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## 1. Scope

1.1. This policy is the responsibility of all:

- Councillors
- Staff and volunteers
- Contractors and partners working for or on behalf of the council.

References to staff in this policy include all workers (e.g. permanent and temporary staff, agency staff, casual staff, volunteers, apprentices and those undertaking internships or work experience). The Staff Code of Conduct requires compliance with the policy.

1.2. Children and young people are defined as those aged under 18.

1.3. A vulnerable adult is someone aged 18 or over who:

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

For example a person who:

- Is frail due to age
- Has drug or alcohol problems
- Has a learning disability
- Has mental or physical ill health or disability
- Has been trafficked for purposes such as forced labour or sexual exploitation.

Vulnerability is related to how able an adult is to make and exercise their own informed choice, free from duress or undue influence, and to protect themselves from abuse, neglect and exploitation. There is no hard and fast

rule: an adult should be assumed to be covered by this policy unless there is information to indicate that they are not.

## **2. Reasons for the policy**

- 2.1. Everyone, including children, young people and vulnerable adults, has the right not to be abused. We recognise the need to ensure their welfare when they come into contact with the services we provide. The council has wide ranging contacts with potentially vulnerable children and adults. It is essential that a clear and consistent approach to safeguarding is followed across the all council services.
- 2.2. It is known that some individuals will actively seek employment or voluntary work with vulnerable people, particularly with children and young people in order to control harm and 'control' them. People who work with children, young people and adults who may be at risk, contractors and other partners of the council have a role to play in protecting them from harm and safeguarding their welfare.
- 2.3. It is also important to recognise additional vulnerability in terms of race, disability, religion, ethnicity or language. Specific reference is made to these issues in the Pan Sussex Children Protection and Safeguarding Procedures and in the Sussex Multi Agency Policy and Procedures for Safeguarding Vulnerable Adults.
- 2.4. The Children Act 2004 and the Care Act 2014 place specific duties on District and Borough councils to have regard to the need to safeguard and promote the welfare of children and vulnerable adults, and to co-operate with other agencies to improve the wellbeing of children and vulnerable adults. The council is a partner of the East Sussex Local Safeguarding Children Board (LSCB) and the East Sussex Local Safeguarding Adults Board (LSAB) and is required, where appropriate, to contribute information to Serious Case Reviews (SCRs) and Safeguarding Adults Reviews (SARs), and to ensure learning from these is disseminated and acted on within the council.

## **3. Safeguarding statement**

- 3.1. Lewes District and Eastbourne councils work to ensure that all children, young people and vulnerable adults coming into contact with the council and its employees are protected and treated with respect. The council will endeavour to create an organisational culture where staff, councillors and contractors are sensitive to abuse and exploitation and take responsibility for and feel confident in reporting concerns. The council will cooperate with relevant partners in order to protect children and adults experiencing or at risk of abuse in accordance

with arrangements and procedures agreed by the Local Safeguarding Children Board and the Safeguarding Adults Board.

- 3.2. It is not the policy of the council to encourage staff to investigate suspicions or allegations, but to make all staff aware of the issues surrounding child and vulnerable adult protection and to have clear procedures in place to ensure that staff are aware of how and to whom any concerns should be reported. All staff involved in the provision of services should know what to do if there are any concerns about abuse and what procedures and guidelines they should follow.

#### **4. Safeguarding roles and responsibilities**

- 1.1. Safeguarding children from abuse and promoting their welfare means:
  - protecting children from maltreatment;
  - preventing impairment of children's health or development;
  - ensuring children are growing up in circumstances consistent with the provision of safe and effective care;
  - taking action to enable all children to have the best outcomes.
- 1.2. Safeguarding vulnerable adults means protecting them from maltreatment, and preventing injury or significant harm. Abuse violates an adult's human and civil rights. It can vary from treating someone with disrespect in a way which significantly affects the person's quality of life, to causing actual physical suffering.
- 1.3. A safeguarding concern arises if abuse is suspected or disclosed. Abuse can happen anywhere – at home, in a residential or nursing home, a hospital, in the workplace, at a day centre or educational establishment or in the street.
- 1.4. It is the responsibility of all those working within or on behalf of the council to be vigilant and report alleged or suspected incidents of child, young person and/or vulnerable adult abuse.
- 1.5. A minimum of five team leaders or other officers in key roles within the council will act as **Safeguarding Contacts** supporting staff and ensuring that concerns are reported appropriately and in accordance with current guidance. The role and responsibilities of the Safeguarding Contacts are set out in more detail in Section 8.
- 1.6. The **Named Senior Officer**, the Director of Service Delivery, has overall responsibility for safeguarding, including e-safety. This responsibility includes:
  - keeping this policy up to date and ensuring its conformity with the Pan Sussex LSCB and LSAB guidance;
  - making sure this policy is implemented, and that staff, councillors, contractors, organisations receiving financial support from the Councils and partners understand their responsibilities;
  - checking that appropriate steps are taken in the event of any allegations against a councillor or member of staff, and that the council liaises

appropriately and effectively with authorities responsible for investigating these safeguarding concerns: the Police and/or East Sussex County Council Children's and Adults' Services. The Named Senior Officer oversees liaison between the responsible authorities and the councils to determine how any internal and external investigations can be conducted properly, preserving evidence and avoiding unnecessary duplication and delay. Investigation by the responsible authorities normally takes precedence over council investigations under the complaints, grievance or disciplinary procedures

- supporting the Safeguarding Contacts and other staff, providing direction, advice and guidance where appropriate;
- ensuring that the council actively supports all Serious Case Reviews (SCRs) and Safeguarding Adults Reviews (SARs) where the council may have had involvement / contact with the victim; and
- ensuring that the council acts on lessons learnt from SCRs and SARs and other safeguarding issues, grievances or disciplinary proceedings.

1.4. The **Prevent Lead**, the Strategy and Partnerships Lead – Thriving Communities, has overall responsibility for the Council's Prevent duties. These include:

- attending meetings of the East Sussex Prevent Board and maintaining up to date knowledge of the Council's duties and locally agreed procedures for reporting concerns
- ensuring that staff, councillors, contractors, organisations receiving financial support from the Council and partners understand their responsibilities under the Counter Terrorism and Security Act 2015;
- supporting the Safeguarding Contacts and other staff, providing direction, advice and guidance where appropriate.

1.5. Specific safeguarding responsibilities are tabulated at Appendix A.

## 5. Types of abuse

1.7. The Care Act 2014 includes a list of some types and patterns of abuse and neglect and the different situations in which this may take place. This is intended as an illustration rather than an exhaustive list and the Councils should not limit its view of what constitutes abuse or neglect to examples illustrated. The list below is included as an illustration of the types of abuse and neglect that may arise.

1.8. **Physical: causing physical harm**, including hitting, shaking, biting, grabbing, withholding food or drink, force-feeding, wrongly administering medicine, unnecessary restraint, failing to provide physical care and aids to living;

1.9. **Sexual**: including sexual assault, rape, inappropriate touching/molesting, forcing or enticing, someone into sexual acts they don't understand or feel powerless to refuse; grooming a child or young person in preparation for abuse, including on-line activity;

- 1.10. **Emotional or psychological:** persistent emotional ill treatment or rejection (domestic or otherwise), including verbal abuse, shouting, swearing, threatening abandonment or harm, isolating, taking away privacy or other rights, bullying/intimidation, blaming, belittling, silencing, controlling or humiliating;
- 1.11. **Exploitation:** either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain;
- 1.12. **Financial or material: illegal or improper use of an adult's property, money or other assets without their informed consent or where the consent is obtained by fraud.** It can include withholding money or possessions, theft of money or property, fraud, intentionally mismanaging finances, borrowing money and not repaying. In relation to an adult's financial affairs or arrangements this could include wills, property, inheritance or financial transactions of the misuse or misappropriation of property, possessions or benefits;
- 1.13. **Neglect and acts of omission:** persistent or severe failure to meet a person's basic physical and psychological needs. It will result in serious impairment of their health or development, and can include withholding shelter, food, drink, heating and clothing, failing to provide access to health, social and educational services, ignoring physical care needs, exposing a person to unacceptable risk, failing to ensure adequate supervision or unresponsiveness to the basic emotional needs of a child;
- 1.14. **Discriminatory abuse:** including slurs, harassment and maltreatment due to a protected characteristic (Equality Act 2010);
- 1.15. **Institutional abuse:** including neglect and poor care practice within an institution or specific care setting such as a hospital, care home or children's home;
- 1.16. **Unintentional abuse:** this may be the result of negligence or ignorance;
- 1.17. **Child Sexual Exploitation (CSE):** includes forcing or enticing a child aged under 18 to take part in sexual activities whether or not the child is aware of what is happening. The may include situations or relationships where children receive something (e.g. food, drugs, alcohol, cigarettes, affection, gifts, accommodation and money) linked to sexual activity. CSE also occurs remotely, not necessarily with the child's awareness through the use of technology, e.g. posing sexual images on the internet;
- 1.18. **Modern slavery:** recruiting people by deception or coercion and moving them to a new place where they can be exploited. This includes human trafficking;
- 1.19. **Domestic abuse:** an incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an

intimate partner or family member regardless of gender or sexuality. Children who have witnessed domestic abuse may also need safeguarding.

- 1.20. **Honour Based Abuse (HBA):** A collection of practices which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour and which can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code;
- 1.21. **Forced Marriage (FM):** A marriage conducted without the valid consent of one or both parties and where duress is a factor. FM is now a specific offence under section 121 of the Anti-Social Behaviour, Crime and Policing Act 2014;
- 1.22. **Female Genital Mutilation (FGM):** FGM is a collective term for a range of procedures which involve partial or total removal of the external female genitalia for non-medical reasons, sometimes referred to as female circumcision or female genital cutting. FGM of girls is regarded as child abuse;
- 1.23. **Human Trafficking:** The recruitment, transportation, transfer, harbouring or receipt of people by means of threat or use of force or other forms of coercion, abduction, fraud, of deception, abuse of power or inducements for the purpose of exploitation through prostitution or others forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal or organs. Victims may be physically or psychologically 'imprisoned';
- 1.24. **Self-neglect:** Self-neglect is the 'inability (intentional or non-intentional) to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and well-being of people who self-neglect and perhaps even to their community' (Gibbons, 2006);
- 1.25. **Prevent:** This is the Government counter-terrorism strategy. From July 2015 local authorities have a responsibility to work with and support individuals and communities who may be vulnerable to the threat of violent extremism and terrorism. Children and vulnerable adults may be at risk of being drawn into extremism. Early intervention can help protect them before illegality occurs, and concerns relating to extremism can be reported as a Safeguarding concern.

## 6. Signs of abuse

- 1.26. There are many possible signs of abuse, none being conclusive on their own. Examples include:
  - Unexplained injury / weight loss / cuts and bruises / dirtiness
  - Changes in behaviour
  - Depression / low self-esteem / anxiety
  - Lack of self-care / dehydration / abnormal eating pattern
  - Harm to self
  - Obsessive behaviour
  - Bills not being paid

- An overly critical or disrespectful carer (or boss, for trafficking) who may control, bully or undermine
- Isolation from usual network of friends, family or community
- No access to GP / local services and legal documents e.g. passport (trafficking).

## 7 Reporting safeguarding concerns

- 1.27. We all have a responsibility to report any safeguarding concerns over the welfare of children, young people or vulnerable adults. This extends to the identification of signs of abuse, poor practice by staff, councillors and others acting for or on behalf of the council, allegations brought to our attention by a member of the public. This includes the need to report concerns relating to children who have witnessed domestic abuse. Reporting safeguarding concerns can prevent serious abuse or harm from happening, or from escalating.
- 1.28. All staff, volunteers, members contractors and partners of the council are expected to act promptly and effectively in communicating concerns relating to child and adult protection either through one of the council's Safeguarding contacts or directly to East Sussex Children's Services or Adult Social Care Service.
- 1.29. A list of the council's **Safeguarding Contacts** is maintained by the Strategy and Partnerships Lead for Thriving Communities. Staff must not attempt to investigate abuse themselves; neither must they confront anyone who is allegedly responsible for abuse nor tell them that allegations have been made against them.
- 1.30. **Inside normal office hours** safeguarding concerns must be reported to a Safeguarding Contact at the earliest possible opportunity and within **one working day** of recognising the risk. Verbal reports must be confirmed on the CRM within one working day.
- 1.31. **Outside normal office hours** safeguarding concerns must be reported immediately to the East Sussex County Council Emergency Duty Service. A record must be made of everything that is said and a Safeguarding Contact must be informed on the next working day and the details of the report recorded on the CRM.
- 1.32. **Dial 999** if a child, young person or vulnerable adult may be in imminent danger or a criminal offence may have been committed before taking the above steps.
- 1.33. The Safeguarding Contact should be given as much factual information as possible. For example:



- The child, young person or vulnerable adult's name and address (and parents'/carers' address if different);
- The reason for concern – a note of significant events or conversation should be made as promptly as possible to assist with any referral and subsequent investigation. Evidence such as texts or social media entries should be preserved;
- Any other known factors which may be contributing to the problem;
- Additional information such as age (or date of birth), ethnicity, religion, language and disabilities/specific needs.

However, it is not the role of council staff to investigate suspicions or allegations and any safeguarding concern should be reported whether or not the information is complete.

- 7,8 If there are doubts about whether a safeguarding concern has been handled in accordance with the Safeguarding Policy, these should be raised with the Named Senior Officer. If this is not appropriate, the concern should be raised with another member of the council's Corporate Management Team.
- 7.9 Variations to these arrangements may be agreed with specific terms (e.g. sheltered housing) to ensure that safeguarding concerns are dealt with promptly.

## **8 Role of Safeguarding Contacts**

- 8.1 A Safeguarding Contact is responsible for receiving reports of safeguarding concerns inside normal office hours from any councillor or staff member **regardless** of which team they work in and for maintaining appropriate records on behalf of the council, seeking advice from East Sussex County Council (ESCC) Children's and Adult Services and informing the Named Senior Officer of the concern and advice received.
- 8.2 To discharge this responsibility the Safeguarding Contact must inform the ESCC Children's or Adult Services of the Safeguarding concern, where possible on the same working day as it is received and **within 24 hours** and obtain their advice about the appropriate action to be taken. For Children's Services the point of contact will be the Single Point of Advice (SPOA). Advice may also be received from the police if appropriate.
- 8.3 It is not the job of the Safeguarding Contact or the Named Senior Officer to establish whether or not abuse is taking place, or whether a crime has been committed. That is the job of the "responsible authorities" (Police, ESCC Children's or Adult Services).

- 8.4 Safeguarding Contacts are also responsible for supporting staff who report concerns directly to ESCC whether this is out of normal hours or in situations where they have not been able to locate a Safeguarding Contact.

## **9 Confidentiality, record keeping and sharing information**

- 9.1 Information about safeguarding concerns should be regarded as **confidential** and should be channelled through a Safeguarding Contact. The information is not secret, however, and the Safeguarding Contact will seek advice from ESCC Children's and Adults' Services and be guided by the information set out at Appendix H. Information sharing must be necessary, proportionate, relevant, accurate, timely and secure.
- 9.2 If someone discloses abuse, but asks that it should be kept a secret, they should be told that if what they have said indicates that they, or someone else, may be harmed, there is a duty to report it to a Safeguarding Contact. This is called acting in the public interest.
- 9.3 If a witness who is not a councillor or member of staff requests anonymity, they should be told that it is much better if they are willing to give their name, but if not, their concern will still be reported to a Safeguarding Contact.
- 9.4 Records should be written in plain English, and should always differentiate clearly between fact and opinion or judgement. All must be dated, and stored securely. Any paper records must be signed, and appropriately destroyed after scanning.
- 9.5 Information about a safeguarding concern may be shared by a Safeguarding Contact or the Named Senior Officer at the earliest opportunity with appropriate others in accordance with information sharing principles (Appendix H). For example:
- The council's HR Manager in the case of an allegation against staff
  - The council's Monitoring Officer in the case of an allegation against a councillor
  - Where safeguarding concerns and allegation relate to contractors or partners the appropriate company/organisation manager and council senior manager overseeing the contract or partnership;
  - The alleged victim or their parent/carer where appropriate (regarding the safeguarding concern and steps being taken to deal with it).
- 1.1. A secure GCSX compliant email system must be used where there is a need to share safeguarding or other confidential information with external organisations (in accordance with the information sharing requirements of this policy).

- 1.2. Records will be stored in accordance with the council's policies and procedures governing information management and record/document retention and disposal.

## **10 Allegations against staff, councillors, contractors or partners**

- 1.3. If someone witnesses behaviour by a councillor, member of staff, contractor or partner, or an allegation is made about them that indicates that they have, or may have:

- harmed a child, young person or vulnerable adult, or put them at risk of harm;
- possibly committed a criminal offence against or related to a child, young person or vulnerable adult, or;
- behaved in a way that indicated they may pose a risk of harm to children young people or vulnerable adults.

they must report it as a safeguarding concern to a Safeguarding Contact (see section 8).

- 1.4. It is acknowledged that an allegation against any member of staff will generate concern amongst other staff. The way in which any such allegations are dealt with should be professional and fair and, above all, protect the welfare of the child, young person or vulnerable adult. Staff will be supported if they disclose information about a colleague.
- 1.5. A councillor or member of staff, whether paid or unpaid, must report any allegation made against them to a Safeguarding Contact following the procedure in Section 7 of this policy.
- 1.6. Safeguarding concerns and allegations relating to staff will be dealt with in accordance with the council's disciplinary procedures (including instances where the member of staff resigns or leaves). However, investigations by the responsible authorities will take precedence over internal council procedures relating to conduct. The HR Manager will liaise with the responsible authorities to agree the appropriate course of action.
- 1.7. The HR Manager will seek advice from ESCC Children's or Adult Services or the police prior to informing a member of staff of an allegation against them. The HR Manager will offer appropriate welfare support to the member of staff and ensure they are kept appropriately informed during any investigation process.
- 1.8. In accordance with the law the council will refer to the Disclosure and Barring Service (DBS) any member of staff who:

- was dismissed because they harmed a child or adult;
- was dismissed or removed from working in a regulated activity because they might otherwise have harmed a child or adult;
- would have been dismissed for either of the above reasons but they resigned first; or,
- who works with children or vulnerable adults in regulated activity and has been cautioned or convicted for a relevant offence.

1.9. Safeguarding concerns and allegations relating to councillors will be referred to the Monitoring Officer and dealt with in accordance with the council's Code of Conduct of Members and liaison with the lead officer responsible for safeguarding.

1.10. The council will implement procedures to deal with the outcome of any investigation including:

- advice and reassurance to the public;
- media attention;
- dealing with staff if the event of allegations being unfounded;
- dealing with staff should an allegation about a staff member be proven.

## **11 Recruitment and selection**

1.11. The council will take all reasonable steps to prevent unsuitable people working with children, young people and vulnerable adults on behalf of the council. Procedures will be deployed consistently for all staff whether in full time, part time, permanent or temporary employment and whether paid or voluntary.

1.12. The need to recruit quickly will not be allowed to take precedence over safe recruitment principles. They are incorporated into the council's recruitment policies and practices, and the HR Manager is responsible for their implementation and review. Key aspects are:

- a commitment to safeguarding must be included in all future employment contracts
- criminal record checks will be made where appropriate. Roles that involve regulated activities, such as caring for, supervising or being in sole charge of children or vulnerable adults, require an enhanced Disclosure and Barring Service (DBS) Check. This may include checking whether someone is included in the two DBS 'barred lists' of individuals who are unsuitable for working with children and adults. DBS checks must be obtained for staff and volunteers undertaking these roles, and they will not be permitted to

commence unaccompanied work until they have been received. It is against the law for employers to employ someone, or allow them to volunteer for this kind of work if they are on one of the barred lists.

- a commitment to safeguarding must be included in all employment contracts.
- any post-specific requirements relating to safeguarding must be included in the relevant job description and person specification.
- offers of employment or placements are subject to receipt of satisfactory references and identity checks. Where the post involves significant contact with children, young people or vulnerable adults, former employers will be asked about the suitability of the candidate and whether there have been any concerns, allegations or disciplinary investigations related to safeguarding.
- managers and HR staff must comply with corporate policies on the security of DBS records and on the Rehabilitation of Offenders to ensure the confidentiality of information received in relation to applicants.

1.13. Managers are responsible for ensuring that employment agencies used by the council offer safe recruitment and selection processes. Employment agencies must be made aware of this policy, must provide the council with a copy of their safeguarding procedure and must agree to share with the council any safeguarding concern within the agency relating to individual staff.

## **12 Information and training**

1.14. Information will be made available in council premises to raise awareness and to let people know how to voice any safeguarding concerns they may have.

1.15. Appropriate information will be made available to staff councillors, contractors and partners in the form of this policy and appendices.

1.16. All training carried out will be consistent with the recommendations of the Local Safeguarding Children Board and Safeguarding Adults Board.

1.17. Induction for new staff and councillors on safeguarding must be completed within 3 months of the start of their employment/placement/term of office. It will include:

- signposting this policy, procedures for reporting safeguarding concerns and contact details of safeguarding contacts.
- awareness training on safeguarding and role boundaries.

1.18. Existing staff and councillors will be required to undertake refresher awareness training on safeguarding and role boundaries every 3 years.

1.19. Requirements for more advanced training for staff who have significant contact with children young people or vulnerable adults will be identified as part of the induction and/or appraisal process, dependant on the nature of the post.

1.20. Requirements for additional training for HR Officers, Safeguarding Contacts, the Monitoring Officer, the Named Senior Officer and the Prevent Lead will be identified as part of the induction and/or appraisal process and refreshed at appropriate intervals.

### **13 External organisation licensed by, or working with for or on behalf of the council**

1.21. The council works with and through a number of external organisations such as charities, contractors, licensees, other public sector bodies, etc. Checks that relevant external organisations operate safe recruitment practices must be made at the tender/quotation stage.

1.22. Where these external organisations are likely to have significant contact with children, young people or vulnerable adults as a direct result of their work for, on behalf of or in partnership with the council, they are required to have safeguarding procedures, such as safe recruitment and selection process in place. They must be aware of this policy, must provide the council with a copy of their safeguarding procedure and must agree to share with the council any safeguarding concern within their organisation relating to relevant individuals who undertake work for or on behalf of the council.

1.23. Support for programmes which involve children, young people or vulnerable adults (funding, premises, etc.) will be subject to those organisations providing evidence of effective policy and procedures on child and vulnerable adult protection. This includes all those managing any of the council's building or with a licence to run services from any of the council's buildings.

1.24. Heads of Service and managers are responsible for ensuring that their teams are made aware of and comply with the provisions set out in 13.2. and 13.3.

1.25. Heads of Service and managers are responsible for obtaining assurances that external organisations have implemented their own safeguarding procedures once they have been alerted to a safeguarding concern under section 7. Senior Heads of Service and managers will also take appropriate steps to address any risk that may be posed by an individual in the course of their organisation's work for or on behalf of the council.

1.26. The council will undertake DBS checks in accordance with national guidelines as part of the licence application process (e.g. taxi licence applications).

#### **14 Policy review and version control**

This policy will be reviewed annually or in line with new advice from the LSCB or SAB or changes to the Pan Susses procedures.

<b>Date reviewed</b>	<b>Reviewed by</b>	<b>Approved by</b>
August 2018	Laura Lea/Pat Taylor	Tim Whelan (Head of Service Delivery)

DRAFT

## Appendix A – table of specific responsibilities in relation to safeguarding

Role			
Named Senior Officer	Safeguarding Contacts	HR Manager	Others
Maintain policy – update and ensure conformity with East Sussex LSCB and LSAB guidance.	Receive reports of safeguarding concerns and seek advice from ESCC Children’s and Adults’ Services	Manage allegations against staff <ul style="list-style-type: none"> <li>• Implement disciplinary procedure where appropriate;</li> <li>• Liaise with responsible authorities</li> <li>• Share information with appropriate others;</li> <li>• Offer appropriate welfare support to person against whom allegations have been made;</li> <li>• Make referrals to the DBS when appropriate.</li> </ul>	<b>Cabinet Member for Direct Assistance Services</b>  <b>Customer Communications and Lead</b>  Ensure Communications including social media comply with Safeguarding policies and standards and the Pan Sussex E-Safety Strategy
Oversee policy implementation and ensure awareness and understanding.  Ensure Corporate Risk	Raise concerns and submit reports to SPOA and HSCC as appropriate and ensure information is recorded and stored securely on appropriate system	Implement safe recruitment practices including <ul style="list-style-type: none"> <li>• DBS checks where applicable;</li> <li>• Information in application pack;</li> <li>• Pre-employment checks.</li> </ul>	<b>Heads of Service / Managers</b> <ul style="list-style-type: none"> <li>• Ensure departmental compliance with the policy including completion, updating and recording of risk assessments on Pentana;</li> </ul>



<p>Assessment is carried out, updated and recorded on Pentana</p>			<ul style="list-style-type: none"> <li>• Implement section 13 (external organisations).</li> <li>• Implement section 11.3 (employment agency checks)</li> <li>• Managers and Safeguarding Contacts ensure information is properly protected and shared, and use monitored.</li> </ul>
<p>Oversee management of allegations against councillors including</p> <ul style="list-style-type: none"> <li>• Implementation of appropriate procedures;</li> <li>• Liaison with responsible authorities.</li> </ul>		<p>Arrange appropriate induction and training</p>	<p><b>Assistant Director for Corporate Governance</b></p> <ul style="list-style-type: none"> <li>• Ensure appropriate induction and training is provided for councillors.</li> <li>• Ensure that safeguarding concerns and allegations relating to councillors are dealt with in accordance with the Code of Conduct of Members of the Council.</li> </ul>
<p>Ensure policy and procedures are implemented by staff</p> <p>Maintain and publicise a list of Safeguarding Contacts.</p>	<p>Maintain appropriate records of concerns, advice, decisions and actions taken.</p>	<p>Ensure staff agreements relating to IT Acceptable Use are in place covering e-safety</p> <p>Arrange appropriate induction and training for staff.</p>	<p><b>Heads or Service / Managers</b></p> <p>Ensure safeguarding issues are covered appropriately in induction, 1:1 and team meetings and staff appraisals and that mandatory training is completed.</p>

<p>Deliver policy with respect to contracts and grants</p>			<p><b>Heads of Service / Managers</b></p> <p>Ensure procurement and grant processes comply with policy and procedures</p> <p><b>Specialist Advisor - Licensing</b> Implement national guidance on DBS checks as part of the licence application process.</p>
<p>Ensure appropriate information is shared with Safeguarding Contacts and Senior Managers of Service</p> <p>Support Serious Case Reviews and Safeguarding Adult Reviews</p> <ul style="list-style-type: none"> <li>• Active co-operation;</li> <li>• Lessons learnt.</li> </ul> <p>Support and direct the Safeguarding Contacts, in the light of advice from ESCC Children's and Adults' Services</p>	<p>Share information with appropriate others.</p>		

## Appendix B – General Guidance for Staff and Managers

We can reduce likely situations for abuse of children and help protect our staff and volunteers from false accusations by making sure that everyone is aware that **it is not acceptable to:**

- Spend time alone with children away from others;
- Take children alone in a car on journeys, however short;
- Take children to their home.

In exceptional circumstances where it is **absolutely unavoidable** that these things do happen, they should **only** occur with the full knowledge and consent of the senior head or their deputy.

You should make it clear to all staff and volunteers in your organisation that they should **never:**

- Engage in rough physical games, including horseplay (apart from structured sports activities);
- Allow or engage in inappropriate touching of any form;
- Allow children to use inappropriate language unchallenged;
- Make sexually suggestive comments about, or to, a child;
- Let allegations a child makes go unchallenged or unrecorded;
- Do things of a personal nature for children or vulnerable adults.

## Appendix C – Guidance For Managers: Supervision of Children

Making arrangements for the proper supervision of children is one of the most effective ways of minimising opportunities for children to suffer harm of any kind whilst taking part in organised programmes or whilst at Council facilities.

### Planning

- Organisers **must** plan and prepare a detailed programme of activities for the children who are involved in the project, **including preparing a risk assessment prior to the event.**
- Managers must ensure that all staff and volunteers have got required appropriate DBS clearance in place.
- Organisers are responsible for the welfare and safety of the children for the whole time they are in their care.
- Young people should not be left to their own devices when undertaking a supervised programme.
- All children should be adequately supervised and engaged in suitable activities at all times.
- In circumstances when planned activities are disrupted, e.g. due to weather conditions, then organisers should have a number of alternative activities planned.

### Supervision

- Leaders in charge must be satisfied that those workers and adults who accompany group parties are fully competent to do so.
- Children must be supervised at all times.
- Children must not be left unsupervised at any venue whether it is indoors or out of doors.
- Workers should know at all times where children are and what they are doing.
- Any activity using potentially dangerous equipment should have constant adult supervision.
- Children will be safer if supervised by two or more adults.
- Dangerous behaviour by children should not be allowed.

### Adult/Child Ratios

Level of supervision must be adequate whether at the organisation's venue or on a journey/visit. Therefore, when deciding how many adults are required to supervise, manager must take into consideration a range of practical matters:

- The number of participants in the group
- The nature of the site/venue and of the activity involved
- It is important that each individual supervisor knows the responsibilities he/she is expected to bear.

It is for the Manager in charge to exercise his/her professional judgement in deciding the level of supervision taking into account the appropriate national guidance. Risk assessments should be carried out in advance of programming the activity.

**Guidelines for listening to a child, young person or vulnerable adult who claims he or she has been abused:**

- React calmly so as not to frighten the child, young person or vulnerable adult
- Tell them they are not to blame and that they were right to tell
- Take what they say seriously, recognising how difficult it was for them to confide in you
- Always reassure them but do not make promises of confidentiality. Immediately afterwards, make a full, detailed record of what has been said, heard and/or seen.

## **Appendix D – What to do if you have concerns – reporting incidents or allegations**

**All staff** must report any incidents or allegations to one of the council's **Safeguarding Contacts**, or, in their absence, to a direct line manager.

If a disclosure is made it **must be reported**. If in doubt contact one of the Safeguarding Contacts, your line manager, Human Resources or the Director of Service Delivery.

The Safeguarding Contacts will be identified to the member of staff at the start of their employment.

These include:

- Customer Contact Manager
- Customer Contact Team Leaders
- Neighbourhood First Team
- Specialist Advisor – Housing
- Manager - Sports Team
- Events Coordinator

A full list may be found on the council's intranet.

The Safeguarding Contact or manager will contact the relevant team at East Sussex County Council during working hours or the Emergency Duty Team if outside office hours.

The Safeguarding Lead and Senior Named Officer should be informed.

In an emergency, if it is out of office hours or you are unable to contact a Safeguarding Contact, report your concerns directly.

If a child, young person or vulnerable adult is in **immediate danger ring 999**.

If the person you are concerned about is **injured, call an ambulance** or contact a doctor.

When requested by East Sussex Children's Services use the Safeguarding Referral Form at Appendix F as a checklist and to record information relating to a concern about a child or young person but **do not send this other than by secure (GCSX) email**.

This form can be also be used as guidelines:

- If you observe something that gives you concern, or witness and incident that involves a child or young person

- If you are concerned about the behaviour of a member of Eastbourne Borough Council staff towards a child or young person adult
- If a child, young person or vulnerable adult discloses abuse or neglect.

Pass this report to a Safeguarding Contact, or, if they are not available, to the Named Senior Officer or another member of the Corporate Management Team.

If you are unable to answer all the questions, do not delay making a report. Do not try to gather any further information. Staff, volunteers, members and partners are **not** expected to investigate suspected incidents but **must** act promptly and effectively in communicating the issues to child and adult protection professionals.

### **Reporting Concerns about child protection**

- Concerns relating to child protection should be reported to the Single Point of Advice on 01323 46422 or by secure (GCSX) email to [0-19SPOA@eastsussex.gcsx.gov.uk](mailto:0-19SPOA@eastsussex.gcsx.gov.uk) during office hours – by the Safeguarding Contact or manager who has been notified of the incident, or, if none of these is available, by the member of staff raising the concern.
- Out of hours, in the case of urgent childcare issues which cannot wait until the following day, staff should raise their concerns directly through the Out of Hours service on 01273 335906 or 01273 335905. This service is available out of office hours, including weekends and Public Holidays.
- All allegations should be reported regardless of their nature or who receives them. If you are unsure whether the concern should be referred, you should contact the Single Point of Advice on 01323 464222.

### **Reporting suspected abuse of an adult at risk**

- Concerns relating to suspected abuse of an adult at risk should be reported to East Sussex Adult Social Care Direct on 0345 6080 191.

### **Reporting concerns under the duty to Prevent extremist behavior**

- Concerns relating to a child or young person under 18 being drawn into extremist activity, should be reported through Safeguarding Contacts to SPOA in the usual way.
- Concerns relating to a vulnerable adult being drawn into extremist activity, should be reported to East Sussex Adult Social Care Direct in the usual way.
- You may be asked to complete and submit a Channel Referral Form. This can be found at Appendix F and should be sent by secure (GCSX) email.

### **Other useful contacts**

- Action on Elder Abuse  
Phone: 080 8808 8141  
Website: [www.elderabuse.org.uk](http://www.elderabuse.org.uk);

- Healthwatch  
Phone: 0300 0683 000  
email: [enquiries@healthwatch.co.uk](mailto:enquiries@healthwatch.co.uk)  
website: [www.healthwatch.co.uk](http://www.healthwatch.co.uk)
- Public Concern at Work (for staff concerned about bad practice in the workplace)  
Phone: 020 7404 6609;  
Website: [www.pcaw.org.uk](http://www.pcaw.org.uk)
- NHS Direct  
Phone: 111
- Samaritans (centre office)  
Phone: 0208 394 8300
- Carers Direct National Helpline  
Freephone: 0300 123 1053
- Care Quality Commission  
Phone: 03000 616161
- National Domestic Violence Helpline (24-hour helpline)  
Freephone: 0808 2000 247

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## **Appendix E - Allegations against a member of staff or councillor**

### **Allegations against a member of staff or councillor**

If you are concerned about the behaviour of a member of council staff or councillor towards a child, young person or vulnerable adult you must report this.

Where an allegation is made against an employee:

- the matter will be investigated in accordance with the council's disciplinary procedure.
- an appropriate person will be appointed to investigate;
- an immediate evaluation will be carried out to determine if there needs to be a full investigation;
- the employee may be suspended in cases of a more serious nature;
- if during the investigation there are suspicions of criminal activity or intent, the case will be referred to the police and/or social services.

Where an allegation is made against a councillor:

- The matter will be referred to the council's Monitoring Officer and will be investigated in accordance with the Code of Conduct of Members of the Council;
- If during the investigation there are suspicions of criminal activity or intent, the case will be referred to the police and/or social services.

If you report your concerns, you will be treated with sensitivity and fully supported by the council.

## Appendix F – Reporting Forms



### East Sussex Statement of referral

**To make a referral to children’s services you need to contact the countywide SPOA service:  
Tel: 01323 464222 / Email: 0-19.SPOA@eastsussex.gov.uk**  
**The SPOA Worker will ask if you have discussed with your agency Safeguarding lead with reference to the East Sussex Continuum of Need prior to calling and which level of need the case sits on, the concerns should be discussed in this way first, unless a significant immediate risk of harm is identified. Referrals should be followed up in writing using this form within 24 hours**

For more information on the Continuum of Need please go to <https://czone.eastsussex.gov.uk/Continuum>

- If handwritten, please complete in BLOCK CAPITALS
- If you run out of space please attach a separate sheet

<b>To: (name of contact at East Sussex County Council)</b>	<b>Today’s date:</b>
--	----------------------

**Please attach any relevant additional information e.g. Chronology, Early Help Plan, CAF (information from attached documents **does not** have to be repeated on this form)**  
**Please tell us what documents you have attached:**

1. Child / young person you are concerned about			
Full name		Gender	
Date of Birth		Educational setting	
Address		Phone number	
NHS number			

2. All other children & young people you are aware of in the household					
Full name	Date of birth	Gender	Relationship to above	Educational setting	NHS number

2a. Ethnicity of children & young people in the household			
White	Mixed	Asian or Asian British	Black or Black British
<input type="checkbox"/> British	<input type="checkbox"/> White & Black	<input type="checkbox"/> Indian	<input type="checkbox"/> Caribbean
<input type="checkbox"/> Irish	<input type="checkbox"/> White & Black African	<input type="checkbox"/> Pakistani	<input type="checkbox"/> African
<input type="checkbox"/> Gypsy/Roma	<input type="checkbox"/> White & Asian	<input type="checkbox"/> Bangladeshi	<input type="checkbox"/> Other*
<input type="checkbox"/> Irish Traveller	<input type="checkbox"/> Other*	<input type="checkbox"/> Other*	
<input type="checkbox"/> Other*	<input type="checkbox"/> Arab	<input type="checkbox"/> Chinese	<input type="checkbox"/> Prefer not to say

**\*Other Ethnic Group:**

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**3. Adults you are aware of in the household**

Full name	Gender	Relationship	Parental responsibility? Y/N

**3a. Any other significant adults, children or young people who live elsewhere**

Full name	Gender	Relationship	Parental responsibility? Y/N

**4. Why are you worried about this child / family? What is your risk assessment for them?**

Please include a chronology if not already attached/hi-light risks ie CSE/PREVENT/PHYSICAL ABUSE

--

**5. Do you know what has already been tried to support this family and the outcome of that support?  
(include attachments as appropriate)**

--

**6. What help do you think Children's Services – Early Help or Social Care can give in this case?**

--

**7. Who in the family is aware of this referral? What do they think about this referral being made?**

--

Please note: it is possible that this SOR and its contents will be discussed within the SPOA team and also within MASH if the SOR is passed through to that service. MASH is a multi-agency team and consists of staff from Children's Social Care, Police and other key early help services, information will be shared in order to work out the best way to respond to the concerns. We use the principles of information sharing as set out within Working Together 2015.

**8. Please list any organisations or services you think are working with any members of the family**

**9. Referrer information: Please tell us about you**

Name		Role	
Service		Contact details	
Signature			

# Pan-Sussex Channel referral and assessment form

Restricted when complete (this document is only disclosed to those partners who have an information sharing agreement in place).

<b>Pan-Sussex Channel referral and assessment form</b>			
<b>Referral Details</b>			
<b>Name:</b>			
<b>Alternative name:</b>			
<b>Date of Birth:</b>		<b>Gender:</b>	
<b>Address:</b>			
<b>Nationality:</b>		<b>Ethnicity:</b>	
<b>Language (first):</b>		<b>Faith:</b>	
<b>School/college or Occupation/workplace:</b>			
<b>Family or Carer details:</b>			
<b>Referring Agency Details</b>			
<b>Referral Author and Contact Details:</b>			
<b>Agency:</b>			
<b>Date of Referral:</b>			

<b>Vulnerability Factors</b>		
<b>Factor</b>	<b>Notes</b>	<b>Y/N</b>
<b>Faith/Ideology</b>	e.g. concerning comments relating to faith or ideology, or association with extremists	
<b>Social Mobility</b>	e.g. poverty, lack of education or employment, immigration issues	
<b>Physical or mental health</b>	e.g. disability, learning difficulties, mental health support needs	
<b>Risk or harm factor</b>	e.g. threat posed by family member (Domestic Violence issues), victim of hate crime or personal attack: Perpetrator of Hate Crime.	
<b>Criminal Activity or association</b>	e.g. involved in criminal activity or associating with known criminals	

<b>Isolation or exclusion</b>	e.g. lack of social activity, isolation, absent peer groups	
<b>Other factor</b>	Any other factors Please specify: e.g Jordan is a violent young man who seems to enjoy fighting. He's also quite charismatic and intelligent and also appears to be quite manipulative.	
<b>Is the individual aware of the referral?</b>	It is not always necessary to notify the individual, but it can be beneficial if they are aware.	

### Restricted when Completed

<b>Summary reason for referral</b>
Outline main reasons for referral:
<b>Existing agency involvement</b>
<i>Outline and existing agency involvement (that you are aware of) e.g. CAF (Common Assessment framework), MAPPA (Multi Agency Public Protection Arrangements), Safeguarding:</i>
<b>Any other relevant information</b>
<p><b>Notes:</b> A Channel referral places an individual into a multi-agency assessment and support process which aims to reduce their vulnerability to extremist-related activity. Each referral is screened for suitability. Further information will be sought from partner agencies before any support mechanisms are put in place. Your referral is important and does not mean an individual is a terrorist or will become a terrorist, only that vulnerabilities have been identified which require further investigation or help. Please provide as much detail as possible.</p> <p>If you have any questions or concerns please do not hesitate to discuss with your head of safeguarding, your nominated Single Point of Contact or local <i>Prevent</i> Engagement Officer:</p> <p>Naomi Watkinson - Prevent Officer Force Counter Terrorism Intelligence Unit Sussex Police Telephone 07788 566585</p> <p>Email: <a href="mailto:naomi.watkinson@sussex.pnn.police.uk">naomi.watkinson@sussex.pnn.police.uk</a></p>

When completed please email to [channel@sussex.pnn.police.uk](mailto:channel@sussex.pnn.police.uk)

## Appendix G – Risk Assessment

The Named Senior Officer is responsible for ensuring that a corporate risk assessment covering safeguarding is carried out and recorded on Pentana.

Heads of Service are responsible for ensuring risk assessments are carried out in their service areas and recorded on Pentana.

For the purposes of this policy the type of work shown is indicative of the type of areas where protection of children and vulnerable adults should be considered. It is not intended to be comprehensive or exclusive.

Managers of work areas have responsibility for identifying “at risk” staff and other groups.

**High Risk:** Staff who enter people’s homes where Children or Vulnerable Adults may be, e.g.

- Leisure Centre & Sports Centre Staff
- Events staff
- Neighbourhood Advisors
- Contractors
- Volunteers

**Low Risk:** Staff who work out of the office but have no direct contact with Children, e.g.

- Contract inspectors
- Planning Officers / Building Control Officers

**No Risk:** Staff who are office based and have no contact with Children or Vulnerable Adults, e.g. Financial or Legal staff

When considering risk the same methodology should be applied to Council members, staff, contractors and volunteers.

## Appendix H – Information Sharing

Working Together to Safeguard Children 2015 states that:

*“Effective sharing of information between professionals and local agencies is essential for effective identification, assessment and service provision.*

*Early sharing of information is the key to providing effective early help where there are emerging problems. At the other end of the continuum, sharing information can be essential to put in place effective child protection services. Serious Case Reviews (SCRs) have shown how poor information - sharing has contributed to the deaths or serious injuries of children.*

*Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.” (Working Together 2015)*

Professionals often feel confused or concerned when they are asked to provide information to Children’s or Adult Social Care. Usually, this concern centres on the Data Protection Act and whether or not the professional has to obtain the consent of a parent before personal information can be shared.

There have been occasions when attempts to protect children from significant harm have been obstructed or delayed by a professional’s reluctance to share relevant information.

No professional should assume that someone else will pass on information which they think may be critical to keeping a child safe. If a professional has concerns about a child’s welfare and believes they are suffering or likely to suffer harm, then they should share the information with local authority children’s social care.

### **What is the legal basis for sharing information?**

Sharing information with Children’s or Adult Social Care when they are discharging their legal duty to safeguard children or vulnerable adults is enshrined in legislation, statutory guidance, and in inter-agency safeguarding procedures.

- The Children Act 1989 requires local authorities to make child protection enquiries if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, and requires other organisations to assist them with those enquiries if asked to do so.
- The Children Act 1989 places a general duty on local authorities to provide services for children in need in their area; section 27 of the act enables local authorities to request the help of other organisations to exercise this duty.
- Section 10 of the Children Act 2004 requires organisations to cooperate with the local authority to make arrangements to improve the wellbeing of children in their area.



- Section 11 of the Children Act 2004 places a duty on organisations to make arrangements to ensure their functions are discharged with regard to the need to safeguard and promote the welfare of children; this includes ensuring arrangements are in place for appropriate information sharing.
- Section 175 of the Education Act 2002 requires governing bodies of maintained schools and further education colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. Section 157 of the Education Act 2002 requires proprietors of independent schools (including academies, Free Schools and city technology colleges) and The Non-Maintained Special Schools Regulations 1999 require governing bodies of non-maintained special schools to make similar arrangements to safeguard and promote the welfare of children. Collaborative work and information sharing is necessary to fulfil these duties.
- Clause 45 of the Care Act focuses on 'supply of information'. This relates to the responsibilities of others to comply with requests for information from the Safeguarding Adults board

Staff should be aware of:

- 'Working Together to Safeguard Children' 2018, which replaces the guidance issued in 2015 (<http://www.workingtogetheronline.co.uk/>)
- The 'Care and Support Statutory Guidance' 2018 (<http://www.safecic.co.uk/>)
- Local requirements as set out in the *Sussex Safeguarding and Child Protection Procedures* (<https://sussexchildprotection.procedures.org.uk/>)
- Local requirements as set out in the *Sussex Safeguarding Adult – Policy and Procedures* (<http://sussexsafeguardingadults.procedures.org.uk/>)

The general principle is that information will only be shared with the consent of the subject of the information.

However, consent should not be sought:

- If it would place a child or adult at increased risk of harm
- If it would prejudice the prevention of detection of a serious crime
- If it would lead to unjustified delay in making enquiries about allegations of significant harm to a child
- If required by a statutory duty or a court order to share information

Consent is not necessary in cases where Children's Social Care are making child protection enquiries under section 47 of the Children Act 1989 – information needs to be shared with them; staff should ensure they record that the information has been shared.

## Seven Golden Rules

- i. Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.
- ii. Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- iii. Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
- iv. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgment on the facts of the case. See also [Further Information to Inform Decision Making Procedure](#) regarding the need for consent.
- v. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and wellbeing of the person and others who may be affected by their actions.
- vi. Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- vii. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

(Extract from “Information sharing: Guidance for Practitioners and Managers”)

**Further information can be found at:**

[www.eastsussexlscb.org.uk](http://www.eastsussexlscb.org.uk) or <http://sussexsafeguardingadults.procedures.org.uk/>

## **Appendix I**

### **Multi-agency Public Protection Arrangements (MAPPA)**

The purpose of the MAPPA framework is to reduce the risks posed by sexual and violent offenders in order to protect the public, including previous victims, from serious harm.

The responsible authorities in respect of MAPPA are the police, prison and probation services. They have a duty to ensure that MAPPA is established in each of their geographic areas in order to ensure the risk assessment and management of all identified MAPPA offenders (primarily violent offenders on licence or mental health orders and all registered sex offenders).

Police, prison and probation services have a clear statutory duty to share information for MAPPA purposes. Other organisations have a duty to cooperate with the responsible authority, including housing providers. This information includes sensitive personal data where a need-to-know approach applies.

The council sends a representative to MAPPA meetings and contributes to minimising risk in the community through its participation. The council's Senior Specialist Advisor – Housing is the council's lead representative for MAPPA.

### **Multi-agency Risk Assessment Committee (MARAC)**

As a housing services provider the council makes referrals to and participates in casework at MARAC meetings when an incident of domestic violence, stalking or 'honour'-based violence triggers a risk concern. The MARAC data sharing protocol adopts a need-to-know approach. This requires the council to provide a Single Point of Contact (SPOC) to manage the security and appropriate dissemination of information and to co-ordinate council officer case involvement.

The council's Senior Specialist Advisor – Housing is the council's Single Point of Contact for MARAC and is responsible for ensuring attendance at MARAC meetings.

Where domestic violence is being experienced by an adult at risk, safeguarding procedures provide the overarching process for ensuring the coordination of multi-agency involvement. The MARAC process is used in addition to ensure that issues relating to domestic abuse are covered effectively.

The council's safeguarding contacts, managers and team leaders are responsible for ensuring legislative compliance, best practice, up-to-date contact details and effective liaison with partners at an operational level.

## Appendix J – e-Safety policy

This policy has been developed to support the council’s commitment to safeguarding and promoting the welfare of children and young people in a digital age.

The council recognises that being safe on line is not just a matter of technology and a comprehensive approach to e-safety is necessary.

### Background

“All agencies providing services to children have a duty to understand e-safety issues, recognising their role in helping children to remain safe online while also supporting adults who care for children.”

*Becta 2008, Safeguarding Children in a Digital World*

E-safety is the process of limiting risks to children and young people when using Information and Communications Technology (ICT). E-safety is primarily a safeguarding issue not a technological issue, which relates to the use of all ICT-fixed or mobile; current, emerging and future ICT.

ICT is used daily as a tool to improve teaching, learning, communication and working practices to the benefit of our children and young people and those that work to support them. The use of ICT is recognised as being of significant benefit to all members of our community, in personal, social, professional and educational contexts. However alongside these benefits, there are potential risks that we have a statutory duty of care to manage, to ensure they do not become actual dangers to children and young people in our care or for employees.

### E-Safety Risks & Issues

Some E-safety risks and issues are illustrated below

	<b>Commercial</b>	<b>Aggressive</b>	<b>Sexual</b>	<b>Values</b>
<b>Content</b> (child as recipient)	Adverts Spam Sponsorship Personal info	Violent/hateful content	Pornographic or unwelcome sexual content	Bias Racist Misleading info or advice
<b>Contact</b> (child as participant)	Tracking Harvesting personal info	Being bullied, harassed or stalked	Meeting strangers; being groomed	Self-harm Unwelcome persuasions
<b>Conduct</b> (child as actor)	Illegal downloading Hacking Gambling Financial scams Terrorism	Bullying or harassing another	Creating and uploading inappropriate material	Providing misleading info or advice.

*DSCF, 2008 - Safer Children in a Digital World: The report of the Byron Review*

## **e-Safety lead officer**

The Head of ICT is the council's e-Safety lead officer, responsible for ensuring that this policy is disseminated, implemented and reviewed.

The e-Safety lead officer is responsible for:

- Ensuring that appropriate Acceptable Use of ICT policies are in place and included in the suite of policies that all staff, volunteers and council Members sign to confirm their compliance
- Ensuring that procedures are in place for reporting an e-safety incident, e.g. clear lines of reporting incidents of misuse of ICT by users and safeguarding incidents when a user is at risk or has come to actual harm through the use of ICT.

## **Procedures**

All staff and volunteers are responsible for reporting any incidents of misuse of ICT by users that they become aware of to their line manager or Head of Service.

All council Members are responsible for reporting any incidents of misuse of ICT that they become aware of to the council's Monitoring Officer.

All staff and volunteers are responsible for reporting any safeguarding incidents when a user is at risk or has come to actual harm through the use of ICT through the council's agreed Safeguarding Procedures.

## **Infrastructure & Technology**

The council will:

- Identify all routes to access the Internet in council run buildings and carry out risk assessments with regards to e-Safety;
- consider the use of additional software and/or settings for technologies to limit the e-safety risk;
- use up to date security software / solutions for technologies;
- where Internet access is available, ensure that all web content filtering products or services used, as a minimum:
  - subscribe to the Internet Watch Foundation Child Abuse Images and Content (CAIC) URL List;
  - block 100% of illegal material identified by the Internet Watch Foundation (IWF);
  - are capable of blocking 90% of inappropriate content in each of the following categories:
    - Pornographic, adult, tasteless or offensive material;

- Violence (including weapons and bombs, radicalisation);
- Racist, extremist and hate material;
- Illegal drug taking and promotion;
- Criminal skills and software piracy.

### **Training**

Where Council staff, volunteers and members have contact with children and young people the Council aims to raise awareness of e-safety through induction and training programmes.

All staff, volunteers and Council Members are made aware of the Council's policies and procedures governing Safeguarding, including this Policy on e-safety.

The Council also aims to promote awareness of e-safety and to encourage staff and partner organisations to attend training covering issues of e-safety.

### **Policy review**

This policy will be reviewed annually or in response to new technologies or e-safety incidents if sooner.

## **Appendix K: Private Fostering**

There is a duty on parents and private foster carers who enter into a private fostering arrangement to notify Children's Services of this.

Private Fostering is when a child under the age of 16 (or under 18 if the child is disabled) is cared for by someone who is not their parent or a 'close relative' through a private arrangement made between a parent and a carer for 28 days or more.

A 'close relative' can include step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half-bloods or by marriage).

If any private fostering arrangements come to our attention the Council will check with SPOA to ensure they have been made aware of the situation.

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## Appendix L – Domestic Abuse

### Definition

Domestic abuse can encompass, but is not limited to, the following types of abuse:

- Psychological;
- Physical;
- Sexual;
- Financial;
- Emotional.

Whilst women are more likely to experience the most serious forms of domestic violence and abuse, it is important to acknowledge that there are female perpetrators and male victims and that domestic violence and abuse also occurs within same sex relationships.

The definition of 'harm' in Section 31A of the Children Act 1989 (introduced by the Adoption and Children Act 2002) recognises that a child may suffer harm through witnessing domestic violence and abuse. Research evidence also indicates a strong link between domestic violence and abuse and all types of abuse and neglect.

Officers dealing with cases where domestic abuse has been reported, should ensure their response safeguards both the child and the non-abusing parent. Local arrangements set out how this assessment is undertaken including use of the [DASH Risk Assessment Tool](#) and referral to the Multi-Agency Risk Assessment Conference (MARAC) process. The MARAC is a process involving the participation of all the key statutory and voluntary agencies who might be involved in supporting victims of domestic violence and abuse. The objective is to share information and establish a simple multi-agency action plan to support the victim and make links with other public protection procedures, particularly safeguarding children, vulnerable adults and the management of offenders.

Any staff member who becomes aware of domestic violence and abuse should safeguard the safety of the victim and:

- ascertain whether there are any children living in the household or if the victim is pregnant and, if so, refer the case to Children's Services
- make a preliminary determination of the degree of exposure of the children to the incidents of violence and its consequent impact;
- where possible provide the victim with information on local support services and refuge details, taking into account any ethnic or cultural issues (available from local domestic violence forums).

Staff need also to be aware of **The Domestic Violence Disclosure Scheme** (DVDS) (also known as 'Clare's Law'). This gives members of the public a formal mechanism to make enquires about an individual who they are in a relationship with, or who is in a relationship with someone they know, where there is a concern that



the individual may be violent towards their partner. This scheme adds a further dimension to the information sharing about children where there are concerns that domestic violence and abuse is impacting on the care and welfare of the children in the family.

Members of the public can make an application for a disclosure, known as the 'right to ask'. Anybody can make an enquiry, but information will only be given to someone at risk or a person in a position to safeguard the victim. The scheme is for anyone in an intimate relationship regardless of gender. Partner agencies, such as local authorities, can also request disclosure is made of an offender's past history where it is believed someone is at risk of harm. This is known as 'right to know'.

If a potentially violent individual is identified as having convictions for violent offences, or information is held about their behaviour which reasonably leads the police and other agencies to believe they pose a risk of harm to their partner, the police will consider disclosing the information. A disclosure can be made if it is legal, proportionate and necessary to do so.

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