01/2024	V3	Has reviewed and approved amendments to the policy.
Alison Lightbown Head of Schools & Communities	Author	30/04/2026	V4	Approved revisions from Safeguarding Consultant Andy Lusk, updated DSL contact details.
Kristina Gough Executive Assistant to Public Engagement Director	Reviewer	30/04/2026	V4	Reviewed edits.
Tom O’Leary Public Engagement Director	Approver	30/04/2026	V4	Has reviewed and approved amendments to the policy.

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