

Agenda

Policy and Resources Committee Meeting

Date: Wednesday, 26 March 2025

Time 7.00 pm

Venue: Committee Room, Swale House, East Street, Sittingbourne, Kent, ME10 3HT

Membership:

Councillors Mike Baldock (Vice-Chair), Monique Bonney, Lloyd Bowen, Derek Carnell, Charles Gibson, Tim Gibson (Chair), Angela Harrison, James Hunt, Elliott Jayes, Mark Last, Rich Lehmann, Peter Marchington, Julien Speed, Ashley Wise and Dolley Wooster.

Quorum = 5

Pages

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2. Apologies for Absence

3. Minutes

To approve the [Minutes](#) of the Meeting held on 5 February 2025 (Minute Nos. 613 – 628) as a correct record.

4. Declarations of Interest

Councillors should not act or take decisions in order to gain financial or other material benefits for themselves, their families or friends.

The Chair will ask Members if they have any disclosable pecuniary interests (DPIs) or disclosable non-pecuniary interests (DNPIs) to declare in respect of items on the agenda. Members with a DPI in an item must leave the room for that item and may not participate in the debate or vote.

Aside from disclosable interests, where a fair-minded and informed observer would think there was a real possibility that a Member might be biased or predetermined on an item, the Member should declare this and leave the room while that item is considered.

Members who are in any doubt about interests, bias or predetermination should contact the monitoring officer for advice prior to the meeting.

5.	Annual update on Corporate Plan actions	5 - 28
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9.	Changes to the committee structure - Report to-follow	
10.	Constitution Update - report to-follow	
11.	Overnight Parking on the Isle of Sheppey - Report to-follow	
12.	Empowering You (Community Development Strategy) sign off	65 - 94
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14. Recommendations from the Swale Joint Transportation Board meeting held on 3 March 2025 - to-follow
15. Recommendations from the Planning and Transportation Policy Working Group held on 13 March 2025 - to-follow
16. Forward Decisions Plan 143 -
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Issued on Tuesday, 18 March 2025

The reports included in Part I of this agenda can be made available in alternative formats. For further information about this service, or to arrange for special facilities to be provided at the meeting, please contact democraticservices@swale.gov.uk. . To find out more about the work of this meeting, please visit www.swale.gov.uk

**Chief Executive, Swale Borough Council,
Swale House, East Street, Sittingbourne, Kent, ME10 3HT**

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Policy & Resources Committee Meeting	
Meeting Date	26 March 2025
Report Title	Corporate Plan 2023-2027 update report
EMT Lead	Larissa Reed – Chief Executive
Head of Service	Philip Sutcliffe – Communications & Policy Manager
Lead Officer	Janet Dart – Policy & Engagement Officer
Classification	Open
Recommendations	Members of the Policy & Resources Committee are invited to note and discuss the Corporate Plan 2023-2027 update at Appendix I.

1 Purpose of Report and Executive Summary

- 1.1 The report at Appendix I provides an update on the progress of the objectives and actions in the Corporate Plan 2023-2027.
- 1.2 The update shows that good progress has been made on most of the actions. Out of 59 actions, 43 are rated as green, of those 6 are completed and 37 are on track for completion. Thirteen are rated as amber (changed and/or timeline revised, but on track for delivery), 2 are rated red (on hold, significantly behind schedule with a risk of non-delivery or not started) and one is rated as red/amber.

2 Background

- 2.1 Following the May 2023 borough election, the administration developed a Corporate Plan which set out their vision and ambition for the borough for the period 2023-2027. The Corporate Plan was adopted by Council on 3 April 2024. This is a living document setting out the vision of the council and the strategic, corporate priorities.
- 2.2 It is good practice to review the Corporate Plan each year to monitor the progress on actions, noting which items are completed, on target for completion or are at risk on non-completion.
- 2.3 The Council's Corporate Plan establishes the political and managerial priorities on which the organisation will focus over a medium-term period. Without attempting to cover in any detail all of the objectives to be pursued by every department, it sets the tone for future resource allocation, establishing which activities and objectives are priorities.
- 2.4 In an era of constrained and diminishing resources, it is important to have a Plan that is linked to the Medium-Term Financial Plan (MTFP) which should inform the key decisions of the Council.

- 2.5 The Corporate Plan is also linked to the Annual Delivery Plan which is a 3-year service plan prioritising and setting the work programmes for each service. It also sets out statutory duties, areas for service improvement, key projects and procurements.
- 2.6 The plan is central to the strategic framework which links to departments' operational service plans and to individual officers' objectives. It establishes clear priorities while also providing a steer for all teams to link their work to the overall ambitions of the council.

3 Proposals

- 3.1 Members of the Policy & Resources Committee are invited to note and discuss the Corporate Plan 2023-2027 update at Appendix I.

4 Alternative Options Considered and Rejected

- 4.1 As this is largely a report for information, there are no alternative options proposed.

5 Consultation Undertaken or Proposed

- 5.1 The Senior Management Team were consulted to obtain updates on each of the actions in the Corporate Plan 2023-2027.

6 Implications

Issue	Implications
Corporate Plan	The Corporate Plan 2023-2027 was adopted by Council on 3 April 2024. It is good practice to review the Corporate Plan each year to monitor the progress on actions, noting which items are completed, on target for completion or are at risk on non-completion.
Financial, Resource and Property	By carrying out an annual update of the Corporate Plan, any financial implications arising from identified delivery problems can be addressed at an early stage. The Corporate Plan complements the MTFP, in that it sets out in broad terms what the council aims to achieve given the resources established by the MTFP. It is anticipated that the activities required by the plan will generally be funded within the resourcing framework established in the MTFP.
Legal, Statutory and Procurement	The legal status of the Corporate Plan as a component of the statutory policy framework originates from the Local Government Act 2000 and regulations subsequently made under it. No specific procurement implications have been identified at this stage.

Crime and Disorder	The Plan at Appendix II includes some specific points of relevance to crime and disorder, particularly under priority 1 – Community.
Environment and Climate/Ecological Emergency	The Plan at Appendix II includes some specific points of relevance to the environment and to the climate and ecological emergencies, particularly under priority 3 - Environment.
Health and Wellbeing	The Plan at Appendix II includes some specific points of relevance to health and wellbeing, particularly under priority 4 – Health & Housing.
Safeguarding of Children, Young People and Vulnerable Adults	The Plan at Appendix II includes some specific points of relevance to safeguarding of children, young people and vulnerable adults, particularly under priority 1 – Community and priority 4 – Health & Housing.
Risk Management and Health and Safety	No specific implications have been identified at this stage.
Equality and Diversity	The Public Sector Equality Duty requires decision-makers to have due regard to the need to eliminate unlawful discrimination and advance equality of opportunity right throughout the decision-making process. An equality impact assessment was carried out when the Corporate Plan was developed. The Corporate Plan is in general at too high a level of abstraction for the aims of the Equality Duty to be relevant in any concrete way, although they are likely to be much more relevant to many of the pieces of work which will flow from it, which will all need to be subject to individual impact assessments. The impact of the Plan itself on the aims of the Equality Duty, without reference to these more detailed pieces of work, is considered to be low, and nothing requiring the mitigation of adverse impacts has been identified. It is believed that the Plan involves no unlawful discrimination.
Privacy and Data Protection	No specific implications have been identified at this stage.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

Appendix I – Corporate Plan 2023-2027 update report

Appendix II – [Corporate Plan 2023-2027](#)

8 Background Papers

None.

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Corporate Plan update on actions – March 2025

RAG rating definitions:

Action on hold, significantly behind schedule with a risk of non-delivery or not started, or does not have funding.
Action changed and/or timeline revised, but on track for delivery. Further or additional funding may be needed which could cause some delay in delivery.
Action on track or completed.

Priority 1: Community - To enable our residents to live, work and enjoy their leisure time safely in our borough and to support community resilience.

Priority number	Corporate Plan actions	Actions update	RAG rating
1.1	Provide the evidence base for the Local Plan to ensure our built and outdoor sport and health facilities meet the demands of the current and future populations.	Built Facilities Strategy has been commissioned, developed and approved by the Community and Leisure Committee and Sport England. It is now being used by planners to justify developer contributions. The Playing Pitch Strategy is in final drafting stages and awaiting sign off from national governing bodies of sport and Sport England.	Complete
1.2	Review the Leisure centre service in order to deliver a range of options for residents to improve their health and wellbeing.	Leisure specialist consultants appointed. Cross party Member working group has met regularly. Community and Leisure Committee approved in January 2025 to outsource the contract for 10+5 years. Tender being prepared.	On track
1.3	Inspect and maintain the playgrounds across the borough and seek external contributions to enhance them wherever possible.	Playground development programme approved by Community and Leisure committee. 2024/25 and 2025/26 playground improvements currently out to tender.	On track

		A review of all 78 playgrounds will be undertaken in 2025 to inform future savings.	
1.4	Complete the Parking Policy review and implement the principles to ensure traffic flow across the borough.	Project completed. Policy approved by Members and uploaded to website. Principles being used for ongoing decisions. Civil Enforcement Contract and Cashless Parking option contract approved for extension.	Complete
1.5	Work in partnership with the local towns and parishes and voluntary sector on our community assets – e.g. playgrounds, sports pitches and pavilions, community halls.	Corporate process for asset transfers has been reviewed. Disposal and Asset Transfer strategies approved by committee. Expression of interest form created for town and parishes to complete and updated them via Parish Liaison Forum. Have been working with interested community groups such as New Road Football Club around future asset transfers. Committed funding from developer contributions to a project to install a new artificial playing pitch in Faversham supporting local school and community sports club.	On track
1.6	To support local groups and organisations in Swale through the delivery of the member grants programme and review the funding mechanism of a community lottery scheme.	Members grant scheme operated and closes at end of February. Community lottery application and licence applied for, website developed, and good causes information session arranged. Currently awaiting operating licence approval before final launch.	On track

1.7	Enable and empower the existing voluntary and community sector in Swale to develop, strengthen, grow, and improve sustainability for the future.	Extensive work undertaken with the Swale Voluntary Alliance and programme of work delivered, outcome report has been provided. Currently considering next steps to make the work sustainable in the future.	On track
1.8	To consult with our residents on ways of devolving power and giving communities a greater say in what happens in their locale potentially through the establishment of new Parish, Town and Community Councils if there is community support to do it.	Following the publication of the English Devolution White Paper in December 2024, developments around Local Government Reorganisation are being monitored as well as the need for all areas to have representation under any new unitary structure.	On hold pending further information
1.9	To ensure active and effective engagement mechanisms are in place so that all residents and communities have the opportunity to engage with the Council.	The Communications Strategy 2024-2027 was developed with members and adopted at Policy & Resources Committee on 16 October 2024. This document sets out the priorities and mechanisms for communicating and engaging with residents. Area Committees continue to take place 4 times a year and are proven to be an important engagement mechanism.	On track
1.10	To support the voluntary and community sector to co-ordinate an effective response to the cost-of-living crisis, including effective distribution of the Household Support Fund.	Cost of Living partnership group continues to meet and deliver a co-ordinated response for residents. The Household Support Fund has delivered direct support through VCSE organisations.	On track
1.11	To work as part of the Community Safety Partnership to delivery priorities to address domestic abuse, crime, and disorder, ASB and support vulnerable people.	The Community Safety Partnership has delivered against the priorities set out in the 2024/25 CSP plan. The strategic assessment has been prepared to review priorities for next year's plan. Delivery of a range of initiatives and use of the PCC grant have been achieved.	Complete

1.12	To deliver the Safer Streets Programme in Sittingbourne and Sheerness town centres.	The Safer Streets programme has been delivered with successful outcomes in Sittingbourne and Sheerness Town Centres. This has included a wide range of initiatives including increased CCTV, Street Marshalls, Youth Provision, By-stander training and environmental works.	Complete
1.13	To deliver an effective public space CCTV service and town centre radio scheme, and to grow wider service delivery by the control centre.	The control centre continues to operate a high-quality service and has seen expansion through external contract with other councils. The town centre radio scheme continues to operate.	On track
1.14	To engage with schools to inform young people about democracy and the work of the council.	Project options provided to local schools but limited to no engagement. Toolkits sent to all secondary schools for national democracy week in November.	Not progressed

Priority 2: Economy - Working with our businesses and community organisations to work towards a sustainable economy which delivers for local people

Priority number	Corporate Plan actions	Actions update	RAG rating
2.1	Use the Levelling-Up Fund as a catalyst for further regeneration on the Isle of Sheppey.	<p>The three Sheerness Revival projects continue to schedule and budget. All planning permissions have been received and all construction contracts awarded. February 2025 saw the groundbreaking event at Sheppey College, with similar events due at Masters House and Beachfields in mid-late Spring.</p> <p>Economy and Property Committee agreed in January 2025 not to dispose of the Old Library in Trinity Road, pending an exploration of external investment opportunities.</p>	On track
2.2	Use the Sittingbourne Supplementary Planning Document as a model framework to support town centre regeneration.	<p>Outside of the Levelling Up Fund, town centre regeneration has been delivered principally via UKSPF in 2024/25. This has seen a restoration and interpretation project delivered at Periwinkle Mill, a town centre wayfinding initiative in Faversham and investment in Trinity Gardens, Sheerness.</p> <p>The UKSPF Town Action Grants scheme awarded over 30 separate grants to businesses and organisations in Faversham, Sittingbourne, Milton Regis, Sheerness and Queenborough.</p>	On track

2.3	Implement the Property Asset Strategy to support best use of our assets and look to increase our income.	<p>Following a period of public consultation, Economy and Property Committee approved the refreshed Disposals and Community Assets Transfer Policies in January 2025. These support the Property Asset Strategy, approved by Committee the previous year.</p> <p>The internal Property Review Group has been established to aid implementation of the Property Asset Strategy.</p>	On track
2.4	Deliver economic development through the UK Shared Prosperity Fund (UKSPF) and the Rural England Prosperity Fund (REPF) (currently programmed to March 2025).	<p>Both programmes are on track to achieve full spend by 31 March 2025, and we are pleased to have been given a further allocation of £554,150 (UKSPF) for 2025/26.</p> <p>Sample highlights of the current programme have included:</p> <ul style="list-style-type: none"> • Investment in the town centre radio scheme in Sheerness, Faversham, Sittingbourne and Leysdown • Grant schemes for <ul style="list-style-type: none"> ➤ town centre actions ➤ carbon reduction ➤ community infrastructure (with a focus on digital access, community buildings and active travel) ➤ rural businesses (with a particular focus on the visitor economy) • Support for a Visit Swale photo / video bank • Town centre capital investment – Faversham wayfinding scheme, Periwinkle Mill and improvements to Trinity Gardens, Sheerness 	On track

2.5	Develop an Economic Development Strategy, building on the successes of the Economic Improvement Plan.	<p>Work on the Economic Development Strategy has been paused pending an understanding of the role of national and regional government in delivering economic development, and in particular the future funding landscape (eg the introduction of central government funded schemes / devolved funding / the future of regional economic partnerships such as KMEP).</p> <p>The UKSPF and REPF funding guidance / indicators have provided suitable frameworks for interim investment.</p>	On hold
2.6	Progress a Local Plan with local needs and capacity at its heart.	<p>There has been significant work undertaken in 2024/25 to develop Swale's next Local Plan.</p> <p>This has included an 'Exceptional Circumstances' research piece to help understand the robustness and suitability of the government-imposed housing target for the borough.</p> <p>Other work has included:</p> <ul style="list-style-type: none"> • the adoption by Full Council of the Local Development Scheme; • the progression of Vision, Objectives and Growth Options proposals (recommended by Policy and Resources Committee to Full Council, but subsequently deferred to allow further evidence to be gathered); • Approval by Full Council of the starting point for the Local Plan housing target 	On track

		<ul style="list-style-type: none"> • Approval by Full Council of the draft employment site allocations for consultation • Approval by Policy and Resources Committee of the updated Statement of Community Involvement for consultation <p>Other supportive work has included the adoption of the Faversham Neighbourhood Plan, the adoption of the Enforcement Strategy, agreeing the approvals process for the Local Nature Recovery Strategy and the approval of the Local Heritage List.</p>	
2.7	Support skills development through advocacy and partnership working.	<p>The delivery of the Sheppey College extension using Levelling Up Fund investment continues to schedule and budget. This will provide junior, further and adult education across a range of subject areas.</p> <p>We have awarded £250,000 UKSPF investment to a consortium of EKC Group, Job Centre Plus and local VCS organisations focusing on support programmes for individuals to access employment.</p> <p>We have used UKSPF to support those Not in Employment, Education or Training (NEETs) and to provide adult learning space (for EKC Group) in Swale House.</p> <p>Separately, we have responded to the KCC Education Commissioning Plan 2025-2029 and supported EKC Group's Strategic Plan consultation event.</p>	On track

2.8	Develop the borough's second Heritage Action Plan that reflects in-house and partnership capacity, to support and promote our outstanding assets.	<p>Swale's first Local Heritage List was approved by Policy and Resources Committee in November 2024, detailing over 150 heritage assets.</p> <p>Conservation Area reviews have been completed in 2024-25 for Sheerness Marine Town, Sheerness Mile Town, Milton Regis, Faversham Preston Next and Faversham Town.</p> <p>An updated Cellar Hill and Greenstreet Conservation Area Appraisal was considered by Policy and Resources Committee in November 2024 and approved pending consultation on potential boundary additions.</p> <p>Scoping work has been undertaken on the introduction of an Area of Special Advertisement Control.</p> <p>Work is underway to designate a new Conservation Area for Bexon (Bredgar) and to review the Conservation Areas of Graveney Church, Graveney Bridge and Goodnestone.</p> <p>Work to agree priorities for second Heritage Action Plan will commence later in the Corporate Plan period, once the first plan is substantially complete.</p>	On track
2.9	Support modal shift and partnership-based solutions to key issues countering sustainability and congestion.	We continue to advocate for modal shift investment and prioritisation for rail freight, including in consultation responses to KCC's Local Transport Plan and in submissions to KMED's call for pipeline	On track

		<p>projects for investment. This involves regular liaison with relevant partners.</p> <p>We continue to work with Network Rail to promote investment opportunities for rail freight and for opportunities to combat congestion in central Sittingbourne</p>	
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Priority 3: Environment - To provide a cleaner, healthier, more sustainable and enjoyable environment, and to prepare our borough for the challenges ahead

Priority number	Corporate Plan actions	Actions update	RAG rating
3.1	Refresh the Climate and Ecological Emergency Action Plan and continue to be a leader in our work towards net zero.	Carbon footprint of the Council has been re-calculated. Steady progress being made against our emissions. New Climate and Ecological Emergency Action Plan has been drafted and goes for approval at committee in March 2025.	On-track
3.2	Look at the feasibility of solar and renewable energy solutions for our estate, including council car parks.	Initial feasibility project for Council buildings undertaken. This led to approval being granted to tender for solar panel installation. Currently out to tender and installation will proceed mid-2025.	On-track
3.3	Create an air quality policy that formalises what we can do to improve air quality for the benefit of our residents.	The Air Quality policy is now complete with updates made in 2024. Changes will be included in the Regulation 18 local plan consultation reflecting the recent updates to NPPF.	On-track
3.4	Form partnerships with key stakeholders to ensure we champion active travel opportunities.	New Active Travel Coordinator appointed. Key workstreams include collating the various plans into one Swale Local Cycling and Walking Infrastructure Plan. Public consultation to follow. The Plan requires a range of key stakeholders to work together to deliver new routes. Planning process encourages new active travel opportunities through the design and application process of new developments.	On-track

3.5	Review the grounds maintenance service to ensure we maximise biodiversity gains, particularly with grass cutting, whilst continuing to provide places for residents to enjoy their leisure time.	Review was delayed whilst other options were looked at. Continue to look at reducing grass cutting regimes. A number of sites have had their management plan adapted to allow for greater biodiversity. Our country parks continue to develop and improve.	On track
3.6	Ensure key policy documents such as the Local Plan and Open Spaces Strategy lever in improvements in the quantity and quality of open space to meet the needs of a growing population.	<p>The existing Open Spaces and Play Strategy is used by planners to lever in developer contributions for existing open spaces or generating new ones.</p> <p>The strategy is being reviewed which includes a full reanalysis of the supply and demand for open spaces. The new strategy will be used to provide evidence for the new local plan period.</p>	Delayed
3.7	Work with our partners and contractor to successfully deliver the new waste collection contract and undertake initiatives to deliver improved recycling participation.	<p>New service roll-out throughout 2024/25. Following serious disruption, various adjustments to rounds and additional rounds added in. 3 - 4 re-routes to ensure service is as effective and efficient as possible. IT systems and uploads updated regularly.</p> <p>Review of litter bins ongoing through 2024/25. QR code project to be rolled out and further review of street cleansing required.</p>	On track
3.8	Promote the circular economy by raising awareness of how the materials residents put in their bins can be used for the benefit of the environment.	Communications/education campaigns have not been possible during the disruption period. Plans for projects underway to be delivered in 2025. Particular focus to be on contamination as the	Delayed

		<p>Borough is losing lots of recycling tonnages through misuse.</p> <p>Residents to be informed of the government legislation changes and what this means for collections.</p>	
3.9	Build on the benefits of an improved street cleansing service and work with residents to ensure they can take pride in their local community.	<p>Additional crew mobilised for 6-month period to undertake major deep cleanses in worst affected areas.</p> <p>Improvements still needed for day-to-day street cleansing service and we are working with the contractor to mobilise these.</p>	On track
3.10	Make best use of our resources alongside other enforcement agencies to investigate the most disruptive environmental crimes across the borough, in order to deliver the best environmental outcomes for residents.	The Environmental Enforcement Team has investigated a large range of issues around the Borough. Enforcement is always proportionate and the most serious have led to successful prosecutions.	On track
3.11	Lobby for the best possible standards in marine and coastal environments, protecting our habitats and reducing the impacts of pollution.	Regular engagement with Southern Water and the Environment Agency. We pay close attention to monitoring of sea pollution and continue to push for improvements. Water quality has enabled the Council to apply for Blue Flags and Quality Seaside awards.	On track

Priority 4: Health & Housing - To aspire to be a borough where everyone has access to a decent home and improved health and wellbeing

Priority number	Corporate Plan actions	Actions update	RAG rating	
4.1	Work with Breaking Barriers Innovation playbook programme, to develop a long-term programme to tackle health inequalities on the Isle of Sheppey.	Intervention designed for Sheppey work readiness pilot programme, delayed roll out due to changes with secondary school system on the Island. Further funding required to deliver further work. Currently linking into the Kent Marmot Coastal Programme to establish if pilot can be funded.	Delayed	
4.2	Actively play our role in the Health and Care Partnership to address health inequalities in the borough.	SBC has continued and active engagement in the Swale Health and Care Partnership and working on a range of initiative and delivery strands.	On track	
4.3	Ensure we address health inequalities in all our policies ensuring a blueprint for a healthy borough.	Health implications are considered as part of the decision-making process of all policies.	On track	
4.4	Deliver the Housing, Homelessness and Rough Sleeping Strategy 2023 -2027, to meet and build on our statutory obligations to tackle homelessness and improve the standards of homes.	Good progress has been made against the delivery priorities of the Housing, Homelessness and Rough Sleeping Strategy 2023-27. Annual report is provided to Housing and Health Committee.	On track	
4.5	Purchase accommodation to use as temporary accommodation to enable us to control costs and provide improved quality and more local provision.	Temporary Accommodation purchase programme Phase 1 is near completion. Evaluation being prepared for Housing and Health Committee.	On track	
4.6	Prepare for the introduction of the Renters Reform Bill 2023 and ensure we implement the requirements when it receives royal ascent.	The Renters Reform Bill has been re-drafted as The Renters Rights Bill, it is currently at the House of Lords stage. The team are preparing an implementation stage and indication that we will receive new burdens funding.	On track	

4.7	Work in partnership to maximise the number and range of affordable homes in the borough.	Work continues with registered providers to engage them in providing land led and S.106 schemes in Swale. Despite excellent delivery over the past few years, there are challenges to viability and capacity and despite a strong s.106 pipeline RPs are not able to make the schemes work.	Ongoing
4.8	Ensure we meet our safeguarding obligations to keep children and vulnerable adults safe.	Safeguarding processes well established in the Council. External audit assurance has taken place with both the adult and children's boards.	Complete
4.9	Achieve Domestic Abuse Housing Accreditation, demonstrating our commitment to identifying abuse, preventing it and provide help to those affected.	Work has been completed for the application for the DAHA process, currently waiting for assessment process to be completed.	On track

Priority 5 - Running the Council - Working within our resources to proactively engage with communities and outside bodies to deliver in a transparent and efficient way

Priority	Theme	Corporate Plan actions	Actions update	RAG rating
5.1	Finance	Maintain fiscally sound and stable position.	Balanced budget proposed to full council for 18 February 2025. However continued reliance on reserves is not sustainable and a robust savings plan needs to be agreed to ensure the council can continue to avoid a s114 notice.	At risk
		Maximising opportunities for external funding and income streams.	Teams are working to maximise grant opportunities and fees and charges set to maximise our income streams.	Ongoing
		Work towards maximising the rates of income on all commercial council properties.	The property team are reviewing where possible and issuing leases to maximise the council's position.	Ongoing
		Maximising opportunities for external grant funding to deliver the Council's corporate objectives.	Grant funding is sought to deliver council schemes and maximised to support services where the criteria allows.	Ongoing
		Managing finances and having a sound culture of performance management robustly to ensure Value for Money.	Internal and external audit opinions have reported that we continue to deliver a sound culture of financial and performance management have a strong governance position and are delivering value for money services.	Ongoing

		Ensuring value for money is embedded in culture, service quality and social values.	Internal and external audit opinions have reported that we continue to deliver a sound culture of financial and performance management have a strong governance position and are delivering value for money services.	Ongoing
		Investing in projects which deliver financial returns and/or contribute to our wider objectives around Net Zero.	Projects are assessed on their financial viability, member decisions and where possible we aim to contribute to the council's net zero objective.	Ongoing
5.2	Resources/ staff	Seek to make best use of assets and staff resources.	Ongoing process of review and assessment of staff and assets required to deliver our services. Workforce strategy approved by Policy & Resources Committee on 5 February 2025.	Ongoing
5.3	Partnership working	Effective partnership working. Reviewing contract and partnership arrangements to ensure the most appropriate and efficient means of delivering services to our diverse communities and customers.	Service contracts and delivery methods under constant review when procurement dictates or changes arise to allow a seek alternative approaches to efficient service arrangements.	Ongoing
5.4	Customer Services	Reviewing our customer service options to enable better outcomes for customers.	Customer Access Strategy being developed. Initial data analysis and some stakeholder workshops undertaken.	On track
5.5	Equality, Diversity and Inclusion	Ensuring inclusivity and equality for all residents. Actively promoting fairness, equality and diversity.	The Corporate Equality Strategy 2024-2028 was developed with Members and adopted at Policy & Resources Committee in July 2024. The equality objectives progress will be reported to Committee in 2026.	Ongoing

5.6	Communication with residents	Improving communication with residents via all channels.	The Communications Strategy 2024-2027 was developed with members and adopted at Policy & Resources Committee on 16 October 2024. This document sets out the priorities and mechanisms for communicating and engaging with residents	Complete
5.7	Services/ performance management	Provide services that meet the needs of residents. A sound culture of performance management.	Regular performance monitoring is reported to members with a review of indicators completed in line with the adoption of the new Corporate Plan.	Ongoing
5.8	Staff values, development and well-being	Create a culture that empowers and fosters an ambitious and motivated workforce. Welcoming fair and appropriate challenge. Instilling the values of integrity, dignity, respect and pride. Embedding well-being policy. Supporting and training for effective workforce development. Work collaboratively to alleviate difficulties with recruitment and retention.	Wellbeing events and information are shared regularly with staff across the council. There is also a wellbeing week delivered annually promoting a number of health initiatives to improve staff wellbeing. Values workshops ran at the Swale Managers Forum in December 2023 and at the All-Staff Event in June 2024. Draft values developed and shared at All Staff Webinar in September 2024. Now on hold while Member/Officer Relations work is completed, and then the Values project will be picked up with Members to develop a shared set of Values. Training plan is organised and delivered annually based on skill requirements from the organisation and development needs from staff.	Ongoing

			Managers and HR work together on recruitment and this can include advice from external recruitment agencies to address hard to fill roles.	
5.9	Members training, values and codes of conduct	<p>Appropriate training and support to be provided to our councillors.</p> <p>Welcoming fair and appropriate challenge.</p> <p>Instilling the values of integrity, dignity, respect and pride.</p> <p>Working together to ensure that staff and elected members codes of conduct are met and adhered to.</p>	<p>The member training programme for the civic year 2025/26 is due to be finalised by the Member Development Working Group at their next meeting scheduled for March 2025.</p> <p>Work on joint values and behaviours for Swale members and officers are on hold while member/officer relations work is completed, and then the Values project will be picked up with Members to develop a shared set of Values.</p> <p>The member/officer protocol has now been adopted by Council and following a process of minor amendment has been communicated to all members and staff.</p>	Ongoing
5.10	Governance	<p>Ensuring core governance around corporate and financial planning, workforce planning, managing assets and sound and ethical procurement.</p> <p>Maintaining effective governance that allows sound decision making.</p>	Robust policies and procedures in place to support our financial management, procurement and governance position – evidenced by sound internal and external audit opinions.	Ongoing

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Policy & Resources Committee Meeting	
Meeting Date	26 March 2025
Report Title	Corporate Peer Challenge Action Plan update report
EMT Lead	Larissa Reed – Chief Executive
Head of Service	Philip Sutcliffe – Communications & Policy Manager
Lead Officer	Janet Dart – Policy & Engagement Officer
Classification	Open
Recommendations	Members of the Policy & Resources Committee are invited to note and discuss the Corporate Peer Challenge Action Plan update report at Appendix I.

1 Purpose of Report and Executive Summary

- 1.1 The report at Appendix I provides an update of the progress on the actions in the Swale Corporate Peer Challenge Action Plan.

2 Background

- 2.1 In March 2023 the Swale Borough Council undertook a Local Government Association (LGA) Corporate Peer Challenge. Councillors and officers from other similar councils spent a week at Swale House looking at how we operate as a council.
- 2.2 Peer challenges are improvement-focused and tailored to meet a Council's needs by providing challenge and sharing learning.
- 2.3 The Peer team consisted of cross-party members and senior officers. Cross-party members and officers from across the organisation were interviewed as were partners such as Kent County Council, the local Members of Parliament, the Police, local businesses, representatives from the voluntary sector, parish/town councils and members of the public.
- 2.5 The Peer Challenge Team provided a detailed feedback report containing ten key recommendations which can be viewed at Appendix II
- 2.6 Members and senior officers considered the recommendations and together developed an Action Plan which members of the Policy & Resources Committee agreed on 18 October 2023.
- 2.7 It is good practice to review the Swale Corporate Peer Challenge Action Plan each year to monitor the progress on actions, noting which items are completed, on target for completion or are at risk on non-completion.

3 Proposals

- 3.1 Members of the Policy & Resources Committee are invited to note and discuss the Corporate Peer Challenge Action Plan update report at Appendix I.

4 Alternative Options Considered and Rejected

- 4.1 As this is largely a report for information, there are no alternative options proposed.

5 Consultation Undertaken or Proposed

- 5.1 The Senior Management Team were consulted during the preparation of the Action Plan update report.

6 Implications

Issue	Implications
Corporate Plan	The Swale Corporate Peer Challenge Action Plan was developed in line with the Corporate Plan 2023-2027, ensuring the actions complemented the Corporate Plan priorities and objectives.
Financial, Resource and Property	By carrying out an annual update of the Action Plan, any financial implications arising from identified delivery problems can be addressed at an early stage.
Legal, Statutory and Procurement	None identified at this stage.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	None identified at this stage.
Health and Wellbeing	None identified at this stage.
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this stage.

Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	Any changes that are implemented as a result of the Action Plan that necessitate any Policy or Strategy changes may require Equality Impact Assessments to be carried out.
Privacy and Data Protection	None identified at this stage.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

Appendix I: *Swale Corporate Peer Challenge Action Plan update report.*

Appendix II: [LGA Corporate Peer Challenge Feedback Report](#)

8 Background Papers

None.

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Corporate Peer Challenge Action Plan update – March 2025

RAG rating definitions:

Action on hold, significantly behind schedule with a risk of non-delivery or not started, or does not have funding.
Action changed and/or timeline revised, but on track for delivery. Further or additional funding may be needed which could cause some delay in delivery.
Action on track or completed.

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<p>Work at pace to develop a new Corporate Plan that has a clear and well-defined strategic vision with strategic priorities, owned by members and clearly communicated to staff, residents and partners. <i>Having a Corporate Plan, supported by the agreed budget and a financial sustainability plan, is crucial for ensuring all staff, members and stakeholders understand what the council is seeking to achieve and how staff, members, partners, and stakeholders can share the responsibility in delivering these goals. Now is the time to work together to agree on and deliver a new Corporate Plan.</i></p>		<p>The Corporate Plan was adopted by Council in April 2024 and is published on the website. The annual update on actions is going to the March 2025 Policy & Resources Committee meeting.</p>
<p>Action 1.1</p>	<p>We have started to develop the new Corporate Plan with the administration and officers working together to agree the strategic priorities.</p>	<p>Complete</p>
<p>Action 1.2</p>	<p>We will analyse the feedback parish/town councils and residents have given at Area Committees following the presentation of the proposed priorities at the September 2023 round of meetings.</p>	<p>Complete</p>
<p>Action 1.3</p>	<p>We will develop the strategic priorities in more detail by Service Committee Chairs and Vice-Chairs working with heads of service, to make sure that everyone understands how they will be achieved within the agreed budget.</p>	<p>Complete</p>

Action 1.4	We will carry out sessions with staff, members, partners and stakeholders to communicate what the council is seeking to achieve and to encourage shared responsibility in delivering the goals.	Complete
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<p>Develop and embed joint values and behaviours for Swale members and officers. <i>It is important that joint values for the organisation are in place, lived and modelled by all the senior leaders in the organisation. Having these in place will help the council develop a culture of trust and respect between members and officers.</i></p>		
Action 2.1	We plan to hold sessions with members and officers at all levels to agree and develop joint values and behaviours.	Values workshops ran at the Swale Managers Forum in December 2023 and at the All Staff Event in June 2024. Draft values developed and shared at All Staff Webinar in September 2024. Now on hold while Member/Officer Relations work is completed, and then the Values project will be picked up with Members to develop a shared set of Values.
Action 2.2	We will work with Members to agree how the values and behaviours fit with the staff code of conduct, the member code of conduct and the officer/member protocol.	This will be arranged once the Values have been agreed.
Action 2.3	We will provide training in neurodivergence to assist with everyone having a better understanding of individuals different ways of working, learning, communicating, and perceiving the environment.	Webinars were delivered January 2024.
Action 2.4	Once the joint values and behaviours have been agreed we will ensure they are embedded and promoted in the organisation through regular Member and officer training sessions.	To be actioned once joint values and behaviours have been agreed.

<p>Develop a robust and detailed savings plan, ensuring clear ownership of projects/plans by the administration and officers. <i>Develop a savings plan with both the administration and officer accountability, and proactively manage this, alongside day-to-day active fiscal management, and controls. Have regular conversations with staff, members, and budget holders communicating Swale's budget position, and instilling ownership of savings plans and projects across the organisation.</i></p>		
<p>Action 3.1</p>	<p>We will work towards communicating the budget position to staff and members on a regular basis. This will be done through regular all-staff briefings and six-monthly budget briefings with all members.</p>	<p>For 2025/26 – Regular meetings were held with the coalition administration from March 2024-December 2024 and then the Labour administration group in January and February 2025. Meetings were held with opposition groups during the budget preparation period and a cross-party group met to discuss the budget position following P&R on 5 February 2025.</p> <p>An update to staff was given at the January 2025 all staff briefings.</p>
<p>Action 3.2</p>	<p>We will provide accountable managers and the administration with more in-depth briefings on the budget position which will include information on overachieving and underachieving income streams, risks and budget gaps to assist with making decisions on savings plans and projects.</p>	<p>Budget holders are provided with monthly reports on their budgets with quarterly reports discussed at EMT/SMT.</p>
<p>Action 3.3</p>	<p>The finance sub-group will continue to work on developing measures to recommend to Full Council to ensure the council set a balanced budget and have a robust Medium Term Financial Plan.</p>	<p>Finance sub-group meetings with the administration have been held over the summer with detailed discussion on the current budget position used to inform MTFP. Meetings are set to continue for the full year to maintain the focus for the budget position for the duration of the administration.</p>

Action 3.4

These actions will ensure that the administration will have clarity on the budget position and the requirement for savings in the short term and in future years.

Ongoing.

	<p>Continue to work on the member/officer protocol and work to improve member/officer relationships. <i>There is room for improvement in the levels of collaboration, mutual understanding, and tone of communication between some elected members and staff. Work on this has started, with defining and managing ways of working between members and officers, through the member/officer protocol; it is recommended that work on improving relationships be considered a priority for the new administration.</i></p>	
<p>Action 4.1</p>	<p>The work on developing joint values and behaviours will assist with achieving mutual understanding and tone of communication between some elected members and staff.</p>	<p>Ongoing and will be achieved once joint values and behaviours have been agreed.</p>
<p>Action 4.2</p>	<p>We will take a proposed protocol, which unions will have been consulted on, to the Standards Committee. Once agreed it will be communicated to members and staff.</p>	<p>The Protocol has now been adopted by Council and following a process of minor amendment has been communicated to all members and staff.</p>
<p>Action 4.3</p>	<p>The Communications Strategy to reflect how the member/officer protocol should be communicated.</p>	<p>Members approved the communications strategy, and member/officer protocol updated and communicated.</p>
<p>Action 4.4</p>	<p>We will put more robust mechanisms in place to better communicate the issues raised at exit interviews and take action where necessary.</p>	<p>A process for exit interviews has been agreed and implemented in May 2024.</p>
<p>Action 4.5</p>	<p>We will put in place a safe-space for people to talk about problems that may arise with member/officer relationships and provide external mediation where necessary.</p>	<p>The Member/Officer Protocol achieves this action.</p>

	<p>Develop a comprehensive induction and support programme for members which includes the statutory roles of the council, budget responsibilities, and building internal/external positive relationships. <i>It is important that members are supported to deliver their roles and responsibilities as elected members. Building relationships both internally and externally will enrich the council and enable groups and external partners to all pull together. Introduce briefings for all members on key issues, providing the opportunity to have open discussions across all parties. These should include training and briefings on financial understanding and monitoring, to enable effective financial scrutiny and decision-making.</i></p>	
<p>Action 5.1</p>	<p>Although there is already an extensive member training programme in place, we will carry out a review with members to identify any gaps.</p>	<p>The member training programme for the civic year 25/26 is due to be finalised by the Member Development Working Group at their next meeting scheduled for March 2025.</p>
<p>Action 5.2</p>	<p>We will implement a four-year rolling training programme for members including refresher training and to ensure continued reinforcement of principles.</p>	<p>A wide range of planning training has been programmed, with bi-monthly “bitesize” sessions, and other bespoke offers.</p> <p>A member-senior officer ‘buddying’ scheme is in operation.</p>
<p>Action 5.3</p>	<p>We will record training sessions so they are available for members to watch at a later date.</p>	<p>Complete and ongoing. A Teams folder has been created for Members which contains resources such as slides from briefings.</p>
<p>Action 5.4</p>	<p>We will link members to the Employee Assistance Programme.</p>	<p>Complete</p>
<p>Action 5.5</p>	<p>We will set up two-way training with external partners so that members understand how they work with the council and partners understand local government and political processes.</p>	<p>Training sessions have taken place with Administration Members, Strategic Management Team and the Local Government Association (LGA). Further sessions will be scheduled throughout the year.</p>

<p>Conduct a review of committee meetings including the number of meetings and capacity to support their frequency. Test further opportunities for wider scrutiny and challenge within the committee system. Review the number of committees looking at opportunities to reduce duplication and increase efficiency. Also, look at ways of enabling scrutiny as part of the committee system.</p>		
<p>Action 6.1</p>	<p>We will work with the Leader to conduct a review of committees including the number of committees, the frequency of meetings and agenda items.</p>	<p>The review was carried out and the number of committees is unchanged, but the frequency has been reduced.</p>
<p>Action 6.2</p>	<p>We will discuss with members how scrutiny is carried out and develop an annual scrutiny programme within the committee system.</p>	<p>The Constitution Working Group (CWG) was satisfied that the constitution was clear on scrutiny being the responsibility of the individual committees. It was then for committees to consider their own scrutiny work programs.</p>

<p>Maximise your links with small and big businesses. Tap into their work on corporate social responsibility activity, employment opportunities and how these can support your local priorities. <i>Use the current opportunity and goodwill in the business sector to capitalise on the relationships built with the business community during and after the pandemic. With many large businesses in the borough, proactively engaging with the whole sector could help deliver Swale's ambitions for economic development and expand the apprenticeship and training ambitions and opportunities for local people.</i></p>		
<p>Action 7.1</p>	<p>We will agree with members expectations and resource within existing budgets to work with businesses.</p>	<p>The Corporate Plan 2023-2027 balances expectations and resources. It acknowledges that Shared Prosperity Funds (UKSPF and REPF) have been a primary means of delivering economic development / business support from 2022/23 to 2024/25. A confirmed UKSPF funding allocation for 2025/26 means this approach can continue. Town Centre and Rural Business grant schemes have offered the most direct and tangible business support.</p>
<p>Action 7.2</p>	<p>There are already a number of established links with local businesses, the council's vision is to develop further engagement with businesses and how we work with them.</p>	<p>UKSPF and REPF are limited tools to widen our business reach. We have received confirmation of continued UKSPF investment in 2025/26 and are developing spend proposals.</p> <p>Broader engagement work cuts across Council services, including procurement and social value, climate change and skills and employability.</p> <p>The wider use of the Council's underused property assets to support local business</p>

		<p>continues to progress, specifically at Masters House and Swale House, which continue to welcome new tenants.</p> <p>The Sheerness Revival Levelling Up Fund construction contracts offer strong examples of social value outcomes.</p>
Action 7.3	We will signpost and co-ordinate relationships between businesses to maximise links and encourage joint working.	Our business newsletter and website updates continue. There is limited current capacity to be more proactive in this domain, but opportunities are engaged with as they present including, for example, regular engagement with KMEP. There has been widespread promotion of UKSPF and REPF grant schemes.
Action 7.4	We will share the council's unspent Apprenticeship Levy with businesses that can develop a programme that will benefit the council and businesses.	Two work strands are at an infant stage to pool the levy, SBC are looking to work with Breaking Barriers and the Medway & Swale Health Care Partnership.

	<p>Prioritise work on developing your communications and engagement strategy. <i>Having these strategies in place will help to ensure information from the council to residents, and between members and staff flows effectively. These will be key to ensuring the smooth dissemination of key messages, goals, and initiatives both internally and externally. Swale having clear and well-defined strategies in this area will help with keeping members, staff, and residents informed, aligned, and engaged, fostering a sense of clarity and purpose alongside the new Corporate Plan.</i></p>	
<p>Action 8.1</p>	<p>We are in the process of developing a corporate communications strategy alongside the Corporate Plan.</p>	<p>Corporate communications strategy approved by members.</p>
<p>Action 8.2</p>	<p>The strategy will ensure there is an effective flow of information both externally with residents and internally with members and staff.</p>	<p>Strategy addresses need for effective flow of information, with actions to improve communications externally and internally.</p>
<p>Action 8.3</p>	<p>We will encourage and train members and staff to be proactive in photographing and filming news of the Council's achievements.</p>	<p>Training had been identified, need to determine who to receive and how to fund.</p>
<p>Action 8.4</p>	<p>We will encourage and train members and appropriate staff to effectively use social media to communicate news of the Council's achievements and share information that is of value to residents.</p>	<p>Potential training identified, need to agree funding and arrange.</p>
<p>Action 8.5</p>	<p>We will provide more diverse information on cultural events. The communications team will develop a diary of cultural events, including awareness days.</p>	<p>No steer on which days to include, though some celebrated through things like Sheerness Clocktower lighting. Still need input on what events/days to include that the organisation will support in meaningful way to avoid tokenism.</p>
<p>Action 8.6</p>	<p>We will give accessibility guidance to members and staff to ensure that any communications are easily accessible to all residents equally.</p>	<p>Accessibility resources shared, and continue to emphasise importance as part of day-to-day work.</p>
<p>Action 8.7</p>	<p>We are developing different approaches to community engagement to ensure effective consultation takes place.</p>	<p>Consultation approach being drafted, and will be progressed when resources allow.</p>

	<p>Celebrate and communicate the Council's successes. <i>It is important that Swale Borough Council celebrate and effectively communicate the successes of the council. Doing so will help to boost staff morale, reinforce a positive organisational culture, and may enhance the council's external reputation.</i></p>	
<p>Action 9.1</p>	<p>We will improve service engagement and information sharing from and to service areas.</p>	<p>Good news stories are shared at All Staff Briefing sessions. Discussions will take place at the Corporate Leadership Team meetings to identify good news items, these will be taken to the Senior Management Team to agree which stories will be selected to spotlight.</p>
<p>Action 9.2</p>	<p>We will celebrate and communicate staff achievements. This year we have reintroduced the Swale Stars awards which celebrates staff achievements. Feedback from staff has been positive.</p>	<p>Swale Stars will take place in the summer of 2025. We have introduced a regular scheduled item at the All-Staff Briefings to celebrate long service and staff achievements on a regular basis.</p>
<p>Action 9.3</p>	<p>We include an award for external partner engagement.</p>	<p>Work is being carried out to review the Swale Stars categories and include a partnership award.</p>

	<p>Closely monitor the impact of the 34-hour week, considering the impact on the organisation and residents. <i>It is important to recognise that this policy is a departure from the customary working practices within the council and local authority sector. Acknowledge that it carries risks as well as benefits. Work to balance the innovative spirit of the policy with a data-driven monitoring and review process to help identify and mitigate risks and inject timely contingencies as needed.</i></p>	
<p>Action 10.1</p>	<p>We carry out monthly staff surveys to monitor the impact of the introduction of the 34-hour week. We will share the findings with members.</p>	<p>Complete</p> <p>Staff surveys will continue to be carried out periodically to monitor the impact of the 34-hour week.</p>
<p>Action 10.2</p>	<p>We will capture individual teams' views and ensure regular discussions at team meetings and one to one check-ins with staff are taking place. Heads of service will make themselves available at drop-in sessions should staff feel more comfortable giving feedback in that way.</p>	<p>Complete</p>
<p>Action 10.3</p>	<p>We will ensure the feedback managers receive from staff is passed onto the 34-hour implementation group.</p>	<p>Complete</p>
<p>Action 10.4</p>	<p>We will run sessions with officers before the permanent move to a 34-hour week takes place.</p>	<p>Complete</p>

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Policy & Resources Committee Meeting	
Meeting Date	26 March 2025
Report Title	Risk Management Update
EMT Lead	Lisa Fillery – Director of Resources
Head of Service	Katherine Woodward – Head of Audit
Lead Officer	Georgia Harvey – Auditor and Systems Officer
Classification	Open
Recommendations	1. To consider the Council’s corporate risks and overall risk profile, gaining assurance that key risks are being appropriately managed.

1 Purpose of Report and Executive Summary

- 1.1 The reporting of risk information is essential to ensure risks are being appropriately identified and managed and, ultimately, to ensuring the Council achieves its priorities.
- 1.2 The purpose of this update is to provide the latest position on the Council’s corporate risks, as well as an overview of operational risks, which are reviewed and updated regularly by officers. In addition, this update also includes details on the progress for implementing planned controls, as well as changes, and additions of, risks which could prevent the achievement of the Council’s strategic priorities.
- 1.3 Following feedback from members and officers, the format of the report has changed since it was last presented in November 2024. The main changes are:
 - The inclusion of a dashboard to show all risk matrices on a single page to facilitate comparative data analysis. (Appendix 1 - Page 3)
 - Summary narrative on the main changes to risks over the last quarter. (Appendix 1 - Page 3)
 - A table to show the changes to the unmitigated rating, at the end of each quarter, for each risk on the corporate risk register has been included. (Appendix 3)

2 Background

- 2.1 The Council’s risk management arrangements have been in place since 2015, with Mid Kent Audit facilitating the operation of the overall process. The Risk Management Framework is comprehensively reviewed and updated, with the current version approved by Audit Committee in July 2022. Risk management is well established within the Council; with officers engaged in the process, and aware of their risks and how to manage them.
- 2.2 The Council uses risk management software (JCAD) to support risk owners with the maintenance of their risks in accordance with the Council’s Risk Management Framework.

2.3 Risk information is routinely reported to members and the management team as follows: Senior Management Team (SMT) receive quarterly updates on all corporate and key operational risks. Policy & Resources Committee received half yearly updates on risk management. The Audit Committee receive an annual report on the effectiveness of the Council's risk management arrangements each April.

3 Proposals

3.1 Members of Policy & Resources Committee are responsible for oversight and challenge of how the Council's key risks are managed. In particular, the management of those risks above the Council's risk appetite. As such, Members are asked to consider the Council's risks and whether they are being appropriately managed.

4 Alternative Options

4.1 Identifying and monitoring the Council's risks is a key component of effective governance. The Council could decide not to identify, monitor and report on high-level risks, but this would be contrary to the agreed Risk Management Framework and principles of good governance.

5 Consultation Undertaken or Proposed

5.1 All risk owners and Heads of Service have been involved in the identification and assessment of the Council's risks. The risks reported have been reviewed and updated by the relevant risk owner.

6 Implications

Issue	Implications
Corporate Plan	Effective risk management is part of the Council's governance framework. The purpose of the risk management process is to ensure that key risks are identified and appropriately managed as the Council pursues its corporate objectives.
Financial, Resource and Property	Investment in developing risk management arrangements is being met from existing resources within the Mid Kent Audit partnership. No implications have been identified.
Legal, Statutory and Procurement	None identified at this stage.
Crime and Disorder	No implications have been identified.
Environment and Climate/Ecological Emergency	No implications have been identified.
Health and Wellbeing	No implications have been identified.
Safeguarding of	No implications have been identified.

Children, Young People and Vulnerable Adults	
Risk Management and Health and Safety	This report is about risk management across the Council. No health and safety implications have been identified.
Equality and Diversity	No implications have been identified.
Privacy and Data Protection	No implications have been identified.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix 1: Risk Management Update – March 2025
- Appendix 2: Corporate Risk Register
- Appendix 3: Corporate Risk Movement

8 Background Papers

- Risk Management Framework 2022.

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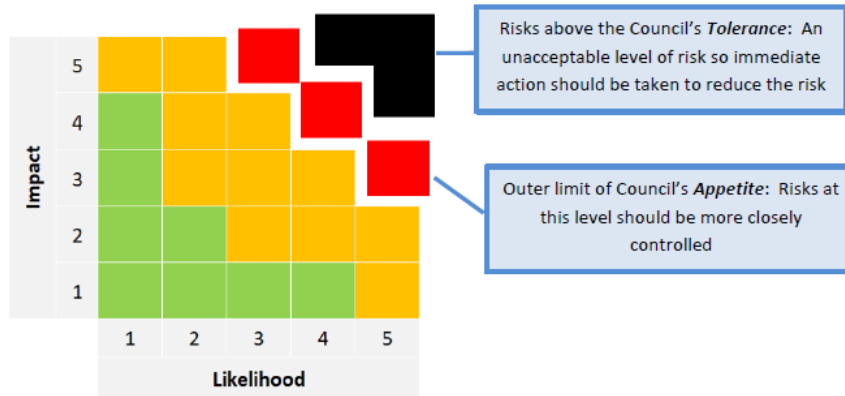
Risk Management Update

March 2025

INTRODUCTION

A risk is a **potential future event that, if it materialises, effects the achievement of objectives**. Risk management is the process of identifying, measuring and responding to risks. These processes help to ensure that the Council achieves its corporate and service objectives by controlling risks in balance with resources. Good risk management also increases our ability to cope with developing and uncertain events and helps to instil a culture of continuous improvement and optimisation.

The Risk Management Framework sets out the Council's approach to managing corporate (strategic) and operational (service) risks. The Risk Management Framework also includes the Council's risk appetite statement, which articulates how much risk the Council is comfortable with and able to bear. The Council recognises that to achieve its objectives it must take risks, but that some risks are unacceptable (above our tolerance) and so action should be taken immediately to manage these risks. Risk appetite and tolerance are illustrated in the following matrix:



Risks are assessed for impact and likelihood using the following definitions to inform the assessment:

Impact

Level	Service	Reputation	Wellbeing	Legal/Compliance	Financial	Strategic Objectives
Catastrophic (5)	Ongoing failure to provide an adequate service in a key area	Perceived as a failing authority requiring intervention	Significant staff dissatisfaction, long term absence, or increased staff turnover including key personnel	Litigation almost certain and difficult to defend. Breaches of law punishable by imprisonment. Possible responsibility for death.	Uncontrollable financial loss or overspend over £1.5m	Failure to deliver multiple key priorities
Major (4)	Key service areas disrupted 5+ days Other service areas ongoing failure	Significant adverse national publicity	Adverse staff dissatisfaction, or increased absence and turnover of staff	Litigation expected and uncertain if defensible. Breaches of law punishable by significant fines. Fails to prevent death, causes extensive permanent injuries or long term sick	Financial loss or overspend greater than £1m	Failure to deliver key priority
Moderate (3)	Key service disruption 3-5 days Other service disruption 7+ days	Adverse national publicity of significant adverse local publicity	Declining staff satisfaction, or some loss of staff due to absence or turnover	Litigation expected but defensible. Breaches of law punishable by fines. Fails to prevent extensive permanent injuries or long term sick.	Financial loss or overspend greater than £700k	Unsatisfactory delivery of priorities
Minor (2)	Key service disruption 2 days Other service disruption 2-7 days	Minor adverse local publicity	Short-term dissatisfaction, minor loss of staff due to absence or turnover	Complaint or litigation possible. Breaches of regulations or standards. Long term injuries or sickness.	Financial loss or overspend greater than £100k	Poor delivery of priorities
Minimal (1)	Any service disruption 1+ day	Unlikely to cause adverse publicity	Loss of staff morale but unlikely to result in absence or turnover of staff	Unlikely to cause complaint. Breaches of local procedures.	Financial loss or overspend under £100k	Minimal reduction in delivery of priorities

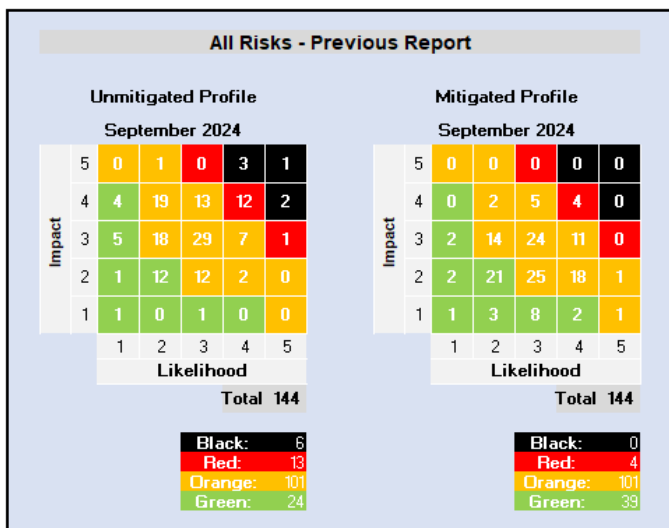
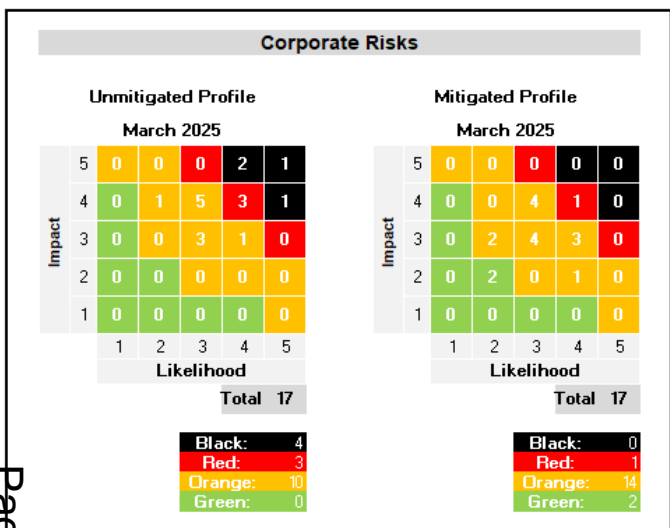
Likelihood

Level	Probability	Description
Highly Probable (5)	80% +	Without action is likely to occur; frequent similar occurrences in local government / Council history or anticipated within the next 6 months.
Probable (4)	60% - 80%	Similar occurrences known often in local government / Council history or anticipated within the next 12 months.
Possible (3)	40% - 60%	Similar occurrences experienced in local government / Council history or anticipated within the next 18 months.
Unlikely (2)	20% - 40%	Not unheard-of occurrence in local government / Council history. Anticipated within the next 2 years.
Rare (1)	0% - 20%	Rarely occurs; no recent similar instances in local government / Council history.

RISK MATRIX DASHBOARD

The following diagrams detail the Council's risk profile for Swale, and shared services, in relation to corporate and operational risks, between September 2024 and February 2025. This demonstrates the risk to the Council if no action is taken (the **unmitigated rating**) and the risk assuming actions are implemented (the **mitigated rating**).

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Corporate Risks

There have been no changes to corporate risks since the last report.

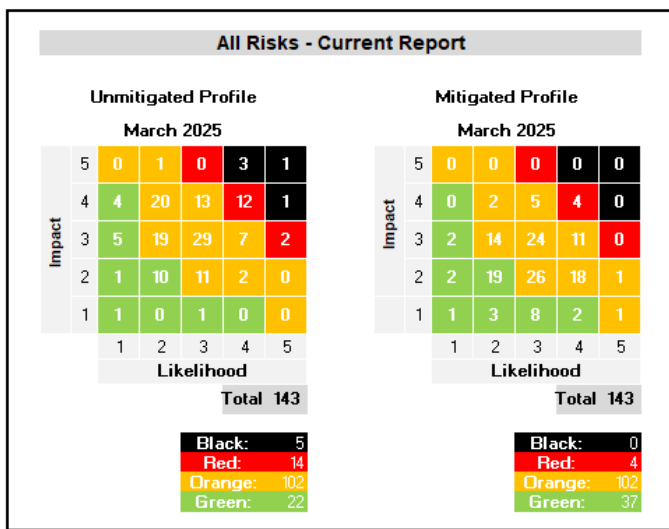
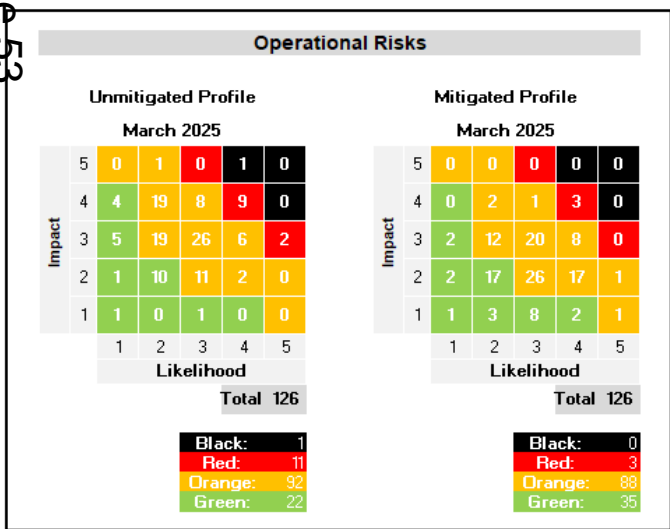
A copy of the corporate risk register is enclosed at **Appendix 1**.

A copy of the changes to each of the corporate risks, at the end of each quarter, are set out in **Appendix 2**. (Note – the date used for the last quarter is 25/02/2025.)

Operational Risks

The following changes to operational risks have occurred:

- An operational risk for Finance was closed. This risk had an unmitigated rating of medium (6) and a mitigated rating of low (4).
- An operational risk for Planning was closed. This risk had an unmitigated rating of low (4) and a mitigated rating of low (4).
- An operational risk for Digital was added. This risk has an unmitigated rating of medium (12) and a mitigated rating of medium (9).



Future Consideration

1. The Strategic Management Team are considering adding a new risk to the corporate risk register for the Local Government Restructure.
2. A review of the corporate risk register is being organised for later this year. As this progresses, members will be involved.

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Appendix 2 – SBC Corporate Risk Register

Risk Ref	Risk Description	Risk Owner	Key Existing Controls	Unmitig Rating		Controls Planned	% Complete Target Date	Mitigated Score
				Score	Change			
S-SBC0005	Balancing the Budget over the medium term	Lisa Fillery	<ul style="list-style-type: none"> Budget setting & monitoring process and Medium Term Financial Plan Information sharing at Chief Finance Officers and Chief Accountants Groups Use of specialist local government financial consultants Reserves strategy Income generation initiatives Ongoing regular reporting to SMT and the Leader, including a Finance Sub Group to consider the budget and fees & charges Awareness of proposed changes to local government finance 	25	10	<ul style="list-style-type: none"> All services to review budgets with a view to achieving the required savings (of £2.0m) to deliver a balanced budget for 23-24 Aligning the fees & charges and budget setting proces Future decision making needs to be robust to ensure resources match spending plans Ongoing review of services to with a view to achieving the required savings to deliver a balanced budget for 25-26 	100% 100% 30% 31/03/2025 0% 19/02/2025	12
S-SBC0001	Increases in homelessness	Charlotte Hudson	<ul style="list-style-type: none"> Review of temporary accommodation provision and maximising use of public sector assets Supporting / influencing developers to unlock additional social housing Landlord incentive scheme Housing Allocations Policy Homeless Prevention Team in place Forecasting of homelessness spend and adjustments to budgets made as part of medium-term financial planning Increasing supply of affordable housing to increase rental supply Temporary Accommodation Improvement Plan in place and being actioned. 	20	4	<ul style="list-style-type: none"> Housing Options Restructure and investment in team Undertake a tender process for provision of temporary accommodation Review all those in temporary accommodation households Implement TA Purchase project Revised Housing Strategy drafted and approved to go out to consultation Business case being prepared for Council purchase of properties to use as temporary accommodation Housing Emergency Actions 	70% 31/03/2025 100% 100% 40% 28/02/2025 100% 100% 70% 31/12/2025	12

Risk Ref	Risk Description	Risk Owner	Key Existing Controls	Unmitig Score	Rating Change	Controls Planned	% Complete Target Date	Mitigated Score
S-SBC0010	Major Contractor Failure or Decline: Existing suppliers not delivering as per the contract.	Martyn Cassell	<ul style="list-style-type: none"> Contracts in place and regularly monitored Annual reconciliation of invoices paid to contractors Regular dialogue with contractors and use of performance mechanisms Awareness of industry developments and best practice Routine financial checks Supporting contractors to undertake new initiatives to resolve problems 	20	8	<ul style="list-style-type: none"> Discussions with contractors around the impact of COVID-19 / other external issues Recovery and Delivery Plan created Regular and detailed dialogue with key Members Regular engagement with Borough partners for transfer of learning, peer support and collection intervention 	100% 90% 90% 80%	12
S-SBC0015	Funding Capital Spend Delivery of council priorities requires capital spend which cannot be accommodated within the revenue budget.	Lisa Fillery	<ul style="list-style-type: none"> Revenue implications of capital explicitly funded through revenue budget Liaison with commercial tenants All capital projects to have business case agreed by relevant Committee Capital schemes may generate new revenue income streams North Kent Pooled Business rate fund to meet capital costs Annual review of capital programme and ongoing process to review business plans for current programme as required. 	20	11	<ul style="list-style-type: none"> Generation of capital receipts through selling assets Work more closely with commercial tenants Consultant working on the Rainbow Homes business case and reviewing costs s106 and grant funding of new capital projects only in the future 	0% 0% 30% 70%	12
S-LTS0003	Future Leisure Centre provision	Martyn Cassell	<ul style="list-style-type: none"> Formal agreement of contract extension approved by committee and draft terms agreed by all parties 	12	8	<ul style="list-style-type: none"> External specialists commissioned to complete contract documents Deed variations completed by MKLS and will be presented to SERCO. Series of Member workshops to discuss strategic objectives and operating models Create Project Plan to finalise the long term provision and investment plan Undertake the required procurement process or in-house service set up 	98% 100% 100% 100% 0% 30/05/2025 07/01/2027	4

Risk Ref	Risk Description	Risk Owner	Key Existing Controls	Unmitig Rating Score	Change	Controls Planned	% Complete Target Date	Mitigated Score
S-SBC0008	Cyber Security Incident	Julie May	<ul style="list-style-type: none"> • Effective backup arrangements • External testing • ICT policies & staff training, including disaster recovery plan • Cyber security testing & training, plus awareness quarterly campaigns • Nessus scanning software reporting daily on system vulnerabilities • Darktrace enterprise cyber immune system deployed • New firewall in place (August 2022) 	12				8
S-SBC0011	Focus on established priorities: Resources are dissipated away from statutory responsibilities and established priorities	Larissa Reed	<ul style="list-style-type: none"> • Agreed corporate plan priorities which have been prioritised and are being monitored through Pentana • Service planning process designed to relate activity more explicitly to resources and priorities • Regular 1-2-1 meetings between senior members & heads of service. • Robust budget-setting process • Single CLT member identified to monitor/coordinate cross-cutting work on each corporate-plan objective • Directors have overall responsibility for the delivery of the priorities • Annual report process to be focused on corporate-plan objectives • Routine reporting on progress against priorities to P&R Committee 	8		<ul style="list-style-type: none"> • LGA Corporate Peer review action plan 	40% 31/05/2023	4

Risk Ref	Risk Description	Risk Owner	Key Existing Controls	Unmitig Score	Rating Change	Controls Planned	% Complete Target Date	Mitigated Score
S-SBC0009	Affordable Housing: Failure to develop a good quality, viable project for Hudson the delivery of affordable housing	Charlotte	<ul style="list-style-type: none"> Access to expert consultancy and legal advice Strong relationships with RPs that develop in Swale Capital funding agreed by Council SBC Landholdings identified to support the project Review of best practice Initial scoping and viability work undertaken on landholdings Available sources of funding reviewed Testing the market for possible partners Local Housing Company set up and director appointed to lead on development of sites Monitor market for land acquisitions 	12		<ul style="list-style-type: none"> Deliver 3 development sites agreed by Cabinet Acquire suitable land to enable development of Affordable Housing Homes England grant application being developed Become an investment partner with Homes England Rainbow Homes to become a registered provider 	30% 31/03/2025	9
S-SBC0017	Difficulties in recruiting and retaining talented staff during organisational change	Bal Sandher	<ul style="list-style-type: none"> Workforce strategy monitoring & reporting Training & development programme Occupational health, employee support and HSE Stress Survey Recruitment process includes ability to adjust pay & market supplement for hard to recruit jobs Rewards package reviewed regularly Commissioning specialist external support as required Use of ClearReview to encourage continuous conversations and clear objectives Hybrid Policy and service review of hybrid working arrangements Graduates site created and career grades used for staff progression Reviewing exit interviews on reasons for leaving 	9	3	<ul style="list-style-type: none"> Strengthen the succession planning process 	30% 19/09/2025	6

Risk Ref	Risk Description	Risk Owner	Key Existing Controls	Unmitig Score	Rating Change	Controls Planned	% Complete Target Date	Mitigated Score
S-SBC0003	Housing Supply: Council unable to deliver a 5 year housing supply (5YHLS)	Joanne Johnson	<ul style="list-style-type: none"> Provision of a sound evidence base to support the delivery of a new Local Plan Ensure Members are kept up to date with key regulation and legislation changes 	12	0	<ul style="list-style-type: none"> Local Plan Review - P&R and Full Council will be asked to agree to continue to develop the evidence base. Introduction of a 'statement of common ground' process for major development sites. Figure to be robustly reviewed at appropriate update opportunities 	100%	12
							0%	
							50%	

Risk Ref	Risk Description	Risk Owner	Key Existing Controls	Unmitig Score	Rating Change	Controls Planned	% Complete Target Date	Mitigated Score
S-SBC0004	Design of Major Contracts: Significant changes in how major contracts are delivered when the contract expires.	Martyn Cassell		9	-3	<ul style="list-style-type: none"> • Availability of expert legal advice • Robust tender process that includes the early identification of contracts approaching the end of their term • Ongoing engagement with Members to provide a clear perspective on direction • Awareness of central government legislative changes • Review potential methods of operation, including researching approaches adopted by other local authorities • Continued Member engagement • Early market testing to support financial predictions • Continue to follow Government consultations on new legislation • Design of waste specification completed with careful consideration of financial implications • GM contract completed and in final transition • Final waste and street cleansing tender stage underway followed by evaluation • Continue to research alternatives to commissioned services and ways to reduce financial implications • Oversee transition from old to new waste and street cleansing contract 	<ul style="list-style-type: none"> 100% 100% 100% 100% 100% 50% 100% 85% 100% 100% 100% 100% 75% 	9

Risk Ref	Risk Description	Risk Owner	Key Existing Controls	Unmitig Score	Rating Change	Controls Planned	% Complete Target Date	Mitigated Score
S-SBC0018	increase in demands on Council services, loss of income and community pressure	Charlotte Hudson	<ul style="list-style-type: none"> Internal Cost of living working group Administration of Household Support Fund Volunteer sector group in place to identify key risks and collaborative working Controls outlined in the Homelessness risk Explore Redirection of grant funds to support increase on demand to VCS Use of Policy & Practice data platform to provide targeted support 	16	-4	• Development of Community Development Strategy	0% 01/04/2025	16

Appendix 3 – SBC Corporate Risk Movement

Ref	Business Unit	Risk Description	Unmitigated Rating				Mitigated Rating		Controls				
			06/24	10/24	12/24	02/25	Rating	Target Date	Not Started	In Progress	Implemented	Total	% Implemented
S-LTS0003	Leisure & Technical Services (S)	Future Leisure Centre provision	12	12	12	12	4	07/01/2027	1	2	3	6	50%
S-SBC0001	Swale BC	Increases in homelessness	20	20	20	20	12	31/12/2025	1	3	11	15	73%
S-SBC0003	Swale BC	Housing Supply: Council unable to deliver a 5 year housing supply (5YHLS)	12	12	12	12	12		1	3	1	5	20%
S-SBC0004	Swale BC	Design of Major Contracts: Significant changes in how major contracts are delivered when the contract expires.	9	9	9	9	9		0	3	10	13	77%
S-SBC0005	Swale BC	Balancing the Budget over the medium term	25	25	25	25	12	31/03/2025	1	1	9	11	82%
S-SBC0006	Swale BC	Borough wide infrastructure does not meet need / demand. Infrastructure programmes don't align to the	12	12	12	12	9	31/10/2025	4	2	6	12	50%
S-SBC0007	Swale BC	The Council is unable to deliver the climate & ecological emergency motion agreed at Council in June 2019.	9	9	9	9	6	31/05/2025	1	2	6	9	67%
S-SBC0008	Swale BC	Cyber Security Incident	12	12	12	12	8		0	0	7	7	100%
S-SBC0009	Swale BC	Affordable Housing: Failure to develop a good quality, viable project for the delivery of affordable housing	12	12	12	12	9	31/03/2025	0	4	11	15	73%
S-SBC0010	Swale BC	Major Contractor Failure or Decline: Existing suppliers not delivering as per the contract.	20	20	20	20	12		0	5	5	10	50%
S-SBC0011	Swale BC	Focus on established priorities: Resources are dissipated away from statutory responsibilities and established priorities	8	8	8	8	4	31/05/2023	0	1	8	9	89%
S-SBC0015	Swale BC	Funding Capital Spend Delivery of council priorities requires capital spend which cannot be accommodated within	20	20	20	20	12		3	2	5	10	50%
S-SBC0017	Swale BC	Difficulties in recruiting and retaining talented staff during organisational change	6	6	9	9	6	19/09/2025	0	1	10	11	91%
S-SBC0018	Swale BC	increase in demands on Council services, loss of income and community pressure	16	16	16	16	16	01/04/2025	1	0	6	7	86%
		14							13	29	98	140	70%

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Policy and Resources Committee	
Meeting Date	Wednesday 26 th March 2025
Report Title	Empowering You in Swale – Community Development Strategy 2024-2027
EMT Lead	Emma Wiggins, Director of Regeneration & Neighbourhoods
Head of Service	Charlotte Hudson, Head of Housing & Community Services
Lead Officer	Sarah-Jane Radley, Community & Partnerships Manager
Classification	Open
Recommendations	1. For the Policy & Resources Committee to note the Empowering You in Swale Strategy has been ratified by the Community & Leisure Committee and to recommend to Full Council for formal adoption.

1 Purpose of Report and Executive Summary

- 1.1 The Empowering You in Swale strategy document is being developed to provide Swale with a Community Development Strategy to outline how the council intends to support the community over the next 3 years in line with Swale’s Corporate Plan. We ask the committee to note the Empowering You in Swale Strategy has been ratified by the Community & Leisure Committee and to recommend to Full Council for formal adoption.

2 Background

- 2.1 In March 2024 the Health & Housing Committee agreed to the closedown of the Health & Wellbeing Strategy due to the restructure of the community team and the deletion of the Health & Wellbeing post. The committee proposal included the development of a new strategy that encompasses key delivery for community services in line with the existing Corporate Plan and Service Plan.

A cross party member working group took place to discuss ideas and suggestions for the key priorities of the strategy and how members would like the strategy to be set out. The name Empowering You in Swale was agreed as the title for the document and an outline of items that should be included.

In addition to the members working group, the Cost of Living Partnership Group were engaged in a workshop to discuss the key themes and priorities within the strategy and valuable input from our statutory and VCS partners helped to start to shape the document.

Community & Leisure Committee reviewed the draft strategy at the meeting held on the 5th March 2025 and amendments have been made accordingly.

2.2

2 Proposals

- 3.1 We propose to use the Empowering You in Swale Strategy as the roadmap for delivery of community development led activities. The Community & Partnerships Team will continue to deliver against the priorities set out within the strategy and utilise existing mechanisms to promote innovation and new opportunities for the benefit of Swale residents.
- 3.2 The committee is asked to note the Empowering You in Swale Strategy has been ratified by the Community & Leisure Committee and to recommend to Full Council for formal adoption.

4 Alternative Options Considered and Rejected

- 4.1 The alternative option of continuing to deliver the Health & Wellbeing Plan was dismissed by the Health & Housing Committee due to a lack of resources. The work of the Community & Partnerships Team has evolved since the development of the Health & Wellbeing Strategy to encompass a wider area of delivery and so this is reflected within the new strategy.
- 4.2 We do not feel that the option to 'do nothing' is the best option as although we have a commitment to community within the Corporate Plan, this strategy enables us to provide a level of detail for how we intend to improve the lives of Swale residents through community development.

5 Consultation Undertaken or Proposed

- 5.1 An 8-week public consultation has been carried out to enable public feedback to be collected and used to refine the strategy. A cross-party members working group discussed ideas and proposals for the document and made suggestions for its name. In addition, we have delivered workshops, online, and face to face sessions including presenting at all four Area Committees to enable multiple opportunities to feed into the document.
- 5.2 We received 16 responses to the external consultation. The responses contained some constructive feedback of which we have adjusted some of the strategy details to reflect and some we are able to utilise in the forward planning of the work of the team. We also noted the comments that were made at Area Committees, however some of the overall comments were outside of the scope of the work or were not appropriate to the delivery of the strategy.
- 5.3 In general, the feedback and comments were supportive of the strategy priorities and in favour of our commitment to the strategy.

5.4 Community & Leisure Committee reviewed the draft strategy at the meeting held on the 5th March 2025 and amendments have been made accordingly.

6 Implications

Issue	Implications
Corporate Plan	Empowering You in Swale links to the four key objectives of the Corporate Plan through the delivery activities being proposed within the strategy.
Financial, Resource and Property	Delivery of the work associated to the Empowering You in Swale Strategy will be committed to from the existing delivery resources of the Community & Partnerships Team and wider team input where there is a cross over of service delivery, no additional funding for projects outside of this area of work has been agreed.
Legal, Statutory and Procurement	None identified at this stage
Crime and Disorder	The Empowering You in Swale Strategy outlines collaborative projects that aim to improve the lives of communities and links to the delivery plan for the Community Safety Executive.
Environment and Climate/Ecological Emergency	The Empowering You in Swale Strategy outlines collaborative projects that aim to improve the lives of communities through community development, and this includes tackling fuel and water poverty in the borough.
Health and Wellbeing	The Empowering You in Swale Strategy outlines collaborative projects that aim to improve the lives of communities through community development, and this includes tackling health inequalities in the borough.
Safeguarding of Children, Young People and Vulnerable Adults	The Empowering You in Swale Strategy outlines collaborative projects that aim to improve the lives of communities through community development, and we ensure that all partners we work with comply with safeguarding policies and we are delivering according to our own policies.
Risk Management and Health and Safety	None identified at this stage
Equality and Diversity	Equality Impact Assessment
Privacy and Data Protection	None identified at this stage

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Empowering You in Swale – Community Development Strategy for Swale 2024-2025

8 Background Papers

Community & Leisure Committee – Agreement to proceed to P&R Committee
5th March 2025

[Agenda for Community and Leisure Committee on Wednesday, 5 March 2025, 7.00 pm](#)

Empowering You in Swale

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Community Development Strategy for Swale

2024-2027

Forward

Welcome to Swale Borough Councils Empowering You in Swale Strategy which sets out our priorities for community development until 2027. The strategy aims to cement the work to improve the lives of residents in the borough and tackle inequalities.

It cannot be denied that it has been a tough few years for communities, dealing with the after effects of the pandemic, Cost of Living, Fuel, and Housing Crises, which are just some of the issues that are being faced. Sadly, we know households in the borough need our help and advice more than ever and are turning to emergency support such as the Household Support Fund, food banks, the voluntary, community and enterprise sectors to deal with the day to day issues that families are facing.

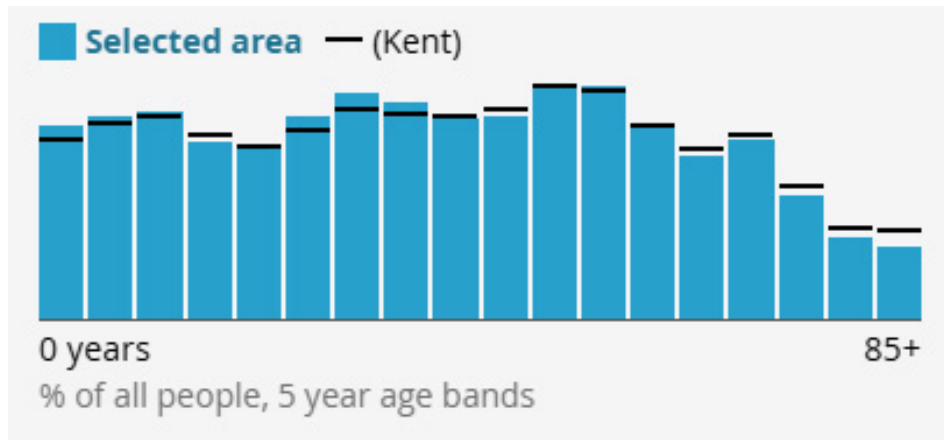
The strategy outlines our continued commitment to help families where we can through a partnership approach, engaging with residents and services through well-established groups and networks to ensure that we are properly informed and well positioned to be able to create innovative community projects that are sustainable for the future.

We believe the priorities in this strategy, on skills, health, sustainability and partnership are the right ones on which to focus our efforts, to be effective and improve the lives of our residents.

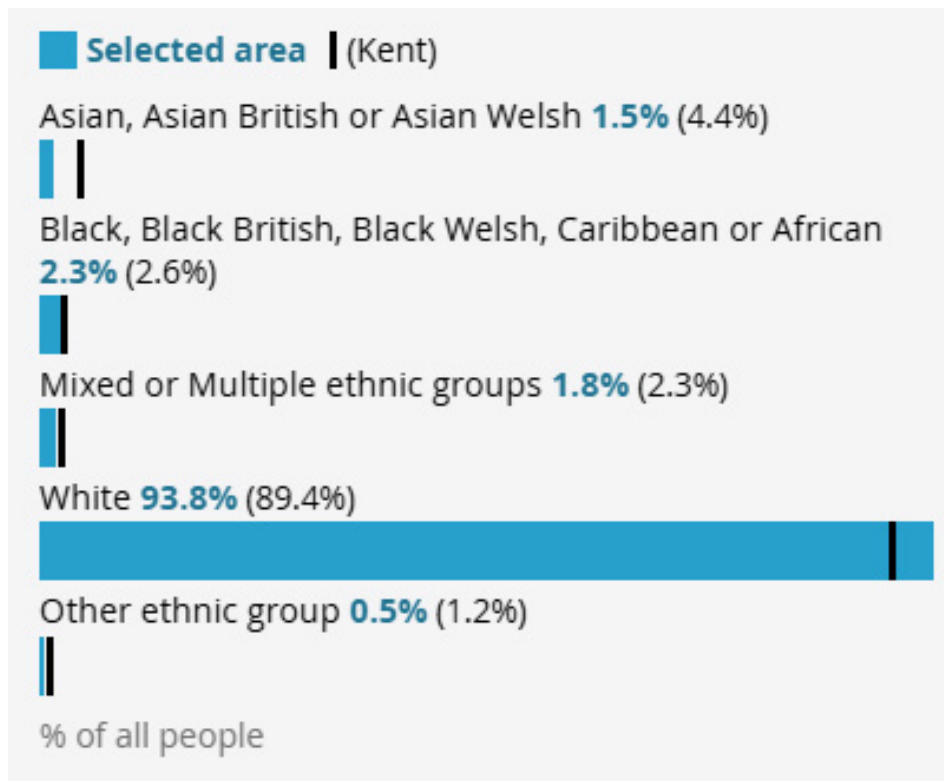
Cllr Tim Gibson *Leader of Swale Borough Council*

Cllr Elliott Jayes *Community & Leisure Committee Chair*

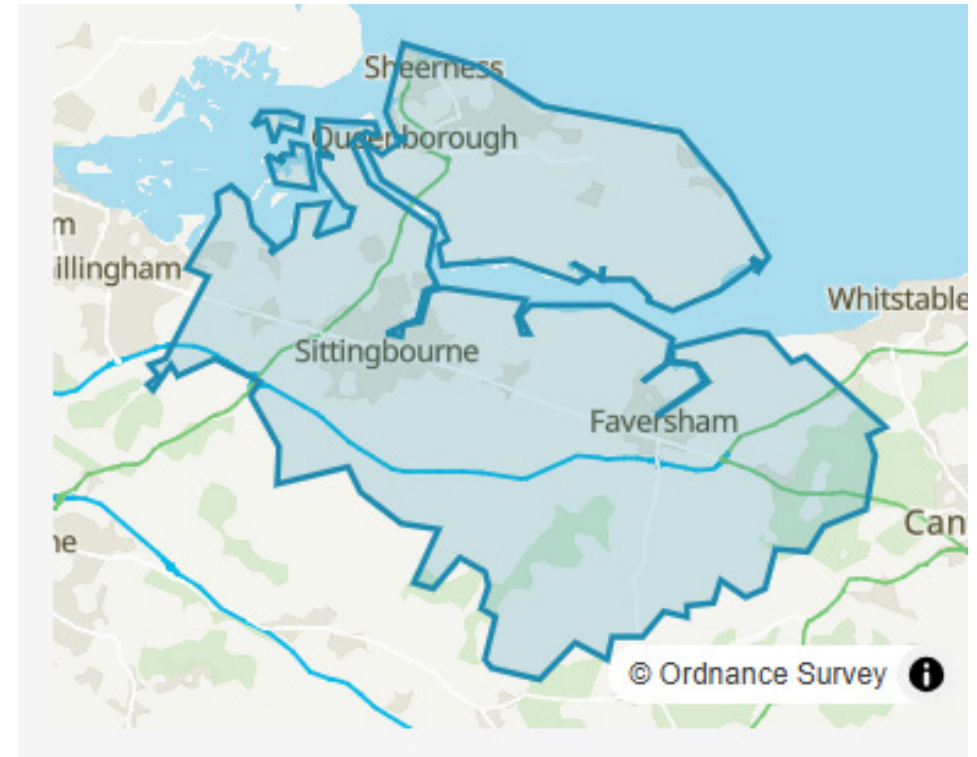
Age profile



Ethnic group



Area map



Population

151,700 people

1,576,100 people in Kent

Rounded up to the nearest 100 people

Overview of the borough

Deprivation

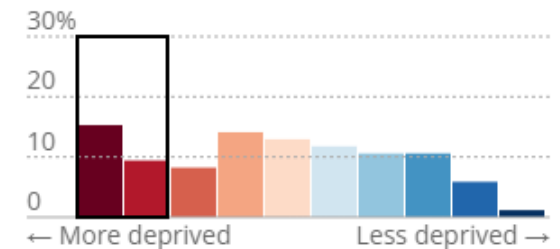
The Index of Multiple Deprivation (IMD) datasets are small area measures of relative deprivation across each of the constituent nations of the United Kingdom. This information is used to measure the level of poverty, and it is also used to target resources to help those who need it the most.

CDRC Harmonised 2019 IMD

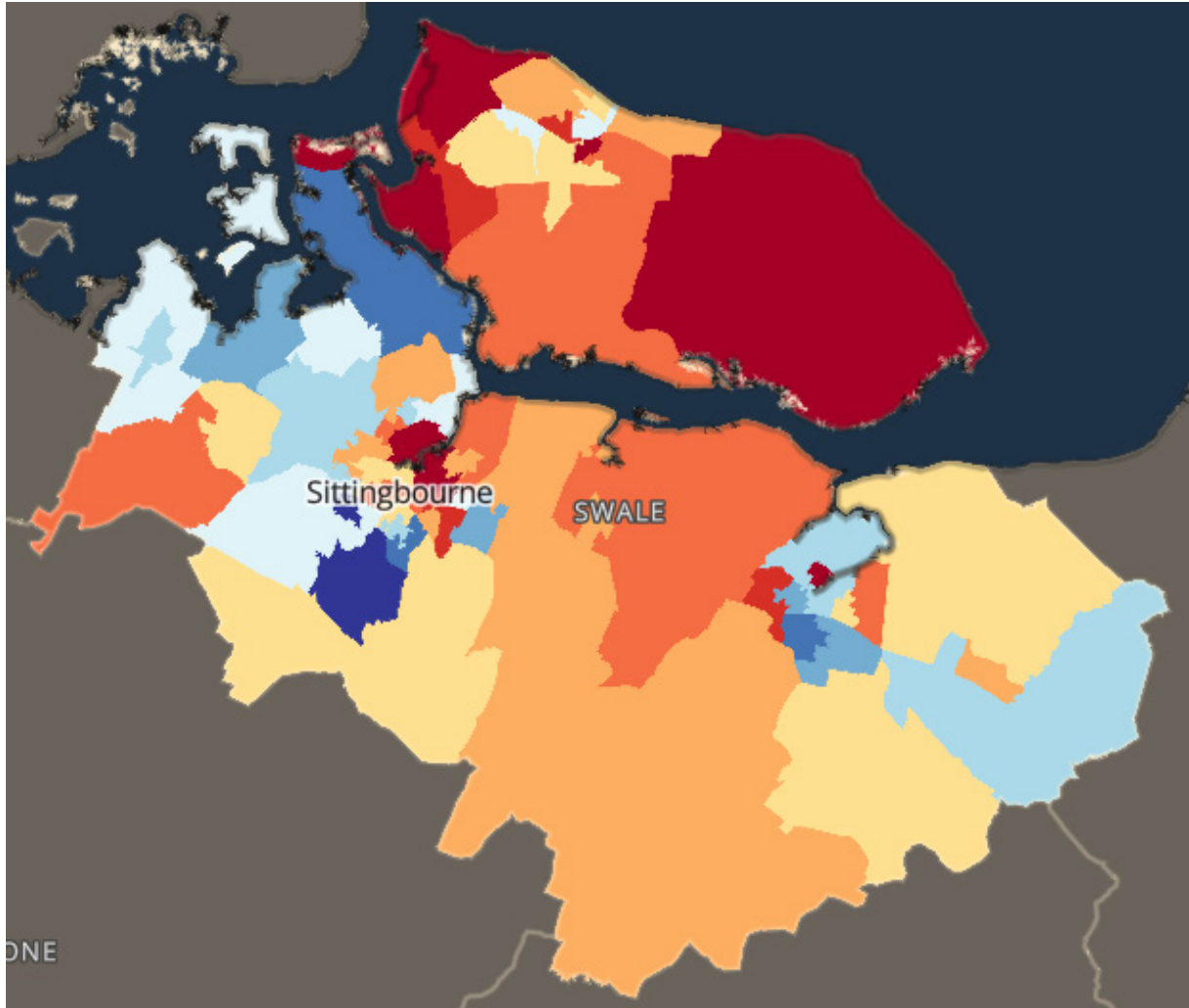


Swale

Neighbourhoods by income deprivation



A decile is a value that divides a data set into 10 equal parts.



Consumer Data Research Centre: DLUHC, OCSI, NISRA, Scottish Government

Introduction

Introduction

The Empowering You in Swale Strategy has been developed with the aim of contributing towards Swales Corporate Plan and to bring together a set of priorities that guide us in our aims to reduce inequalities and support Swales communities to thrive and be more sustainable for the future.

The priorities have been selected through engagement with communities and our partners to identify the key issues and develop projects that will look to address these by working together over the next three years. You will read throughout this strategy how we will work closely through community development projects and partnerships to find new ways to improve the lives of Swale residents. We know that lasting change cannot be achieved by the Council on its own, and we hope this strategy shows what can be achieved when we work collectively.

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What do we mean by Community Development?

Community development brings people together to take collective action and work on solutions for common problems. It is an important part of the work we do with communities to improve people's quality of life and bring about positive change.

What have we been doing?

Back in 2021, in the aftermath of COVID 19 pandemic, communities in Swale were struggling with a number of serious issues and with poverty hitting hard there didn't seem to be a light at the end of the tunnel for many. We saw how the voluntary, community and enterprise sector rallied together throughout the pandemic. We worked together to provide an emergency response that would change the way the

council works with the voluntary sector and develop new ways of delivering support to residents.

The Cost of Living Crisis that followed hit families hard and we knew that we had to be smart with the resources available to help residents who had reached crisis point, unable to feed their families, heat their homes or pay the mounting bills. We used the process of community development to bring everyone along on a journey with us to create a new way of working that would make sure that our communities are at the heart of what we do.

The creation of the Cost of Living Partnership Group and a number of other smaller working groups has enabled the council to develop a partnership that uses data and evidence to deliver support to our most vulnerable families in collaboration with frontline organisations that residents trust and know.

Cost of Living Community Development

The last 3 years has laid the foundations for the development of partnerships and a more collaborative approach to delivering community projects that look to improve the lives of Swale families and build more sustainable communities.

- ↓ Cost of Living Crisis affecting families, working in partnership to identify community needs
- ↓ Work with individuals and organisations within the partnership to develop solutions that can be delivered effectively
- ↓ Implement community led projects collaboratively
- ↓ Monitor and evaluate projects ensuring all voices are heard

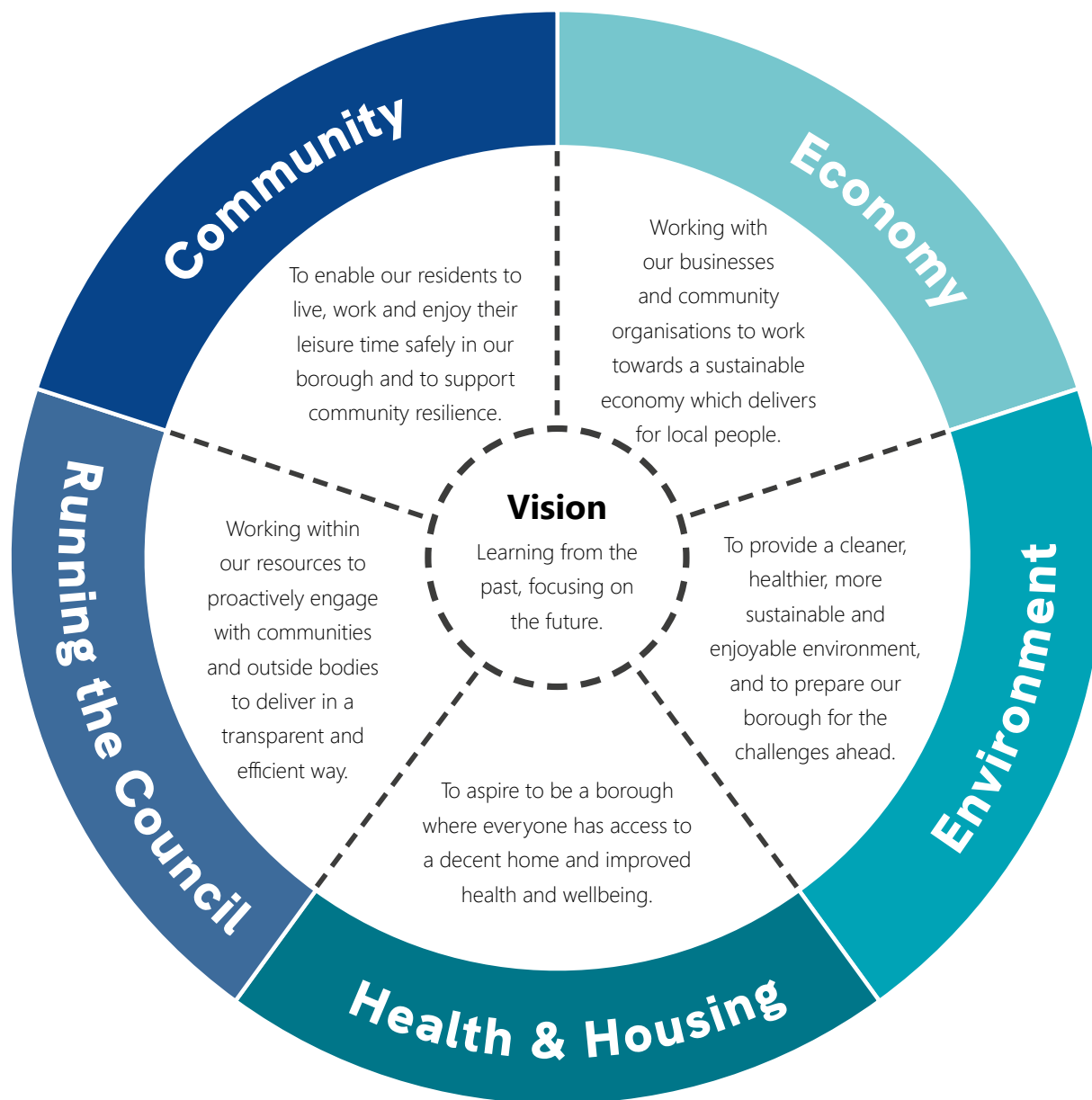
This strategy outlines the work we are developing collaboratively and informs our approach to continued community development and building new opportunities.

Corporate plan 2023-2027

Swale – Learning from the past, focusing on the future

[Council - Corporate Plan \(swale.gov.uk\)](https://www.swale.gov.uk/council-corporate-plan)

The Corporate Plan sets out the council's ambitions and priorities up to 2027. Empowering You in Swale is intended to link in with the overarching priorities of the Corporate Plan to ensure that we are delivering the best for our communities and consistently linking service delivery to overall priorities.



Engagement

We have worked collaboratively with residents, Councillors, representatives from Swale's Voluntary, Community and Enterprise Sector, and our statutory partners to ensure that local voices are heard in the creation of this strategy, as well as holding an eight week public consultation process and discussed at the four Area Committees to capture feedback and comments.

We will continue to engage throughout the life of the plan to ensure we have a clear understanding of the local landscape and remain engaged with our communities and partners.

“

Comments

'Strong partnerships and good communication is the key to providing a more cohesive approach'

'As a local resident these I would agree are key priorities for Swale'

'Based on health inequalities data, the priorities will enable greater community cohesion'

'You will need a KPI method for assessment along with regular updates to guide future public opinion surveys.'

”

Priority 1:

**Creating skilled, educated
and working communities**

Supporting improved access to education and training through continued development of engagement pathways that encourage increased confidence and promotion of activities through a partnership approach.

Key areas of work:

- Supporting the development and promotion of good skills, training and apprenticeships in the borough
- Improved access to education and training, including supporting projects regarding the ongoing issue of transport
- Working collaboratively to improve school attendance figures and related issues
- Supporting young people Not in education, employment or training 'NEET'

Kent District Unemployment - December 2024

Area	Number	Rate	Number change since last month	Percentage change since last month	Number change since last year	Percentage change since last year
Ashford	2,685	3.30%	65	2.50%	225	9.10%
Canterbury	3,320	3.40%	10	0.30%	95	2.90%
Dartford	2,425	3.20%	50	2.10%	205	9.20%
Dover	2,520	3.70%	-10	-0.40%	-190	-7.00%
Folkestone & Hythe	2,700	4.20%	60	2.30%	105	4.00%
Gravesham	3,025	4.60%	40	1.30%	220	7.80%
Maidstone	3,610	3.30%	40	1.10%	345	10.60%
Sevenoaks	1,520	2.10%	5	0.30%	50	3.40%
Swale	3,480	3.70%	0	0.00%	15	0.40%
Thanet	4,655	5.70%	110	2.40%	125	2.80%
Tonbridge & Malling	1,870	2.30%	25	1.40%	95	5.40%
Tunbridge Wells	1,850	2.60%	-30	-1.60%	220	13.50%
Kent	33,655	3.50%	360	1.10%	1,505	4.70%
Medway	7,540	4.30%	130	1.80%	770	11.40%

Area	Number	Rate	Number change since last month	Percentage change since last month	Number change since last year	Percentage change since last year
Kent	33,655	3.50%	360	1.10%	1,505	4.70%
Great Britain	1,690,595	4.10%	4,885	0.30%	182,620	12.10%

Pupils Not in Education, Employment or Training (NEET)

NEET is an acronym meaning 'not in employment, education or training'. The category usually represents people in the age group from 16 to 24 years old.

CYPE - MI Report

County NEET and Not Known (NK) Breakdown

MI Reporting Month: Select District: Select Academic Age:

38,787 Overall Cohort **4.0%** NEET **1,539** NEET Cohort **3.9%** Not Known **1,518** Not Known Cohort **7.9%** NEET and Not Known **3,057** NEET and Not Known Cohort

District	Total Cohort Y12&Y13	No. of NEET Y12&Y13	% of NEET Y12&Y13	NEET Target Y12 & Y13 (Sep 2022)	No. of NEET Y12	% of NEET Y12	No. of NEET Y13	% of NEET Y13	No. of NK Y12&Y13	% of NK Y12&Y13	No. of NK Y12	% of NK Y12	No. of NK Y13	% of NK Y13	NEET and Not Known %	NEET & NK Ranking
Ashford	3,504	122	3.5%	3.2%	47	2.6%	75	4.5%	118	3.4%	50	2.7%	68	4.1%	6.8%	4
Canterbury	3,439	161	4.7%	2.4%	70	4.2%	91	5.2%	97	2.8%	30	1.8%	67	3.8%	7.5%	7
Dartford	3,284	93	2.8%	2.3%	28	1.7%	65	3.9%	149	4.5%	51	3.1%	98	5.9%	7.4%	6
Dover	2,681	134	5.0%	2.7%	51	3.8%	83	6.2%	131	4.9%	39	2.9%	92	6.9%	9.9%	13
Folkestone and Hythe	2,470	89	3.6%	3.4%	35	2.8%	54	4.5%	127	5.1%	48	3.8%	79	6.6%	8.7%	10
Gravesham	2,967	120	4.0%	2.3%	38	2.6%	82	5.5%	107	3.6%	40	2.7%	67	4.5%	7.7%	8
Maidstone	4,313	185	4.3%	3.0%	83	3.8%	102	4.8%	202	4.7%	68	3.1%	134	6.3%	9.0%	11
Sevenoaks	2,595	82	3.2%	1.7%	30	2.3%	52	4.1%	104	4.0%	43	3.2%	61	4.8%	7.2%	5
Swale	3,808	196	5.1%	3.6%	90	4.7%	106	5.6%	165	4.3%	74	3.9%	91	4.8%	9.5%	12
Thanet	3,507	173	4.9%	4.0%	79	4.4%	94	5.5%	61	1.7%	23	1.3%	38	2.2%	6.7%	3
Tonbridge and Malling	3,272	111	3.4%	2.7%	47	2.9%	64	3.9%	160	4.9%	71	4.4%	89	5.4%	8.3%	9
Tunbridge Wells	2,947	73	2.5%	1.9%	29	2.0%	44	3.0%	97	3.3%	45	3.1%	52	3.5%	5.8%	2
Kent	38,787	1539	4.0%	2.8%	627	3.2%	912	4.7%	1,518	3.9%	582	3.0%	936	4.9%	7.9%	

NEET Length of Time

MI Reporting Month: Select District: Select Academic Age:

NEET Length of Time by District

District	0-6 Weeks	7-13 Weeks	14-26 Weeks	27-52 Weeks	52+ Weeks	Total
Swale	21	32	92	27	24	196
Kent	21	32	92	27	24	196

NEET Length of Time by District

District	0-6 Weeks	7-13 Weeks	14-26 Weeks	27-52 Weeks	52+ Weeks
Swale	10.7%	16.3%	46.9%	13.8%	12.2%
Kent	10.7%	16.3%	46.9%	13.8%	12.2%

Pupil Premium – Free school meals data

District	% of Pupils Eligible for Free School Meals				% of Pupils whose First Language is not English/Believed to be not English			
	Primary	Secondary	Special	Overall	Primary	Secondary	Special	Overall
National	24.3	24.1	47.4	24.6	22.8	18.6	14.5	20.8
Kent	26.6	23.1	46.2	25.5	15.2	12.2	5.9	13.6
Ashford	25.1	24.8	43.0	25.4	14.6	16.6	6.4	15.3
Canterbury	27.7	24.0	53.6	26.6	15.0	10.9	7.2	12.8
Dartford	21.7	20.1	61.6	21.2	27.8	19.1	0.0	23.3
Dover	36.5	30.0	75.4	34.1	9.3	8.1	1.5	8.6
Folkestone and Hythe	30.9	29.6	55.4	31.0	10.0	8.6	5.7	9.3
Gravesham	28.7	23.6	46.3	26.6	27.3	20.4	19.9	24.0
Maidstone	22.8	18.0	44.2	21.6	18.4	14.1	5.1	15.8
Sevenoaks	18.8	22.7	35.6	20.3	9.3	6.1	9.3	8.6
Swale	31.5	28.0	45.5	30.4	8.9	6.2	3.6	7.7
Thanet	41.3	34.5	45.4	38.5	12.6	10.1	4.9	11.2
Tonbridge and Malling	19.3	16.5	39.9	18.4	8.7	6.4	5.2	7.5
Tunbridge Wells	17.9	12.2	37.2	15.6	17.8	11.9	4.6	14.3

30.4% of children were eligible for free school meals across Swale

Where are we now?

Due to the end in European Social Funding we have seen a huge reduction in the number of providers supporting those at risk of becoming NEET or are already in the NEET category across Swale. Funding is an issue for providers to be able to deliver meaningful and sustainable work within the borough and it is becoming increasingly more difficult for NEETs who are experiencing a lot of mental health issues preventing them from actively engaging. However, we have been working closely with partners on a number of projects that look at tackling this issue and improving the employment and education prospects of young people in the borough.

Schools now have to adhere to a set of benchmarks when it comes to positive interactions and engagements with employers right the way from Year 7 to years 12/13, these are known as the [Gatsby Benchmarks](#). This is to enable greater career guidance and understanding from an earlier age and better local labour market information. It's about directing individuals with a particular sector interest to the correct information so they are aware of what's involved.

It is known that the VCSE are well engaged to our communities and can interact with residents through exciting and different ways. Using UK Shared Prosperity Funds, we have been able to link skills projects to residents who need support building confidence and to enable them to access training and skills to build a brighter future.

Looking forward

In the last academic year, we have seen significant changes to the school provision on the Isle of Sheppey, two new providers have taken over secondary school education and are at the start of their journey. We will continue to work alongside them by utilising the VCSE sector and others, to assist them to embed into the community.

To understand fully the local landscape, we intend to continue to engage with existing groups, such as the Local Childrens Partnership Meetings, Vulnerability Panel, Family Hubs and Youth Services meetings as part of the Community Safety Partnership to ensure that we can work together to find solutions to the issues our children and young people are facing.

We will champion apprenticeships and skills offers through existing council departments as well as utilising our relationship with local businesses and other agencies such as the Department for Work and Pensions to raise awareness and promote new opportunities.

Through our partnership approach, we will continue to seek opportunities for funding to enable activities that will support communities to access skills and employment and continue to engage in conversations that support new ideas.

We know that transport has been a long standing issue for residents living in rural areas. We will lobby for change, exploring all options, including tapping into new initiatives, to remove this barrier to work and training opportunities.

Priority 2:

Growing healthy communities

Working collectively to reduce health inequalities in the borough by supporting place based solutions that fit outside of the statutory health profession and making the most of our voluntary, community and enterprise sector to deliver localised projects.

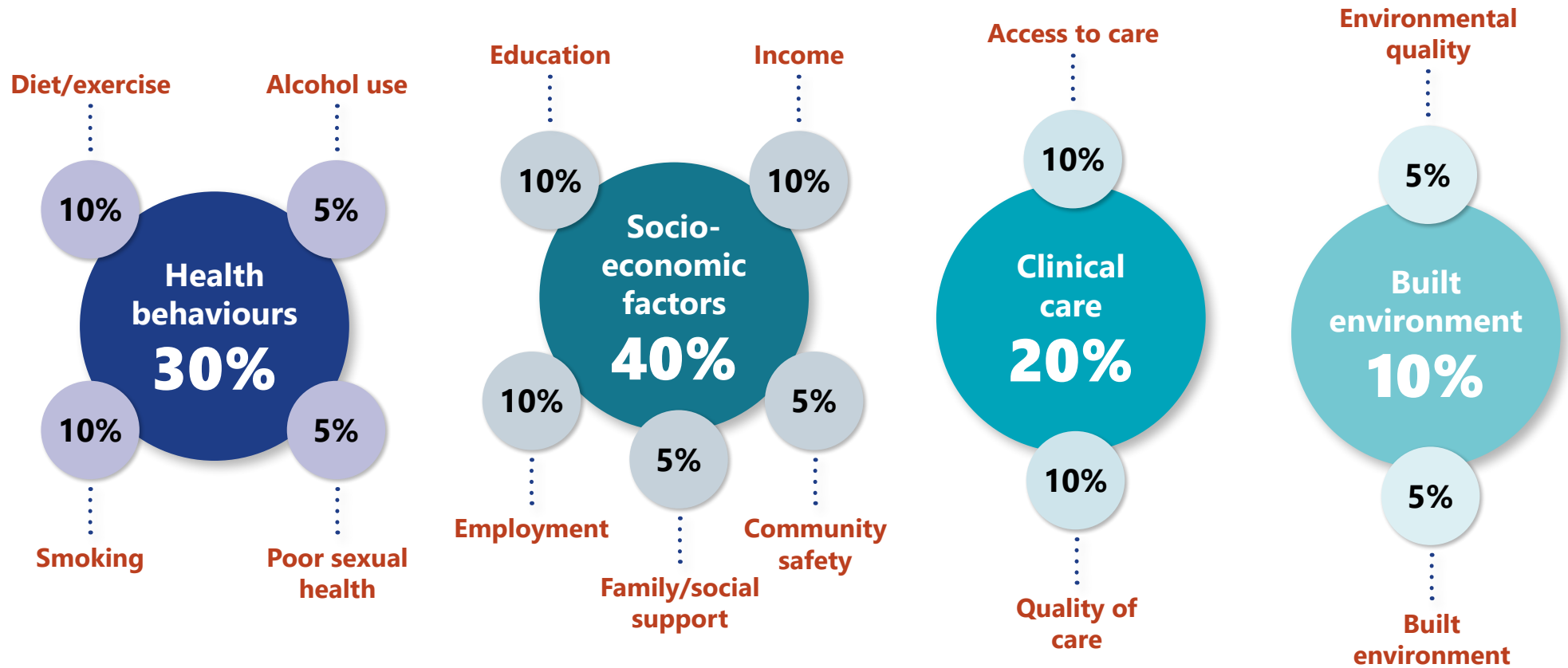
Suggested key areas of work:

- Working collaboratively to reduce health inequalities in the borough and reduce loneliness
- Improved access to health care, including transport to appointments
- Promoting access to leisure facilities, as well as parks and open spaces within the borough
- Promoting better living conditions in the borough with an aim of reducing damp and mould in people's homes



Indicator	Period	Swale			Kent	England	England		
		Recent Trend	Count	Value	Value	Value	Worst	Range	Best
A01b - Life expectancy at birth (Male, 3 year range)	2020 - 22	-	-	78.1	79.0	78.9	73.4		83.7
A01b - Life expectancy at birth (Female, 3 year range)	2020 - 22	-	-	82.0	83.0	82.8	79.0		86.3
A01b - Life expectancy at birth (Male, 1 year range)	2022	-	-	78.8	79.5	79.3	73.8		83.8
A01b - Life expectancy at birth (Female, 1 year range)	2022	-	-	82.0	83.3	83.2	79.2		87.0
A02a - Inequality in life expectancy at birth (Male)	2018 - 20	-	-	7.3	7.8	9.7	17.0		0.7
A02a - Inequality in life expectancy at birth (Female)	2018 - 20	-	-	4.4	5.6	7.9	13.9		-1.8
Overarching indicators at age 65									
A01b - Life expectancy at 65 (Male, 3 year range)	2020 - 22	-	-	17.8	18.4	18.4	15.8		21.2
A01b - Life expectancy at 65 (Female, 3 year range)	2020 - 22	-	-	20.4	21.0	20.9	18.2		23.3
A01b - Life expectancy at 65 (Male, 1 year range)	2022	-	-	18.4	18.8	18.7	16.1		21.5
A01b - Life expectancy at 65 (Female, 1 year range)	2022	-	-	20.7	21.3	21.2	18.7		23.7
A02a - Inequality in life expectancy at 65 (Male)	2018 - 20	-	-	3.1	4.0	5.2	12.7		-0.9
A02a - Inequality in life expectancy at 65 (Female)	2018 - 20	-	-	2.5	3.1	4.8	9.5		-1.1

There are a wide range of things that determine someone's health and wellbeing, with clinical care only accounting for 20 per cent of the impact. We call the factors that affect health, the wider determinants of health.



Based on: Robert Wood Johnson Foundation and University of Wisconsin Population Health Institute, US County health rankings model 2014
www.countyhealthrankings.org/sites/default/files/media/document/CHRR_2014_Key_Findings.paf

Health inequalities are a result of a number of different causes, such as:

- The long term effects of a deprivation
- Differences in access to information, services and resources
- Differences in exposure to risk
- Lack of choices over your own life circumstances
- A health system that may reinforce inequalities

These factors all contribute to a variety of ill health triggers and that can affect communities and increase reliance on health and other services.

Where are we now?

We are not formally responsible for public health as this sits with the County Council under the Social Care Act 2012, however we have a huge role to play in promoting better health outcomes within the community and we have been working hard with our partners in the NHS and many others to ensure that we are collectively working together to tackle health inequalities.

The new Sheppey Community Diagnostic Centre (CDC) is a community hub delivering the provision of imaging, physiological measurement, and pathology tests and scans it will deliver a significant increase in access for residents of Swale. The centre will be part of the existing community hospital and provide improved access for those locally who struggle to attend appointments at places like Medway Hospital. We will continue to work alongside our colleagues at the Health & Care Partnership to ensure that opportunities such as this are developed and where needed lobbied for.

Improving health in the early years of life contributes considerably to better health outcomes in later life, with reduced levels of diabetes, coronary heart disease and hypertension, all of which have a significant impact on the NHS as well as wider society, children and their families. We have been working closely with Kent County Council to feed into the development of the Kent Family Hub model, of which Swale has 6 centres, all of which play a pivotal role with supporting families in Swale. We will continue to develop opportunities for young and families to ensure there is appropriate provision in Swale going forwards.

Shaping the physical environment of the community so that it can better promote healthier lifestyles is central to borough's 'regulatory health improvement role. The new National Planning Policy Framework highlights the role of the planning system in facilitating social interaction and creating healthy, inclusive communities. This includes measures aimed at reducing health inequalities, improving access to healthy food and reducing obesity, encouraging physical activity, improving mental health and wellbeing, and improving air quality to reduce the incidence of respiratory diseases.

Looking forward

Tackling health inequalities in the borough is a priority thread that runs through all 4 priorities. We will continue to encourage new initiatives to the borough, linking closely with our partners in health settings, we will continue to drive change and increase opportunities for families to access services more easily and frequently.

We will work with our partners to improve loneliness in the borough, which is experienced throughout the full lifespan from young right the way through to elderly. By improving loneliness and linking this to things such as transport to hospital appointments, we can start to make a difference to the lives of our residents.

Working with council departments such as Leisure and Planning, we will promote the use of facilities in the borough such as our parks and open spaces, and leisure centres to increase activity and promote healthier lifestyles.

Working with Swales Private Sector Housing Team we will promote the Healthy Homes project which is addressing health issues associated with damp and mould in the home, as well as raising awareness with landlords and using enforcement activities where necessary.

Medway & Swale Health & Care Partnership are driving forward change through place-based solutions that fit outside of the statutory health and care profession and in the wider determinants of health. We will continue to play a role in ensuring a joined-up approach to transforming the health and wellbeing of our communities through Social Regeneration.

Continuing our drive to influence and empower change within the borough we are similarly linked to Kent County Councils [Integrated Care Strategy](#), of which we are committed to integrating key themes of the strategy through our Corporate Plan and in localised Service Plans to collaborate on key themes such as Supporting families and communities so children thrive and tackling the wider determinants of health making the most of our VCSE and community links.

Priority 3:

Empowering stronger, more sustainable communities

We will continue to develop innovative solutions to the difficulties faced by our communities, including the aftereffects of the COVID 19 pandemic, Cost of Living, Fuel Crisis, and day to day hardship. We will continue to work with the voluntary, community and enterprise sector to improve resilience and enable organisations to grow and thrive in the borough.

Suggested key areas of work:

- Delivering a collective response to Cost of Living, fuel and other crisis
- Data led targeted interventions such as benefit uptake campaigns and direct mailings to promote opportunities
- Improved awareness and information sharing of available services
- Development of a more resilient and sustainable voluntary, community and enterprise sector in Swale

Where are we now?

Sadly, we know some residents of Swale are still feeling the impacts of the COVID-19 Pandemic and continue to struggle on a day to day basis with basic needs such as feeding their families and fuelling their homes as Cost of Living continues to have an impact to the boroughs most vulnerable residents, this includes those on a low income, those with disabilities, refugees, as well as pensioners.

Domestic Abuse remains at a high level across the borough, albeit there has been a slight reduction since the peaks seen following the pandemic. Support services, which are largely delivered by the voluntary, community and enterprise sector, these organisations are continuing to see high demand; often increasingly more complex needs; and a reduction in funding available continues to put strain on

services. Overall levels of crime remain steady, with seasonal increases in Anti-Social Behaviour. There are high levels of youth ASB, which does correlate with reductions in diversionary activities due to funding loss.

The voluntary, community and enterprise sector in Swale offer services which are recognised to improve and change the lives of the residents they support. We have been working closely with the sector over the last 2 years to identify areas of specific need to help the organisations within this group become stronger and more sustainable. There has been a number of social and economic factors including the pandemic which has had a huge impact on things such as access to funding and volunteers which has in part seen some of these organisations closing their doors.

We have transformed the way that community services are delivered to ensure that we are providing innovative solutions to difficult and complex issues within our communities. We have learned through the evolution of Household Support Fund the power of two-way conversations and the strength of doing things in partnership. We will continue to value this way of working going forwards recognising the ever-changing landscape in Local Government.

Looking forward...

We will continue to prioritise improving the lives of our residents, whether that be through targeted interventions such as Benefit Uptake Campaigns, through crisis response grants such as Household Support Fund or working with the voluntary, community and enterprise sector and other statutory partners to ensure every resident has awareness of what is available to them in their time of need, through activities such as the One Swale Roadshows.

Through the existing Cost of Living Partnership Group, we will continue to meet with organisations from across the borough to agree how to tackle localised issues, monitor data and trends and provide a platform to enable lobbying for change.

We want to support the voluntary, community and enterprise sector through the delivery of Swale Voluntary Alliance (SVA) to be able to collaborate with not only the Local Authority but with other organisations within the sector. The sector said they wanted change and so we will continue to support them to deliver this through SVA and foster relationships with statutory bodies as well as Swale Borough Council.

Using existing platforms and a collaborative approach we will promote easy access to services for our residents to ensure families can find information easily and quickly, whilst working with our communications teams to promote relevant information through a variety of channels.



Priority 4:

**Developing strong
partnerships that deliver
for our communities**

Strong relationships, not only with our communities but with our partners, are powerful in driving forward change and helping to initiate sustainable, long-lasting transformation. We are committed to continuing to build upon the footings we have made through existing partnerships and look to make meaningful new ones that will support our vision to tackle health inequalities, promote community safety, reduce poverty and create sustainable communities.

Suggested key areas of work:

- Continued development of the relationship with Swale's voluntary, community, and enterprise Sector
- Delivery of the Community Safety Partnership and associated projects
- Develop relationships with Swales Business community to promote corporate social responsibility
- Continued strengthening of partnerships with health partners including Medway & Swale Health & Care Partnership, East Kent Health & Care Partnership and the Kent Integrated Care Board

Where are we now?

We have been building relationships with our partners for many years and a good example of how this can work well is the borough's Community Safety Partnership, consisting of partners such as Police, Probation, NHS, the VCSE and others. This successful partnership has been delivering targeted projects collaboratively to tackle issues such as Crime, antisocial behaviour and domestic abuse for many years.

A powerful relationship has formed between the council and the various organisations across the borough that came together to respond to the issues created by the Cost of Living and Fuel crisis as well as other outside impacts. This group has effected change by collaborating and creating a strong voice for the vulnerable residents who need us to defend and provide for them. In conjunction with this, our work has seen a relationship form with the VCSE in Swale that will enable us to be creative in our outlook and design new and innovative ways of working together for the benefit of Swale residents.

Our partnership with Medway & Swale Health & Care Partnership (NHS) has grown, and we are excited to be working closely with them within the boundaries of our expertise and driving forward projects tackling Obesity, Living Conditions and Self-harm to name a few.

Looking forward...

We will continue to build the partnership with communities in the borough, ensuring that we are engaging through Area Committees, through our frontline service delivery and through engagement opportunities such as the One Swale Roadshows, opening opportunities for residents to have a voice on the things that matter to them.

We know that we can't deliver change within our communities without the support and collaboration of our partners, whether that be statutory bodies such as NHS and Police, or our vibrant voluntary, community and enterprise sector. We must partner and develop our vision together, allowing the voices of our partners to be heard in the development of our services and supporting others to fulfil their own priorities.

Internally within the organisation we seek to ensure that there are improved linkages between departments meaning that we can be sure that when a planning development is underway, or the housing crisis is being tackled, we are collectively acting in the best interests of the communities affected.

We know there is always work to be done to sustain and improve partnership working in the community and we look to continue this important work creating new relationships for the benefit of all.

How will we monitor progress?

We will monitor progress of the intended work being undertaken within this document through key performance targets set out below. Progress will be reported yearly to the Community & Leisure Committee and through the councils KPI monitoring.

- School attendance figures
- NEET stats
- Health inequality stats
- Healthy Homes targets
- Diagnostic centre outcomes
- Data led campaign figures
- Household Support Fund or equivalent emergency support- food/ fuel bank data
- Swale Voluntary Alliance progress reporting
- Update on new/old collaborative projects

How will we resource delivery?

Utilising the One Council approach the Community & Partnerships Team will look for opportunities to link in with internal service delivery to ensure that we are making the most of all available resources and to ensure a joined-up approach to service delivery. We will utilise existing resources within the council to deliver as per agreed Service Plans.

The team will engage and collaborate with external organisations and partners to seek external funding opportunities to develop projects within the boundaries of officer time and the resources available.

Policy and Resources Committee Meeting	
Meeting Date	26 th March 2025
Report Title	Safeguarding Policy Review
EMT Lead	Emma Wiggins, Head of Regeneration and Neighbourhoods
Head of Service	Charlotte Hudson, Head of Housing and Communities
Lead Officer	Stephanie Curtis, Community Services Manager Tina Grafton, ASB and Safeguarding Team Leader
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. For the Policy and Resources Committee to note the Housing and Health Committee decision to approve the refreshed Safeguarding Policy and to change its review frequency to bi-annual; and to agree the refreshed policy for adoption.

1 Purpose of Report and Executive Summary

- 1.1 This report summarises the amendments that have been recommended to be made to the Safeguarding Policy and agreed by the Housing and Health Committee.

2 Background

- 2.1 Safeguarding is 'everyone's business'. The policy sets out Swale Borough Council's (SBC) responsibilities under the Children Act 2004, Care Act 2014 and other legislation to ensure children, young people and adults at risk are kept safe from harm.
- 2.2 The Safeguarding Policy was last revised in March 2024 and has previously been subject to an annual review to ensure that it reflects any legislative or procedural changes.
- 2.3 The main amendments that have been made to the previous version of the Safeguarding Policy and summarised below:
 - Section 5.3 – Changes to Local Authority Designated Officer (LADO) service as now Local Education Safeguarding Advisory Service (LESAS) due to merge with education service.
 - Section 7 - DBS Disclosures: Addition of reference to elected members and to DBS procedure which has been added as an appendix (appendix 6), following

agreement from Standards Committee in 2024 that elected members will be required to undertake a basic DBS check.

- Appendix 5: added Managing Allegations policy (updated November 2024) and adding to main policy as an appendix. This has been added as part of the KMSAB audit outcome and brings together all documents around staff and members conduct.
- Section 11 - Addition of guidance for translation services making it more explicit when these services should be used, following a recommendation from the Kent Safeguarding Adults Board.
- Typo in web link corrected for a KMSAB policy link.
- added reference to internal policy for Safer Recruitment Policy (currently being updated) at the end of appendix 7 for awareness.
- Additions to the table of safeguarding concerns in section 5.1.2, following discussion at Housing and Health Committee
- Amendments to the colours used throughout the document to ensure it is accessibility compliant, following discussion at Housing and Health Committee.

2.4 This policy has previously been reviewed annually due recommendations from serious case reviews and other practice recommendations and legislative changes. However, it is now felt that we are at a level where this can be changed to bi-annually. Any necessary changes required can be made via an addendum except major policy/legislative changes which would be brought to necessary Committee or panels as necessary.

2.5 The Policy was discussed at the Housing and Health Committee on the 4th March 2025, where it was approved, subject to minor amendments suggested; and agreed to reduce its review frequency to bi-annually.

3 Proposals

1. For the Policy and Resources Committee to note the Housing and Health Committee decision to approve the refreshed Safeguarding Policy and to change its review frequency to bi-annual; and to agree the refreshed policy for adoption.

4 Alternative Options

- 4.1 That the revised Safeguarding Policy is not adopted. This is not recommended as although the current Policy is largely accurate in relation to legislative requirements, it is not complete; and a number of recommendations were made by an external audit for inclusion within the policy.

5 Consultation Undertaken or Proposed

- 5.1 Consultation has taken place with team managers, of those teams that identify the greater number of safeguarding concerns.

6 Implications

Issue	Implications
Corporate Plan	<p>This policy refresh will contribute to the corporate priorities : Health and Housing priority - Ensure we meet our safeguarding obligations to keep children and vulnerable adults safe.</p> <p>Achieve Domestic Abuse Housing Accreditation, demonstrating our commitment to identifying abuse, preventing it and provide help to those affected.</p>
Financial, Resource and Property	<p>Existing staff are in place (1 FTE Community Services Manager; 1 FTE ASB and Vulnerability Team Leader; and 1 FTE Safeguarding Officer) to manage the implementation of this policy.</p> <p>In order to deliver the proposed staff training plan, there is a financial cost for some sessions, however these are met through existing corporate training budgets or by contributions already made to the Safeguarding Partnerships.</p>
Legal, Statutory and Procurement	<p>The Children Act 1989 states that the child's welfare is paramount and that every child has a right to protection from abuse, neglect and exploitation. The Children Act 2004 specifies the statutory guidance relating to Swale Borough Council under this agenda.</p> <p>The Safeguarding Policy also highlights other legislation relating to this agenda and requirements upon the Council including The Care Act 2014, Counter Terrorism Act 2015; Modern Slavery Act 2015; Domestic Abuse Act 2021; and more recently the Police, Crime Sentencing and Courts Act 2022</p>
Crime and Disorder	<p>Through the implementation of the Safeguarding Policy and addressing safeguarding concerns of vulnerable individuals, there will naturally be some cases where the individual is also supported to address crime and anti-social behavioural issues, through referrals and information sharing with other agencies.</p>
Environment and Climate/Ecological Emergency	<p>No air quality, or climate/ecological emergency implications have been identified at this stage.</p>

Health and Wellbeing	The Safeguarding Policy will ensure that the Council responds appropriately to safeguard children and vulnerable adults. This also extends to welfare concerns that may not have met the thresholds for referrals to statutory services, but by addressing the needs identified, improves the community's health and wellbeing.
Safeguarding of Children, Young People and Vulnerable Adults	This revised Safeguarding Policy details the Council's response to Safeguarding and the process by which it should be managed.
Risk Management and Health and Safety	Safeguarding has in the past been one of the risks identified in the corporate risk register, but due to the levels of controls in place as identified by this Policy is now only within the Housing and Communities Service Plan Risk Register.
Equality and Diversity	No specific equality and diversity implications have been identified at this stage. All safeguarding concerns are handled in an appropriate manner for the case in question. Resources to address any identified communication needs are within the revised policy and these place greater emphasis on the need for utilising translation services to cover individual communication needs in a safe manner.
Privacy and Data Protection	The safeguarding database 'My Concern' referenced within the Policy as part of the recording process, has a high level of security – all users must be approved by the safeguarding team and given an appropriate level of access. All referrals can also securely be saved here and case notes. Section 4.4.11 of the policy discusses information sharing.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Draft Swale Borough Council Safeguarding Policy 2025

8 Background Papers

None.

Safeguarding Policy

March 2025 Review

Foreword



Ensuring that the most vulnerable in our community are protected is something which is the responsibility of us all. This policy provides essential information about how we will deal with concerns about the safety of a vulnerable child and adult. This policy also sets out clearly how we will work with others and support people to report abuse or concerns. It also ensures that, through training and review of our policies, the council will always work in a way which promotes safeguarding and tackles any form of abuse of vulnerable people

Larissa Reed, Chief Executive, Swale Borough Council

“It’s not my job.” “It’s none of my business.”

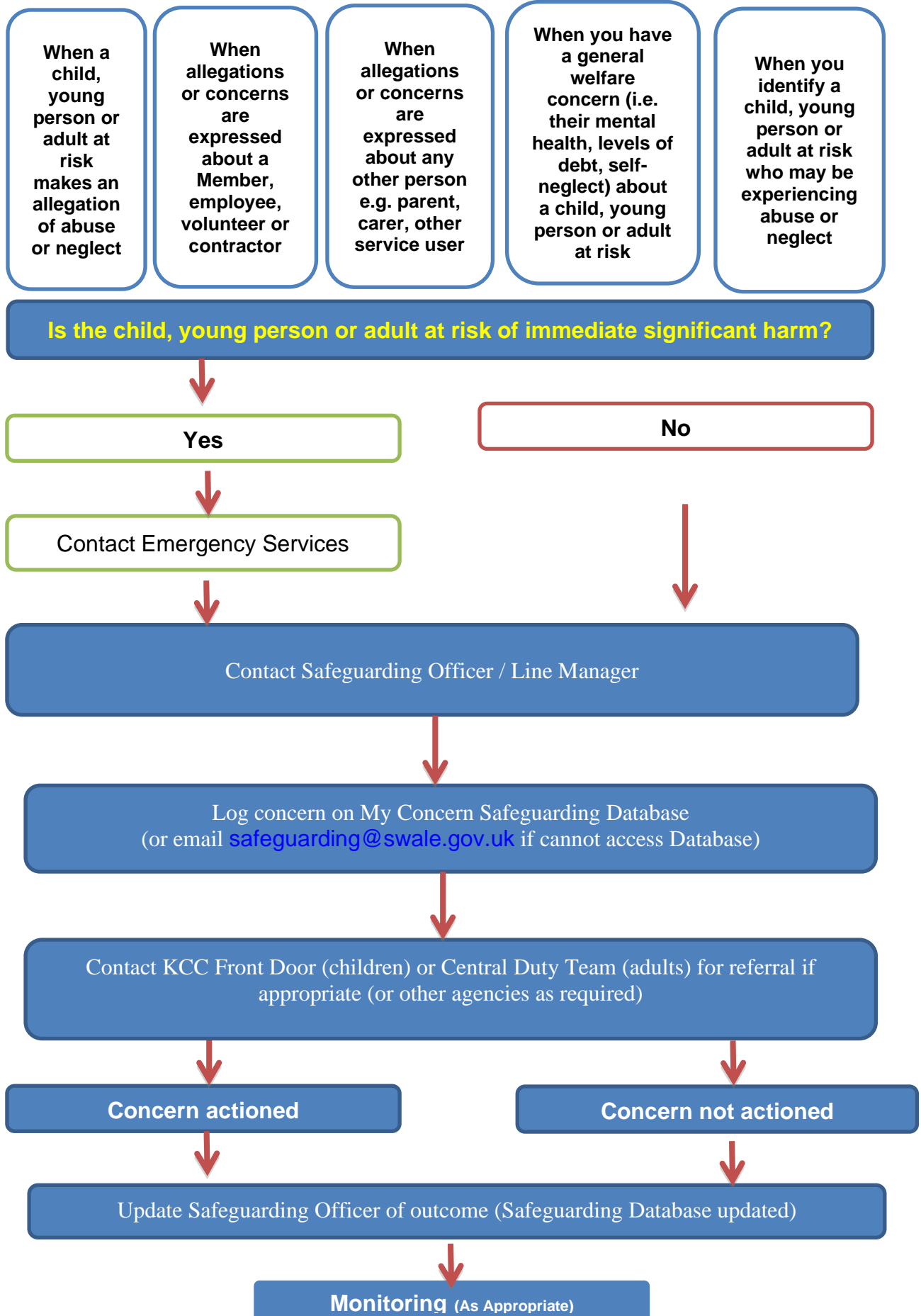
How many times have we heard or read that?

Well, Safeguarding is our job and it is our business. If in doubt, report it. Someone else can decide whether there is any substance – you don’t have to; you just have to be concerned. Imagine if it were one of your family. Wouldn’t YOU want someone to raise any concerns? Better to be Safe than Sorry.



Councillor Angela Harrison, Swale Borough Council

Safeguarding 'Quick View' Procedure



1. Introduction

Safeguarding is 'everyone's business'. This policy sets out Swale Borough Council's (SBC) responsibilities under the Children Act 2004, Care Act 2014 and other legislation to ensure children, young people and adults at risk are kept safe from harm.

2. Purpose

- 2.1** The purpose of this policy and the associated procedures are to protect and promote the welfare of the children, young people and adults using or receiving services provided or commissioned by SBC. The policy also aims to support the Council, its officers, elected members and volunteers in fulfilling their statutory responsibilities. Swale Borough Council is not a Children's Services Authority and it is not the role of the Council to investigate allegations of abuse. However, all Elected Members, employees, volunteers and contracted services providers have a clear responsibility to take action when they suspect or recognise that a child, young person or adult at risk may be a victim of significant harm or abuse.
- 2.2** This policy demonstrates how SBC will meet its legal obligations and reassure members of the public, service users, Members, employees, volunteers and those working on behalf of the Council as to:
- a) What they can expect SBC to do to protect and safeguard children, young people and adults at risk;
 - b) That they are able to safely voice any concerns through an established procedure;
 - c) That all reports of abuse or potential abuse are dealt with in a serious and effective manner;
 - d) That they can raise even a basic welfare concern for a child or adult and that appropriate action will be taken;
 - e) That there is an efficient recording and monitoring system in place;
 - f) That Members, employees, volunteers and contractors receive appropriate training;
 - g) That robust 'safer' recruitment procedures are in place.

3. Legal Duties

- 3.1** The Children Act 1989 states that the child's welfare is paramount and that every child has a right to protection from abuse, neglect and exploitation. Statutory guidance on making arrangements to safeguard and promote the welfare of children under Section 10, 11 and 13 of the Children Act 2004 and specifies what is required of SBC. This includes:
- Senior management commitment to the importance of safeguarding and promoting children's welfare;
 - A clear statement of the Council's responsibilities to children, available to staff;
 - Clear lines of accountability for work on safeguarding and promoting well being;

- Using the views of children and young people to help shape services;
 - Safer recruitment procedures for those coming into contact with children and young people;
 - Appropriate training for staff;
 - A duty to promote inter-agency cooperation between named agencies, including district councils;
 - Representation on, and participation in, local safeguarding children's boards;
 - Effective working relations within the Council and with other agencies to safeguard and promote well-being and to share information effectively.
- 3.2** Under the Children Act 2004 and Working Together to Safeguard Children 2023, SBC has a duty to co-operate with Kent County Council (KCC) in discharging its duties as a Children's Services Authority and to promote the well-being of children and young people. (app)
- 3.3** KCC is the lead agency for the protection of adults at risk. SBC is committed to working in partnership with KCC in delivering their responsibilities around Safeguarding Adults.
- 3.4** SBC must carry out its responsibilities by ensuring that the needs and interests of children, young people and adults at risk are considered by all Members, employees, volunteers and contracted services, when taking decisions in relation to service provision.
- 3.5** SBC policies and procedures are governed by The Care Act 2014 that provides the legal framework for how local authorities (in this case Kent County Council) and other parts of the system such as relevant partners (which includes SBC as a district council) should protect adults at risk of abuse or neglect. SBC has a duty to co-operate with KCC in the exercise of:
- (a) their respective functions relating to adults with needs for care and support
 - (b) their respective functions relating to carers, and
 - (c) functions of theirs the exercise of which is relevant to functions referred to in paragraph (a) or (b).
- 3.6** The Counter-Terrorism Act 2015 dictates that local authorities are vital to the Prevent work which exists to reduce the risk of people being drawn into terrorism. Local authorities must use counter-terrorism local profiles (CTLPs) for SBC must be used to assess the risk of individuals being drawn into terrorism. SBC must incorporate the duty into existing policies and procedures to fulfil safeguarding responsibilities ensuring there are clear and robust policies to identify and safeguard children at risk. Furthermore SBC must develop a Prevent action plan should there be a risk to identify interventions to be actioned. SBC must also ensure that appropriate frontline staff, including those of it's contractors, have a good understanding of Prevent and are trained to recognise vulnerability to being drawn into terrorism and are aware of available programmes to deal with the issue. The Community Safety Plan is utilised to ensure a consistent response to Prevent (Prevent guidance 2023) is provided across local partner agencies and that this duty is met by SBC. (app)

- 3.7 Under the Modern Slavery Act 2015 SBC 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. Adult victims are able to remain anonymous should they wish to do so. SBC are under a duty to co-operate with the Commissioner. (app)
- 3.8 The Domestic Abuse Act 2021 had placed a number of additional duties on Swale Borough Council that must be considered within our safeguarding response. These include:
- The definition of Domestic Abuse has been changed to cover those ‘personally connected’;
 - Children are now to be seen as a victim of Domestic Abuse in their own right, if they hear or experience the effects of the abuse and should be able to access support;
 - Appropriate priority will be given to victims of Domestic Abuse and like for like lifetime tenancies will be upheld. Victims should not find that their tenure is affected by fleeing Domestic Abuse;
 - The individual fleeing DA should be offered safe accommodation or at the choice of the victim to remain in their own home have access to the sanctuary scheme and local support;
 - It is recognised that many people will wish to flee with animals, and will try to accommodate needs or look for solutions;
 - That there should be promotion of the one stop shops and local support groups and services;
 - Swale BC must contribute to the local partnership board and creation of a local needs assessment.
- 3.9 Section 68 of the Care Act 2014 requires that the Local Authority (upper tier authority) must arrange for an independent advocate to represent and support an adult who is the subject of a safeguarding enquiry or review, where the adult has ‘substantial difficulty’ in being involved in the process and where there is no other ‘appropriate person’ to represent them. For Swale Borough Council, although this duty does not apply directly to us, officers must have due regard to this need and ensure that appropriate signposting can take place to advocacy services as required. (see appendices and link to statutory advocacy)
- 3.10 Under the Care Act 2014, a carer is an individual who provides or intends to provide care for another adult. If a carer has any level of needs for support, they are entitled to a carer’s assessment, which would be conducted by Kent County Council. Swale Borough Council must have due regard for the needs of carers (Carers assessment) and make a referral for a care needs assessment, as required.
- 3.11 The Children and Social Work Act 2017 and Working Together to Safeguard Children 2023 places a number of duties on housing authorities to work jointly with a children’s services authorities in relation to housing of care leavers. All young people need to have safe and appropriate accommodation to meet their needs, with planned supportive transitions to independent living. Any

homelessness risks should be identified and acted upon at an early stage. This includes the expectation for keeping in touch with care leavers over the age of 21, and the non-mandatory reporting of care leaver deaths up to age 25 to improve learning and outcomes for this group of young people. (app)

- 3.12 The Police, Crime Sentencing and Courts Act 2022 received royal assent in April 2022. Part 2 of the PCSC Act creates a requirement for specified authorities to collaborate and plan to reduce or prevent serious violence. Statutory guidance was issued in December 2022 and provides details on the expectations on the Serious Violence Duty. For Swale Borough Council, this duty will be discharged mainly through its cooperation with the Swale Community Safety Partnership. However, If any victims of serious violence are identified through the safeguarding processes, appropriate referrals will be made to support agencies.

4. Policy Position

4.1 Principles

SBC believes Safeguarding is committed to the following principles for children, young people and adults at risk:

- Their welfare is paramount;
- Whatever their background and culture, parental or pregnancy status, age, disability, gender, racial origin, religious belief, sexual orientation and/or gender identity, they have the right to participate in society in an environment which is safe and free from violence, fear, abuse, bullying and discrimination;
- They have the right to be protected from harm, exploitation, abuse, and to be provided with safe environments to live and play;
- Working in partnership with them, alongside their parents or carers and other agencies, is essential to the promotion of their welfare.

4.2 Policy Statement

SBC is committed to safeguarding children, young people and adults at risk from abuse when they are engaged in services organised and provided by, or on behalf of, the Council. The Council will:

- a) Endeavour to keep residents and service users safe from abuse. Suspicion of abuse will be responded to promptly and appropriately. We will always act in the best interests of the child, young person or adults at risk;
- b) Proactively seek to promote the welfare and protection of all children, young people and adults at risk living in Swale at all times;
- c) Ensure that unsuitable people are prevented from working with children, young people and adults at risk through robust 'safer recruitment' procedures;
- d) Deal with any concern raised by a Member, employee, volunteer, contracted service provider, or member of the public appropriately and sensitively;
- e) Any Safeguarding referrals made by a Member, employee, volunteer or contracted service provider cannot be anonymous and should be made in the

knowledge that, during the course of enquiries, the referrers may be required as prosecution witnesses;

- f) Not tolerate harassment of any Member, employee, volunteer, contracted service provider or child, young person or vulnerable adult who raises concerns of abuse or neglect;
- g) Work in co-operation with KCC as required under the Children Act 2004 and the Care Act 2014 to make appropriate changes and amendments to improve the Council's safeguarding policies and procedures as recommended by Adult and Child Safeguarding Partnership Boards;
- h) Prevent abuse by using good practice to create a safe and healthy environment and avoid situations where abuse or allegations of abuse could occur;
- i) Use a trauma informed approach where appropriate.

4.3 Scope

4.3.1 This policy covers all Members, employees and volunteers at SBC, including contracted service providers

4.3.2 While Members, employees, volunteers and contracted services providers are likely to have varied levels of contact with children, young people and adults at risk as part of their duties and responsibilities for the Council, everyone should be aware of the potential indicators of abuse and neglect and be clear about what to do if they have concerns. Responsibilities are limited and it is important to remember the following:

IT IS NOT THE RESPONSIBILITY OF ANY SBC MEMBER, EMPLOYEE, VOLUNTEER OR CONTRACTED SERVICE PROVIDER TO DETERMINE WHETHER ABUSE IS ACTUALLY TAKING PLACE

HOWEVER:

IT IS THE RESPONSIBILITY OF THE MEMBER, EMPLOYEE, VOLUNTEER OR CONTRACTED SERVICE PROVIDER TO TAKE THE ACTIONS SET OUT IN THE PROCEDURE, IF THEY ARE CONCERNED ABUSE MAYBE TAKING

4.3.3 Domestic Abuse Policy, Staff Policy and procedures

Separate Domestic Abuse policies and procedures have been created and outline the Council's response specifically for members of the public, or staff, affected by domestic abuse. Although in the main responses to disclosure of domestic abuse will be in line with this Policy, these separate documents must be referred to.

4.4 Safeguarding Roles, Responsibilities and Governance in SBC

4.4.1 SBC offers a range of training dependent on the role. Safeguarding training offered ranges from basic awareness training via Elms E-Learning, to more in

depth training provided through the Safeguarding Boards or other external training providers. Staff at SBC are assigned a role category which determines the level of Safeguarding training required. Below are the categories of staff roles. All staff will be advised of the required safeguarding training for their level by the Safeguarding leads, as agreed with Senior Management Team. This training plan is shown in Appendix I.

0 – No contact with children/young people/adults at risk and/or parents/carers;

1 – Limited contact with children/young people/adults at risk/ and/or parents/carers-no unsupervised contact;

2a – Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact (Private Sector Housing Team, Environmental Response Team, some Open Spaces team and other roles as agreed by Safeguarding Officers)

2b - Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact (within the Housing Options team)

3 – Professional advisers and designated leads for children’s and/or adults at risk safeguarding irrespective of the level of contact with children/young people/adults at risk and/or parents/carers.

4 - Strategic responsibility for safeguarding children and/or adults at risk for the organisation irrespective of the level of contact with children/young people/adults at risk and/or parents/carers.

4.4.2 Chief Executive or Officer from the Strategic Management Team (SMT)

The Chief Executive and SMT are responsible for ensuring that this policy and related procedures are implemented, monitored and consistently reviewed.

4.4.3 Housing and Health Committee

The Housing and Health Committee is responsible for ensuring the implementation, consistent monitoring and improvements of the Safeguarding Policy and related procedures.

4.4.4 Community Services Manager

The Community Services Manager is responsible on behalf of the Head of Housing and Community Services for implementing this policy and procedures and ensuring regular monitoring.

4.4.5 Safeguarding Team Lead

The Safeguarding Team Lead is responsible for the day-to-day oversight of the Safeguarding officer’s and their response to safeguarding concerns.

4.4.6 Safeguarding Officer

The Safeguarding Officer is responsible for dealing with reports or concerns about the protection of children, young people and adults at risk appropriately and in accordance with the procedures that underpin this policy.

4.4.7 All Heads of Service must ensure that appropriate employees are subject to Disclosure and Barring Service checks and that their staff members comply with this policy and the related procedures.

4.4.8 All Service Managers (and Contract Managers responsible for contracted service providers) are responsible for ensuring that employees follow this policy and its related procedures and receive the safeguarding training and support they need, in line with their responsibilities and level of contact with children, young people and adults at risk.

4.4.9 All Members, employees and volunteers 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. They must bring safeguarding concerns to the attention of the Safeguarding Officer.

4.4.10 Contractors, sub-contractors or other organisations funded by or on behalf of the Council are responsible for applying the correct safeguarding procedures. Please see section 9 of this policy for more information.

4.4.11 Information sharing is vital to safeguarding and promoting the welfare of children and adults at risk. The lawful basis for processing most safeguarding-related personal data will usually be 'public task' or 'legal obligation', and the consent of the data subject is therefore not necessary. Information which is relevant to safeguarding will sometimes be 'special category' data, meaning it is particularly sensitive and therefore subject to more stringent restrictions. The Data Protection Act 2018 allows special category personal data to be processed without the consent of a child or an at-risk adult for the purpose of protecting their wellbeing or preventing harm to them, as long as the processing is necessary for reasons of substantial public interest and their consent cannot reasonably be obtained.

5. Safeguarding Procedures

5.1 Types of Concerns

5.1.1 The procedure for reporting a concern or allegation informs all SBC Members, employees, volunteers and those contracted service providers that have accepted this policy, of what actions they should take if they have concerns or suspicions, or encounter a case of abuse or neglect in any child, young person or adult at risk.

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 and discuss with an appropriate Safeguarding representative within SBC.

5.1.2 Abuse is a form of maltreatment that can occur in several forms as shown below:

<p>For children, types of abuse include:</p> <ul style="list-style-type: none"> Physical abuse Psychological / emotional Sexual abuse Grooming Criminal exploitation – sexual, gang and child on child can be related also referred to as extra familial abuse Neglect Domestic Abuse Female Genital Mutilation (FGM) Technology assisted abuse Domestic Abuse Self-neglect/Self-injurious Forced Marriage Risk of harm to unborn 	<p>Types of adult abuse include:</p> <ul style="list-style-type: none"> Physical Sexual Psychological Discrimination Criminal Exploitation Financial Organisational Domestic Abuse - including Adolescent Parent Violence, Coercive control/ Stalking Self-neglect/Self-injurious Modern slavery/Human trafficking Neglect and acts of Omission Female Genital Mutilation (FGM) Inappropriate Restraint
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5.1.3 It is important to note that these types of abuse are not mutually exclusive, and many different categories of concern may be occurring at the same time.

5.1.4 Many types of abuse might not be obvious and will require a level of professional curiosity to understand what is occurring within a household.

5.1.5 With an increasingly diverse community within the Borough, there is also a need to ensure greater awareness of different cultures and possible abuse that can occur within these, along with ensuring an appropriate response can be put into place.

5.1.6 There are a number of other concerns that may need to be flagged specifically related to children. This may include children that are missing, being home schooled, or private fostering arrangements have been put into place. Advice should be taken from safeguarding officers if there are any concerns regarding these types of concerns.

There are five main situations when Members, employees, volunteers and contracted service providers may need to respond and report a concern or case of alleged or suspected abuse. These are set out below:

5.2 When you identify a child, young person or adult at risk who may be experiencing abuse or neglect, you should:

- Stay calm and try to get another witness, if it does not compromise the situation;
- If you believe the person is ‘at risk’ of immediate significant harm, which includes situations which any Member, employee or volunteer would reasonably believe requires the emergency services, then you must contact the relevant emergency service and notify the Safeguarding Officer, Line Manager or Head of Service;

- Immediately report to and inform the Safeguarding Officer, Line Manager or Head of Service (as appropriate and where possible);
- Record all details you are aware of and log your concern, as soon as possible, on the My Concern Database (Safeguarding Database). If you are not registered on the Database, please email your concern to safeguarding@swale.gov.uk
- Consultation with the Kent Front Door (Children Social Services) or Central Referral Unit (Adult social services) and/or referral to be made and recorded with support from the Safeguarding Officer /Line Manager.
- Outcome of the consultation/referral to be recorded on the Safeguarding Database.

5.3 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 you believe the person is 'at risk' of immediate significant harm, which includes situations which any Member, employee or volunteer would reasonably believe requires the emergency services, then you must contact the relevant emergency service and notify the Safeguarding Officer, 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 e.g. 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 adult at risk 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 the Safeguarding Officer, Line Manager or Head of Service (as appropriate and where possible);
- Record all details you are aware of and log your concern, as soon as possible, on the My Concern Database (Safeguarding Database). If you are not registered on the Database, please email your concern to safeguarding@swale.gov.uk
- Referrals to Kent Children Social Services (Front Door or urgent support) and Adult Social Services referral must be recorded with support from the Safeguarding team / Line Manager.
- Outcome of any consultation/referral to be recorded on the Safeguarding Database.

5.3 When allegations or concerns are expressed about a Member, employee, volunteer or contracted service provider, you should:

- Take the allegation or concern seriously;
- Immediately inform the Safeguarding Officer, Line Manager, Head of Service or Contract Manager (as appropriate);

- The Safeguarding Officer informs Human Resources or Contract Manager at the earliest opportunity, provides a report of the incident and the intended action in accordance with 'Managing Allegations' procedure;
- If you believe the child, young person or adult is 'at risk' of immediate significant harm, which includes situations which you would reasonably believe requires the emergency services, then you should contact the relevant emergency service and then notify the Safeguarding Officer, Line Manager or Head of Service;
- Record all details you are aware of and log your concern, as soon as possible, on the My Concern Database (Safeguarding Database). If you are not registered on the Database, please email your concern to safeguarding@swale.gov.uk
- The Safeguarding Officer has a consultation with Kent Front Door/Kent Central Referral Unit or makes formal referral
- The Safeguarding Officer follows procedures outlined in 'Managing Allegations' procedure and makes contact with the KCC LADO Education Safeguarding Advisory Services (LESAS) formerly known as Local Authority Designated Officer (LADO). The KCC LESAS can support Human Resources or Contract Manager with appropriate decision-making.
- Any Member, employee or volunteer can make a referral to the KCC LESAS if they believe a case has been inappropriately or ineffectively investigated by SBC (app PIPOT guidance)

5.4 When allegations or concerns are expressed about any other person (e.g. parent, carer, other service user), you should:

- Take the allegation or concern seriously;
- If you believe the child, young person or adult is 'at risk' of immediate significant harm, which includes situations which you would reasonably believe requires the emergency services, then you should contact the relevant emergency service and then notify the Safeguarding Officer, Line Manager or Head of Service and immediately ;
- Immediately report to and inform the Safeguarding Officer & Line Manager or Head of Service (as appropriate);
- Record all details you are aware of and log your concern, as soon as possible, on the My Concern Database (Safeguarding Database). If you are not registered on the Database, please email your concern to safeguarding@swale.gov.uk or contact the team by phone.
- Referrals to Kent Children Social Services (Front Door or urgent support) and Adult Social Services referral must be recorded with support from the Safeguarding Team / Line Manager
Outcome of the consultation/referral to be recorded on the Safeguarding Database.

5.5 When you have a general welfare concern (i.e. their mental health, levels of debt etc) about a child, young person or adult at risk you should:

- Discuss your concern as soon as possible with a Safeguarding Officer – formal consultation or referrals to social care or the Police may not be needed, but a wider range of referrals to support agencies could be looked into and made.

5.6 When you have a concern that someone may be self-neglecting, you should:

- Discuss your concern with a Safeguarding Officer as soon as possible.
- The Kent and Medway Self Neglect Protocol is in place to guide all agencies in the process to follow for cases of possible self-neglect by adults. As an identifying agency, it may be that Swale BC needs to lead this process. This protocol can be found at <https://kmsab.org.uk/professionals/kmsab-policies>
- A self-neglect fact sheet has been developed (Appendix 2) for staff to follow to ensure an appropriate response is in place.

5.6.1 For all concerns, there may be cases identified to the Safeguarding Officers that meet the criteria for the multi-agency Swale Vulnerability Panel. This panel focuses on adults that have been or are likely to be a victim of crime or ASB; are isolated; felt to be self-neglect; have a diagnosed, or felt undiagnosed, mental health condition; meet the threshold for statutory services but limited engagement. Cases should be referred to this panel by the Safeguarding Officers if it is felt the criteria are met, for a multi-agency discussion on how best to support the adult.

5.7 Recording Concerns

If any Member, employee or volunteer has concerns about the welfare or safety of a child, young person or adult at risk, or has concerns about the behaviour of a Member, employee or volunteer, it is vitally important to record all relevant details regardless of whether or not the concerns are shared with the Police, KCC or other appropriate partners.

The My Concern Safeguarding Database is in place to record and manage all safeguarding concerns. A new Concern should be logged on the database for all events of concern (even if no referral is subsequently made).

The Safeguarding Database can be found at: <https://www.myconcern.education>.

It is the responsibility of the person who directly observes/witnesses the event (e.g. living situation) of concern or who has participated in the meeting/conversation that has caused concern, to record details of the concern. The record should be clear which person provided the information and there must be clear differentiation between opinion and fact.

If the person who has witnessed/observed/participated in the event of concern and is unable to log their concern on the Safeguarding database, the details of the concern should be emailed directly, as soon as possible, to safeguarding@swale.gov.uk to alert the Safeguarding Officer. Their Line Manager should also be alerted to this, who may be able to log the concern on their behalf.

Rational / decision making should be clearly documented with the case management. This includes decisions rational of not completing certain actions or referrals.

Records may be used for: Evidence for investigations and inquires; Court Proceedings; Monitoring Quality Assurance; and Disciplinary procedures. The Safeguarding Officer will then manage the process and follow guidance on information sharing, confidentiality, consent and making appropriate referrals to KCC and other agencies. It is also important that notes regarding capacity are made, as well as decisions/choices made by any adults at risk.

Appendix 3 details the case standards that are expected for the online case management of safeguarding concerns. This covers the logging of; ongoing management; and closure of concerns.

Employees will be allocated a My Concern Login within those teams that identify the greater number of safeguarding concerns. User accounts will be reviewed at least annually, or when notification of a leaver is received by the safeguarding team, with accounts deactivated as required.

5.8 Consent

It is always best practice to obtain consent from an adult at risk (or parent in relation to children/young people) prior to making referrals or sharing information with another agency.

However, consent is not required for a service referral/information sharing where an adult (or their children) are at high risk of serious harm.

There may be occasions when an adult at risk refuses consent for this information sharing or referrals for support. This may have to be accepted if there is no risk of serious harm to this person or another, however self-neglect (section 5.6 may need to be considered) or their capacity to make a safe decision (see section 5.10).

5.9 Making Safeguarding Personal

"No decision about me without me"

Making Safeguarding Personal (MSP) is about professionals working with adults at risk to ensure that they are making a difference to their lives. Considering, with them, what matters to them so that the interventions are personal and meaningful. It should empower, engage and inform individuals so that they can prevent and resolve abuse and neglect in their own lives and build their personal resilience. It must enhance their involvement, choice and control as well as improving quality of life, wellbeing and safety.

It should underpin all interactions and involvement with the adult at risk.

Processes should fit around the person to ensure that the persons views remain central in the safeguarding journey. Further detail can be found on the KMASB.

5.10 Capacity

There may be occasions when adults become unable to make decisions for themselves due to ill health or mental impairment. When this happens, the person is said to 'lack capacity'. The Mental Capacity Act protects and supports these people and outlines who can and should make decisions on their behalf.

It must always be assumed that everyone is able to make a decision for themselves, until it is proven that they cannot. The only way to do this is for a mental capacity assessment to be undertaken by a trained professional.

If there is a concern that an adult at risk may not have capacity to make a decision related to their safety or wellbeing, advice must be taken from the Safeguarding Officer as to how to proceed. Further guidance can be found KMASB. (App)

6. Recruitment

SBC is committed to safer recruitment procedures set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) Where it is identified that services or staff have regular contact with children, young people and adults at risk, or will hold safeguarding responsibility, then appropriate procedures are initiated by the recruiting Manager and the relevant Human Resources Officer. Managers who are recruiting for a post of safeguarding level 2 or 3 are required to have completed 'Safer Recruitment' training within the last 3 years.

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 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. See appendix for relevant guidance.

7 DBS Disclosures

SBC is not a Children's Services Authority therefore scope for working directly with children, young people or vulnerable adults is limited. DBS disclosures should only be sought where an elected Member, employee or volunteer has substantial, regular or unsupervised contact with children, young people and adults at risk as part of their duties or responsibilities for, or on behalf of, the Council.

SBC will refer any elected member, member of staff or volunteer to DBS for consideration for the barred list(s) if SBC thinks a person has:

- harmed or poses a risk of harm to a child or vulnerable adult
- has satisfied the harm test; or
- has received a caution or conviction for a relevant offence and;

- the person they're referring is, has or might in future be working in regulated activity and;
- the DBS may consider it appropriate for the person to be added to a barred list

(Please see the separate DBS Policy for further information, Members DBS procedure Appendix 6)

8. Escalating Concerns and Case Reviews

There may be times when officers working on a safeguarding case cannot resolve the concern, or may disagree with another professional from another agency as to the best way forward. These should in the first instance be flagged to the Community Services Manager or Safeguarding Officer, if not already done so. These officers may determine the best path forward, particularly if relating to another agency, may be to raise to the Head of Housing and Communities. A referral can also be made to the Vulnerability Panel to problem solve an approach for a case.

The Kent and Medway Safeguarding Adults Board have an escalation policy in place for when professional disagree about a way forward with a safeguarding adult case. This can be found at <https://kmsab.org.uk/professionals/kmsab-policies>

The Kent Safeguarding Children Multi-Agency Partnership also has an escalation process in place for the same reason – this can be found at <https://www.kscmp.org.uk/procedures>.

There are also occasions when either the Kent and Medway Safeguarding Adults Board, Kent Children Safeguarding Multi-agency Partnership or Kent Community Safety Partnership convene a case review to identify any lessons that can be learnt from the handling of a case between agencies. There are set criteria for when each of these can be convened and procedures in place for their management, but are typically when there has been a death or serious harm caused. Details of these can be found as follows:

- Domestic Homicide review: <https://www.kent.gov.uk/about-the-council/partnerships/kent-community-safety-partnership/domestic-homicide-reviews>
- Safeguarding Adult Review - <https://kmsab.org.uk/professionals/kmsab-policies>
- Kent Child Safeguarding Practice review – <https://www.kscmp.org.uk/procedures>

The Community Safety Manager and Safeguarding Team Lead will hold details of the procedures for these reviews and will be the point of contact for the lead agencies that may convene these reviews.

Should any officers feel that a case that they are working on meets the criteria for one of these reviews, the Community Safety Manager will lead on the completion of any relevant notifications to the above Partnership(s) as appropriate.

9. Procurement and contract monitoring

Where Council services are contracted externally, assurance needs to be in place that the contractor or sub-contractor adequately deal with safeguarding concerns. The Safeguarding Contract Management Framework is in place to manage this compliance. At the point of all procurement, all contracts with a level of engagement with children, young people or vulnerable adults need to be graded 'Gold, Silver or Bronze' depending on their level of contact. Compliance to a range of measures will be confirmed by the Safeguarding Team. A contractors ongoing compliance to these safeguarding measures will also need to be monitored by the lead contract manager, in line with the Council's Contract Monitoring Procedure.

10. Safeguarding Partnership Boards

Kent Safeguarding Children Multi-Agency Partnership (KCSMP) is set-up as a result of the Working Together to Safeguard Children 2018 and is led by the Local Authority (Kent County Council), Kent Police and Health to ensure partners work together to safeguard children. Swale Borough Council has a duty to cooperate with this partnership and any relevant sub-groups, including compliance with its partnership policies. This includes to complete a bi-annual Section 11 Audit to ensure compliance with all safeguarding children legislation. Further details on the KSCMP are available at <https://www.kscmp.org.uk>.

There are a number of policies and procedures that Swale BC must follow in relation to our safeguarding response to children and these can be found on their website.

The Kent and Medway Safeguarding Adults Board is an equivalent statutory partnership to ensure member agencies work together to help keep adult's safe from harm and to protect their rights. Again, Swale Borough Council has a duty to cooperate with the partnership including its sub-groups; compliance with multi-agency policies; and to complete a bi-annual audit to ensure compliance with all legislation to safeguard adults. Further details of the KMSAB can be found at [Kent & Medway SAB website \(kmsab.org.uk\)](http://kmsab.org.uk)

There are a number of policies created by the Kent and Medway Safeguarding Adults Board to which SBC must follow. These are found on their website and have also been referenced within this Policy and within the attached appendices where appropriate.

Key updates and information are shared regularly by both Boards with the Safeguarding team and these are cascaded to other officers as appropriate.

11. Translators / Interpreters

Advisers must be sensitive to the potential for there to be communication difficulties between them and their client, even if they speak the same language. If it becomes clear that the client and adviser are unable to communicate clearly and easily, then the adviser must arrange for a suitable interpreter to be present when they meet their client.

An officer must be mindful of the fact that while clients and interpreters may share a common language, they may have significantly different cultural, political or religious beliefs.

If a client wishes a friend or family member to interpret for them, the officer must assess and decide if the person is sufficiently competent and able to do so. This includes assessing whether they understand the instructions, their role as interpreter, and can communicate clearly and accurately between themselves, the client and the officer. The officer must also ensure that the person interpreting is willing to act as an interpreter and understands the requirements relating to client confidentiality.

It is not appropriate to use a witness or potential witness as an interpreter in cases such as Domestic Abuse or Modern Slavery.

A suitable interpreter or translator is one who is competent to provide such service taking into account the client's needs and the nature of the matter to be conveyed. For example, a family member or friend may be suitable to help support the client in your initial meeting when you are generally discussing the client's case, options and costs, or in subsequent calls where you are seeking clarification on a point, however a qualified professional may be necessary where you are confirming a witness statement or drafting detailed representations. When seeing a professional interpreter or translator their relevant qualifications, experience, independence and membership of such organisations as the National Register of Public Service Interpreters (NRPSI) should be considered and costs for such services discussed with the client.

To access Language line call 0845 310 9900, ID /Password is required.

It is important to signpost or refer into the most appropriate supporting agency for the victim/survivor. There are many specialist supporting agencies nationally for victims/survivors who may be deaf, blind, male, BAME, LBGQT, exposed to HBV or FGM (this is not an extensive list). It is important that we consider the best placed support service for the victim.

A list of specialist services and options for accessing legal advice for non-molestation and occupation orders can be found on the service mapping document :

<https://midkentgovuk.sharepoint.com/sites/SBCCSU/SafeguardingInformation/Fo rms/AllItems.aspx>

12. Key Safeguarding Contacts

Safeguarding Officer:

Email: safeguarding@swale.gov.uk

This email must be used to ensure all safeguarding concerns or questions are picked up by the Officers and wider team. Personal email addresses should not be used for reporting of new concerns or urgent case updates.

Phone: 01795 417457 or 'Safeguarding Queue' on Teams

Kent County Council

Kent County Council Adults Social Services – **03000 41 61 61**

Social Services Children & Families – **03000 41 11 11**

Social Services Out of Hours – **03000 41 91 91**

Kent Police

Emergency – 999

Non-emergency – 101

13. Safeguarding Training

Table 1 details the agreed minimum level of training expected for each Safeguarding Contact Level (see section 4.4.1 for definition of levels).

E-learning will be required to be refreshed every three years. The Face-to-face (or virtual) training will also be three years, with the exception of Safeguarding Children (Designated Officer) which will be refreshed every two years.

All new starters, regardless of their Safeguarding Level, must complete the safeguarding e-learning modules. Level 2a, 2b, 3 and 4 staff should complete a short input with a member of the Safeguarding team to gain an oversight of our local procedures and training required.

A number of advisory training sessions are included within this training plan. Although not mandatory, it would be deemed best practice for all staff at that level to complete these.

A certain number of Face to face/Virtual Sessions of each training module for level 2 and above staff will be organised each year. These where possible will be spread throughout the year and delivered on different days/times to increase opportunities for staff to attend.

Deadlines will be set for all completion of training and compliance will be reported quarterly to Senior Management Team. The following steps will be taken to address non-compliance:

- Safeguarding Team Lead to flag training that is required, with completion date, to Officer and their Line Manager

- If still not completed within new time period, report of all those non-compliant staff to be provided to SMT.
- Head of Service to review list and contact Officer and their Line Manager regarding completion.
- Further action for non-compliance to be discussed on a case-by-case basis.

Table 1: Safeguarding Training Plan: Minimum learning requirement

Safeguarding Contact Level	Level of Contact definition	Minimum learning requirements
0	No contact with children/young people/adults at risk and/or parents/carers	Elms e-learning <ol style="list-style-type: none"> 1. Safeguarding Children 2. Safeguarding Adults 3. Combined Safeguarding Issues 4. Domestic Abuse
1	Limited contact with children/young people/adults at risk and/or parents/carers-no unsupervised contact	Elms e-learning <ol style="list-style-type: none"> 1. Safeguarding Children 2. Safeguarding Adults 3. Combined Safeguarding Issues 4. Domestic Abuse Recommended Awareness Session: Suicide Awareness Economical Abuse
2a	Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact (Specific roles within Private Housing, Environmental Response, Open Space and other teams)	Face-to-Face (or Virtual) <ol style="list-style-type: none"> 1. Prevent (Counter-Terrorism) training 2. Modern Slavery training 3. Child Exploitation training 4. Child Protection 5. Safeguarding Adults 6. Domestic Abuse Recommended Awareness Session Suicide Awareness Self-Neglect

2b	<p>Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact</p> <p>(Housing Options team)</p>	<p>Face-to-Face (or Virtual)</p> <ol style="list-style-type: none"> 1. Prevent (Counter-Terrorism) training 2. Modern Slavery training 3. Child Exploitation training 4. Child Protection 5. Safeguarding Adults 6. Domestic Abuse 7. DASH (Domestic Abuse Risk Assessment) 8. Mental Capacity <p>Recommended Awareness Sessions:</p> <p>Suicide Awareness</p> <p>Self-Neglect</p> <p>Domestic Abuse By and For Services</p>
3	<p>Professional advisers and designated leads for safeguarding children and/or adults at risk, irrespective of the level of contact with children/young people/adults at risk and/or parents/carers</p>	<p>Face-To-Face (or Virtual)</p> <ol style="list-style-type: none"> 1. Prevent (Counter-Terrorism) training 2. Modern Slavery training 3. Child Exploitation training 4. Child Protection 5. Safeguarding Adults 6. Domestic Abuse 7. Safeguarding Children (Designated Staff) 8. Mental Capacity 9. Self-Neglect <p>Recommended Awareness Sessions</p> <p>Domestic Abuse By and For Services</p>
4	<p>Strategic responsibility for safeguarding children and/or adults at risk for the organisation irrespective of the level of contact with children/young people/adults at risk and/or parents/carers.</p>	<p>Elms e-learning</p> <ol style="list-style-type: none"> 1. Safeguarding Children 2. Safeguarding Adults 3. Combined Safeguarding Issues

		<p>4. Domestic Abuse</p> <p>Face to Face</p> <p>1. Safeguarding Children (Designated Staff)</p> <p>2. Safeguarding Adult</p>
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Appendix 1 – Case Standards

Introduction

This case note guidance is to be used to inform the management of safeguarding cases by Swale Borough Council and its Safeguarding Leads. It aims to ensure that a 'good' standard is reached and maintained for all safeguarding case records.

It is important that case records are 'good' as they demonstrate the actions taken to safeguard individuals; can evidence why decisions were made and support provided; and allow for better information sharing and cross-agency communications. They may also be provided as evidence in case reviews by other agencies. It will also ensure that other members of the Safeguarding team can sufficiently cover the service in the absence of the Safeguarding Officers(s).

These standards have been compiled following guidance and advice from the Kent Safeguarding Multi-Agency Partnership and internal Audit team. (Swale also has a standalone DA procedure and guidance).

Recording of new cases

- All concerns should be logged on the My Concern database for management.
- All new cases should be logged within 2 working days of them being raised to the Safeguarding Leads,
- As far as possible, the officer raising the concern should be encouraged them to log the case on the database. If this is not possible, the reporting team should be included in the initial details of the concern.
- A new case should be logged for all concerns raised to the team.
 - If the personal details of the individual(s) in question are unknown such as name, these should be logged as 'unknown' but with as many details as possible to differentiate them.
- A case owner should be allocated to each case at the point it is logged, dependant on the date it is received by the team and the case loads of each officer.
- For concerns raised by Housing Options, their housing database must be reviewed at the point the concern is raised. Appropriate notes should be copied or transposed across to the Safeguarding Database to detail the safeguarding concern.
- All notes should be recorded in clear English, within any use of acronyms explained. These should also be explained in any notes copied over from the Housing Options database.
- As far as possible, distinction should be made between opinion and fact.

Ongoing case management

- Ongoing cases should be reviewed in a timely manner, a minimum of bi-weekly. If it is felt that a case does not require update on this frequency, the case notes

should reflect the reasoning for this e.g. a meeting is due to take place in 2 weeks.

- If there are no updates to note, but the case review has been completed, a note should be added to state this.
- Case owners are responsible for flagging to the Safeguarding Team Lead if their updates are falling outside of this time period.
- All case updates must be logged on the database within 2 working days of their receipt, or another team member be asked to complete if needed.
- An update should be logged that the case has been reviewed, even if there are no updates to provide.
- The case owner is responsible for logging of all updates on each case, unless they are on leave or off sick. In which case another member of the team will log these.
- Justifications should be added in for decision making where appropriate, such as information sharing or any deviation from procedures.
- Rational / decisions making should be clearly documented with notes along with the voice of the child / adult documented at every opportunity
- Emails that detail any specific issues with the case and action taken, should be attached as separate files, rather than the body of the text copied and pasted into a file note. This does not need to be all correspondence.

Referrals and Outcomes

- All referrals should be logged in the 'referral section' of the database.
- This should include when it is not necessary to make a referral, due to the case already being open to another agency.
- Outcomes of referrals must be chased prior to a case being filed. If an agency is unable or unwilling to provide an outcome, in discussion with the Safeguarding Team Lead a decision can be made to file a case without this.

Case Filing

- A case should be filed when:
 - I. the appropriate agencies are engaged with the family/individual and taking appropriate action;
 - II. The individual/family has been signposted to support;
 - III. The individual/family will not consent to referrals and its deemed they have capacity;
- When it is determined that a case can be closed, a note should be logged detailing the reasoning for this and the outcomes achieved.
- Case closures must be reviewed by the Safeguarding Team Lead or Community Safety Manager. A task must be raised for them to review and close the case. If it is the case that the Safeguarding Team Lead is the lead for a concern, the Community Safety Manager should review that case for closure.
- Case closures must be completed within 2 weeks of being raised.

- If the reviewing officer does not feel the case can be closed, this must be documented within the case notes and fed back to the case owner.
- All DA cases should have a DA closure check list completed and attached to the case.
- As far as possible, case closures should be completed by the Safeguarding Team Lead or an officer independent to the case.

Handovers

- A handover email should be sent to the other Safeguarding Officer (or Safeguarding Team Lead in the absence of the other Safeguarding Officer) at the end of a working period of any cases that require update, review or action for the following period.

Management Oversight and Review

- In Safeguarding Officer's 121s, cases that have been open longer than 3 months will be discussed. Any other cases that the Safeguarding Officer feels should be raised may also be discussed, including any that they are struggling to progress or are facing difficulty with.
- Team meetings will also be used monthly to highlight any cases that are of concern or an officer is unsure how to progress.
- A performance report will be presented to Senior Management Team on a quarterly basis. A Safeguarding Officer will be responsible for the development of this.

Re-opening of cases

- If a similar concern is raised for an individual within 1 month of a previous one being filed, the concern can be re-opened and where possible, allocated to the previous case lead.
- If a longer time period has passed or the concern is of a different nature, a new concern should be logged.

Review

This guidance will be reviewed on an annual basis.

Appendix 2 -Swale Borough Council Hoarding and Self Neglect Fact Sheet

This guidance will be referred to by Swale Borough Council staff where an adult at risk is believed to be self-neglecting or showing hoarding behaviour which puts them at risk.

Self-Neglect

SCIE (Social Care Institute of Excellence) defines self-neglect as “an extreme lack of selfcare, it is sometimes associated with hoarding and may be a result of other issues such as addictions”.

It can include:

- Lack of selfcare to an extent that it threatens personal health and safety
- Neglecting to care for one’s personal hygiene, health, nutrition or environment
- Inability to avoid harm as a result of self-neglect
- Failure to seek help, support or access services to meet health and social care needs
- Refusal of services that would mitigate risk of harm.
- Unwillingness to manage one’s personal affairs.

It is important to remember that self-neglect is not about someone being unable to care for themselves. Many people who come to the attention of adult social services do so because they are no longer able to perform the activities of daily living, such as attending to their personal care or nutrition. In these situations, an assessment under the Care Act and the provision of services will ensure that their needs are met.

Self-neglect is when someone is unwilling, for a number of reasons, to care for themselves. It can be longstanding or recent.

If a person is capacitated and able to make a particular decision, they are entitled to make an unwise decision for themselves as long as it does not have an adverse effect on others.

Hoarding

Hoarding is a recognised mental health diagnosis. It is the excessive collection and retention of any material to the point that living space is sufficiently cluttered to preclude activities for what they are designed for. Hoarding may be characterised by:

- persistent difficulty in discarding or parting with possessions because of a perceived need to save them.
- an intense emotional attachment to objects that may not be regarded as having the same value to others.
- distress at the thought of getting rid of the items.

It is important to recognise that self-neglect and hoarding may be related to medical conditions such as:

- **Diogenes syndrome** is described as an aggravation of eccentric and aloof/reclusive personalities, leading to isolation, severe self-neglect, extreme hoarding and squalid living condition. Further information is available on the NHS England [NHS England website](#) (page 29).
- **Wernicke/Korsakoff Syndrome** is a chronic memory disorder caused by severe deficiency of thiamine (vitamin B-1). Korsakoff syndrome is most commonly caused by alcohol misuse, but certain other conditions also can cause the syndrome. More information is available on the [Alzheimers Association website](#).
- **Frontal Lobe Damage**
- **Depression**

- **Obsessive Compulsive Disorder**
- **Schizophrenia**

Identifying Individuals who self-neglect or demonstrate hoarding behaviour

One or more of the following situations may be an indicator of self-neglect/hoarding and should be considered in the context of each individuals' specific circumstances and characteristics (this list is not exhaustive):

- a) living in very unclean and/or verminous circumstances
- b) neglecting household maintenance, and therefore creating hazards within and surrounding the property
- c) portraying eccentric behaviour / lifestyles
- d) poor diet and nutrition. For example, evidenced by little or no fresh food in the fridge, or what is there, being mouldy
- e) declining or refusing prescribed medication/treatment and / or other community healthcare support
- f) refusing to allow access to health and / or social care staff in relation to personal hygiene, treatment and/or care
- g) refusing to allow access to other organisations with an interest in the property, for example, staff working for utility companies (water, gas, electricity)
- g) not engaging with a required network of support
- h) repeated episodes of anti-social behaviour – either as a victim or perpetrator
- i) being unwilling to attend external appointments with professional staff, whether social care, health, housing or other organisations
- j) poor personal hygiene and/or health
- k) isolation
- l) difficulty in discarding or parting with possessions

The Kent Adults Safeguarding Board relevant policy sets out the legal responsibilities that everyone has under the Care Act 2014, and other associated legislation, with regards to safeguarding adults at risk. In relation to adults perceived to be at risk because of self-neglect/hoarding, authorities are expected to act within the powers granted to them. They must act fairly, proportionately, rationally and in line with the principles of the Care Act 2014, the Mental Capacity Act (2005) and consideration should be given to the application of the Mental Health Act (1983) where appropriate.

A decision on whether a response is required under safeguarding should be made on a case-by-case basis and “will depend on the adult’s ability to protect themselves by controlling their own behaviour”.

Additionally, there are powers that can be used when someone demonstrates hoarding behaviour that puts them or others at risk of harm but may not be self-neglecting. These powers are enabled through a number of Acts including; the Housing Act 2004, Fire Services Act, 2004, Public Health Act 1936, Prevention of Damage by Pests Act 1949, Environmental Protection Act 1990, Town and Country Planning Act 1990, The Animal Welfare Act 2006; Appendices 1 & 2 refer.

Information sharing

Information Sharing procedures can be found in the Kent and Medway multi-agency Policy, Protocols and Guidance document:

Protocol Section 6.1: *Making decisions about sharing confidential information in the [Kent and Medway Multi-Agency Policy, Protocols and Guidance Document](#)*

Swale Safeguarding process:

1. Using the clutter rating scale below (appendix 2) to assess the level of concern and or identify using the definition of self neglect above to identify areas of concern and evidence of self-neglect (appendix 1 tool kit below can also assist with this)
2. Discuss or refer to the Safeguarding team for further guidance
3. Necessary referrals will need to be completed as agreed with your safeguarding team
4. Consent should be obtained where possible and the thought and wishes of the individual documented. It is important to record whether the person consents, or not, to any safeguarding actions and whether the person has capacity to consent. If a person does not consent, action can still be taken where there is reasonable suspicion of a potential crime, risks to others, coercion or harassment of the person, or when it is in the public interest to do so. If a person lacks capacity to consent, a capacity assessment must be completed by the most relevant person and a Best Interests Decision made regarding the referral, or any planned action.
5. A risk assessment should be completed -a copy can be found within [Kent and Medway multi-agency policy and procedure to support people that self neglect or demonstrate hoarding behaviour \(kmsab.org.uk\)](#)
6. If the case does not meet the level for a Safeguarding enquiry to be opened the lead agency are required to call a multi-agency meeting using the template minutes for recording. (This can found in the document referenced above)
7. All actions and multi-agency meetings should be managed and monitored via MyConcern and each managed by a Safeguarding Officer. This does not replace the obligations of other departments and officers within SBC.

Assessment Tool Guidance

Guidance for practitioners

Listed below are examples of questions you may wish to ask where you are concerned about someone's safety in their own home, where you suspect a risk of self-neglect and/or hoarding.

The questions should be used alongside the clutter rating and professional judgement to identify level of risk. The questions are designed to help you ascertain what the primary issue or concern is for the individual and therefore what the most appropriate route for support may be.

The question set should be taken as a whole, and it should always be remembered to consider whether mental health and wellbeing support is needed alongside other solutions.

Most clients with a hoarding problem will be embarrassed about their surroundings. Try to ascertain information whilst being as sensitive as possible. The individual should be engaged in the process of seeking further support and their consent gained for referrals to be made.

Practical

- How do you get in and out of your property?
- Do you feel safe living here?
- Have you ever had an accident, slipped, tripped up or fallen? How did it happen?

- Is there hot water, lighting and heating in the property? Do these services work properly?
- Are you able to use all the rooms in your property e.g. the bathroom and toilet ok?
- Where do you sleep?
- Has a fire ever started by accident? Is the property at risk from fire?
- Do you have a housing support worker? Do you have any support from Adult Social Care?

Physical

- Do you have any physical health needs, mobility supports etc...
- Does your physical health prevent you from clearing your property?
- Do you have anyone helping you with your current situation

Consider:

- Is a referral to Adult Social Care needed?
- Does the person need to see their GP?

Psychological

- Do you have any difficulty with throwing things away? If so what stops you? If I was to throw something away right now how would you feel?
- Do you ever feel upset by your living situation?
- Do you ever feel down, depressed or hopeless?
- Do you ever have thoughts that you would be better off dead or thoughts of hurting yourself
- Have you ever had any support for your mental health before?

Consider

- Checking for current mental health support
- Support to self-refer into Mental Health / Wellbeing Services
- Does the person need to see their GP? (for acute mental health issues person should be referred to their GP or mental health crisis team)
- Give information about the Mental Health Buddy schemes where these exist
- Consider leaving self-help pack

Provision

- Would you like you some support to manage your current situation?
- Are you happy for us to share your information with other professionals who may be able to help you?

Ask person to sign consent form and liaise with other agencies as appropriate – refer to Consent section of the Procedures to Support People who Self-Neglect or Demonstrate Hoarding Behaviour

Bedroom Clutter Image Rating



1

2

3

Clutter Level 1 (image rating 1-3): Household environment is considered standard. No specialised assistance is needed. If the resident would like some assistance with general housework or feels they are declining towards a higher clutter scale, appropriate referrals can be made subject to circumstance.



4

5

6

Clutter Level 2 (image rating 4-6) Social Care Under Self-neglect: Household environment requires professional response to resolve the clutter and the maintenance issues in the property. Requires a referral to Social Care under Self Neglect.



7

8

9

Clutter Level 3 (image rating 7-9) Requires Safeguarding Alert: Household environment will require intervention with a collaborative multi-agency approach with the involvement from a wide range of professionals. This level of hoarding constitutes a Safeguarding alert due to the significant risk to health of the householders, surrounding properties and residents. Residents are often unaware of the implication of their hoarding actions and oblivious to the risk it poses.

Lounge Clutter Image Rating



1	2	3
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Clutter Level 1 (image rating 1-3): Household environment is considered standard. No specialised assistance is needed. If the resident would like some assistance with general housework or feels they are declining towards a higher clutter scale, appropriate referrals can be made subject to circumstance.



4	5	6
---	---	---

Clutter Level 2 (image rating 4-6) Social Care Under Self-neglect: Household environment requires professional response to resolve the clutter and the maintenance issues in the property. Requires a referral to Social Care under Self Neglect.



7	8	9
---	---	---

Clutter Level 3 (image rating 7-9) Requires Safeguarding Alert: Household environment will require intervention with a collaborative multi-agency approach with the involvement from a wide range of professionals. This level of hoarding constitutes a Safeguarding alert due to the significant risk to health of the householders, surrounding properties and residents. Residents are often unaware of the implication of their hoarding actions and oblivious to the risk it poses.

Kitchen Clutter Image Rating



1



2



3

Clutter Level 1 (image rating 1-3): Household environment is considered standard. No specialised assistance is needed. If the resident would like some assistance with general housework or feels they are declining towards a higher clutter scale, appropriate referrals can be made subject to circumstance.



4



5



6

Clutter Level 2 (image rating 4-6) Social Care Under Self-neglect: Household environment requires professional response to resolve the clutter and the maintenance issues in the property. Requires a referral to Social Care under Self Neglect.



7



8



9

Clutter Level 3 (image rating 7-9) Requires Safeguarding Alert: Household environment will require intervention with a collaborative multi-agency approach with the involvement from a wide range of professionals. This level of hoarding constitutes a Safeguarding alert due to the significant risk to health of the householders, surrounding properties and residents. Residents are often unaware of the implication of their hoarding actions and oblivious to the risk it poses.

Appendix 3: Suicide Threat Procedural Guide

Someone discloses that they might/will/want to/feel like attempting suicide or you are concerned that they will



Where possible let the person know that as they have disclosed information like this that you will have to alert Safeguarding/Police due to being concerned for their welfare. (See attached guidance for questions to ask. Safeguarding team may need to call them back but they may not answer)



Contact Safeguarding team or Police colleagues in the Community Safety Unit who will ask you some questions to clarify the risk level (see attached document) and the circumstances surrounding the threat, and follow advice. If unable to get hold of us continue to next stage



If it is an emergency call 999, Ambulance and if necessary Kent Police



Alert the Safeguarding Officer by email if you haven't already



Do you know if the person has children? Are they at risk due to Parental Mental Health?



Yes



Complete Child Protection/Child in Need/Early Help referral to Social Services Children and Families. Call 03000411111 or follow advice from safeguarding team
Note: Where possible inform parent/carer of referral but if an immediate risk of significant harm then consent not required – state on form whether consent obtained



No



Is this a new case or is there an ongoing case/relationship with this person?



New Case



Does the person give consent for you to inform their GP or alert CMHT /SS for support?
If so consider submitting Kent Adult Safeguarding Alert Form / complete an urgent referral to mental health together plus/ contact GP where appropriate
Consult the CMHT (MHT+) and see if they are known to them (if not can GP refer?)
If no GP – Contact KMPT Urgent mental health line **0800 783 9111** , 111 option 2, encourage person to do self-referral for support
Alert Safeguarding Officer/team
Safeguarding@swale.gov.uk



Known/Pre-existing



Are they already known to SS or CMHT or involved with their GP regarding mental health? If so update relevant agencies of events
Update /
Alert Safeguarding Officer/team
Safeguarding@swale.gov.uk



Consider the reasons/problems behind the suicide threat and signpost to relevant support and follow our other procedures where appropriate (e.g. financial struggles, DV/DA, Housing, relationship troubles etc.)



Email safeguarding if you haven't already, and monitor as appropriate and keep Safeguarding Officer/team up to date

KMPT Urgent mental health line (SPOA) – 0800 783 9111 / 111 option 2

Swale Community Mental Health Team - 01795 418359

Kent County Council Adult Social Services – 03000 41 61 61

Social Services Children and Families – 03000 41 11 11

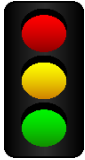
Release the Pressure Text the word **Kent** to 85258 or phone 0800 107 0160

Citizens Advice Bureau - 03444 111 444

MIND: 0300 123 3393 [Mind helplines - Mind](#)

Samaritans - 08457 90 90 90

SANE Support line 0800 304 7000



Traffic light system



RISK ASSESSMENT

Do you currently have any thoughts of harming yourself or suicide?
How likely would you be to act on these thoughts? (*scale of 1 to 10*)
Have you made any plans to act on these thoughts? Have you made any preparations? Have you thought about how?
Is there anything that would prevent with carrying out these actions, (e.g. knowing things will change, impact on people who love you, religious beliefs)
Have you ever tried to harm yourself or take your own life in the past?
Have you ever been physically violent to others?
Were the police involved?
Are you currently at risk of physical harm or verbal / emotional abuse from someone else?

Emergency

- **Current suicidal thoughts**
- **Clear plan with means available and intent to end life**
- **Or suicide plan already implemented e.g. Overdose taken**
- **Or recent suicide attempt**

RED: Refer to Emergency Services
Safety plan
Refer to safeguarding Team

Urgent

- **Suicidal thoughts not easily dismissed AND/OR**
- **No immediate intent or plans but some idea about means AND/OR**
- **History of previous suicide attempts**
-

AMBER: Emergency contacts,
Safety plan where possible,
Urgent mental health referral
Refer to safeguarding Team
provide Mental health service support details

Routine

- **No history of suicide attempts**
- **No or fleeting suicidal thoughts easily dismissed**
- **No intent or plan**

GREEN: Safety plan & emergency contacts,
refer to GP
provide Mental health service support details
Refer to safeguarding Team

Three warning signs

1. Threatening to hurt or kill self, have experienced a loss of any type(person, home job etc.
2. Looking for ways to kill self: seeking access to pills, weapons or other means.
3. Talking or writing about death, dying or suicide.

Further warning signs

- Hopeless, feeling worthless or a burden
- Recent loss such as death, relationship, job etc.
- Rage, anger, seeking revenge
- Acting recklessly or engaging on risky activities, seemingly without thinking
- Feeling trapped, like there is no way out
- Increasing alcohol or drug use
- Withdrawing from friends, family or community
- Anxiety, agitation, unable to sleep or sleeping all the time
- Dramatic changes in mood
- No reason for living, no sense of purpose in life

Factors that increase risk

- Current ideation, intent, plan, access to means
- Previous suicide attempt or attempts
- Alcohol / substance abuse
- Current or previous history of psychiatric diagnosis
- Impulsivity and poor self control
- Hopelessness – presence, duration, severity
- Recent losses – physical, financial, personal – social, status, shame
- Recent discharge from an inpatient psychiatric unit
- Family history of suicide / loss of another
- History of abuse (physical, sexual or emotional)
- Co-morbid health problems, especially a newly diagnosed problem or worsening symptoms, pain, female – menopause
- Age, gender, race (elderly or young adult, unmarried, white, male, living alone), ethnicity - cultural
- Same-sex, sexual orientation / transgender
- Given birth in

Positive Factors

- Positive social support
- Spirituality
- Sense of responsibility to family
- Children in the home, pregnancy – hormone changes
- Life satisfaction
- Reality testing ability
- Positive coping skills
- Positive problem-solving skills
- Positive therapeutic relationship

Most affective approach

- A positive and compassionate encounter
- Identify and mitigate all risks
- Promotion of protective factors
- Instil hope
- Co-create a safety plan with explicit reference to removal of means – by agreement

Appendix 4: Did Not Attend / Was not Brought -Trauma Informed Practice

Individuals who have experienced trauma can often struggle to engage with professionals due to mistrust, fear of judgement and an unregulated nervous system which impacts executive functioning. A trauma informed approach will be taken when working with those who frequently do not attend (DNA) appointments and meetings to promote accessibility, holistic support and reduce the risk of harm.

Any adult with additional health or care needs or a child who rely on a care giver to attend appointments will be recorded as Was Not Brought (WNB) This should inform as to whether safeguarding advice is sought regarding appropriate needs being met.

Swale Borough Council will work to identify any barriers and communicate with the individual concerned and/or care giver along with professionals involved and allow for flexibility to build trusting relationships where possible. Consideration should be given to the following:

- The mental capacity of the adult
- Whether domestic abuse/HBV has been reported or there is a risk of this
- A Family First Approach (would children be impacted by the difficulty of the adult to engage fully with services)

Procedure:

Appointments will be made with the needs of the individual in mind to encourage engagement. Where possible, individuals will be given a choice of telephone/face to face meetings and a person's trauma will be considered in regard to their communication style, gender preference or place of safety. For example; someone who is experiencing domestic abuse may have a gender preference for an appointment and may require specific timings to safeguard themselves from the perpetrator.

All DNA appointments are to be recorded fully in a timely manner and reasons for the missed appointments are to be sought along with any potential barriers that person may be facing.

If vulnerabilities have been identified and there is an excess of three missed appointments, the relevant staff member will inform their line manager and/or Safeguarding team to determine whether further safeguarding enquiries need to be completed.

Professional curiosity and judgement is to be used if fewer than three appointments have been missed but the individual may be at risk of harm. SBC will ensure multi-agency working is upheld and communication between the individual is a priority. At no point will non- trauma aware language be used and the offer of service provision will not be withdrawn due to DNA. If an individual reapproaches, SBC will resume the support without judgement.

1. Policy Introduction

Any Member, employee, volunteer or contracted service provider who suspects that a colleague may be abusing a child, young person or vulnerable adult must act on their concerns. Also, action should be taken if there is reason to believe that colleagues are not following the codes of conduct. This action will serve not only to protect children, young people and vulnerable adults but Members, employees, volunteers, and contracted service providers from false accusations.

Members, employees or volunteers are often the first to realise that there may be something seriously wrong within their own working environment. However, they may not express their concerns because they believe that speaking up would be disloyal to their colleagues or the Council, and/or that there is a possibility that their concerns are unfounded. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may be a suspicion of malpractice.

However, safeguarding is 'everyone's business' and you have responsibility to report your concerns.

The Council acknowledges that 'Managing Allegations' is an extremely sensitive issue and assures Members, employees and volunteers it will fully support and protect anyone who in good faith reports a concern or an allegation that a colleague is, or may be, abusing a child, young person or vulnerable adult. Guidance can be sort from both Children and Adult safeguarding Boards with particular reference to:

- [Kent and Medway Managing Concerns around People in Positions of Trust \(PiPOT\) \(kmsab.org.uk\)](https://www.kmsab.org.uk)
- [Local Authority Designated Officer \(LADO\) - Kent Safeguarding Children Multi-Agency Partnership](#) – (September 2024 now referred to as **LADO Education Safeguarding Advisory Services LESAS**)

1. Types of investigation

Where there is a complaint of abuse against a Member, employee or volunteer, there are three types of investigation that may apply:

- criminal;
- child protection or adult protection; and
- disciplinary.

Civil proceedings could also be instigated by the person/family of the person who alleged the abuse.

The results of any Police and statutory services investigation may influence a disciplinary investigation by the Council, in some cases.

2. Confidentiality

In line with the Whistle Blowing Policy, we as a council make every effort to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a 'need to know' basis only. This is required in order to:

- protect children and vulnerable adults;
- facilitate enquiries;
- avoid victimisation;
- safeguard the rights of the person about whom the allegation has been made and others who might be affected; and
- manage any disciplinary or complaints aspects.

Those involved on a 'need to know' basis would be likely to be the following:

- the person making the allegation;
- the parents or carer of the child, young person or vulnerable adult alleged to have been abused;
- members of the team overseeing any investigation;
- KCC Local Area Designated Officer (LESAS) if involving a child or child services;
- Police; and
- the alleged abuser (and the alleged abuser's parents if the alleged abuser is under 18 years of age).

Any information will be stored in a secure place with access limited to the investigation team, and in line with data protection requirements.

3. Action to be taken

Poor Practice: if the Safeguarding Officer and/or statutory services have investigated an allegation against a member of staff and found evidence of poor practice this may lead to either disciplinary or capability proceedings. The evidence gathered during the investigation will be used as evidence in any proceedings, and the appropriate level of penalty will be determined in accordance with the relevant policy.

Suspected abuse: any suspicion that a Member, employee or volunteer has abused a child, young person or vulnerable adult should be immediately reported to the Safeguarding Officer, the Line Manager or Head of Service of the member of staff.

The manager informed should inform the designated Safeguarding Officer, who will:

- take such steps as they feel appropriate to ensure the safety of the child, young person or vulnerable adult;

- report the incident to the relevant Head of Service and the Human Resources, where consideration will be given to the next steps. These steps may include suspension on full pay, whilst the matter is investigated further;
- seek advice from the KCC Local Area Designated Officer (LESAS) who may involve the police; and
- in collaboration with the appropriate line manager, initiate an investigation in line with Swale Borough Council's Disciplinary Procedure to oversee the internal investigation. In most instances this team will include the Safeguarding Officer.

NB: if the Safeguarding Officer is the subject of the suspicion or allegation, the report must be made directly to the Chief Executive who will assume their role in the above procedure

4. Internal inquiries and suspension

Irrespective of the LADO (LESAS) or of police inquiries, the Council will assess all individual cases under its own disciplinary procedures to decide the appropriate management action. The Council will reach a decision based on the available information and decide on a balance of probability basis whether an allegation is true.

The welfare of the child, young person or vulnerable adult will always remain paramount during such assessments and decision-making.

5. Notification to Social Services

A consultation with LADO (LESAS) and or Adult Social Care (safeguarding team) should be made without delay, including a referral to statutory services under recommendation from KCC and the LADO (LESAS). This is the responsibility of the Safeguarding Officer.

Any further inquiries from KCC or the LADO (LESAS) and any other interested third party should be passed immediately to the disciplinary investigation team. A written record should be kept of any contact with third parties.

6. Support to the Subject of Allegations

Subject to the specific procedures the subject of the allegations should be:

- advised of their rights to be accompanied during any formal procedures;
- treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes;
- kept informed of the progress of the case and of the investigation;
- clearly informed of the outcome of any investigation and the implications for disciplinary or related processes; and
- provided with appropriate support (eg via occupational health or the Employee Assistance Programme).

7. Allegations of previous abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child by a member of staff who is still currently working with children). This should still be investigated as above because other children, young people, or vulnerable adults may be at risk from this individual.

8. Disclosure and Barring Service (DBS)

- As an employer of staff in a 'regulated activity', for Swale and, where appropriate, Swale Borough Council has a legal duty to refer concerns to the DBS in accordance with the Safeguarding Vulnerable Groups Act 2006.
- A staff member of Swale Borough Council must be referred to the Disclosure and Barring Service if:
 - they have been permanently removed from 'regulated activity' through dismissal or permanent transfer, or
 - they would have been removed or transferred if they had not left, resigned, retired or been made redundant, and if
 - they are believed to have engaged in 'relevant conduct' (i.e. been involved in an action or inaction that has harmed a child or vulnerable adult, or put them at risk of harm), or
 - they have satisfied the 'harm test' (i.e. no action or inaction was found to have occurred, but a significant risk remains that it could occur), or
 - they have received a caution or conviction for a 'relevant offence' (i.e. involving automatic barring, either with or without the right to make representations). See Appendix 1 for detailed information on 'relevant conduct'.
- When an allegation is made, it is important to investigate thoroughly, to establish whether or not it has foundation. This will inform any decision to dismiss or remove the individual from regulated activity. An investigation must always be completed, even if the staff member leaves Swale Borough Council employment in the meantime.
- The DBS has no investigative powers and bases its decisions on the evidence supplied to it. It is therefore essential that an investigation is as detailed as possible, in order to provide as much evidence as possible.
- If additional information becomes available after a referral is made, this should also be provided to the DBS.
- Following an investigation, if it is decided that the individual can return to regulated activity, there may not be a legal duty to make a referral.

- The duty to make a referral may not be triggered by temporary suspension and depends on whether there is sufficient information to meet the referral criteria. However, a person may be suspended where an allegation has been made and an investigation is pending.
- The website Making barring referrals to the DBS offers comprehensive guidance, as well as a DBS barring referrals flowchart.
- Referral is with the DBS secure online referral form, which includes on-screen guidance. Help and advice are also available from the DBS on 03000 200 190.

9. Misuse of the Procedure

Members, employees, or volunteers may not discuss any allegations of abuse, whether substantiated or otherwise with:

- anyone within Swale Borough Council, other than the manager who they consulted, the Chief Executive, and the Safeguarding Officer;
- any member of any external agency, other than as part of the formal reporting procedure as set out in this Policy or as part of the investigative process; and
- any other interested party, including parents, carers, and relatives of the child, young person or vulnerable adult, without the express permission of the person with overall responsibility for the investigation. (NB This does not limit the rights of an employee to consult with a trade union representative or Human Resources).

Any enquiries from the media concerning an allegation of child or vulnerable adult abuse must be referred to the lead investigating agencies press office, or the SBC Press Officer. Any direct question must be answered with the phrase “No comment”.

Malicious complaints about a member, employee or volunteer, and/or serious and/or persistent abuse of the Safeguarding Children, Young People and Vulnerable Adults. Policy will not be tolerated, and will be dealt with through the Council’s Disciplinary Policy.

Relevant conduct:

Vulnerable adults definition - A vulnerable adult is a person aged 18 years or over who is receiving a service or assistance which is classed as regulated activity for adults.

Any behaviour is classed as ‘relevant conduct’ if it:

- endangers a vulnerable adult or is likely to endanger a vulnerable adult
- if repeated against, or in relation to, a vulnerable adult, would endanger the vulnerable adult or be likely to endanger them
- involves sexual material relating to children

- involves sexually explicit images depicting violence against human beings (including possession of such images)
- is of a sexual nature involving a vulnerable adult. A person's conduct endangers a vulnerable adult if it:
 - harms a vulnerable adult
- causes a vulnerable adult to be harmed
- puts a vulnerable adult at risk of harm
- makes an attempt to harm a vulnerable adult
- incites another person to harm a vulnerable adult. A person's conduct satisfies the 'harm test' if they are thought likely to:
 - harm a vulnerable adult
- cause a vulnerable adult to be harmed
- put a vulnerable adult at risk of harm
- make an attempt to harm a vulnerable adult
- incite another person to harm a vulnerable adult

Appendix 6: Links to related guidance, advice and policy for sections within the Safeguarding policy

[Working together to safeguard children: statutory framework \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Prevent duty guidance: Guidance for specified authorities in England and Wales \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK \(www.gov.uk\) revised January 2024](https://www.gov.uk)

[Domestic Abuse: statutory guidance \(accessible version\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Swale BC Domestic Abuse Policy \(swale.gov.uk\)](https://swale.gov.uk)

[Intranet link Statutory advocacy flow chart SBCCSU - Flowchart for Statutory Advocacy.pdf - All Documents \(sharepoint.com\)](#)

[Referrals | The Advocacy People - https://www.theadvocacypeople.org.uk/makeareferral](https://www.theadvocacypeople.org.uk/makeareferral)

[Care Leavers - Moving On \(lea.kent.sch.uk\)](https://lea.kent.sch.uk)

[People In positions of trust - Kent and Medway Managing Concerns around People in Positions of Trust \(PiPOT\) \(kmsab.org.uk\)-](https://kmsab.org.uk)

[Making Safeguarding personal - Kent and Medway SAB - What is Making Safeguarding Personal \(kmsab.org.uk\)](https://kmsab.org.uk)

[Support for carers - Kent and Medway SAB - Support for Carers \(kmsab.org.uk\) Carers assessment referral should be considered for all carers and referrals made via](https://kmsab.org.uk)

[Capacity - Liberty Protection Safeguards \(LPS\) | SCIE](#)

[Professionals difference - Multi-agency escalation policy; resolving practitioner differences \(kmsab.org.uk\)](https://kmsab.org.uk)

[Kent and Medway SAB - Support for Carers \(kmsab.org.uk\) Support for carers - Kent County Council](https://kmsab.org.uk)

Internal policy / Procedures:

Safer recruitment Policy
Members DBS Process

Policy and Resources Committee Forward Decisions Plan – March 2025

Report title, background information and recommendation(s)	Date of meeting	Open or exempt?	Lead Officer and report author
Revisions to the Covert Surveillance and Access to Communications Data Policy and Guidance Notes	June 2025	Open	Head of Service: Robin Harris Report Author: Gary Rowland
Performance Management – 2024/2025 Quarter 4	June 2025	Open	Head of Service: Lisa Fillery Report Author: Chris Nichol
Risk Management Update Q2	September 2025	Open	Head of Service: Katherine Woodward Report Author: Georgia Harvey
Risk Management Update Q4	March 2026	Open	Head of Service: Katherine Woodward Report Author: Georgia Harvey

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