

# **Safeguarding Policy**

# Contents

		Page
1.	Executive Summary	3
2.	Policy Statement	3
3	Statutory Responsibilities	4
4..	Who does the policy apply to	4
5.	Definitions and Supporting Information	4
6.	Reporting concerns – Everyone’s responsibility	7
7.	Who to Tell	7
8.	Process for reporting and dealing with concerns.	9
9	What happens after I report or raise a safeguarding concern?	10
10.	Allegations of abuse against staff, elected members or volunteers	10
11.	Decisions about Sharing Concerns	11
12.	Equality Impact Assessment and Monitoring	11
13.	Data Protection	11
Appendix A – Safeguarding Incident Reporting Form		12

## 1. Executive Summary

- 1.1 Wyre Council is fully committed to its duties and responsibilities to safeguard and promote the welfare of children, young people and adults at risk of abuse, neglect and exploitation. This Safeguarding Policy reinforces that commitment and provides assurance that the Council will act in the best interests of the local community.
- 1.2 Safeguarding cannot be achieved by one agency alone and the role we play, alongside our partners to effectively deliver this commitment across Wyre is paramount. We will therefore demand good public services from our partner agencies in this regard.
- 1.3 All children, young people and adults have the right to participate and be safe whatever their age, gender identity, marriage and civil partnership, pregnancy and maternity, sexual orientation, race, religion or belief, disability, culture or circumstance. This includes a right to protection from abuse, neglect and any form of exploitation.
- 1.4 This Safeguarding Policy aims to ensure that a consistent approach to safeguarding exists across all council services. It outlines key roles and responsibilities of individual officers to embed safeguarding policies, practices and procedures into the council's everyday business.

## 2. Policy Statement

- 2.1 Wyre Council is committed to working in partnership with others to safeguard children and adults at risk from all forms of abuse, neglect or exploitation. The council will raise awareness of safeguarding issues to ensure that the needs and interests of children, young people and adults at risk are incumbent in decision making processes and through service provision.
- 2.2 This policy aims to ensure that an overarching approach to safeguarding is embedded within all council services and that employees, elected members, those delivering contracts on behalf of the council and volunteers understand their role and responsibilities in supporting all residents to live a life free from abuse, exploitation and intimidation.
- 2.3 We will create an environment where staff are trained to an appropriate level and encouraged to think of safeguarding as being their responsibility, understanding the need for them to play a full and active part in the delivery of the council's response. We will also create an organisational culture where the reporting of abuse and exploitation is encouraged and staff, elected members and contractors feel supported to do so.
- 2.4 The council will ensure that it complies with all relevant safeguarding legislation, data protection legislation and government guidance.
- 2.5 In particular the Council is committed to the following principles and actions:
  - The Council will ensure that a safeguarding culture is in place and is actively promoted within the Council and will work together with other agencies to safeguard vulnerable children, young people and adults at risk.
  - The Council will implement procedures to safeguard children, young people and adults at risk and take all reasonable steps to protect them from harm, discrimination and to respect their rights, wishes and feelings.
  - All employees of Wyre Council who work with children, young people and adults at risk will be recruited with regard to their suitability for that responsibility. Employees who have substantial access to children, young people and adults at risk are subject to an enhanced Disclosure Barring Service (DBS) check prior to appointment, which includes a check against the vetting and barring scheme in line with the Safeguarding Vulnerable Groups Act 2006.
  - All employees have a responsibility to report concerns of suspected abuse or poor practice and the Council will provide designated points of contact to deal with such reports.
  - Council employees are expected to work in an open and transparent way avoiding any conduct that may cause a reasonable person to question their motives and intentions.

- The Council will promote good practice that encourages a safe environment, protects all parties and avoids mistaken allegations of abuse.
- The Council will take all incidents of poor practice and allegations or suspicions of abuse seriously and these will be responded to swiftly and appropriately.
- The Council will respond promptly to suspicions or allegations involving employees and appropriate disciplinary and appeals procedures will be implemented.
- This policy will be reviewed every three years or whenever there is a change in the relevant legislation or any other adopted standard of best practice.
- Confidentiality shall be upheld in line with current data protection and human rights legislation.

### 3. Statutory Responsibilities

3.1 As a District Council we have specific legal safeguarding responsibilities under:-

- Section 11 of the Children Act 2004
- Children and Social Work Act 2017
- Care Act 2014
- Mental Capacity Act, 2005
- Counter Terrorism and Security Act 2015
- Modern Slavery Act 2015
- Housing Act 2004

### 4. Who does the policy apply to?

4.1 The policy applies to employees, elected members, volunteers, contractors and everyone working on behalf of or representing the Council. For the purpose of this policy the term "employee" relates to any person paid or unpaid working on behalf of the Council.

4.2 Robust safeguarding procedures must be applied when entering into contracts and service level agreements. It is the responsibility of the officer managing the agreement or contract to check that the organisation has appropriate safeguarding procedures in place and that their staff have relevant training and are Disclosure and Barring Service (DBS) checked where necessary.

### 5. Definitions and Supporting Information

<b>Child, or young person</b>	Anyone under the age of 18
<b>Adult at Risk</b>	A person aged 18 years or over, who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
<b>Parent</b>	Parent, carer or guardian
<b>Staff, elected members and volunteers</b>	Anyone working on behalf of, delivering a service for, or representing the Council
<b>Abuse</b>	<p>Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It can take many forms, including the following:</p> <p><b>Discriminatory Abuse:</b> Includes abuse on the grounds of race, faith or religion, age, disability, gender, sexual orientation or any of the other protected characteristics</p> <p><b>Domestic Abuse:</b> Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over</p>

	<p>who are or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional abuse.</p> <p><b>Financial or material abuse:</b> includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.</p> <p><b>Physical Abuse:</b> is the non-accidental infliction of physical force that results (or could result) in bodily injury, pain or impairment.</p> <p><b>Sexual abuse:</b> is the direct or indirect involvement in sexual activity without consent or forcing or enticing children or young people in sexual activities.</p>
<b>Neglect</b>	Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating.
<b>Organisational abuse</b>	Is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where the adult lives or that they use.
<b>Psychological abuse</b>	Sometimes called Emotional Abuse is behaviour that has a harmful effect on emotional health, well-being and development.
<b>Self-Neglect</b>	This covers a wide range of behaviours including neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding
<b>Child Sexual Exploitation (CSE)</b>	A form of child abuse. It occurs where anyone under the age of 18 is persuaded, coerced or forced into sexual activity in exchange for, amongst other things, money, drugs/alcohol, gifts, affection or status. Consent is irrelevant, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. CSE does not always involve physical contact and may occur online.
<b>County Lines</b>	County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and adults at risk to move and store drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities. County lines may also involve the commission of the offences of 'slavery, servitude, forced or compulsory labour' and 'human trafficking' as defined by the Modern Slavery Act 2015.
<b>Child Criminal Exploitation (CCE)</b>	Child Criminal Exploitation is common in county lines but is broader than it, e.g. those being forced to work on cannabis farms or to commit theft. CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. It can be perpetrated by individuals or groups, males or females, and young people or adults. Criminal exploitation does not always involve physical contact and can occur through the use of technology. It may also involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. CCE often occurs without the child's immediate recognition, even though activity may appear to be consensual and despite the fact that victims frequently believe that they are in control of the situation. In reality, they are often exposed to injuries, trauma, sexual violence, debt bondage and danger.
<b>Prevent</b>	As part of the national counter-terrorist strategy Prevent aims to stop people becoming involved in terrorist activity or supporting terrorism by working with individuals and communities to address issues before they become a criminal

	<p>matter, and to stop people moving from extremism into terrorist-related activity. Individuals who are identified as being at risk will be referred to the Channel Panel programme.</p> <p>There is no expectation for the council to take on a surveillance or enforcement role as a result of Prevent. Rather, the council will work with partner organisations to contribute to the prevention of terrorism by safeguarding and protecting vulnerable individuals and making safety a shared endeavour.</p>
<b>Modern Slavery (and Human Trafficking)</b>	Encompasses slavery, human trafficking, forced labour and domestic servitude.
<b>Honour Based Abuse, including Female Genital Mutilation and Forced Marriage</b>	<p>Honour Based Abuse is violence and abuse in the name of honour, covering a variety of behaviours (including crimes), mainly but not exclusively against females, where the person is being punished by their family and/or community for a perceived transgression against the 'honour' of the family or community, or is required to undergo certain activities or procedures in 'honour' of the family.</p> <p>Honour Based Abuse is not a crime itself, however the practices used to punish individuals are criminal acts, i.e. abduction, forced marriage, assault and murder and includes physical abuse, sexual abuse, emotional and/or psychological abuse, financial abuse, forced marriage and female genital mutilation.</p> <p>Female Genital Mutilation is a collective term for illegal procedures which include the removal of part/all external female genitalia for cultural or other nontherapeutic reasons. The practice is not required by any religion. It is painful, medically unnecessary and has serious health consequences at the time it is carried out and in later life. The procedure is typically performed on girls of any age, but is also performed on new born girls and on young women before marriage/pregnancy. A number of girls die as a direct result of the procedure, from blood loss or infection. FGM may be practised illegally by doctors or traditional health workers in the UK, or girls may be taken abroad for the operation.</p> <p>A Forced Marriage "is a marriage conducted without the valid consent of both parties, where duress is a factor" ('A Choice by Right' HM Government 2000). It is illegal under the Anti-Social Behaviour, Crime and Policing Act 2014 to:</p> <ul style="list-style-type: none"> <li>a) use violence, threats or any other form of coercion for the purposes of causing another person to enter into a marriage; and</li> <li>b) believe, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.</li> </ul> <p>Duress can involve physical, psychological, sexual, financial and/or emotional pressure.</p> <p>The legislation also applies to a person deceiving someone into going abroad for the specific purpose of forcing them to marry and is committed whether or not the forced marriage goes ahead.</p>

## 6. Reporting concerns – Everyone's responsibility

- 6.1 It is not our job to establish whether or not abuse is taking place but it is everyone's responsibility to report any concerns we have over the welfare of children, young people or adults at risk. This responsibility includes; spotting signs of abuse, reporting concerns and handling any allegations reported to us by members of the public.

As a general rule if something does not feel right it may not be and so should be reported.

## 7. Who to Tell

- 7.1 All suspicions, concerns and disclosures must be reported immediately to one of the Designated Safeguarding Officers (DSO's) below:

Lead Designated Safeguarding Officer	Mark Broadhurst, Head of Housing and Community Services	01253 887433
Designated Safeguarding Officer	Shelley Birch, Health Partnerships and Early Action Officer	01253 887240
Designated Safeguarding Officer	Neil Greenwood, Head of Environmental Health & Community Safety	01253 887410
Designated Safeguarding Officer	Jane Collier, Senior Human Resources Advisor	01253 887506

Where you think the case is urgent and none of the above are available, do not delay contact

Lancashire County Council Adult Social Care – 0300 123 6721

Lancashire County Council Childrens Social Care:

0300 123 6720 (Monday – Friday 9am -5pm)

0300 123 6722 (Out of Hours)

Lancashire Police – 0845 125 3545 or 999 in an emergency.

- 7.2 Where the Designated Safeguarding Officer considers the concern does not reach the Lancashire County Council safeguarding threshold for action consideration will be given to the matter being referred to the Wyre and Fylde Integrated Team (WFIT)

WFIT is a multi-agency partnership, hosted by the Council every two weeks that provides a multi-agency response to support a vulnerable person.

### 7.3 What to do if someone tells you that they are being abused

Council staff have no investigative role and should not prompt or probe for information if someone starts to talk to them about abuse or neglect. The most important thing to do is to stay calm and listen. Listening and responding effectively means helping people to open up and you can do this by:

- Giving them your full attention
  - Keeping your body language open, calm and reassuring
  - Being compassionate and understanding
  - Reassuring them that their feelings are important
  - Respecting pauses and not interrupting - let them go at their own pace
  - Making it clear that you're interested in what they're telling you
  - Reflecting back what they said to check your understanding, using their language to show it's their experience
- 
- DO NOT make promises about confidentiality but do reassure people that you will only share sensitive information on a 'need to know' basis
  - DO NOT get embroiled in why?
  - DO NOT judge or react negatively.

- Avoid displays of shock and keep opinions to yourself, i.e. about what may have happened or those allegedly involved

What to do next:

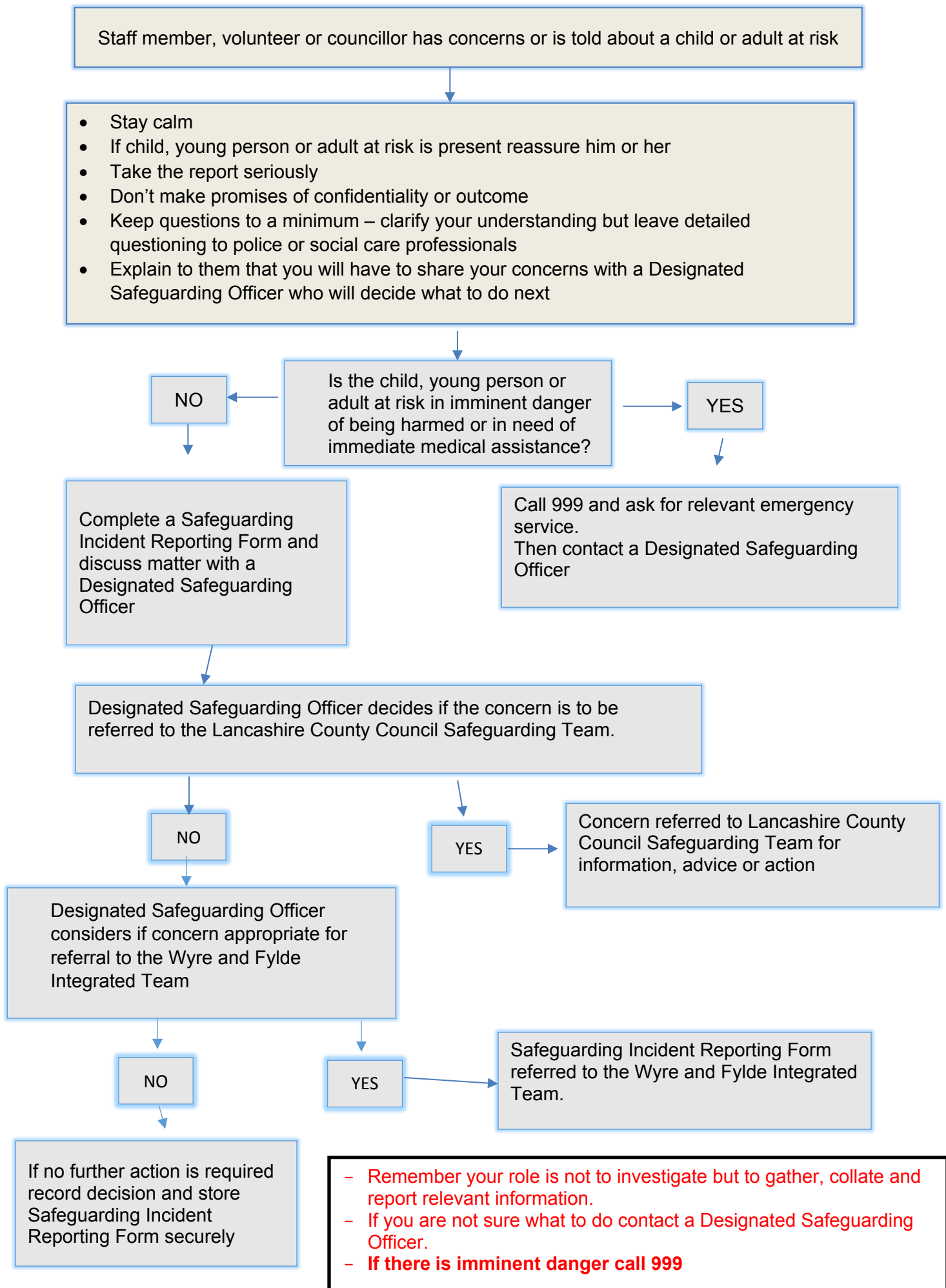
If there is an immediate risk of harm call 999, otherwise make a note of the key facts as soon as possible on a Safeguarding Incident Reporting Form. Remember to:

- stick to the facts as you understand them - who? what? where? when?
- use their words and phrases
- record what led up to the conversation, where it took place and who was present
- make a note of any questions you needed to ask

Discuss the matter with a Designated Safeguarding Officer as soon as possible and follow the steps laid out in section 8.



## 8. Process for reporting and dealing with concerns.



## 9 What happens after I report or raise a safeguarding concern?

Once you have raised concerns with a Designated Safeguarding Officer (DSO) using the Safeguarding Incident Reporting Form (Appendix 1) the action that then follows will largely depend on the nature of the concerns raised.

It is likely the DSO will need to speak to you for clarification and may seek additional information or intelligence on the matter before proceeding.

The DSO may agree with you what further action is necessary, but again depending on the nature of the concern the matter may be referred on to an appropriate agency or officer and the final outcome not necessarily disclosed to you.

However you should be assured that any concerns will be taken seriously. Appropriate action will be taken to deal with the concern or it will be escalated to the appropriate level.

Whilst you may not learn the eventual outcome of concerns you raise the following are some potential outcomes.

- referral to an appropriate individual agency for intervention
- a multi-agency response to support the vulnerable person
- criminal investigation
- the instigation of criminal proceedings
- internal disciplinary proceedings

## 10. Allegations against Staff, Elected Members or Volunteers

10.1 Staff who work with children can be vulnerable to malicious or misplaced allegations against them. Unfortunately there are also occasions where some adults/professionals have been found to be perpetrators of child abuse or of displaying unsuitable behaviours which would harm the children they work with.

10.2 Allegations of harm or inappropriate behaviour made against staff, either paid or unpaid, are serious and must be dealt with by the Local Authority Designated Officer (LADO). The LADO is located within Children's Services at Lancashire County Council and must be alerted to all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

The LADO is independent of Wyre Council and the role includes:

- The management and oversight of individual cases
- Providing advice and guidance to employers and voluntary organisations
- Liaising with the police and other agencies
- Monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process

The LADO for Lancashire is Tim Booth contactable on 01772 536694 or at [Tim.booth@lancashire.gov.uk](mailto:Tim.booth@lancashire.gov.uk).

10.3 If an allegation of abuse is made against an employee, the Head of Business Support must be informed immediately. They will inform the relevant Director and the Lead Designated Safeguarding Officer. Consideration will be given to suspending the employee from work or moving them to alternative duties not involving contact with children, young people or adults at

risk – in accordance with the Council's Disciplinary Policy and Procedure.

- 10.4 If it is necessary to conduct an investigation into events surrounding the complaint, this will be conducted in liaison with the LADO and in accordance with the Disciplinary Policy and Procedure.
- 10.5 The consideration of suspension in such circumstances does not imply guilt but is a neutral course of action, which is designed to ensure that both employees and complainants are protected during the investigation.
- 10.6 The details of the safeguarding allegation should not be discussed with them until the strategy for investigation has been agreed with the LADO. This is because the police may decide to lead the safeguarding investigation and any discussion which takes place prior to police interview may result in contamination of evidence.
- 10.7 Externally conducted investigations, e.g. a police investigation, will normally take precedence over any internal investigations.
- 10.8 The alleged perpetrator will be considered innocent unless proven otherwise. Suspension offers protection for them as well as the alleged victim and other service users, and enables a full and fair investigation to take place.
- 10.9 **The Welfare of Staff**

Wyre Council is committed to following the correct process for dealing with any allegation against a member of staff, but it is also mindful of the welfare of that staff member and will provide appropriate help and support to them.

## 11. Decisions about Sharing Concerns

- 11.1 If a child, young person or adult at risk does not want concerns to be followed up, we will take their wishes into account before deciding what to do, considering:-
- the perceived level of risk to the individual and /or others and
  - their capacity to understand the matter in question and to make decisions relating to it.
- The decision will be made by a Designated Safeguarding Officer.
- 11.2 In some circumstances it would be important to talk to parents or carers to clarify any concerns (but not the alleged abuse). For example if a child seems withdrawn, there may be a reasonable explanation, which a parent can provide.
- However, sharing the concern may sometimes seem to present a greater risk, e.g. where the parent / carer is the one who may be responsible for the abuse. In these circumstances, or where concerns still exist despite an explanation from parents and carer, any suspicion, allegation or incident of abuse must be reported to the designated safeguarding officer and recorded.

## 12. Equality Impact Assessment and Monitoring

- 12.1 The operation of this policy will be monitored for its impact on different equality groups in line with the Equality Act 2010. This will enable the Council to assess whether any differences have an adverse impact on a particular group, such that further action would be required.

## 13. Data Protection

In implementing this policy, the Council will ensure that any personal data relating to the application of this policy will be obtained, processed and destroyed in line with Data Protection requirements.

## Appendix A

### Safeguarding Incident Reporting Form

Please give as much information as possible, using extra sheet if necessary. All information will be treated in strict confidence.



<b>Your Details</b>	
<b>Name of person making report</b>	
<b>Position</b>	
<b>Date / Time of report</b>	

<b>Details of person you are concerned about</b>	
<b>Name of person</b>	
<b>Date of Birth</b>	
<b>Adult / Child</b>	
<b>Male / Female</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone Number</b>	

<b>Parent/Guardian details (if applicable)</b>	
<b>Parent/Guardian name</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone Number</b>	

**Details of incident (who?, what?, where?, when?)**

**Have you spoken to the person concerned? Yes/No\* If so, what was said?**

**Signature:**

**Date:**

**Time:**

**This form must now be emailed to a Designated Safeguarding Officer or passed to them by hand in a sealed envelope marked 'Confidential'.**

**REMEMBER TO MAINTAIN CONFIDENTIALITY, DO NOT DISCUSS THE MATTER WITH ANYONE OTHER THAN THOSE THAT NEED TO KNOW**