



GREEN GEN CYMRU

Vulnerable Person Protocol

February 2026

**POWERING
A POSITIVE
ENERGY FUTURE
FOR WALES**

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1.0 Purpose

- 1.1) This protocol outlines the procedures adopted by Green Generation Energy Networks Cymru Limited (**Green Gen Cymru**) for identifying, engaging with, and supporting vulnerable individuals or groups impacted by Green Gen Cymru's proposals. This protocol aligns with the Equality Act 2010.
- 1.2) A vulnerable person is an individual at increased risk of harm, exploitation or neglect. Such individuals may require additional supporting measures to safeguard their wellbeing during Green Gen Cymru's engagement with them.

2.0 Definition of Vulnerability

- 2.1) A person may be considered vulnerable due to:
 - Physical or mental health conditions
 - Learning difficulties
 - Age (young or elderly)
 - Language or literacy barriers
 - Financial hardship
 - Housing insecurity or homelessness
 - Domestic abuse or safeguarding concerns
- 2.2) Vulnerability may be temporary or long-term and may be exacerbated by stress related to Green Gen Cymru's engagement and proposals.

3.0 Identification and Assessment

- 3.1) Persons who are or may be considered to be vulnerable will be identified as follows:
 - In response to any indication from the individuals concerned that they identify as someone who is vulnerable
 - As a result of dynamic assessments undertaken by employees and agents of Green Gen Cymru on the basis of their interaction with landowners and occupiers
 - Green Gen Cymru will be mindful of any changes in circumstances or in the nature of its interactions with individuals so that someone who was initially not regarded as vulnerable may be treated as a vulnerable person in the light of new information and developments
 - Green Gen Cymru will record and manage vulnerability data in accordance with GDPR and company data protection policies within project specific Vulnerable Person Log



4.0 Support Measures

- 4.1) Once a person has been identified as a Vulnerable Person and their details recorded within the project specific vulnerable person log, the project team should consider any reasonable adjustments required to Green Gen Cymru's standard way of operating.

4.1 - Communication Adjustments

- Offer translation, large print, Braille, or easy-read documents
- Allow a reasonable period of additional time to process information or respond to consultations (if requested)

4.2 – Specialist Support

- Assign a **Vulnerability Liaison Officer** where complexity or risk is high
- Signpost to suitable professionals or organisations who may provide specialist support to the Vulnerable Person
- Highlight GGC's "Environmental And Engineering Surveys" document available on the GGC website confirming reasonable professional fees can be recovered

4.3 – Procedural Flexibility

- Adapt the engagement approach where vulnerability is a factor "Using agents or employees for liaising with the vulnerable person who by reason of their own protected characteristics e.g. race/language or sex may make the vulnerable person feel more comfortable in their interaction with Green Gen Cymru"
- Schedule face-to-face meetings in safe, comfortable environments (including at hired venues if requested)
- Recommend engagement with independent land agents who may act on their behalf to minimise direct engagement



5.0 Staff Training

All staff and contractors working with stakeholders will receive training in:

- Mental health awareness
- Equality, diversity, and inclusion
- Effective communication with vulnerable persons

6.0 Safeguarding and Escalation

- Any safeguarding concern will be escalated to the project's Designated Safeguarding Lead. Individuals with safeguarding lead training are listed below.
- Where serious risk is identified, where necessary, staff will involve appropriate statutory authorities

Name	Role	Contact
Francesca Stuttard	Head of Land (all projects).	07985 773754 Francesca.Stuttard@GreenGENCymru.com
Dan Milton	Land Manager (Towy Usk)	07983 870 515 dan.milton@greengencymru.com
Ilan Jones	Land Manager (Vyrnwy Frankton)	07496 368 750 Ilan.Jones@GreenGENCymru.com

7.0 Confidentiality and Record-Keeping

- Vulnerability-related information will be treated sensitively in line with relevant GDPR requirements
- Records will be kept securely and shared only with authorised personnel. Consent will be obtained wherever possible or to the extent legally required before referring or disclosing information to third parties

8.0 Monitoring and Continuous Improvement

- Vulnerability case handling will be reviewed regularly for learning and improvement
- Stakeholder feedback will inform updates to this protocol and associated training