Huntingdonshire District Council

Safeguarding Children, Young People and Adults at Risk of Harm Policy

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Safeguarding is everyone's responsibility

Safeguarding – Quick View Procedure

Is the child, young person or adult at risk of immediate significant harm?

Yes

Call **999**

No

Complete HDC Log of Concern Form

Speak to a Designated Safeguarding Officer, your Line manager or the Lead Safeguarding Officer in their absence

Your DSO will advise if your concerns should be reported to the Cambridgeshire and Peterborough Safeguarding Partnership Board via the online referral form.

Safeguarding referrals should also be copied to DesignatedSafeguardingOfficers@huntingdonshire.gov.uk

When allegations or concerns are expressed about a Councillor, Employee, Volunteer or Contractor – contact your DSO and the Lead Safeguarding Officer.

If an allegation involves a child or young person, the Lead Safeguarding Officer will also contact the Local Authority Designated Officer (LADO) for further advice.

If there is any risk of immediate significant harm then 999 must be called

If you are concerned that a person is at risk of radicalisation, you can get help for them by emailing Prevent@cambs.pnn.police.uk or calling 01480 422 596.

In an emergency call 999

Prevent | Cambridgeshire and Peterborough Safeguarding Partnership Board

For all Policies, guidance and individual DSO contact details see

Safeguarding Children, Young People and Adults at Risk of Harm (sharepoint.com)

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1. Introduction

This policy applies to all staff, councillors, volunteers and contractors that work within the Council. The aim of this policy is to explain the Council's Safeguarding duty.
The Council has a duty to protect the welfare of children, young people and vulnerable adults living in Huntingdonshire.

All organisations that make provision for children and adults at risk of harm must ensure that:

- The welfare of the child or adult at risk of harm is paramount
- All children, young people and adults at risk of harm have the right to protection from abuse. This applies regardless of, their age, culture, disability, gender, language, racial origin religious beliefs and/or sexual identity.
- All suspicions and allegations of abuse and neglect are responded to swiftly and appropriately.

We take our responsibilities seriously and expect all staff, partners and contractors to share this commitment.

Safeguarding is **everyone's** responsibility.

2. Purpose

There are two main aims of this policy:

- To protect and promote the welfare of the children, young people and adults using or receiving services provided or commissioned by Huntingdonshire District Council.
- To support the Council, its officers, councillors, contractors and volunteers in fulfilling their statutory responsibilities.

Huntingdonshire District Council is not a Children's Services Authority. It is not the role of the Council to investigate allegations of abuse. However, all employees, councillors, volunteers and contracted service providers have a clear responsibility to take action when they suspect that a child, young person or adult at risk of harm may be a victim of significant harm or abuse.

This policy demonstrates how the Council will meet its legal obligations. It explains:

a) What the Council will do to protect and safeguard children, young people and adults at risk of harm
b) How people can safely voice any concerns through an established procedure
c) That the Council will deal with all reports of abuse or potential abuse in in a serious and effective manner
d) That Members, employees, volunteers and contractors receive appropriate training
e) That robust 'safer' recruitment procedures are in place.

It should be noted that this policy is not a stand-alone document. It should be used in conjunction with the inter-agency procedures developed by the Cambridgeshire and Peterborough Safeguarding Partnership Board.

In addition, this policy also provides an overarching framework to the Council's approach to all safeguarding matters. Additional Council policies and plans exist and sit beneath the overarching framework and should be read in conjunction with this main Safeguarding Policy. This policy also extends to buildings and premises owned or operated on behalf of the council including communal buildings and leisure facilities.

3. What is safeguarding?

Safeguarding means protecting a person's right to live in safety, free from abuse and neglect. It is about working together to support children, young people and adults at risk of harm to make decisions about the risks they face in their own lives and protecting those who lack the capacity to make these decisions.

The legislation relating to the Safeguarding of Children is different from the legislation relating to the Safeguarding of Adults at risk of harm. This policy covers adults and children. For clarity, the legislation for each group is summarised separately.

4. Key Legislation:

The key legislation underpinning the safeguarding of children, young people and adults is the Care Act 2014, Children and Social Work Act 2017 Working Together to Safeguard Children 2026 and Children's Wellbeing and Schools Act 2026.

Working Together to Safeguard Children 2026 confirms that the 3 statutory safeguarding partners in relation to a local authority area are defined in the Children and Social Work Act 2017 as:

- Local Authority (Tier 1/ responsible for children's services)
  For Huntingdonshire District Council this is Cambridgeshire County Council
- Clinical Commissioning Group (now titled Integrated Care System)
  For Huntingdonshire this is now the Central East Integrated Care Board
- Chief Officer of Police

The 3 statutory partners have a shared and equal duty to make arrangements to work together to safeguard and promote the welfare of all children in a local area.

The Care Act 2014 established the need to have a Safeguarding Partnership Board for children. The **Cambridgeshire and Peterborough Safeguarding Children Partnership Board** brings together a number of agencies across the county to ensure that there is a joined-up approach to safeguarding children and young people. Further information about the Board, including links to useful training and information, can be accessed here

Cambridgeshire & Peterborough Safeguarding Partnership Board (safeguardingcambspeterborough.org.uk)

The Cambridgeshire and Peterborough Safeguarding Children Partnership Board recognise the importance of the lived experience of the child. Further information and Practice guidance can be accessed here.

Lived Experience of the Child Practice Guidance | Cambridgeshire and Peterborough Safeguarding Partnership Board (safeguardingcambspeterborough.org.uk)

5. Key Legislation: Safeguarding Adults at risk

Statutory requirements regarding the Safeguarding of Adults at Risk are set out in the Care Act 2014 and supporting statutory guidance.

The term 'Adult at Risk' is a short form of the phrase 'An adult at risk of abuse or neglect'. It refers to adults who may have safeguarding needs according to the Care Act (2014). An Adult at Risk (sometimes referred to as AAR) is an adult (someone aged 18 or older) who:

a) Has needs for care and support (whether or not the authority is meeting any of those needs)
b) Is experiencing, or is at risk of, abuse or neglect, and
c) As a result of those needs, is unable to protect himself or herself against the abuse or neglect or the risk of it.

The Care Act 2014 established the need to have Safeguarding Adult Boards in each local authority area. The Act confirmed that the three statutory safeguarding partners should be; Local Authority (tier one authority), Chief Officer of Police, and Clinical Commissioning Groups.

The statutory guidance sets out the concept of Making Safeguarding Personal. This requires practitioners to find out about the lived experience of the adult.

Lived Experience of the Adult | Cambridgeshire and Peterborough Safeguarding Partnership Board (safeguardingcambspeterborough.org.uk)

6. Related legislation, policies and processes

6.1 PREVENT

CONTEST is the UK's counter terrorism strategy. It aims to reduce the risks from terrorism, so that people can go about their lives freely with confidence. A key part of the CONTEST strategy is the Prevent Duty.

The Prevent Duty is set out in the Counter-Terrorism and Security Act 2015
The Duty requires Local Authorities, schools, colleges, universities, health bodies, prisons and probation and police to consider the need to safeguard individuals from being drawn into terrorism.

The Council must incorporate the Prevent duty into existing policies and procedures to fulfil its safeguarding responsibilities. The Council must also develop a Prevent Action Plan and ensure that appropriate frontline staff (including those of its contractors), have a good understanding of the Prevent Duty and are trained to recognise vulnerability to being drawn into terrorism. The Community Safety Plan is used to ensure a consistent response to Prevent is taken across local partner agencies.

6.2 Modern slavery (including human trafficking):

This involves the recruitment, transportation, transfer, harbouring or receipt of people, who with the threat or use of force, coercion, abduction, abuse of power or deception, are exploited for the purposes of prostitution, forced labour, slavery or other similar practices. This can occur either from one country to another or even within the same country, county or town. Some victims are forced to work in places like cannabis factories, nail bars, brothels and car washes. There is no typical victim, and some victims don't understand that they have been exploited and are entitled to help and support.

Under the Modern Slavery Act 2015 the Council has a statutory duty to report and provide notification to the National Crime Agency about any potential victims of modern slavery or trafficking that we encounter.

6.3 Domestic abuse

The Domestic Abuse Act became law in April 2021. The act introduced a statutory definition of domestic abuse for the first time and defines it as 'any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over, who are, or have been, intimate partners or family members regardless of gender or sexuality.' Children who witness domestic abuse are also viewed as victims of abuse. Domestic abuse has a devastating effect on victims, their families and the wider community and cuts across all boundaries of social group, class, age, religion, sexuality, gender and lifestyle.

The Council has worked with the Domestic Abuse Housing Alliance and has adopted a Staff Domestic Abuse Policy – Domestic Abuse Support (sharepoint.com)

Public concerns relating to domestic abuse are provided guidance on the Council Website – Domestic Abuse Advice and Information - Huntingdonshire.gov.uk

7. Safeguarding structure

7.1 The Cambridgeshire and Peterborough Safeguarding Partnership Board

The Cambridgeshire and Peterborough Safeguarding Partnership Board consists of representatives from Cambridgeshire County Council, Peterborough City Council, Cambridgeshire Constabulary and the Central East Integrated Care Board. The Partnership Board is responsible for ensuring that children, young people and adults at risk of harm, neglect and exploitation across Cambridgeshire and Peterborough receive the help and protection that they need. This is a combined safeguarding structure which covers the two local authority areas and encompasses the safeguarding of both adults and children.

The Executive Safeguarding Partnership Board is the overarching countywide governance board which oversees the Cambridgeshire and Peterborough Safeguarding Children Partnership Board and the Cambridgeshire and Peterborough Safeguarding Adult Partnership Board.

The Safeguarding Partnership Board website is an important source of information for good practice and training.

Multi-Agency Safeguarding Training | Cambridgeshire and Peterborough Safeguarding Partnership Board (safeguardingcambspeterborough.org.uk)

7.2 Relevant agencies

Relevant agencies are organisations and agencies who are required to work with the statutory safeguarding partners to safeguard and promote the welfare of children, young people and vulnerable adults.

Huntingdonshire District Council is a relevant agency. This means the Council must:

- Fully engage with the Cambridgeshire and Peterborough Safeguarding arrangements
- Ensure that the organisation works in accordance with the inter-agency safeguarding procedures
- Have appropriate robust safeguarding policies and procedures in place specifically relevant to the organisation
- Ensure that the workforce is appropriately skilled to recognise and respond to safeguarding matters.

8. Roles and Responsibilities

8.1 Council Safeguarding Lead and Lead Safeguarding Officer

The Council's Safeguarding Lead is the Chief Executive Officer. They are responsible for chairing the Safeguarding Governance Board, which comprises membership from across council services, including a representative from HR. The Chief Executive Officer may appoint a Chair to the Board to act on their behalf. This role will be reviewed at the Safeguarding Board on an annual basis. Minutes/Action Log will be circulated directly to the members of the Board. The Chief Executive Officer will be updated via a Senior Leadership Team update given by the Chair of the Board.

Any safeguarding allegations or concerns involving a member of staff should be reported to the Lead Safeguarding Officer and investigated by a Designated Safeguarding Officer (DSO) in the first instance. If the allegation involves a child or young person, the LSO must contact the Local Authority Designated Officer (LADO) for further advice and support as required. The LADO will advise as to whether an allegation falls under the provisions of the procedure for Managing Allegations against People in a Position of Trust (PiPoT).

8.2 Safeguarding Governance Board

The Purpose of the Safeguarding Governance Board is to:

- Promote safeguarding amongst Huntingdonshire District Council
- Ensure safeguarding policies are up to date in terms of current/ new legislation and good practice
- Ensure appropriate training is in place
- Monitoring reporting of safeguarding concerns and outcomes
- Review related safeguarding policies and procedures
- Support the Safeguarding Lead to complete the Section 11 audit
- Aid the flow of information from and to the District Safeguarding meetings
- To designate a Lead Safeguarding Officer

8.3 Designated Safeguarding Officers (DSOs)

The work of the Safeguarding Governance Board is supported by the LSO and Designated Safeguarding Officers (DSOs) across the Council. DSOs have been trained to support staff that have reported safeguarding concerns about a child, young person, or adult at risk of harm. Their role is to:

- Provide a point of contact for staff who want to discuss concerns about a child or adults at risk of harm
- Provide guidance for the referrer to seek advice from relevant agencies
- Take forward disclosures / referrals where the referrer is unable to do so
- Provide a champion role for safeguarding issues in their service / department
- Help monitor policy and procedures at a service / departmental level

Designated Safeguarding Officers will typically hold Team Leader or Manager roles or be experienced in safeguarding matters and will understand the safeguarding process in order to appropriately advise colleagues. DSOs have also been identified from key central services (such as HR).

LSO and DSO Job Profiles are detailed on the Safeguarding SharePoint site,

LSO and DSO Job Profiles (sharepoint.com)

8.4 Assistant Directors and Heads of Service

Assistant Directors and Heads of Service are responsible for ensuring that Service Managers, Team Managers and staff within their service areas are aware of the contents of this Policy and the accompanying Procedures, and that the Council's duties to safeguard and promote the welfare of children, young people and adults with needs for care and support are met and effectively discharged.

8.5 Service Managers and Team Managers

Service Managers and Team Managers are responsible for complying with the requirements of this Policy and accompanying Procedures and for the promotion of a staff culture which recognises the rights of children, young people and adults with needs for care and support and the Council's responsibility for their safety when receiving its services.

8.6 Employees, councillors, volunteers and agency staff

All employees, councillors, volunteers and agency staff are responsible for complying with the requirements of the Safeguarding Policy and Procedures. Staff should take all reasonable steps to ensure (within the context of their duties) that risks are minimised and that children, young and vulnerable people are protected, and their welfare promoted when using Council services.

9. Reporting concerns and responding to allegations

If you think a child, young person or an adult at risk of harm is in immediate danger, phone 999.

9.1 Reporting concerns

All employees, councillors, volunteers and agency staff are responsible for carrying out their duties in a way that actively safeguards and promotes the welfare of children, young people and adults at risk. They must also act in a way that protects them from wrongful allegations of abuse as far as possible.

Abuse is a form of maltreatment that can occur in several forms which are not mutually exclusive.

For children, types of abuse include:

- Physical
- Psychological
- Sexual
- Grooming
- Child sexual exploitation
- Female genital mutilation

- Online abuse and cyberbullying
- Child trafficking and modern slavery
- Domestic abuse
- Self-neglect
- Forced marriage

Further information is available on the Cambridgeshire and Peterborough Safeguarding Children Partnership Board website:

Child abuse – definitions and signs – Cambridgeshire and Peterborough Safeguarding Partnership Board (safeguardingcambspeterborough.org.uk)

For adults, types of abuse include:

- Physical
- Sexual
- Psychological
- Discrimination
- Exploitation, modern slavery and human trafficking
- Financial
- Organisational
- Domestic abuse
- Neglect and acts of omission
- Female genital mutilation

Further information is available on the Cambridgeshire and Peterborough Safeguarding Adults Partnership Board website.

Abuse and Neglect – Cambridgeshire and Peterborough Safeguarding Partnership Board (safeguardingcambspeterborough.org.uk)

Even for those experienced in working with child or adult abuse it is not always easy to recognise a situation where abuse may occur or already has taken place. Whilst it is accepted that staff are not experts at such recognition, all staff have a duty to act if they have any concerns. If they are unsure, then any concerns should be discussed with either a Designated Safeguarding Officer or the Lead Safeguarding Officer. The DSO will help advise if and how to complete a referral. A list of DSOs will be kept updated on the Safeguarding Children, Young People and Adults at Risk of Harm site.

9.2 Log of Concern Form

A log of Concern form is available for all employees, councillors, volunteers and agency staff to make a record of any kind of concern (although it is still possible for a concern to be raised directly with a DSO). A log of Concern Form must be returned to one of the Council's Designated Safeguarding Officers or directly to the LSO. The Designated Safeguarding Officer who receives the form may contact you for further information and in consultation with the LSO will decide whether a safeguarding referral should be made to the Cambridgeshire and Peterborough Safeguarding Board via the online referral form.

All Huntingdonshire District Council Log of Concern Forms and associated safeguarding referrals must then be copied to DesignatedSafeguardingOfficers@huntingdonshire.gov.uk.

9.3 Receiving an allegation of abuse

When a child, young person or adult at risk makes an allegation of abuse or bullying, you should:

- Stay calm and try to get another witness if it does not compromise the situation
- If the person making the allegation does not speak in English as their first language (including if they are a user of British Sign Language), consider whether communication may be aided by accessing Interpretation and Translation services.
- If you believe the person is 'at risk' of immediate significant harm, which includes situations which any employee, councillor or volunteer would reasonably believe requires the emergency services, then you must contact the relevant emergency service and notify your Departmental DSO, LSO, Line Manager or Head of Service.
- Listen carefully to what is said and allow the person to talk at their own pace, being careful not to compromise potential evidence.
- Find an appropriate opportunity to explain it is likely that information will need to be shared with other responsible people, do not promise to keep secrets
- Only ask questions for clarification, the use of open questions, for example, what, where, when, who is advisable, do not ask leading questions (that suggest certain answers as this could compromise evidence)
- Reassure the child, young person or adult at risk of harm that they have done the right thing in telling you
- Tell them what you will do next and who you will inform
- Immediately report to and inform your Departmental DSO, LSO, Line Manager or Head of (as appropriate and where possible).

9.4 Allegations involving Employees, Councillors, Volunteers, Agency Staff or Contractors

If a concern or allegation relates to one of the above, this must be reported to the Lead Safeguarding Officer. In addition, if the allegation or concern involves a child or young person, the Lead Safeguarding Officer will liaise with the County Council Local Authority Designated Officer (LADO) for further advice by emailing LADO@cambridgeshire.gov.uk.

9.5 Reporting Concerns about radicalisation

If you believe someone is at risk of radicalisation, you can help them get support and prevent them becoming involved in terrorism and potentially violent activities by raising your concerns via:

Email: Prevent@cambs.pnn.police.uk Telephone: 01480 422 596

Emergencies - If you suspect that someone is about to put themselves in danger by travelling to join a terrorist organisation or appears involved in plans to commit a criminal offence, please inform the police immediately by calling 999.

9.6 Monitoring and record keeping

A record must be kept of all safeguarding concerns to comply with the Section 11 Audit requirements. Copies of all Log of Concern Forms and Safeguarding referrals must be copied to the DesignatedSafeguardingOfficers@huntingdonshire.gov.uk. The LSO is responsible for monitoring the inbox and retaining a record of concerns.

10.Training

The Council will take all reasonable steps to ensure that all employees, councillors and volunteers who are likely to come into contact with children and/or adults at risk of harm as a regular part of their job will be provided with appropriate training including:

- Induction training including Learn training requirements
- Departmental and service procedures
- Specific Basic Safeguarding Awareness training identified for relevant posts
- Corporate training such as Recruitment and Selection
- Specialist role specific training to be coordinated by HR as part of the Safeguarding/DBS Recruitment Process. All training content to be in line with CPSP requirements
- Councillor training to be administered by Democratic Services Member Development and Support Officer in the form of completion of the CPSP Sways for Adult and Child Safeguarding

Additional training resources and good practice information is available on the Cambridgeshire and Peterborough Safeguarding Partnership website

11. Recruitment

Huntingdonshire District Council is committed to safer recruitment procedures set out by the Cambridgeshire and Peterborough Safeguarding Partnership Board.

It is the responsibility of the recruiting manager to undertake a risk assessment for the job description and person specification for those roles likely to involve regular and/or substantial unsupervised contact with children, young people or adults at risk of harm before recruitment takes place. This will determine the safeguarding level of all roles and ensure that only appropriate individuals are selected to undertake DBS procedures. A list is maintained by HR of those roles designated as requiring a DBS and additional training to the iLearn induction training.

12. Equal opportunities

As a council, we are committed to delivering services that narrow the gap in outcomes between disadvantaged groups and the wider community, and to ensuring that protected groups are included and have their voices heard (see our Equality, Diversity and Inclusion Policy for more information). We are also obliged to comply with the Equality Act 2010 and Public Sector Equality Duty. As per the Cambridgeshire Equality Pledge, we recognise that we serve a diverse community with diverse needs. We are committed to anticipating and responding positively to this so that everyone can access our services. In order to achieve the Council's strategic priorities and meet the challenges we face, we involve all communities in developing our services and activities.

13. Information sharing

The Cambridgeshire and Peterborough Information Sharing Framework ('the Framework') is a high-level agreement between a number of public organisations in Cambridgeshire and Peterborough. Its aim is to facilitate more effective data sharing across Cambridgeshire and Peterborough where this is needed to improve service delivery or to enable each organisation to respond quickly to customer needs.

Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, whom and what information will be shared. You should seek consent where an individual may not expect their information to be passed on. There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk. Further information about information sharing can be found on the Information Sharing | Cambridgeshire and Peterborough Safeguarding Partnership Board Site

14. Photography, film and media

The Council will take appropriate action to protect children and young people from the inappropriate use of photographic images. Some photographs taken by or on behalf of the Council will be anonymous group shots in public places. Some photographs taken by or on behalf of the Council will feature images where people can be identified through their image. Wherever a photograph is taken, and a person is able to be identified through their image, the Council will obtain photo consent before using the image in any way. For those aged under 18 years old, photo consent from a parent or guardian will be required. It should be remembered that photographs can be used as a means of identifying children and young people, especially when they are accompanied by personal information. For any event that the Council runs, the Council will communicate that a photographer will be in attendance. The Council will also ensure that, where people have a concern about their photograph being taken, they are able to raise this concern and to take reasonable steps to avoid being photographed and still participate in the given activity or event.

Where the Council has started to introduce the use of body cameras to improve the safety of frontline Officers in particular roles, detailed guidance and procedures about the use of body cameras and camera footage will be developed.

15. Considerations for Specific Council Functions

15.1 Hackney Carriage and Private Hire licencing

All new applicants for Hackney Carriage and Private Hire driver, proprietors of Hackney Carriage and Private Hire vehicle and Operator licences will be required to pass a safeguarding course as approved by this Local Authority.

Where the Licensing Authority receives a complaint regarding the moral, physical, sexual harm or neglect of a child or adult at risk of harm as a consequence of the actions or inactions of a licence holder, the Licencing Service will liaise with Cambridgeshire County Council in relation to school contracts and the Police. Where necessary, they will revoke a licence, and if satisfied the driver is posing an immediate risk to public safety, the revocation will take effect immediately.

15.2 Hiring of Facilities

Where facilities are let to external groups or events organised, which involve children, young people or adults at risk of harm when parents/carers are not present, Huntingdonshire District Council will include provision within its conditions of hire requiring:

- Agreement to work within the expectations of the Council's Safeguarding Policy irrespective of whether the event organiser has its own policy in place
- A requirement that staff who will have significant, unsupervised involvement with children and young people over the course of the event have DBS checks appropriate for the role they are undertaking.

It is a condition of hiring the premises that the facilities are not used for meetings or events which might promote extremism.

The relevant Head of Service will assume accountability for these provisions.

15.3 Housing Advice and Housing Support services

The Council's housing and homelessness services have a duty under Section 11 of the Children Act 2004. Any person working on behalf of the Council in these services, may become aware of conditions that could have or are having an adverse impact on children. Part 1 of the Housing Act 2004 sets out that authorities must take account of the impact of health and safety hazards in housing on vulnerable occupants, including children, when deciding on the action to be taken by landlords to improve conditions. Housing authorities have an important role to play in safeguarding vulnerable young people, including young people who are pregnant or leaving care or a secure establishment.

15.4 Procurement and contractors

Any contractor or sub-contractor engaged by the Council in areas where personnel are likely to come into contact with children, young people or vulnerable adults shall ensure that:

- These personnel have a valid enhanced disclosure check through the Disclosure and Barring service against both the adults barred list and the children's barred list
- That no personnel are permitted to work directly with children, young people or vulnerable adults until they have had a disclosure check and the contractor or sub-contractor has received and evaluated the results
- Monitor the levels on an ongoing basis and validity of these checks with the personnel concerned
- Where a disclosure check for personnel is invalid or deficient the contractor or sub-contractor, shall immediately remove that personnel from the provision of parts of the service requiring direct working with children, young people or vulnerable adults and advise the Council's contract manager.

The supplier shall ensure that their personnel are suitably trained and have awareness of safeguarding and how to report any safeguarding concerns.

Where these requirements are relevant then these must form part of any service level agreement, contract or licence.

Council-owned companies are expected to take reasonable and proportionate steps in relation to safeguarding.

15.5 Grant applicants

As a minimum, all organisations receiving funding from the Council will be expected to have a safeguarding policy and procedure in place, which is understood by employees and volunteers and available to service users, irrespective of how the grant has been awarded.