

<b>Meeting Date</b>	Wednesday 25 <sup>th</sup> September 2019
<b>Report Title</b>	Safeguarding Policy Refresh 2019
<b>Cabinet Member</b>	Cllr Angela Harrison, Cabinet Member for Health and Wellbeing
<b>SMT Lead</b>	Emma Wiggins
<b>Head of Service</b>	Charlotte Hudson
<b>Lead Officer</b>	Stephanie Curtis
<b>Recommendations</b>	1. For Cabinet to approve the revised Safeguarding Policy and associated training plan

## **1 Purpose of Report and Executive Summary**

- 1.1 This report summarises the amendments that are proposed to be made to the Safeguarding Policy and associated training plan and asks that Cabinet agree the revisions made.

## **2 Background**

- 1.2 The Safeguarding Policy was last revised in May 2018 and is subject to an annual review to ensure that it reflects current legislative requirements and any procedural changes.
- 1.3 The main amendments that have been made to the previous version of the Safeguarding Policy are as below:
- Foreword amended to reflect new Cabinet Member;
  - 'Quick View' flowchart amended to reflect addition of 'general welfare concern' and process to take; and change in terminology of KCC Front Door;
  - Terminology throughout documented amended to reflect change of term from 'vulnerable adult' to 'adult at risk' as per Kent and Medway Safeguarding Adult Board terminology;
  - Section 3.8 has been amended – this describes the new Kent Safeguarding Children Multi-Agency Partnership (KSCMAP) which comes into effect in September, replacing the previous Kent Safeguarding Children Board (KSCB). Swale Borough Council are deemed a relevant agency as part of these arrangements. This change should have limited impact on SBC and the implementation of our safeguarding policy as we already worked closely with partners through the KSCB. Multi-agency training will continue to be offered

through the KSCMAP which is the source of a large element of our own staff's training is;

- Section 3.9 has also been added – The Home Office are planning to bring forward legislation to place a duty on specific organisations, including borough councils, to ensure they are focused on and accountable for preventing and reducing serious violence. There will be cross over of this duty with our community safety duties and we currently await further details. It is unlikely to change our working safeguarding procedures but may result in additional training required for the organisation. A further briefing note will be brought forward when further details are available;
- Section 5.2 has been amended to include reference to the Kent and Medway Self-Neglect procedures. With an increasing number of self neglect cases having been identified by SBC, it is important that these procedures are discussed within our policy;
- Section 5.5 has been added to reflect the increase in the number of general welfare concerns that staff and councillors have raised to the safeguarding team over the last 12 months. These are those concerns that don't necessarily require a referral into statutory services such as social services, but where a concern may have been raised about someone's mental health, level of debt etc;
- Section 5.6 has been added to discuss the need for Safeguarding Officers to consider whether any concerns raised to them should be referred on to the multi-agency Vulnerability Panel (previously Community MARAC);
- Key Safeguarding Contacts have been updated;

1.4 Following feedback from staff, there have been changes recommended to the training plan included within this policy, along with the safeguarding levels. These changes have been made to ensure that staff only complete the most relevant subjects and in the most suitable way. Additionally, consideration has been given to whether there are any new subjects that should be included given a review of the highest categories of safeguarding concerns raised across the organisation.

Section 4.4.1 of the policy has been amended to create a 'Level 4' – these are those with 'strategic responsibility for safeguarding' – there will only be 2 posts at this level (Chief Executive and HOS Housing and Economy, Community Services) – they have been separated from level 3 staff (the safeguarding officers and ECS Manager) who need a greater level of specialist face to face training than those now at level 4.

The Training Plan has been amended as follows:

- Level 0 – No changes;

- Level 1 – No change to e-learning requirement. Face to face or team meeting input added for suicide awareness for those teams that deal with high level of calls (e.g. CSC and revenue and benefits);
- Level 2 – Removed requirement for this group to complete e-learning. All must complete face to face sessions which are more detailed and appropriate than the e-learning for this group that have regular contact with vulnerable groups. An input on suicide awareness has also been added (this was a recommendation out of a Domestic Homicide Review due to be published shortly);
- Level 3 – removed required to complete e-learning as need to complete more specialised face to face sessions. Also added in requirement for input on suicide awareness;
- Level 4 – these have been removed from the level 3 staff as not require such a high level of specialist training. Its suggested they complete the e-learning packages and only two face to face sessions that will focus on their strategic responsibilities for safeguarding within the organisation;
- The training requirements are also now to be discussed between the Safeguarding Officers and the team managers for those requiring face to face training, to determine the most suitable form of input. This may be an input at a team meeting level, rather than attending a separate half day training session.

2.4 It has been requested that Member safeguarding training be discussed by the Member development working group when it meets. Previously, safeguarding training inputs have been undertaken in evening member briefings. At this stage, member training requirements are therefore not referenced within the Safeguarding Policy.

### **3 Proposal**

3.1 For Cabinet to approve the revised Safeguarding Policy and associated training plan

## **2 Alternative Options**

4.1 That the Safeguarding Policy is not revised. This is not recommended as although the current Policy is largely accurate in relation to legislative requirements, it is not complete, and the training plan has needed revisions to ensure it meets all current needs and is more reflective of individual's needs.

### **3 Consultation Undertaken or Proposed**

5.1 Consultation has been undertaken with the team managers

## 6 Implications

Issue	Implications
Corporate Plan	The proposals in this report delivers against the Corporate Priority 'delivering improved quality of life' and 'delivering the council of tomorrow'.
Financial, Resource and Procurement	<p>There is limited financial implication to the delivery of the training plan within this Policy. The majority of the subjects can be accessed through the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) for free and one of our staff members has now been trained to deliver these directly for us. Other subjects can also be delivered by other partners such as Kent Police. The ELMS e-learning modules are already in place. If there were any further costs, these could be considered within the corporate training budget.</p> <p>There is staff time involved in both the organisation/delivery of the training plan and for all staff in completing the required sessions and modules. However, this is felt necessary to ensure the level of knowledge across the organisation is at a high enough level to effectively identify and action any safeguarding concern.</p>
Legal, Statutory and Property	<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 and Modern Slavery Act 2015.</p> <p>It also discusses the proposed legislation to be introduced relating to serious violence reduction; and that SBC is named as a relevant authority within the new . Kent Safeguarding Children Multi-Agency Partnership (KSCMP), established from Working Together to Safeguard Children 2018.</p>
Crime and Disorder	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.
Environment and Sustainability	No specific sustainability implications have been identified at this stage.
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 communities health and wellbeing.
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 ECS 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.
Privacy and Data Protection	The safeguarding database 'My Concern' referenced within the Policy as part of the recording process, has increased security compared with the old intranet site – 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 4.4.9 discusses information sharing.

## 7 Appendices

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

- Appendix I: Safeguarding Policy Refresh August 2019

## 8 Background Papers

None.

# Safeguarding Policy

August 2019 Review

## Foreword



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. Better to be Safe than Sorry.

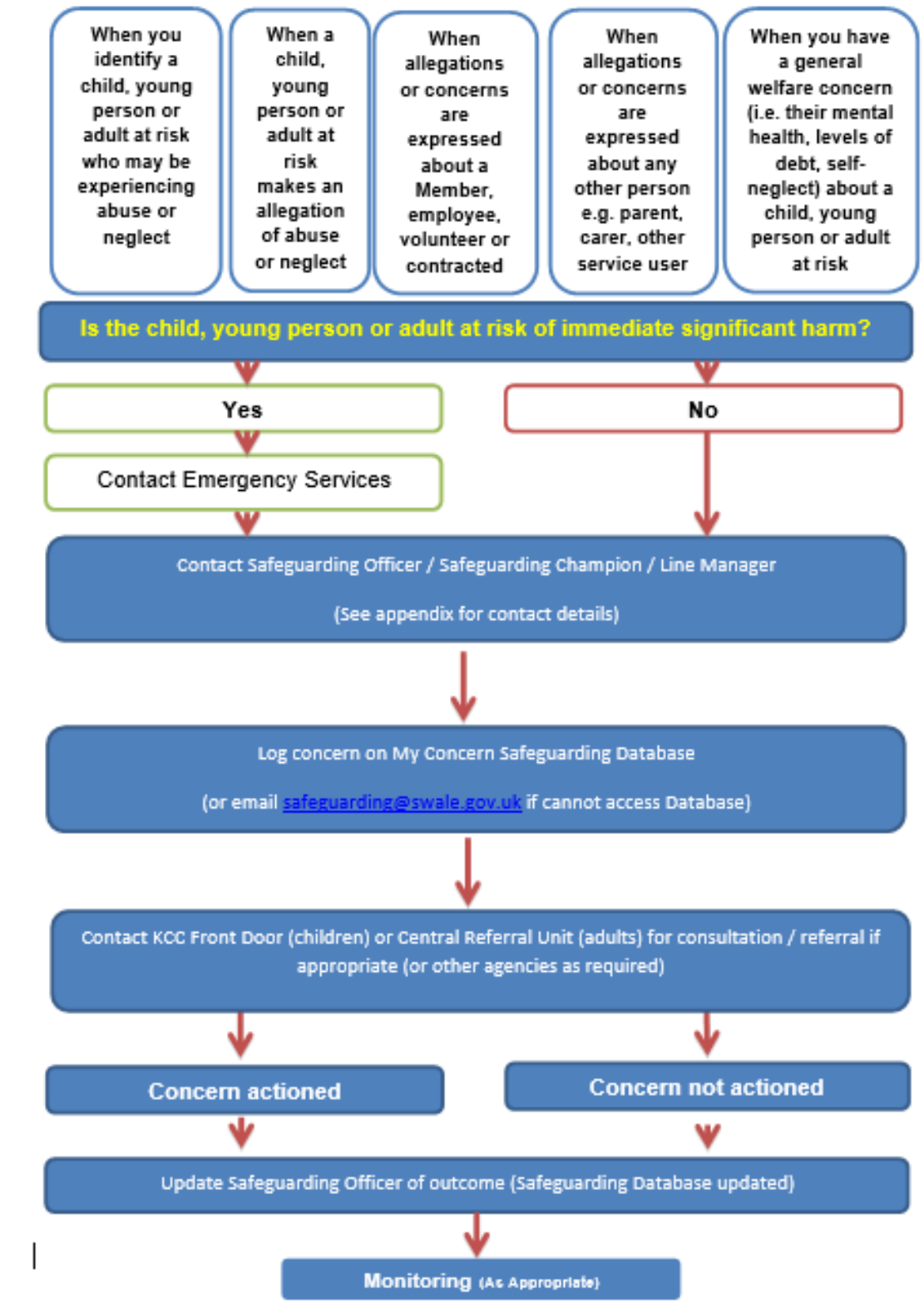
**Councillor Angela Harrison, Swale Borough Council**

Children, young people and adults at risk have a right to expect that they are protected from abuse and can be given opportunities to thrive and fulfil their potential. At Swale Borough Council we believe that every person who works for and with us has a responsibility to ensure that this happens. Alongside our partners, we make sure that our staff in every area of the council's activities understand the importance of safeguarding when providing services to our communities. We will review regularly what we do to inform how best to improve the way in which we deliver our safeguarding responsibilities and will continue to strive to improve best practice.



**Mark Radford, Chief Executive, 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. This policy must be read in conjunction with the supplementary guidance and suite of documents on the Safeguarding intranet site (<https://teams.mkip.org/sites/csu/default.aspx>) or the My Concern Database Resource Area.

## 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 (from hereon referred to as 'the Council' or SBC) 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 (from hereon referred to as '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 2018, 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.
- 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 is provided across local partner agencies and that this duty is met by SBC.

- 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.
- 3.8** The Children Act 2004 has been amended by the Children and Social Work Act 2017 and will see the replacement of Local Children Safeguarding Boards. Working Together to Safeguard Children 2018 details the arrangements for their replacement. Three key safeguarding partners (Local Authority (upper tier), Police and Clinical Commissioning Groups) have been given specific responsibility for safeguarding children and the new 'Kent Safeguarding Children Multi-Agency Partnership (KSCMP)' will be established on the 17<sup>th</sup> September 2019 for these partners to exercise their functions. These safeguarding partners have identified a number of 'relevant agencies' – of which Swale Borough Council is one – that are expected to cooperate with the new Partnership in accordance with the new arrangements, to achieve the purpose to safeguard and promote the welfare of children and young people.
- 3.9** In July 2019, the Home Office published the results of a consultation on introducing a new legal duty to prevent and tackle serious violence. The Government intends to bring forward legislation to implement the results of this consultation. This is likely to be after the annual refresh of this Policy, however will impact the safeguarding requirements for Swale Borough Council. A statutory duty will be placed on specific organisations and local authorities (including district/borough councils) to ensure they are focused on and accountable for preventing and reducing serious violence.

## **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) Establish an appropriate governance structure, made up with delegates from appropriate departments across the Council to monitor activity and make necessary improvements around this agenda, led by the Safeguarding Officer.

## 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**

**4.4 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;

2 – Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact;

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 Lead Cabinet Member**

The Member with the portfolio for safeguarding children and adults at risk is responsible for ensuring the implementation, consistent monitoring and improvements of the Safeguarding Policy and related procedures.

**4.4.4 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.

- 4.4.5 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.
- 4.4.6 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.
- 4.4.7 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.
- 4.4.8 Contractors, sub-contractors or other organisations funded by or on behalf of the Council** are responsible for applying the appropriate DBS checks, delivering safeguarding training commensurate with their level of contact with children, young people and adults at risk and ensuring their employees comply with their organisational Safeguarding Policy and Procedures.
- 4.4.9** Information sharing is vital to safeguarding and promoting the welfare of children and adults at risk. Government guidance 'Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)' highlights key rules for information sharing and is equally helpful for working with adults at risk. Consent is one possible lawful basis to process and share information and can be used if the individual gives this explicitly and freely, although it is not the only option with regards to sharing information regarding a safeguarding concern. Under the General Data Protection Regulation and Data Protection Act 2018 you may share information without consent if, in your judgement, there is another lawful basis to do so. Information can be shared legally without consent, if a referring officer is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child or adult at risk. Relevant personal information can be shared lawfully (without consent) if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional wellbeing.

## **5. Safeguarding Procedures**

### **5.1 Introduction**

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.

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

For children, types of abuse include:	Types of adult abuse include:
Physical Psychological Sexual Grooming Child Sexual Exploitation Female Genital Mutilation Online Abuse/Cyberbullying/Bullying Child Trafficking/Modern Slavery Domestic Abuse Self-neglect/Self-injurious Forced Marriage	Physical Sexual Psychological Discrimination Exploitation Financial Organisational Domestic Abuse Self-neglect/Self-injurious Modern slavery/Human trafficking Neglect and acts of Omission Female Genital Mutilation Inappropriate Restraint

Please refer to the procedural guides and information available on the Intranet under 'Safeguarding' for further information and advice or on the resource section of the My Concern Database.

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](mailto:safeguarding@swale.gov.uk) and contact your team's Safeguarding Champion.

- 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/Safeguarding Champion/Line Manager.
- 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.
- 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](mailto:safeguarding@swale.gov.uk) and contact your team's Safeguarding Champion.
- 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/Safeguarding Champion/Line Manager.
- Outcome of the 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](mailto:safeguarding@swale.gov.uk) and contact your team's Safeguarding Champion;
- 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 Local Authority Designated Officer (LADO). The KCC LADO can support Human Resources or Contract Manager with appropriate decision-making;
- Any Member, employee or volunteer can make a referral to the KCC LADO if they believe a case has been inappropriately or ineffectively investigated by SBC

#### **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](mailto:safeguarding@swale.gov.uk) and contact your team's Safeguarding Champion;
- Consultation with Kent Front Door/Kent Central Referral Unit and/or referral to be made with support from the Safeguarding Officer/Safeguarding Champion/ 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 For all concerns, there may be cases identified to the Safeguarding Officers that meet the criteria for the multi-agency Swale Vulnerability Panel (previously known as Community MARAC). 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 log 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](mailto:safeguarding@swale.gov.uk) to alert the Safeguarding Officer. Their team Safeguarding Champion and Line Manager should also be alerted to this, who may be able to log the concern on their behalf.

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.

## **6. Recruitment**

SBC is committed to safer recruitment procedures set out by the Kent Safeguarding Children Board (KSCB). 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.

## **6.1 Risk Assessment**

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 ensure that only appropriate individuals are selected to undertake DBS procedures. The risk assessment for an adult working with adults at risk must also take into account other forms of potential abuse, which do not necessary apply when working with children (e.g. financial abuse).

## **6.2 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 a 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 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 SBC 'DBS Policy January 2016' for further information.

Further information about barring and regulated activity can be found here <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

## 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' on Skype

### **Department Safeguarding Champion:**

Housing – **Michelle Bussandra, Kerrie McDermott**

Leisure Services – **Kerrie Houghting**

Revenue & Benefits – **Adam Cudworth, Sarah Neaves, Tracy Brown, Andrea French**

Community Safety - **Tina Grafton**

Customer Services – **Jennifer Williams**

Environment Response – **Jo Mapp**

Sheerness Gateway Coordinator – **Sarah-Jane Radley**

### **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

**Further information and guidance on partner agencies and support available can be found on the Safeguarding Information section of the Intranet and the Resource Area of the Safeguarding Database.**

## Safeguarding Training Plan: Minimum learning requirements

Safeguarding Contact Level	Level of Contact definition	Minimum learning requirements
0	No contact with children/young people/adults at risk and/or parents/carers	<b>Elms e-learning</b> <ol style="list-style-type: none"> <li>1. Safeguarding Children</li> <li>2. Safeguarding Adults</li> <li>3. Combined Safeguarding Issues</li> <li>4. Domestic Abuse</li> </ol>
1	Limited contact with children/young people/adults at risk and/or parents/carers- no unsupervised contact	<b>Elms e-learning</b> <ol style="list-style-type: none"> <li>1. Safeguarding Children</li> <li>2. Safeguarding Adults</li> <li>3. Combined Safeguarding Issues</li> <li>4. Domestic Abuse</li> </ol> <p>Where teams have a large amount of telephone contact with adults, suicide awareness inputs will be offered at team level.</p>
2	Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact	<b>Face-to-Face</b> <ol style="list-style-type: none"> <li>1. Prevent (Counter-Terrorism) training</li> <li>2. Modern Slavery training</li> <li>3. Child Sexual Exploitation training</li> <li>4. Child Protection: Basic Awareness</li> <li>5. Safeguarding Adults</li> <li>6. Domestic Abuse</li> <li>7. Suicide Awareness</li> </ol>
3	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	<b>Face-To-Face</b> <ol style="list-style-type: none"> <li>1. Prevent (Counter-Terrorism) training</li> <li>2. Modern Slavery training</li> <li>3. Child Sexual Exploitation training</li> <li>4. Child Protection: Basic Awareness</li> <li>5. Safeguarding Adults</li> </ol>

		6. Domestic Abuse 7. Suicide Awareness 8. Safeguarding Children (Designated Staff)
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.	<b>Elms e-learning</b> <ol style="list-style-type: none"> <li>1. Safeguarding Children</li> <li>2. Safeguarding Adults</li> <li>3. Combined Safeguarding Issues</li> <li>4. Domestic Abuse</li> </ol> <b>Face to Face</b> <ol style="list-style-type: none"> <li>1. Safeguarding Children (Designated Staff)</li> <li>2. Safeguarding Adults</li> </ol>

## Monitoring

Elms E-Learning will need to be completed every 3 years. E-learning adherence will be monitored quarterly and reported to SMT.

Face-to-Face training will need to be renewed every 3 years with the exception of Child Protection for Designated Staff (Level 3 and 4 only) which should be renewed every 2 years.

Face-to-Face training adherence will be monitored quarterly and reported to SMT.

A forward plan of what Training sessions are required for each year will be created in April each year by the Safeguarding Officers.

The Safeguarding Officers will discuss the best method of delivering each face to face training course with Team managers of those staff at training level 2, 3 and 4. This may include staff attendance at externally or internally arranged training courses or an input at a team meeting.