

# Kirklees Council

## Cross Council Corporate Safeguarding Policy

Version Control Table

Ref	Reason for Amendment	Details of amendments	Date finalised
0.1	Review of existing policy required updates to certain sections; re-formatting and additional information to be supplied from Children's and Adults	October 2019 document re-formatted into this to reduce duplication and to ensure a better 'flow'	June 2021
0.2	Additional information required	Section added to incorporate the role of partners and information added for FGM and Hate Crime	July 2021
0.3	Review of Children and Education input	Changes made to update both these sections as many of the links were out of date	August 2021
0.4	Additional information required	Section added to incorporate HBA and FM	August 2021
0.5	Additional information required	Whistleblowing section updated as the links were out of date	August 2021
0.6	Additional information added	Safer recruitment, LADO update and DBS info	August 2021
0.7	Page 18 & 21 amended sentence	Changed to 'relevant services' as agreed at CSOG	Sept 2021
0.8	Draft foreword added	To be agreed by DS	Oct 2021
0.9	Proof read	Formatting and grammar check	Oct 2021
0.10	ET Feedback	Foreword changed to come from Cllr Pattison, rather than ET Sponsor	20/01/22
0.11	ET Feedback	Removal of requirement for all staff to sign to indicate they have completed training on corporate safeguarding but covered under revised performance and policy review section (p23)	20/01/22

**'Safeguarding is Everyone's Business'**

**A commitment towards  
Safeguarding Children, Young People and Adults at  
Risk**

# January 2022

## **FOREWORD FROM CLLR CAROLE PATTISON PORTFOLIO LEAD FOR THE CORPORATE SAFEGUARDING OVERSIGHT GROUP**

The responsibility for undertaking an overview of safeguarding arrangements across the council has been delegated to the Corporate Safeguarding Oversight Group by the Executive Team.

The main responsibilities of the Group are to ensure that robust arrangements for safeguarding children and adults are in place within and across the Council; ensuring there is effective corporate oversight of safeguarding across the range of services which the Council provides and commissions which on their own; ensuring that robust multi-agency arrangements are in place to safeguard children and vulnerable adults and that key partners have appropriate safeguarding systems in place.

As the Portfolio Lead for the Kirklees Corporate Safeguarding Oversight Group, I am delighted to introduce the Cross Council Corporate Safeguarding Policy. At the heart of this policy is an ambition for safeguarding to become everyone's business; so that everyone understands what safeguarding is, and more importantly, how to act if they do have concerns about a child and/or vulnerable adults.

The Kirklees Council Plan covers the vision and outcomes of the organisation and safeguarding is a key strategic theme throughout, as well as being a fundamental aspect of the strategies connected to the Safeguarding Adults Board, the Communities Board and the Children's Safeguarding Partnership. Our Inclusive Communities Framework is currently in development, alongside the review of our Joint Health and Wellbeing Strategy, both of which will further strengthen the council's commitment to making safeguarding everyone's business.

On a regional level, one of the West Yorkshire Mayoral Pledges is 'put keeping women and girls safe at the heart of my policing plan' and we actively support this agenda through various projects and groups, such as the Domestic Abuse Strategic Partnership's Strategy.

We will promote this policy through a range of communications and training initiatives so that everyone truly understands what an important role they play in making Kirklees a safe place for children and vulnerable adults to thrive.

Thank you,

Cllr Carole Pattison (include signature and picture)

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1.	<b>Introduction</b>
	<p>Kirklees Council believes that every child, young person and adult, has the right to live safe from harm, abuse and neglect.</p> <p>The Council acknowledges its role and responsibilities to provide safeguarding guidance for all staff, including those the Council contracts, elected members, voluntary staff, and partner agencies /organisations, to help protect individuals, families, and communities.</p> <p>The key message of the Corporate Safeguarding Policy is that <b>Safeguarding is Everybody's Business</b> and that <b>all</b> employees, (paid or unpaid) have a <b>duty of care</b> to safeguard, prevent, and report any safeguarding concern.</p> <p>Abuse, neglect, and harm can take place anywhere, at any time and be carried out by anyone. It is therefore important that all Council employees, elected members, commissioners, and volunteers are aware of their moral and legal obligations to safeguard children, young people, and adults and know what to do if they have a concern.</p> <p>Council employees who <b>are</b> directly involved in safeguarding children, young people and /or adults as part of their work, are expected to respond to concerns as defined by their role and/or the statutory duties of the Council as their employer.</p> <p>All managers are responsible for ensuring that they are aware of their responsibilities as outlined in this policy, and that those they manage are equally aware and briefed.</p> <p style="text-align: center;"><u>Safeguarding is everyone's responsibility regardless of whether or not there is direct contact with children, young people and /or adults as defined by job roles.</u></p> <p><b>This document will act as a statement to enable all Council employees, elected members, commissioners, and volunteers to understand their role and responsibilities when they have a safeguarding concern, how to report it and where to find additional information.</b></p>
2.	<b>What is Safeguarding?</b>
	<p>Safeguarding relates to all children, young people, and adults; not just those known to services.</p> <p>Safeguarding and promoting the welfare of children and young people is defined by <a href="#">Working Together to Safeguard Children 2018</a> as,</p> <ul style="list-style-type: none"> <li>• protecting children and young people from maltreatment</li> <li>• preventing impairment of children and young people's health or development</li> <li>• ensuring that children and young people grow up in circumstances consistent with the provision of safe and effective care, and</li> <li>• taking action to enable all children and young people to have the best outcomes.</li> </ul>

Safeguarding Adults duties apply to adults over the age of 18 years old as outlined in the [Care Act 2014](#) . These relate to if an adult:

- has needs for care and support (whether or not the local authority is meeting any of those needs AND
- is experiencing, or at risk of, abuse or neglect AND
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

### **3. Definitions, Legislation and Governance**

#### **Children and Young People**

Safeguarding children and young people relates to all children and young people who have not yet reached their 18<sup>th</sup> birthday

*“The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection”.*

Safeguarding children and young people involves.

- protecting children from maltreatment
- preventing impairment of children’s health and development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- taking action to enable all children to have the best outcomes

#### **Child Abuse, Neglect and Harm**

The abuse of a child falls under four categories

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

The abuse or neglect of a child can occur by inflicting harm, and /or by failing to prevent harm; harm can include:

*“ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. ”*

(Working Together to Safeguard Children 2018)

#### **Legislation: Safeguarding Children and Young People**

The legislation and statutory guidance stating the responsibilities for the safeguarding of children and young people are found within the Children Act 1989 and 2004 as amended by the Children and Social Work Act 2017; The Education Act 2002 and 2011; the Working Together to Safeguard Children 2018; the Safeguarding Vulnerable Groups Act 2006 and Keeping Children Safe in Education 2021. The Local Authority also has a Model Policy in place to ensure compliance with the above overarching legislation.

In accordance with Working Together to Safeguard Children 2018, local authorities, working with partner organisations and agencies, have specific duties to safeguard and promote the welfare of all children in their area.

### **Kirklees Safeguarding Children Partnership**

The Children Act 2004, as amended by the Children and Social Work Act 2017, placed new duties on key agencies in a local area, specifically,

- the police,
- clinical commissioning groups and
- the local authority

to make arrangements to work together, and with other partners locally, to safeguard and promote the welfare of all children in their area.

To ensure effective safeguarding of all children in the local area, the statutory Safeguarding Children Partnership arrangements should have effective links with other strategic partnership work in the local area, for example, the Health and Wellbeing Board, Adult Safeguarding Board, and the Community Safety Partnership.

In addition to the duties of the three statutory safeguarding partners, all organisations and agencies have a shared responsibility to safeguard and promote the welfare of all children in a local area and under, section 11 of the Children Act 2004 many local organisations and agencies have a duty to ensure that they consider the need to safeguard and promote the welfare of children when carrying out their functions.

Further information can be found at the [KSCP website](#).

### **Keeping Children Safe in Education (KCSIE)**

KCSIE 2021 is statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Education and Training (Welfare of Children) Act 2021.

Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children.

For the purposes of this guidance children includes everyone under the age of 18. The guidance is for:

- ‘schools’ means: all schools whether maintained, non-maintained or independent schools (including academies, free schools and alternative provision academies), maintained nursery schools and pupil referral units.
- ‘college’ means further education colleges and sixth-form colleges as established under the Further and Higher Education Act 1992, institutions designated as being within the further education sector and providers of post 16 Education as set out
- in the Education and Training (Welfare of Children) Act 2021: 16-19 Academies, Special Post-16 institutions and Independent Training Providers. For colleges, the guidance relates to their responsibilities towards children who are receiving education or training at these institutions.

The Council ensures our compliance with KCSIE 2021 through Letters of Assurance (LOAs) for all council services and staff providing services or contracts to any of the above organisations; the councils LOAs are updated (at least annually) and made available to all schools via Kirklees Business Solutions webpage.

## Adults

### Definition of ‘adult at risk’

The Care Act 2014 defines an ‘adult at risk’ as someone who:

- *has needs for care and support (whether or not the local authority is meeting any of those needs)*
- *is experiencing, or at risk of, abuse or neglect*
- *as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect*

### Definition of ‘safeguarding adults at risk’

The Care Act 2014 defines adult safeguarding as:

*“...protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.” (Care Act 2014 Statutory Guidance, 2018, para 14.7).*

**An explanation of the types of abuse of an adult at risk** can be found in section 4 of this policy but it must be noted that this list is not exhaustive and **“Local Authorities should not limit their view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered”** (Care and Support Statutory Guidance, update Feb 2018. para 14.17)

### Legislation: Safeguarding Adults at Risk

Section 42 of the Care Act 2014 sets out the statutory responsibility to safeguard adults The Act refers to safeguarding an ‘adult at risk’ as defined in Section 3.2 of this policy.

Statutory responsibilities for local authorities regarding adult safeguarding apply equally to those adults with care and support needs, regardless of whether those needs are being met. The duties also apply regardless of whether the adult is assessed as meeting current eligibility for social care, lacks mental capacity or not, and regardless of setting (with exception to prisons and approved premises).

The local authority must make whatever enquiries it thinks is necessary if it believes an adult is experiencing or at risk of abuse or neglect; to enable it to decide whether any action should be taken in the adult's case and if so what action and by who. The organisation should promote the adult's wellbeing in their safeguarding arrangements and the ***six principles of Safeguarding*** also underpin this; informing how professionals and others should work with adults:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

In addition to the six principles, it is important that the safeguarding concern and any enquiry focuses on ***'Making Safeguarding Personal' (MSP)***. This concept allows the concern to be person-centred and outcome led as well as empowering the adult at risk and encouraging choice and involvement.

#### **Kirklees Safeguarding Adults Board (KSAB)**

Section 43 of the Care Act 2014 prescribes that all local authorities in England must establish a Local Safeguarding Adults Board in its area. The fundamental priority is to protect adults at risk from abuse as defined in Section 42 of the Act, by coordinating and ensuring the effectiveness of each of its members.

The Local Safeguarding Adults Board must also arrange for reviews to take place for any cases within its area where an adult at risk dies or has experienced serious neglect or abuse, and there is concern that agencies could have worked more effectively to protect the adult.

There are three statutory partners for the local safeguarding Adults Board (as per the Care Act 2014): the local authority; Clinical Commissioning Groups and the Police. In addition, the board can opt to invite representatives from other appropriate agencies to join.

Further information can be found at the [KSAB website](#).

#### **Kirklees Communities Board (incorporating the statutory Community Safety Partnership)**

Section 5 of the Crime and Disorder Act 1998 and subsequent legislative amendments places a statutory duty on a number of responsible authorities to work in partnership to reduce crime and disorder. Known as Community Safety Partnerships (CSPs) the act defines CSPs as "An alliance of organisations which generate strategies and policies, implement actions and interventions concerning crime and disorder within their partnership area". In Kirklees the CSP is known as the Communities Board and also brings together the partnership arrangements to develop cohesive communities.

**The statutory obligations of the Communities board are:**

- Develop a **Partnership Plan** and deliver the outcomes of the Partnership Plan across the communities of Kirklees. This also includes monitoring progress
- Analyse a wide range of data, including crime levels and patterns, in order to identify priorities in an annual **strategic assessment**
- Produce a strategy to **reduce re-offending**



- Have overview and responsibility for **domestic homicide reviews**.
- Engage and consult with the local **community** about priorities and progress in achieving them
- set up protocols and systems for **sharing information**
- To have a crime and disorder **scrutiny committee** with the power to review and scrutinise decisions made and action taken by the CSP.
- To **assess value for money** of partnership activities.

#### **Communities Board strategic commitments**

The Communities Partnership Plan 2018 – 2021 identifies four priorities/ themes:

- Preventing and Reducing Crime
- Tackling Anti-Social Behaviour (ASB)
- Protecting people from serious harm
- Improving Place

#### **Partnerships**

Protecting those who are vulnerable and/or at risk requires a system wide partnership response, and our partners are intrinsic to the successful implementation of this policy.

Whilst this policy is intended for Kirklees Council, it is recognised that we work closely with a wide range of partners, including Health, West Yorkshire Police, West Yorkshire Fire & Rescue, Housing, local businesses, and voluntary and community sector groups. Kirklees Council is committed to effective partnership arrangements and multi-agency solutions to help ensure the best outcomes for individual children, young people, adults, and their wider families and communities

### **4. What is meant by Abuse, Harm, and Neglect?**

Abuse is an umbrella term relating to many types of behaviours and activities which cause harm. Whilst the policy references certain abuses which relate to children and adults separately, it is recognised that most can affect any child or adult, regardless of age. The glossary below clarifies the different types of abuse and the characteristics associated with each type:

<b>Physical Abuse of Children</b>	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
<b>Physical Abuse of Adults</b>	Assault, hitting, slapping, pushing, misuse of medication, restraint, or inappropriate physical sanctions. Restraint Unlawful or inappropriate use of restraint or physical interventions. In extreme circumstances unlawful or inappropriate use of restraint may constitute a criminal offence. Someone is using restraint if they use force, or threaten to use force, to make someone do something they are resisting, or where an adult's freedom of movement is restricted, whether they are resisting or not.

		<p>Restraint covers a wide range of actions. It includes the use of active or passive means to ensure that the person concerned does something, or does not do something they want to do, for example, the use of key pads to prevent people from going where they want from a closed environment.</p>
	<p><b>Emotional Abuse of Children</b></p>	<p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development.</p> <p>It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing a child participating in normal social interaction.</p> <p>It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p>
	<p><b>Child Sexual Abuse</b></p>	<p>Involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.</p> <p>The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).</p> <p>The sexual abuse of children can be committed by adults and/or by other children.</p>
	<p><b>Sexual Abuse of Adults</b></p>	<p>Examples of sexual abuse include rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.</p> <p>Sexual abuse is not confined to issues of consent the following factors should also be considered:</p> <ul style="list-style-type: none"> <li>• Any sexual relationship or inappropriate sexualised behaviour between a member of staff and service user should lead to disciplinary proceedings;</li> </ul>

	<ul style="list-style-type: none"> <li>A sexual act between a care worker and service user with a mental disorder is also a criminal offence under section 38-42 of the Sexual Offences Act.</li> </ul>
<b>Child Neglect</b>	<p>The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> <li>provide adequate food, clothing, and shelter (including exclusion from home or abandonment)</li> <li>protect a child from physical and emotional harm or danger</li> <li>ensure adequate supervision (including the use of inadequate caregivers)</li> <li>ensure access to appropriate medical care or treatment</li> </ul> <p>It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</p>
<b>Adult Neglect and Acts of Omission</b>	<p>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. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk for themselves.</p> <p><a href="https://www.kirklees.gov.uk/beta/adult-social-care-providers/pdf/ksab-multi-agency-protocol-managing-self-neglect.pdf">https://www.kirklees.gov.uk/beta/adult-social-care-providers/pdf/ksab-multi-agency-protocol-managing-self-neglect.pdf</a></p>
<b>Discriminatory Abuse of Adults</b>	<p>Discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation, and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person’s disability or any other form of harassment, slur, or similar treatment.</p> <p>Excluding a person from activities on the basis they are ‘not liked’ is also discriminatory abuse.</p>
<b>Financial or material Abuse of Adults</b>	<p>Theft, fraud, internet scamming, postal and doorstep scams, 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 are all forms of financial abuse and are often targeted at adults at risk. Financial abuse can have serious effects including loss of income and independence and harm to health, including mental health.</p> <p>The adult at risk can be persuaded to part with large sums of money and in some cases their life savings. These instances should be reported to the local police service and local authority Trading Standards Services for investigation.</p> <p>Where the abuse is perpetrated by someone who has the authority to manage an adult’s money, the relevant body should be informed, e.g., the Office of the Public Guardian for deputies and attorneys and DWP for appointees.</p>
<b>Organisational Abuse of Adults</b>	<p>Is the mistreatment, abuse, or neglect of an adult by a regime or individuals in a setting or service where the adult lives, or by one that they use.</p>

	<p><b>Psychological Abuse of Adults</b></p>	<p>Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.</p>
	<p><b>Domestic Abuse; Children and Adults</b></p>	<p>The Government definition of Domestic Abuse is:  'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:</p> <ul style="list-style-type: none"> <li>• Psychological</li> <li>• Physical</li> <li>• Sexual</li> <li>• Financial/economic</li> <li>• Emotional</li> </ul> <p>Domestic abuse can take place inside or outside of the home, and anyone can be a victim regardless of gender, age, ethnicity, socio-economic status, sexuality, or background.</p> <p>Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and adolescent to parent violence.</p> <p>Children may experience domestic abuse directly, as victims in their own right, or indirectly due to the impact the abuse has on others, such as a non-abusive parent.</p> <p>The Government definition, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group (see additional information below).</p>
	<p><b>Controlling and Coercive Behaviour; Children and Adults</b></p>	<p>Controlling behaviour is:</p> <ul style="list-style-type: none"> <li>• a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour</li> </ul> <p>Coercive behaviour is:</p> <ul style="list-style-type: none"> <li>• an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim</li> </ul> <p>Coercive control is:</p> <ul style="list-style-type: none"> <li>• a form of abuse that involves multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate, and regulate the victim. This pattern of abuse creates high levels of anxiety and fear. Coercive control can have a significant impact on children and young people, both directly, as victims, and indirectly due to the impact the abuse has on the non-abusive adult.</li> </ul> <p>Children may also be forced to participate in controlling or coercive behaviour towards the parent who is being abused.</p>

**So called Honour Based Abuse and Forced Marriage; Children and Adults**

Honour based abuse is a collection of practices used to control behaviour within the family and community in order to protect perceived cultural and religious beliefs and/or honour.

Abuse can occur when perpetrators perceive that a person has shamed the family and/or community by breaking their honour code.

Women are predominantly, but not exclusively, the victims, which can be distinguished from other forms of violence, as it is often committed with some degree of approval and/or collusion from family and/or community members.

Men and boys can also be victims, sometimes as a consequence of their involvement in what is deemed to be an inappropriate relationship, if they are same sex, or if they are believed to be supporting the victim.

Honour based abuse occurs across all cultures, nationalities, faith groups and communities. Relatives, including females, may conspire, aid, abet or participate in honour based abuse, for what might seem a trivial transgression.

The list is not exhaustive but examples of HBA may include:

- Murder
- Unexplained death (suicide)
- Forced marriage
- Fear of forced marriage
- Controlling sexual activity
- Domestic violence (Including psychological, physical, sexual, financial or emotional abuse)
- Child abuse
- Rape
- Kidnapping
- False imprisonment
- Threats to kill
- Assault
- Harassment
- Forced abortion

A forced marriage is where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressurised, or abuse is used, to force them to do so. It is recognised in the UK as a form of domestic or child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will may be:

- physical: for example, threats, physical violence or sexual violence
- emotional and psychological: for example, making someone feel like they are bringing 'shame' on their family

	Financial abuse, for example taking someone's wages, may also be a factor
<b>Female Genital Mutilation (FGM); - Adults and Children</b>	<p>FGM is any procedure which involves the partial or complete removal of the external female genitalia, or other injury to the female genital organs for no medical reason. FGM is illegal in the UK and it is also illegal to a female (child or adult) out of the UK for FGM or for anyone to circumcise women or children for cultural or non-medical reasons here in the UK.</p> <p>In accordance with the Serious Crime Act 2015 there is a mandatory duty to report Female Genital Mutilation</p>
<b>Child Exploitation - Sexual</b>	<p>Child sexual exploitation is when an individual or a group of people takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of 18 into sexual activity</p> <ul style="list-style-type: none"> <li>• in exchange for something the victim needs or wants, and/or</li> <li>• for the financial advantage or increased status of the perpetrator or facilitator.</li> </ul> <p>A child may be sexually exploited even if the sexual activity appears consensual. The sexual exploitation of children does not always involve physical contact; it can also occur through the use of technology.</p>
<b>Child and Adult Criminal Exploitation -</b>	<p>The criminal exploitation of children involves an individual or group taking advantage of an imbalance of power to coerce, control, manipulate or deceive a child under the age of 18 into any criminal activity</p> <ul style="list-style-type: none"> <li>• in exchange for something the victim needs or wants, and/or</li> <li>• for the financial or other advantage of the perpetrator or facilitator and/or</li> <li>• through violence or the threat of violence.</li> </ul> <p>A child may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.</p> <p><b>County Lines</b> involves gangs and organised criminal networks exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. This may involve the exploitation of children and/or vulnerable adults to move and store the drugs and money,</p>
<b>Peer on Peer Abuse - Children</b>	<p>Peer on peer abuse can include (but is not limited to),</p> <ul style="list-style-type: none"> <li>• Bullying - (including cyberbullying)</li> <li>• Physical abuse – including hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm</li> <li>• Sexual violence, including rape, assault by penetration and sexual assault</li> <li>• Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse</li> <li>• Upskirting; which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm,</li> <li>• Sexting (also known as youth produced sexual imagery); and</li> <li>• Initiation type violence and rituals.</li> </ul>

	<p><b>Hate Crimes and Hate Incidents; - Adults and Children</b></p>	<p>A hate crime is any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person's disability, race, religion, sexual orientation or gender identity or perceived disability, race, religion, sexual orientation, or gender identity. Examples can include:</p> <ul style="list-style-type: none"> <li>• Physical attacks</li> <li>• Damage to property</li> <li>• Offensive graffiti and arson</li> </ul> <p>Also, threat of attack, such as inciting hatred by words, pictures or videos, offensive letters, abusive or obscene telephone calls, groups hanging around to intimidate, and unfounded malicious complaints.</p> <p>A hate incident is any non-crime incident which is perceived by the victim or any other person to be motivated by hostility or prejudice based on a person's disability, race, religion, sexual orientation or gender identity or perceived disability, race, religion, sexual orientation, or gender identity. Examples can include:</p> <ul style="list-style-type: none"> <li>• Verbal or online abuse</li> <li>• Insults or harassment, such as taunting</li> <li>• Offensive leaflets or posters</li> <li>• Abusive gestures</li> <li>• Dumping of rubbish outside homes or through letterboxes</li> <li>• Bullying at school or in the workplace</li> </ul>
	<p><b>Prevent and Channel – the risk of extremism</b></p>	<p>Prevent is part of the National Prevent Strategy, published by the government in 2011. It is part of the UK's overall counter-terrorism strategy known as CONTEST. Channel is a multi-agency approach to safeguarding, supporting and protecting children, young people and vulnerable adults at risk of radicalisation, extremism or terrorist related activity.</p>
	<p><b>Modern Slavery – Adults and Children</b></p>	<p>Modern Slavery is an umbrella term, encompassing human trafficking, slavery, servitude and forced labour. It is a hidden crime and victims include adults and children. Victims are controlled, may be transported a short distance or across continents to be forced into jobs they do not want to do. The Modern Slavery Act 2015 places a duty on local authorities to report details of suspected cases of modern slavery to the National Crime Agency.</p> <p>Slavery, servitude and forced or compulsory labour. A person commits an offence if:</p> <ul style="list-style-type: none"> <li>• A person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude; or</li> <li>• The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.</li> </ul> <p>There are many different characteristics that distinguish slavery</p>
<p><b>5.</b></p>	<p><b>Who is Affected by Abuse?</b></p>	

	Any children, young person or adult can experience abuse, neglect, and harm. If you suspect that it is taking place, you should follow the procedures set out in this policy.
<b>6.</b>	<b>Where does abuse occur</b>
	<p>Abuse can be perpetrated by anyone, and can by happen anywhere, including in a child or adult’s own home, in their community, within their family or friendship group, and or in any setting, e.g., an early years setting, a school, college, or workplace, a care/residential home, a hospital, or in voluntary /leisure activity setting. Those who may abuse include:</p> <ul style="list-style-type: none"> <li>• parents</li> <li>• siblings</li> <li>• spouses/partners</li> <li>• extended family members</li> <li>• friends and acquaintances</li> <li>• neighbours/local residents</li> <li>• paid (or unpaid) staff</li> <li>• volunteers</li> <li>• individuals/groups unknown to the victim (including via the internet)</li> <li>• People in a position of trust (Person in a Position of Trust – PiPoT)</li> </ul>
<b>7.</b>	<b>Responsibilities for Safeguarding</b>
	<p>As abuse can take place anywhere, at any time and by anyone, it is important that we are all aware of the signs of abuse and what our responsibilities are.</p> <p><b>All staff and volunteers</b></p> <p>Everyone working within the Council, paid or unpaid has safeguarding responsibilities and should:</p> <ul style="list-style-type: none"> <li>• be familiar with this policy,</li> <li>• know how to raise a safeguarding concern,</li> <li>• be familiar with any additional responsibilities they may have in respect of their role.</li> <li>• undertake safeguarding training required of them.</li> </ul> <p>All staff and volunteers are expected to participate in safeguarding training. The level of training required will be appropriate and proportionate to positions held, roles and responsibilities.</p> <p><b>The Chief Executive</b></p> <p>The Chief Executive holds the overall responsibility for ensuring Kirklees Council has adequate and effective safeguarding arrangements in place for children, young people and adults at risk. These include appropriate reporting mechanisms; policies and procedures and training; ensuring that statutory requirements are met.</p> <p><b>The Director for Children’s Services/ Designated Lead Member for Children’s Services</b></p> <p>In accordance with the Children Act 2004 (section 18 (7) and 19 (2)), Local authorities in England must appoint a Director of Children’s Services (DCS) and ensure the designation of a Lead Member for Children’s Services (LMCS).</p>



The DCS has professional responsibility for the leadership, strategy, and effectiveness of local authority children's services. The LMCS, as a member of the Council, has political responsibility for the leadership, strategy, and effectiveness of local authority children's services.

The DCS and LMCS should ensure that effective arrangements are in place to protect children and young people from harm.

### **Strategic Director for Adults and Health (Director for Adult Social Services)**

The above role includes the responsibilities held by the role known in the Care Act 2014 as 'Director for Adult Social Services' and has a leadership and challenge role in relation to safeguarding. The key elements to the role are the promotion of a person-centred culture and early intervention, prevention and partnership working, to find proactive solutions to safeguarding.

### **Elected Members**

Elected Members are the leaders within their wards and therefore have a crucial role in engaging the public in safeguarding and responding to any concerns they are made aware of. Elected Members also provide an additional level of scrutiny regarding service provision and delivery, the commissioning of provision and Council policy.

### **Commissioners**

Commissioners should gain assurances from their contracted providers and services around their legislative responsibilities regarding the quality and safety of their organisations and ensure that that relevant safeguarding policies and procedures are in place, are being adhered to and are reviewed appropriately. Commissioners should also ensure that mechanisms are in place to hold providers to account where any safeguarding concerns arise.

Commissioners should also work closely with regulatory bodies such as Ofsted or the Care Quality Commission and share information relating to services, settings and/or practice appropriately to ensure children, young people and adults are safe from abuse, neglect, and harm.

## **8. Reporting a safeguarding concern**

The Council is committed to protecting all children and adults at risk in Kirklees from harm.

All Council workers are expected to safeguard any child or adult at risk who comes to their notice, where it is believed they may be suffering harm.

The aim of this section is to ensure that all council employees understand their personal responsibilities for protecting vulnerable groups in Kirklees and are:

- able to take appropriate action if there are suggestions that abuse is taking place
- are informed and able to respond in a helpful manner where anyone discloses to them that abuse is happening.

Staff working in a setting where abuse is suspected should report concerns to their manager or nominated person within their organisation within the same working day. The following additional information may be helpful to reference

- any specialised training undertaken;
- [Child abuse concerns: guide for practitioners - GOV.UK \(www.gov.uk\)](http://www.gov.uk) (Children and Young People)
- [the West Yorkshire consortium online safeguarding children procedures](http://proceduresonline.com) (Children and Young People)
- [Contacts and Referrals \(proceduresonline.com\)](http://proceduresonline.com)

- the [Joint Multi-Agency Safeguarding Adults Policy and Procedures](#) (Adults)
- any other procedure/s as prescribed by the service.

Do not worry that you might have got it wrong, and that abuse is not taking place. It is more important that you report any concerns that you might have, as quickly as possible, so that the relevant services can take responsibility for deciding what needs to happen next.

If any adult or child is in danger, first, ensure the individual is safe. Call the emergency services if immediate help is needed.

### **How to report your concerns in an emergency - Children and Adults**

If any adult or child is in danger, first, ensure the individual is safe. Call the emergency services if immediate help is needed and you require an immediate response:

- In an emergency, don't wait - call 999
- Call the police on 101 if you suspect a crime

### **Children**

Children includes everyone under the age of 18. If you are concerned that a child living in Kirklees is being abused, you can telephone or email:

- Kirklees Duty & Advice 01484 414960 or [DutyAdvice.Admin@kirklees.gov.uk](mailto:DutyAdvice.Admin@kirklees.gov.uk)
- Kirklees Designated Officer (LADO) 01484 221126 or [LADO.cases@kirklees.gov.uk](mailto:LADO.cases@kirklees.gov.uk)

NB: Employees should note that any concerns they have, can be treated in confidence, as set out in the Council's Whistleblowing Policy.

### **Framework for making child safeguarding decisions in Kirklees**

This document sets out the approach in Kirklees to keeping children safe and protected from harm. It is designed to ensure that across the continuum of need professionals consider that the right help is given to the right children at the right time and for the right duration.

[Framework-for-making-safeguarding-decisions-in-Kirklees.pdf \(kirkleessafeguardingchildren.co.uk\)](#)

For more information, please refer to

[Reporting-child-abuse-CM3219.1.pdf \(kirkleessafeguardingchildren.co.uk\)](#)

You can also contact the Kirklees Safeguarding Children Partnership Business unit on – **01484414960**

- Email: [KSCB.admin@kirklees.gov.uk](mailto:KSCB.admin@kirklees.gov.uk)
- <https://www.kirkleessafeguardingchildren.co.uk/>

### **Adults**

If you are concerned that an adult at risk living in Kirklees is being abused you can telephone, visit or email:

- Kirklees Council Civic Centre 3, Market Street, Huddersfield, HD1 2TG
- Walsh Building, Town Hall Way, Dewsbury, WF12 8EQ
- Tel: 01484 414933 Open 24 hours a day

- Email: [gatewaytocare@kirklees.gov.uk](mailto:gatewaytocare@kirklees.gov.uk)

All safeguarding concerns will be taken seriously; enquiries will be made about your concerns and discussions will take place with colleagues in the police if it is a criminal matter. In addition, the wishes of the adult at risk will be considered as part of the enquiry and support will be put into place to achieve the changes they want to be made (wherever possible) including developing a plan with the adult at risk to keep them safe in the future. Full information can be found on the ['report abuse or neglect of an adult at risk' webpage](#).

Additional information on how to identify abuse, report concerns and general information about safeguarding adults at risk can be found at the [Kirklees Safeguarding Adults Board website](#)

**If you are in any doubt about reporting your concerns don't think 'what if I'm wrong?' think 'what if I'm right?'**

**9. Safeguarding concerns you may have about any adult in a position of trust or working (paid or unpaid) with children**

**Children and Young People**

The Local Authority Designated Officer (LADO) **must** be informed within 1 working day (or the next working day) when an allegation is made; prior to any further investigation taking place. Improved outcomes for children are aided by close collaboration between single and multi-agency partners, through timely quality conversations.

**Who should be referred to the LADO?**

All allegations relating to harm of a child or young person by those who work with them, must be taken seriously. A referral should be made when it is alleged that a person who works with children (paid or unpaid capacity) has:

- Behaved in a way that has or may have harmed a child
- Possibly committed a criminal offence against/related to a child
- Behaved toward a child in a way that indicates he or she would pose a risk of harm or
- Behaved or may behave in a way that indicates they may not be suitable to work with children
- An allegation has been made against a person in relation to his/her work with adult service users, which causes concern about the welfare of an adult service user's children or the person also has another role working with children

**Reasons for an allegation**

An allegation is made against a person in relation to a matter that may indicate that the person may not be suitable to work with children. This can relate to his/her employment or voluntary activity, or to a person's private life e.g.,

- Concerns arise about a person's behaviour about his/her own children
- Concerns arise about the behaviour of a partner, member of the family or other household member
- Where other information suggests they may pose a risk to any person that may demonstrate a transferable risk within their role with children

The LADO will ensure that all allegations and enquires are managed proportionately and appropriately; sharing information to ensure that children are safeguarded within multi agency settings.

More information and how guidance on how to make a referral can be found at [Local Authority Designated Officer \(LADO\) | Kirklees Council](#)

## Adults

The Person in a Position of Trust (PiPoT) deals with safeguarding concerns which relate to a person who works with adults within a statutory or voluntary organisation. The PiPoT will then manage any enquiries appropriately and ensure that information is appropriately shared with relevant agencies, dependent on the nature of the enquiry.

**Whilst the focus of safeguarding adults is to safeguard one or more identified adults in care or with support needs, there are occasions when incidents must be reported that do not involve adults at risk but indicate, that a risk may be posed to adults by a Person in a Position of Trust (PIPOT); concerns relating to PIPOT's should be shared via the above telephone and gateway to care email.**

Staff working in a setting where abuse is suspected should report concerns to their manager or nominated person within their organisation within the same working day. It does not matter if the allegation is in doubt or proves to be wrong. This can be reported by using the details below:

- Tel: 01484 414933 Open 24 hours a day
- Email: [gatewaytocare@kirklees.gov.uk](mailto:gatewaytocare@kirklees.gov.uk)

Do not worry that you might have got it wrong and that adult abuse is not taking place. It is more important that you report any concerns that you might have, as quickly as possible, so that adult social care services can take responsibility for deciding what needs to happen next

## 10. Whistleblowing

If you have concerns about another employee, elected member, or volunteer within the Council, you may want to raise the concern in a different way. Whistleblowing is the term used when a worker reports a concern which is in the public interest. Further information on this can be found at: <https://www.gov.uk/whistleblowing>

The Council has its own whistleblowing procedure which covers all areas of concerns, not just safeguarding. Initially you should speak with your line manager to address the concern or approach your Service Director. If you are unable to speak with anyone in your service, there is a dedicated Service Director for whistleblowing as detailed in the policy: <https://www.kirklees.gov.uk/beta/delivering-services/pdf/whistleblowing-policy.pdf>

### Whistleblowing and the Care Quality Commission (CQC)

If you work in a service regulated by the Care Quality Commission (CQC) and have concerns about the care being provided, ideally you should report this via the Council's whistleblowing procedure but you can also report your concern/s directly to the CQC. This following link explains how to do this: [https://www.cqc.org.uk/sites/default/files/20200420\\_Whistleblowing\\_quick\\_guide\\_final\\_update.pdf](https://www.cqc.org.uk/sites/default/files/20200420_Whistleblowing_quick_guide_final_update.pdf)

### Whistleblowing and Ofsted

	<p>Ofsted regulate and inspect children’s social care services in England including:</p> <ul style="list-style-type: none"> <li>• children’s homes</li> <li>• residential family centres</li> <li>• independent fostering agencies</li> <li>• voluntary adoption agencies</li> <li>• adoption support agencies</li> <li>• residential holiday schemes for disabled children</li> </ul> <p>If you have an issue or concern about a service that Ofsted regulate you should contact the service first, to discuss your concerns. Concerns can be reported directly via</p> <ul style="list-style-type: none"> <li>• The Ofsted whistleblowing hotline on 0300 1233155 (8am to 6pm, Monday to Friday)</li> <li>• Or by email @ <a href="mailto:whistleblowing@ofsted.gov.uk">whistleblowing@ofsted.gov.uk</a></li> <li>• You can write to: WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD, or</li> <li>• you can contact the NSPCC National Whistleblowing Advice Line. <a href="#">Whistleblowing Advice Line   NSPCC</a></li> </ul>
<b>11.</b>	<b>Confidentiality</b>
	<p>All information received by the Council which relates to any safeguarding matter will be treated in confidence and will be shared appropriately (need to know) where we feel you or someone else is at ‘risk of harm’.</p>
<b>12.</b>	<b>Safeguarding Information Sharing</b>
	<p>As outlined within the Working Together to Safeguard Children 2018, and the Adult’s <u>Joint Multi-Agency Safeguarding Adults Policy and Procedures</u>, effective sharing of information between practitioners and local organisations and agencies is essential for early identification of need, assessment, and service provision to keep children and adults safe. Safeguarding Practice Reviews (SPRs), Safeguarding Adult Reviews (SARs) and Domestic Homicide Reviews (DHRs) have highlighted that missed opportunities to record, understand the significance of and share information in a timely manner can have severe consequences for the safety and welfare of children and adults.</p> <p>Practitioners should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children’s social care (e.g. they are being supported as a child in need or have a child protection plan). Practitioners should be alert to sharing important information about any adults with whom that child has contact, which may impact the child’s safety or welfare.</p> <p>Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern.</p> <p>The responsibility to share information covers anyone engaged in Kirklees Council work (paid or unpaid) in a position of trust, with vulnerable groups whether directly employed or not. For clarity, this includes: Employees, Volunteers, Apprentices, Work placements, Student placements, Short or long-term work experience, Foster carers, Adopters, Guardians, Personal Assistants, Agency staff, Commissioned services, and contractors. (this list is not exhaustive)</p>

	<p>Sharing the right information, at the right time, with the right people is fundamental to good practice in safeguarding. Information should therefore be shared effectively and efficiently in respect of issues that may affect the safety and welfare of children, young people, and adults</p> <p>Wherever possible you should aim to gain consent to share information, but you should be mindful of situations where to do so would place a child, young person, or adult at risk at increased risk of harm. Information may be shared without consent if you have reason to believe that there is good reason to do so.</p> <p>For more information relating to sharing concerns about children and young people please refer to, <a href="http://publishing.service.gov.uk">Information sharing: advice for practitioners (publishing.service.gov.uk)</a></p> <p>For more information relating to sharing concerns about adults, please refer to section 1.7 in the <a href="#">Joint Multi-Agency Safeguarding Adults Policy and Procedures</a></p>
<b>13.</b>	<b>Safer Recruitment and Retention</b>
	<p>Experience over many years shows that it is important for organisations that provide services to children and adults at risk to incorporate into their recruitment and selection procedures, measures that help deter, reject or identify people who might abuse any vulnerable group, or who are otherwise unsuited to work with them. Making safeguarding and promotion of the welfare of children and adults at risk is an integral part of workforce management and an essential part of creating safe environments for all vulnerable groups.</p> <p>The implementation Safer recruitment supports the Kirklees journey and vision to becoming a safer organisation through these consequent actions, they are.</p> <ul style="list-style-type: none"> <li>• Recruit Social Care staff in accordance with Regulation 19 (Fit and proper persons employed) Schedule 3: Health and Social Care Act 2008 (Regulated Activities) Regulations 2014</li> <li>• In line with Bichard 2004 – Recommendations</li> <li>• Reduce the reliance on criminal record checks (DBS)</li> <li>• Recruitment / selection process needs to be a further safeguard</li> <li>• Evidence base that the council meets our stated position re ‘Letters of Assurance’ for contracts/service with schools.</li> <li>• The transparent and structured management of any disclosed information</li> </ul> <p>All statutory and public organisations which employ staff and/or volunteers to work with or provide services for children and adults at risk have a duty to safeguard and promote the child’s or adult’s welfare. This includes ensuring that safe recruitment and selection procedures are in place to deter, reject or identify people who might abuse or are otherwise unsuitable to work with them.</p> <p>Safer practice in recruitment means thinking about safeguarding at every stage of the process.</p> <p><b>References</b></p> <p>The council recognises that a significant number of our work force work within notifiable occupations, therefore as an employer we have a responsibility to ensure that references are accurate, objective and does not contain any material misstatement or omissions.</p> <p>As an employer we have a responsibility to request and to share information where the reference subject has had allegations upheld (substantiated) that relate either to the safety and welfare of vulnerable groups or behaviours towards vulnerable groups and how the matter was resolved.</p>

	<p>As an employer we should seek to request and to share details where the reference subject has had any disciplinary procedures involving the safety and welfare of vulnerable groups, including in which the disciplinary sanction has expired, and the outcome of those procedures.</p> <p>Details of any allegation which are found to be Malicious or False (Education sector only) should be removed from an individual's personnel record.</p>
<b>14.</b>	<b>Disclosure and Barring Service (DBS)</b>
	<p>The Council DBS statement set out the council's approach to using DBS checks and forms part of the Council's overall safeguarding, safer recruitment strategies and covers the use of disclosure and Barring Service (DBS) Disclosures for eligible positions, as determined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, Police Act 1997, Safeguarding Vulnerable Groups Act (2006) and Protection of Freedoms Act (2012).</p> <p>DBS checks are carried out on appointment for eligible roles.  <a href="https://intranet.kirklees.gov.uk/my-employment/Recruitment/Disclosure-Barring-Service-(DBS)-Checks/Kirklees-Council-Disclosure-Barring-Statement-(004.aspx">https://intranet.kirklees.gov.uk/my-employment/Recruitment/Disclosure-Barring-Service-(DBS)-Checks/Kirklees-Council-Disclosure-Barring-Statement-(004.aspx</a></p> <p><b>Duty to refer</b></p> <p>The following groups have a legal duty to refer outcomes or information to the Disclosure and Barring Service:</p> <ul style="list-style-type: none"> <li>• Regulated Activity suppliers (employers and volunteer managers).</li> <li>• Personnel agency suppliers.</li> <li>• Bodies with a power to refer</li> </ul> <p>Legal duty to refer: the two conditions that must be met; if you are a regulated activity provider or fall within the category of personnel supplier (contractor or agency), you must make a referral when both of the following conditions have been met:</p> <p><u>Condition 1</u>  you withdraw permission for a person to engage in regulated activity with children and/or adults at risk. Or you move the person to another area of work that isn't regulated activity. This includes situations when you would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made.</p> <p><u>Condition 2</u>  You think the person has carried out 1 of the following:</p> <ul style="list-style-type: none"> <li>• engaged in relevant conduct in relation to children and/or adults at risk. An action or inaction has harmed a child or vulnerable adult or put them at risk or harm or</li> <li>• satisfied the harm test in relation to children and / or adults at risk. e.g. there has been no relevant conduct but a risk of harm to a child or adults at risk still exists. Or</li> <li>• been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence</li> </ul> <p>Where you are unsure always seek advice.</p>
<b>15.</b>	<b>Implementation, Performance and Policy Review</b>

	<p>The implementation of this policy will take place in a variety of ways, using traditional methods of communication (newsletters, briefing etc) but also through digital forums and thinking about innovative ways to help reach the more dispersed workforce. The information contained in this policy is overarching but the Corporate Safeguarding Oversight Group do recognise that different methods of sharing information and creating a level of understanding needs to be appropriate to that service area so this will be fully factored into the communication and training plans.</p> <p>The Corporate Safeguarding Oversight Group has a critical role in gaining assurances that safeguarding activity is being delivered effectively across the Council so will be developing mechanisms to assess quality and performance management processes. Whilst not exhaustive, this will include considering thematic learning and dissemination of learning from Domestic Homicide Reviews, Safeguarding Adults Reviews and Safeguarding Practice Reviews, as well as co-ordinating some audit activity (such as the Section 11 Audit for Children Services). As such, this policy will also be monitored and reviewed by the Corporate Safeguarding Oversight Group and governed by legislation and practical concern, with a 3-year review cycle. Should any changes need to be made within the 3-year review cycle, this policy will be updated as necessary and the changes will be communicated widely through a range of methods (such as the intranet, using newsletters and updates given at relevant boards and subgroups).</p> <p>It is recognised that the implementation of the policy and the various facets of training required to do this will be key to its success, so continual engagement and other audits with staff, elected members, commissioners and volunteers are expected to be factored in regularly so that the Corporate Safeguarding Oversight Group can monitor the effectiveness and any improvements that have happened as a result of the refreshed policy (such as staff confidence increasing around recognising abuse).</p>
<b>16.</b>	<b>Policy Review date: March 2025</b>