

Thanet District Council

Safeguarding Policy

September 2016



Monitoring and review:

Version	Date	Changes	Authorisation
1.0	September 2016	N/A	
2.0	October 2016	Inclusion of additional definitions (p5) Amended contractor definition (p16)	Overview and Scrutiny Panel
3.0	February 2017	Included contact details of Jo-Anna Beckingham p 2	Material change Jessica Bailey Line Manager / document author
		Re-wording training requirements and reformatting of tables on p14 & 15 to clarify classroom training requirement for all staff, in addition to e-learning requirement as agreed in policy report Oct 16	Material change Jessica Bailey Line Manager / document author

For more information about this policy please contact Jessica Bailey, Community Safety Team Leader or Jo-Anna Beckingham, Safeguarding Officer.

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1. Introduction

Safeguarding, in its broadest sense, is defined as *‘To protect from harm’*. In recent years, the role of the Local Authority has been extended beyond just specific duties to children and vulnerable adults to now also include responsibilities for safeguarding domestic abuse, exploitation, radicalisation, forced marriage, trafficking and modern slavery.

Thanet District Council (referred to as ‘the council’) has a number of statutory obligations to work with Kent County Council, primarily, as well as other agencies, to ensure safeguarding is embedded within all service areas throughout the council.

This Policy supports the council’s corporate values - Delivering value for money – by transforming and streamlining current provision, Supporting the workforce - through training and awareness of safeguarding and promoting open communications – using effective communication methods to report and refer safeguarding concerns. The policy also supports the council’s corporate priorities, in particular - delivering priority 2: Supporting neighbourhoods – through health and wellbeing and collaborative partnerships, which in turn safeguard communities.

This document is supported by a series of briefings and e-learning and runs in conjunction with the council’s Whistleblowing, Code of Conduct, Data Protection and Information Sharing policies. It also aligns with the Human Resources DBS guidance and Safe Recruitment Procedures.

2. Policy statement

Thanet District Council provides a wide range of services and facilities. This Policy aims to ensure the council protects the welfare of all children, young people and vulnerable adults by:

- ✓ Raising awareness of safeguarding responsibilities, amongst officers, Elected Members, volunteers and contractors.
- ✓ Ensuring that everyone within the council understands their roles and responsibilities with regards to safeguarding
- ✓ Considering the rights and viewpoints of children, young people and vulnerable adults in the council’s decision making
- ✓ Establishing and embedding robust processes and procedures as a clear mechanism to report concerns
- ✓ Identifying and responding appropriately to any safeguarding concerns, incidents or allegations raised
- ✓ Establishing and facilitating regular awareness and training, to employees, Elected Members, contractors and volunteers that is appropriate to their role and level of involvement with children, young people and vulnerable adults
- ✓ Maintaining and undertaking recognised vetting procedures appropriate to the roles held by staff and volunteers
- ✓ Ensuring that organisations the council contracts with or receives services from have appropriate safeguarding processes and protocols in place to undertake suitable vetting procedures
- ✓ Taking as many steps as possible to ensure that unsuitable people, are prevented from working with children, young people and vulnerable adults
- ✓ Reviewing this policy and any associated procedures on a regular basis

3. Scope

This policy applies to all employees, Elected Members, volunteers and contracted and grant funded organisations delivering services on behalf of the council.

External organisations, contractors and volunteers providing services to, or on behalf of, Thanet District Council, are also required to comply with this policy and any associated procedures. It is the dual responsibility of any signatories to such contracts, service level or grant agreements to ensure the compliance with, and reporting of, any discrepancies or concerns, to the designated safeguarding officers within the council.

Where necessary it may be that some functions and service areas require additional policies, processes and training. It is the responsibility of service managers, in consultation with designated safeguarding officers to assess any additional needs.

4. Definitions

‘Abuse’ – is: “an act or omission of an individual’s human and civil rights by any other person. Abuse may consist of a single or repeated act, it may be physical, verbal or psychological, or an act of neglect or omission to do something.

It may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction which he or she has not consented, or cannot consent to. Abuse can occur in any relationship and may result in significant harm to, or exploitation or, the person subjected to it.” (No Secrets Guidance 2000)

‘Safeguarding’– includes all forms of activity that aims to protect or promote the welfare of a group of people or an individual.

‘Children and young people’ – refers to anyone under the age of 18

‘Vulnerable adult’ – refers to anyone over the age of 18, and could be considered ‘vulnerable’ when (for reasons of mental health, learning, physical disability, age, illness or another personal characteristic) requires a form of intervention or community care to take care of themselves, or are unable to protect themselves from harm or exploitation. This may also include having money stolen or taken under duress.

‘Domestic abuse’ - 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.

Domestic abuse can also impact on other people within a household where it is experienced. For example, violence, fear and intimidation may have an indirect impact on other people such as children or vulnerable adults who could suffer due to witnessing or hearing incidents.

‘Controlling behaviour’ – is a range of actions designed to make a person dependant by isolating them from sources of support, depriving and exploiting them for personal gain.

‘Exploitation’ – can be summarised as treating someone unfairly for your own advantage. It is often referred to in terms of child or sexual exploitation (CSE), but is not exclusive to young people.

‘Prevent’ – relates to the National Counter Terrorism agenda, where ‘Prevent’ is one of four delivery strands, aimed at raising awareness and training around safeguarding someone from becoming involved in terrorism, or being persuaded to be involved due to being vulnerable.

‘Human Trafficking’ – also known as **‘Modern Slavery’** – involves the recruitment, transfer, harbouring or receipt of people, with the threat or use of force, coercion, abuse of power or deception are exploited for the purposes of prostitution, forced labour, slavery or similar practices.

Genital Mutilation (GM) - is a term used to describe procedures that include the partial or total removal of the external genital organs, such as circumcision, excision or infibulation. This collective term also covers injury to the genitalia for a cultural or non-medical reason. It is often referred to as ‘female’ genital mutilation, but does not exclusively occur to females.

Forced Marriage - is the act of pressurising someone to marry against their will. Forced marriages can occur in this country or abroad, and differs significantly from an arranged marriage, which is entered into freely by both people, despite their families taking a leading role in the choice of partner.

Chapter 12 part 10 of The Anti-Social Behaviour, Crime and Policing Act 2014 made, from 16 June 2014, parents who force their children to marry liable to be punished by up to seven years in prison. The new law also applies to UK nationals overseas who are at risk of becoming the victim of a forced marriage.

5. Safeguarding functions

In Kent, safeguarding children, young people and vulnerable adults is a multi-agency responsibility. As Kent operates a two, and in some places three tier council system, Thanet District Council liaises with Kent County Council and the respective Parish and Town Councils within the District, alongside other partner agencies and bodies that have responsibility for undertaking safeguarding functions or supporting the agencies that do. Key functions are set out below.

Kent County Council

Kent County Council (KCC) is the responsible authority for children and adult social services. Designated officers from Thanet District Council, liaise with and report safeguarding concerns, incidents or allegations to KCC children or adult social services. This is then assessed by the duty officer and further actions taken and co-ordinated as deemed appropriate by KCC.

Kent Safeguarding Boards



Kent Safeguarding Children's Board (KSCB) is a statutory multi-agency partnership which brings together agencies who work to safeguard and promote the welfare of children and young people. The objective of the SCB is to co-ordinate the activity of each person and agency represented for the purposes of safeguarding.

More information is available on the KSCB website: <http://kscb.org.uk/>



The Kent and Medway Safeguarding Adults Board (SAB) is a statutory multi-agency partnership which brings together agencies who work to safeguarding vulnerable adults in Kent and Medway.

More information is available on the KCC website:

http://www.kent.gov.uk/data/assets/pdf_file/0008/29186/Kent-and-Medway-Safeguarding-Adults-Board-responsibilities.pdf

Designated officers from Thanet District Council sit on both Safeguarding boards.

Kent Police

Has a duty to investigate criminal offences and refer any suspicion, allegation or disclosure that a child or vulnerable adult may be suffering harm, to Kent County Council.

Thanet District Council

It is the responsibility of all employees and members, to acknowledge this policy, participate in any relevant training or learning offered and adhere to associated safeguarding procedures, reporting any concerns, incidents or allegations in accordance with the associated procedures as referred to in this policy.

In addition to responsibilities for safeguarding, all employees and Elected Members should also work within any related 'Safe working practice' guidelines.

An example is included in appendix IV although individual service area managers are encouraged to adapt this to meet the needs of their own services in conjunction with the undertaking of any departmental risk assessments.

6. Roles and responsibilities of the council

Safeguarding is everyone's responsibility. All employees, members, contractors and volunteers have a number of legal duties and responsibilities under a number of pieces of legislation to undertake safeguarding functions.

Primarily this includes legal obligations to safeguard children, young people and vulnerable adults, which all have a common themes including:

- Know what it means to 'safeguard' – and understand different types of abuse, neglect or exploitation
- Identify and report any safeguarding concern about actual or suspected abuse of a child, young person or vulnerable adult
- Have a clear reporting process and know how to access and use this
- Access and undertake regular training

A full list of all key safeguarding legislation and council obligations is included in appendix II.

Role	Responsibilities
Lead Executive Officer for Safeguarding	Overall responsibility for Safeguarding sits with the Chief Executive.
Lead Senior Officer for Safeguarding	The Director of Community Services acts as a senior lead officer for all strategic safeguarding matters, and oversees policy and procedural decisions.
Lead Member for Safeguarding	The Portfolio holder for Community Services acts as lead officer within the Cabinet and promotes safeguarding amongst members
Designated Safeguarding Officers	Head of Safer Neighbourhoods and Community Safety Team Leader hold responsibility as designated officers, and are district leads on the respective children and adult Safeguarding Boards. They ensure CMT and members remain briefed and up to date on policy and procedural reviews and supervise the Safeguarding function on behalf of the Local Authority liaising with other senior safeguarding partners. Both roles give advice on requirements for vetting and training requirements and co-ordinate serious safeguarding cases or reviews.
Safeguarding Officer (Deputy designated officer)	Assesses and co-ordinates all information, intelligence and reports relating to safeguarding. Raises awareness of safeguarding, ensuring that policies and procedures are embedded and accessible. This officer also takes the lead on overseeing and making case referrals, co-ordinates the internal safeguarding forum, delivers safeguarding training and gives advice on and undertakes checking DBS and vetting applications.
Safeguarding Support	Community Safety Officers all have access and clearance to assist with safeguarding enquiries, record and process referrals and give general advice. They are also able to undertake DBS checking for new or amended roles, on behalf of the council.
HR advisors	Ensure that recruitment procedures in place are being followed by recruiting managers and that all new or amended roles are passed to a designated safeguarding officer for review of any new or amended role responsibilities, and their potential for contact or lone working with children, young people and vulnerable adults. To ensure DBS checks have been undertaken by designated officers and submitted before contracts offered or probationary periods completed.
Monitoring officer	Senior officer with responsibility for handing complaints about member conduct and involved in any allegations against staff or members.
Managers and Supervisors	All managers and supervisors are responsible for complying with the Safeguarding Policy. This includes a need to ensure any staff working within

	<p>their service areas have read and understand the policy and associated procedures , can easily access them, comply with them and undertake prescribed training when required.</p> <p>Managers and supervisors are also responsible when recruiting new or amending existing posts, to liaise with a designated safeguarding officer and complete the relevant section on the ‘establishment change form’ indicating perceived level of contact with children, young people and/ or vulnerable adults. Roles and responsibilities contained within job descriptions may also need to be formed in consultation with designated officers, alongside any requirements for DBS checks, Disclosure Scotland or Police Vetting.</p> <p>It is also the responsibility of managers to ensure all new staff are inducted and undertake e-learning, or are booked onto the next available classroom based safeguarding training sessions - which will be made available on the Learning and Development Human Resources intranet pages</p> <p>Safeguarding forms part of the Managers Assurance process and should also be discussed regularly in 1:1s and team meetings where relevant or topical. All managers within each service area are to nominate a ‘Safeguarding Champion’ to sit on the internal safeguarding forum and champion safeguarding issues back amongst teams. In some teams this may be a manager or supervisor.</p> <p>Managers also have responsibility for ensuring contracts, leases, grants, service level agreements and arrangements with volunteers operating within their service area, hold clauses and considerations for safeguarding. This is to ensure those the council works with or discharges functions to, adhere to this policy and are able to legally terminate involvement with contractors or suppliers that fail to comply with this policy.</p>
Safeguarding champion	Has responsibility to attend regular internal safeguarding forum chaired by the Safeguarding Officer. To receive updates and an enhanced level of training and awareness and cascade this information amongst their team.
All employees, Elected Members and volunteers	Have responsibility for reading and understanding this policy and associated procedures, attending training when required as appropriate for their role . To have an awareness of safeguarding, report and refer any concerns in accordance with the policy.
Contractors	Must comply with Thanet District Council’s Safeguarding Policy and where relevant, have appropriate procedures, training and disclosure or vetting processes. Dip testing will be undertaken as part of the review of Safeguarding by the HR Audit Partnership to audit contractor and contract manager compliance.

7. Requirements for specific circumstances

The council funds and assists others to undertake functions on council property or land. It is important that any individuals or organisations that the council liaises with have an awareness of safeguarding and that council property and open spaces are wherever possible designed to promote safety and wellbeing.

Housing

The council has a number of housing related functions which may fall within the notification duty for safeguarding. This includes functions of providing housing assistance and advice, mandatory reporting of any Children In Need due to risk of homelessness or neglect as well as a potential to directly observe safeguarding concerns through property inspections and health and safety risk assessments highlighting factors that could be hazardous to health.

The council also undertakes a landlord function, acting as a Social Landlord through arms length management provision undertaken by East Kent Housing.

In the course of exercising these functions Council officers and contractors are required to notify any concerns or direct safeguarding referrals to the designated safeguarding lead officers to ensure a co-ordinated cross-organisation response to Safeguarding. This insures all reports and outcomes are recorded centrally and auditable.

It may be through exercising specific functions, additional departmental policies and procedures are required and should be formulated and reviewed in consultation with respective safeguarding designated officers.

Leisure, heritage, events and land hire

The council is responsible for managing leisure contracts in facilities, open spaces and foreshores.

Any sports club, leisure provider who has lease agreements or regularly hire out or lease council facilities or open spaces, should have appropriate child, young person and vulnerable adult procedures in place. They should also ensure any volunteer or employee that has unsupervised contact with children, young people or vulnerable adults undertakes a DBS check.

Any Safeguarding concerns on council land should be reported to a designated officer. (Not negating a need to call Police in a safeguarding emergency) Designated safeguarding officers are able to provide further advice and support to groups or organisations.

Grant applications

Safeguarding policies and procedures are required from all grant funded organisations. Satisfactory DBS checks for employees and volunteers are also requested of any organisation or group, working with children, young people and vulnerable adults who seek funding from the council.

As a minimum, an organisation will be expected to have a policy statement or procedure relating to safeguarding. Commissioned, contracted or grant funded organisations with minimal contact with children, young people and vulnerable adults may wish to adopt the councils Safeguarding Policy and procedures if deemed suitable.

Health and Safety

Thanet District Council undertakes Health and Safety enforcement in some premises providing customer services and leisure facilities, including shops and restaurants. Employers in these premises are obliged to carry out risk assessments, including for the employment of young people.

Whilst undertaking normal duties, some council departments may wish to view such risk assessments. If they are unavailable, or there is information to suggest employers may be putting young people or vulnerable adults, at risk, then this information will be passed onto Kent County Council Social Services.

Licensing

The council is responsible for a number of licensing functions. Protecting children from harm is a Licensing objective that the council is legally obliged to consider, when licensing premises under the Licensing Act 2003 or Gambling Act 2005.

The council also issues personal, private hire and hackney carriage, as well as selective licenses to landlords. To be licensed in any of these circumstances, there are provisions within the respective legislations, that stipulate if asked, the applicant must be able to show that they are a 'fit and proper' person.

The applicant can be asked to undertake a DBS check to demonstrate that they don't have any convictions that would bring this into question. Such convictions could include relevant violence, safeguarding and sexual offences.

8. Recognising abuse

Any council employee, member, volunteer or contracted service provider, who has contact with people or who works where people may have access, could potentially come into contact with someone who experiences a form of abuse and they may be required to make a safeguarding report.

Responsibilities under this policy are to report concerns. It is not the responsibility of the person who suspects or has witnessed abuse, to make a judgement or to investigate.

Safeguarding concerns will usually fall into one or more of seven categories: physical, neglect, emotional, sexual, financial, discriminatory or institutional, and could happen to any child, young person or vulnerable adult. A number of different types of abuse may be being committed at the same time.

A summary of signs and indicators is included below as a guide, and is not exhaustive.

Type of abuse	Description	Possible indicator(s)
Emotional or psychological - Emotional acts or behaviour resulting in distress or trauma.	<ul style="list-style-type: none"> Bullying, intimidation, manipulation Humiliation, shaming and ridicule Control or coercion Deliberate isolation Deprivation Threats of harm or abandonment 	<ul style="list-style-type: none"> Disturbed sleep and tendency to withdraw Loss of confidence Loss of appetite, loss of weight Anxiety, confusion Extreme submissiveness Sharp changes in behaviour Excessive craving for attention Self-abusing behaviour, self-harming,
Sexual - Direct or indirect involvement with sexual activity, under duress or without consent / ability to consent.	<ul style="list-style-type: none"> Rape Indecent assault Indecent exposure Exposure to inappropriate material 	<ul style="list-style-type: none"> Unexplained changes in behaviour New tendency to withdraw Recent development of overly sexual behaviour Deliberate self-harm Incontinence / bed wetting Disturbed sleep patterns Discomfort in walking Unexplained bruising, injuries in personal areas Excessive washing Stained or torn clothes Sexually transmitted or urinary tract infections Pregnancy
Physical - Non accidental infliction of force resulting in injury or impairment	<ul style="list-style-type: none"> Inflicted physical injury not satisfactorily explained Injury where it is known or suspected that it was inflicted intentionally or through lack of care Assaults, hitting, slapping, pushing, kicking, burns, abrasions, fractures, welts, mutilation, wounds or marks of physical restraint Misuse of medication or medical processes Inappropriate restraint 	<ul style="list-style-type: none"> Injury that is inconsistent with explanation given Cowering and flinching Bruises/ marks Abrasions, especially to wrists and / or ankles Unexplained burns, scalds or fractures Hair loss in one area Frequent minor incidents without seeking help Unusually sleepy or docile Frequently moving GP or care providers Emotional distress, low self esteem
Neglect or acts	<ul style="list-style-type: none"> Failure of a person who has responsibility, care or 	<ul style="list-style-type: none"> Poor hygiene or cleanliness

<p>of omission</p> <ul style="list-style-type: none"> - Ignoring or withholding physical or medical care to the detriment of wellbeing 	<ul style="list-style-type: none"> • custody to provide access to health, social or educational care services (unintentional or deliberate) • Withholding necessities of life, including nutrition, medication, heating, shelter • Failure to intervene 	<ul style="list-style-type: none"> • Unkempt or unsuitable clothing for the weather conditions/ environment • Untreated illness • Dehydration, weight loss, malnutrition, hunger • Repeated infections • Unexplained trips/ falls • Incontinence issues not addressed • Inconsistent or reluctant contact with health or social care agencies • Withholding needed items such as hearing aids, glasses, medication etc
<p>Financial</p> <ul style="list-style-type: none"> - Unauthorised or fraudulent obtaining and improper use of funds, property or resources 	<ul style="list-style-type: none"> • Misuse or misappropriation of property, possessions or benefits • Theft, fraud, exploitation • Pressure in connection with wills, property or inheritance • Extortion of money, property or possessions by threat, coercion or fraudulent means • Refusal to let the vulnerable person have access to their own money, property or possessions 	<ul style="list-style-type: none"> • Unexplained or sudden inability to pay bills • Unexplained or sudden withdrawal of money from accounts • Personal possessions of value go missing without explanation • Contrast between known income and actual living conditions • Someone responsible for paying bills is not doing so • Unusual interest by a relative, friend or neighbour in financial assets • Where services are refused under pressure from potential beneficiaries • Unusual purchases unrelated to the known interests of vulnerable person
<p>Discriminatory</p> <ul style="list-style-type: none"> - When values, beliefs or culture result in a misuse or power that denies opportunities 	<ul style="list-style-type: none"> • Unequal treatment • Inappropriate use of language • Exclusion • Harassment 	<ul style="list-style-type: none"> • The vulnerable person is subject to racist, sexist, gender or homophobic abuse or relating to their age, illness or disability • Not meeting cultural or religious needs • Imposing unwanted political, cultural or religious beliefs • Acts or comments motivated to harm or intimidate • Inciting others to commit abuse • Lack of effective interpreter provision
<p>Institutional</p> <ul style="list-style-type: none"> - When the culture of the organisation, such as a care or medical facility, doesn't prioritise care 	<ul style="list-style-type: none"> • Abuse due to imposing rigid and insensitive regimes or routines • Poor practices embedded in systems • Unskilled or untrained staff • Intrusive or evasive interventions • Environment allowing inadequate privacy or comfort 	<ul style="list-style-type: none"> • Lack of or inappropriate care plans • Contact with the outside world not encouraged • Restricting visitors • Not accounting for individual preferences • Lack of choice or consultation • Lack of privacy • Subdued behaviour • Lack of personal clothing/ belongings • Strong smell of urine, linen not changed regularly • Furniture positioned to restrict movement

9. Reporting process

There is one streamlined process for any employee, member, contractor or volunteer undertaking services for Thanet District Council to report ANY safeguarding concern, whether it is about a child, young person or vulnerable adult. [An example report form is included in appendix I and available online as a web form, however this information can also be given verbally to a safeguarding officer if it is not possible to fill out a form.]

Having one simplified process, ensures that the council meets its numerous reporting duties around different safeguarding aspects, including child protection, vulnerable adults, human trafficking, modern slavery cases and radicalisation, without having a number of different systems and processes.



This also supports the view that if someone is ‘at risk’ of abuse, this could be complex and include different forms. It is for specialist services to investigate this further. The person reporting the concern may only have one piece of a bigger picture.

It is always advised, where possible, to try to obtain the consent of the person who the concern is about, and notify them of any referral, although it is recognised it is not always possible, or to do so may put someone at risk. Therefore it needs to be considered with each situation.



- All employees, members, contractors and volunteers are trained and advised to report their concerns to their **line manager and the Community Safety department**, which holds responsibility for safeguarding and designated officers, who have undergone enhanced safeguarding training and work in a multi-agency office.

It is recognised that the council is not a 24 hour service, and if it is suspected a person is, or could be in significant and immediate harm, and a designated safeguarding officer isn't available, the information should be passed on **immediately to the Police directly by calling 999, (and then the designated council officer notified afterwards).**

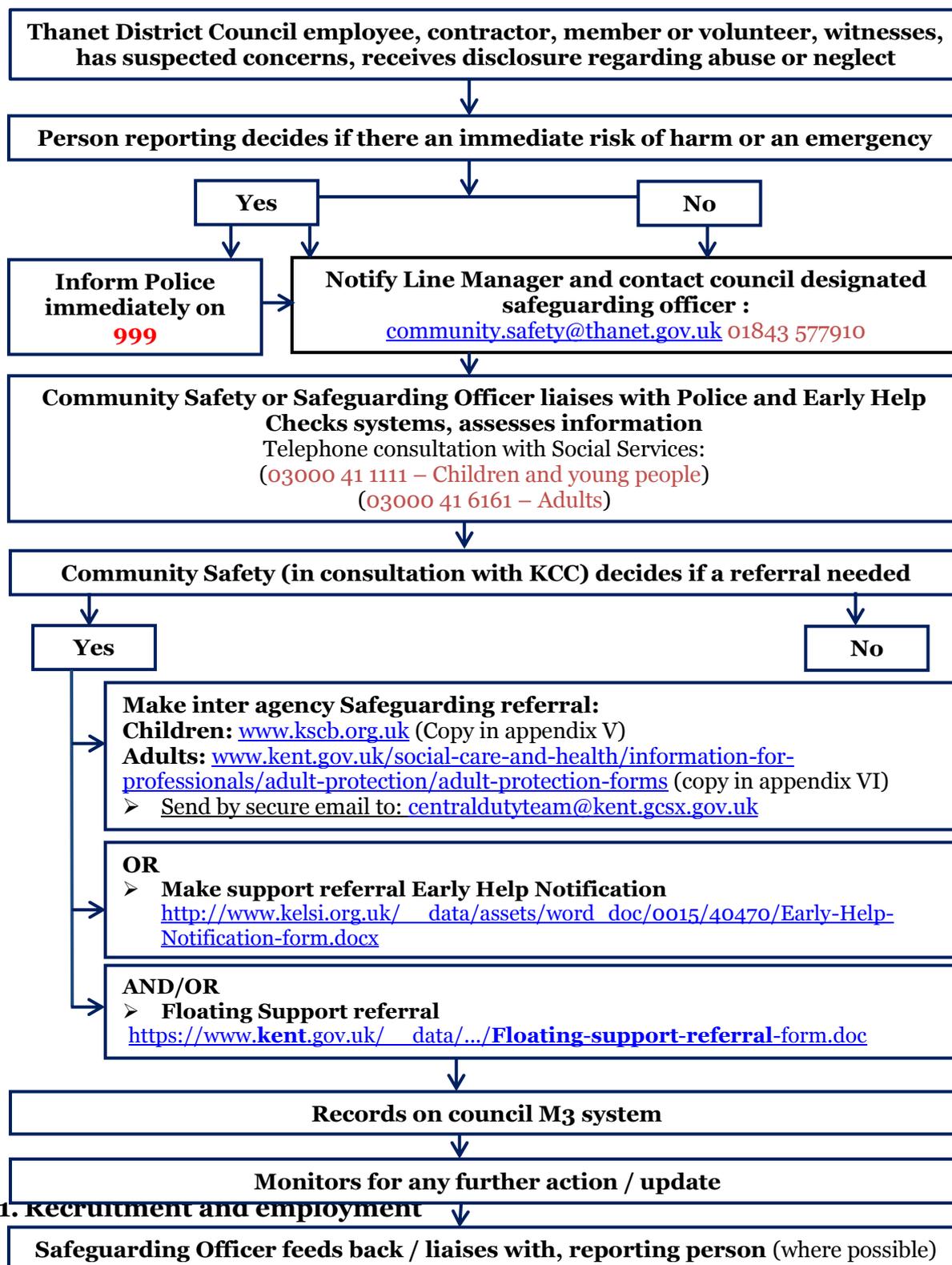
Social Services can be reached out of hours on : 03000 419191 and will deal with urgent enquiries relating to both children and adults.

A full list of key safeguarding contacts is included in appendix IV.

10. What happens after a report

Officers within the Community Safety team, with Safeguarding responsibilities, take the reported information, liaise with the a designated safeguarding officer for the council, partner agencies such as Social Services and the Police and assess any further action.

- The officer who made the report may be asked more questions by either the Community Safety Officer or Social Services and may also be required to give evidence as a witness. It is often not possible to be anonymous.
- Following assessment of the information, it may be that an immediate referral is required, to either Early Help or Social Services, or that a telephone consultation with either children’s or adult services is needed, first to obtain further clarification.



Whilst Thanet District Council does not hold responsibility for Social Services, employees, members, volunteers and contracted service providers may still have contact with children, young people and vulnerable adults.

As such, the council must take all steps possible to ensure checks are undertaken where appropriate to roles and responsibilities, where it is likely there will be a degree of unsupervised contact with a children, young person or vulnerable adult.

Confirmation of employment for all new employees is subject to satisfactory checks and references in line with Thanet District Council's Recruitment and Selection Policy and Procedure, and the Disclosure and Barring Service (DBS) Policy. These documents can be found on the HR web pages.

Each role within the organisation, including that of members, volunteers and service contractors will be categorised depending on level of contact. A level of vetting and assessment is then required for roles where there is likely or regular unsupervised contact with children, young people and vulnerable adults.

This list is maintained and reviewed annually by the safeguarding officer, or as required following any changes to roles and responsibilities.

New or amended roles

Any new or amended job role is passed to a designated safeguarding officer, prior to being submitted for job evaluation. Further enquiries are also made with the recruiting manager by HR if the degree of contact is unclear from the detail in the job description.

- It is the recruiting managers responsibility to ensure any new or amended job roles are passed through a designated or deputy designated Safeguarding Officer. The job evaluation panel should not accept any roles that have not been assessed by a safeguarding officer.

Vetting and disclosure

National guidance and the DBS Exceptions Order 2015 provides guidelines as to the types of job roles and regulated activity that requires certain levels of vetting. A list of all Thanet District Council roles, and the level of vetting required is maintained and held by EK HR and the Safeguarding Officer and made available on the intranet.

The degree of contact with a child, young person or vulnerable adult, that the role and responsibilities require will determine the level of vetting or disclosure checking that is required.

Vetting type	What it covers	Who applies
Basic DBS or Disclosure Scotland	Unspent convictions only	Individual to Disclosure Scotland (although can be sent direct to employer if requested)
Standard DBS	Unspent convictions, cautions, Any relevant spent convictions, or convictions exempt from filtering*	Organisation to the Disclosure and Barring Service
Enhanced DBS	Unspent convictions, cautions, Any relevant spent convictions, or convictions exempt from filtering *, plus any local relevant information	Organisation to the Disclosure and Barring Service
Police Level 2	Any relevant spent or unspent convictions, or convictions exempt from filtering *, plus all local relevant information	Organisation direct to Kent Police Vetting

* Usually includes recent cautions, reprimands or offences that involve violence, drugs, safeguarding or sexual, or that aren't subject to the Rehabilitation of Offenders Act 1974

Classification of roles

Any role that has a degree of regular contact with children, young people or vulnerable adults or is listed on the Exceptions Order 2015, will necessitate a Disclosure and Barring Service (DBS) formerly known as Criminal Records Bureau (CRB) check to be undertaken.

There is also discretion for the employer to risk assess the role requirements and decide in consultation with the Safeguarding Officer if a DBS check is appropriate and there are mitigating or exceptional circumstances for undertaking a level of vetting.

The DBS process checks any unspent convictions recorded by the Police National Computer. Scottish Criminal History System and Criminal Record Viewer (Northern Ireland)

There are three levels of checking by the DBS and a further more intensive screening by Kent Police (Level 2) for specialised roles in the multi-agency collocated office. There is no expiry date, as the check is only as current as when it was carried out, but guidance advises re-checking at least every 3 years.

Government Secure email addresses and vetting

Any new applications for issue of a government secure 'GCSX' email address for roles that handle sensitive information, but do not have direct customer contact warranting standard or enhanced DBS checking are the only roles asked to undertake a Basic Disclosure check.

If a role requires both a secure email address and has customer contact, then a higher level check is required as set out in the classification of roles.

Use of contractors

The Local Authority will take reasonable steps to ensure that any contractors it works with are monitored appropriately. Any contractors, their employees or associated sub-contractors may come into contact with children, young people or vulnerable adults, there is an expectation that they will comply with the terms of this policy.

They must also ensure that they are familiar with the reporting procedures and report any concerns to the Local Authority point of contact managing any contract or service level agreement and a designated safeguarding lead.

- It is the responsibility of any employees, members or volunteers working or contracting out services to ensure that those they are working with are aware of this policy and reporting procedures.

Access to this policy is available on the council webpages, and Safeguarding referred to as clauses within contracts and grant offers.

Work Experience and volunteers

Thanet District Council works with volunteers and offers work experience to some roles within the organisation. Prior to establishing a volunteer or work experience programme, consultation should be had with a designated Safeguarding Officer and Human Resources.

Applications for DBS checks can be undertaken for volunteers at no charge.

- It is the responsibility of any employees, members, or contractors working with volunteers or initiating work experience to ensure that appropriate safeguarding measures are in place and adequate training given, prior to commencing any role.

12. Training

The council has a responsibility to ensure that all staff, employees, members, contractors or volunteers have an awareness of what safeguarding is, appropriate to their role and level of contact with children, young people and vulnerable adults.

The council facilitates tailored Kent Safeguarding Board approved classroom based training and is also signed up to corporate e-learning packages as part of the structured learning and development programme for all employees.

Due to the complex factors surrounding safeguarding, best practice recommends classroom based inputs generating discussion with the trainer, to best enhance and embed learning and awareness.

All staff are expected to participate in a classroom based input as part of their induction and undertake updated training, including e-learning as relevant to their roles and agreed by their line managers in consultation with the safeguarding officer.

The level of training needing to be undertaken is also aligned to the level of vetting and handling of personal information relevant to each specific job role.

E-learning

A Safeguarding e-learning module is available on the e-learning pages on the 'Learning and Development' section of the intranet pages. It contains two core components, one called 'Safeguarding' and once called 'Prevent'.

The Safeguarding module covers general child, young person and vulnerable adult awareness and the 'Prevent' module, contains specific information regarding the new duty to work towards the national counter terrorism agenda.

All members of staff who have computer access are required to undertake both of these modules at least annually. For those staff who do not have e-learning access, additional extended classroom based inputs covering this content, are provided and staff without computer access expected to attend.

Classroom based inputs

The council undertakes in house classroom based safeguarding training using content provided by the Kent Safeguarding Board, delivered by accredited trainers. Classroom based inputs should be refreshed no less than every two years, but where possible annually.

There are five levels of classroom based inputs that are delivered depending on each individuals role requirements.

- Service managers are required to know which training their staff should be invited to and monitor any additional training needs upon development of roles or additional project work.

Role requirements

Assessment as to the level of safeguarding training required, is made in consultation with the service manager, Human Resources and is maintained by the Safeguarding Officer.

The level of training is dependent on each positions responsibilities and job requirements contained within the current job description, and may change depending on specific projects or initiatives.

It is the responsibility of service managers to identify if a specific task requires additional training or awareness.

The list below serves as a guide, with a full staff list being held by the safeguarding officer. The level of training usually aligns with the level of vetting required. Except in the case of manager or supervisor positions who require enhanced inputs regardless of vetting classification.

Training levels	Frequency	Content	Who?
E-learning	Completed annually	Basic remote computer based overview	All staff with computer access (Those without computer access will receive a more in depth basic classroom input)
Basic classroom	1 hour input (Refreshed every two years)	Basic overall summary, responsibilities and reporting process More detailed discussion	Upon induction and refreshed every two years. All staff, members, volunteers and contractors who have very minimal to no, contact with children, young people and vulnerable adults and have already completed e-learning Those with no, or basic DBS checks.
Remote Training – area specific classroom	1-2 hour input (service dependant)	Basic overall summary, responsibilities and reporting process with additional information included in e-learning, tailored to specific service areas.	Those who do not have computer access or who are unable to undertake e-learning Specific to service areas and roles
Enhanced classroom	2 hour input (Annual refresh)	Basic overall summary in more depth	Those who require additional information and awareness, have a degree of regular contact. Roles that undertake home visits or work in public open spaces unsupervised Standard and enhanced DBS
Manager classroom	2 hour input (Annually)	Working with designated officers. Serious case reviews, legal duties, responsibilities Recording and documenting sensitive information Receiving and supervising staff who may raise safeguarding concerns	All service managers, supervisors, heads of service and CMT. Cabinet members, regardless of vetting
Safeguarding champion	Half day input (Quarterly)	More detailed overview Focus on role of safeguarding forum and raising awareness within teams More interactive, with exercises	All safeguarding champions Portfolio holder/ member champion
Designated Officer –	Accredited, half day, Delivered by KSCB trainer, often external (Annual refresh and regular	Full detailed and in depth inputs Able to deliver content on behalf of Kent Safeguarding Boards and accredited to train staff	Designated officers Deputy designated officers Community Safety Officers – Safeguarding assistants

	attendance at Safeguarding Boards for updates)		
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Induction of new starters

All new starters are expected to familiarise themselves with the Safeguarding Policy and associated procedures. This is included in the induction booklet and forms part of the initial discussions with their line manager.

It is the responsibility of line managers of new starters to ensure they are booked onto the next available classroom based safeguarding input.

Appendix I: Safeguarding report form

SAFEGUARDING REPORT FORM

- Please record the details of the concern/ incident / allegation in the boxes.
- Only include facts observed and / or what you have been told.
- Include as much detail as you can remember.

YOUR NAME:

CONTACT DETAILS:

1. WHO was involved?

Victim? Perpetrator? Do you know their names? Any nicknames?
Do you have their contact details? address?
How old are they approximately?
Can you describe them?

2. WHAT happened to give you cause for concern?

Describe in as much detail as possible
Were there any visible injuries? If so, where

3. WHEN did this happen?

Date
Time

4. WHERE did this happen?

Where were you exactly?
Was anyone else there?
Did anyone else witness or hear anything?

5. HOW did they react?

The victim? The perpetrator?
Were you able to tell them you were passing on your concerns or get their consent?

6. WHY did this did you cause for concern?

Please now pass this information onto your line manager and

Community.safety@thanet.gov.uk 01843 577910

999 if someone is in immediate risk of harm

Appendix II : Key Safeguarding legislation

The following legislation and guidance underpins this safeguarding policy, associated procedures and duties. This list is not exhaustive and subject to updates.

Legislation/ guidance	Detail
Modern Slavery Act 2015	Introduced a new duty for the Local Authority to report to the National Crime Agency about any potential victims of modern slavery or trafficking
Serious Crime Act 2015	New offence of ‘Controlling or coercive behaviour’
Counter Terrorism and Security Act 2015	<p>Introduced a national Counter Terrorism Strategy, with four strands: Prevent – people from becoming involved with terrorism or supporting extremist ideals Pursue – those involved in activity supporting terrorism Protect – strengthen infrastructure and improve resilience Prepare – mitigate the impact of an attack</p> <p>The Act also introduced new duties to ensure a local Prevent action plan is formulated and a duty to report those who could be vulnerable to radicalisation or exploitation into extremist activity.</p>
‘Working Together’ (updated) guidance 2015	<p>Revised in 2015. Sets out how organisations should work together to safeguard and promote the welfare of children.</p> <p>A copy can be found here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf</p>
‘Care and Support’ Statutory Guidance 2016	<p>Provides guidance on sections 42-46 of the Care Act 2014 and replaced the ‘No secrets’ Guidance of 2000.</p> <p>Sets out how providers of health and social care functions should work jointly to Safeguard Vulnerable Adults and fulfil statutory duties set out in the Care Act 2014.</p> <p>A copy can be found here: https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance</p>
The Care Act 2014	<p>Outlines the responsibility of Local Authorities to carry out safeguarding enquiries where it is suspected that someone is suffering or at risk of abuse or neglect.</p> <p>It also introduces the responsibility of Local Safeguarding Adults Boards, in order to bring together key local partners to focus on safeguarding strategy and practice.</p>
Anti-Social Behaviour, Crime and Policing Act 2014	<p>Chapter 12, part 10: Introduced forced marriage as a criminal offence, punishable up to 7 years imprisonment. It also applies to UK nationals overseas.</p> <p>Introduced new tools and powers to tackle Anti-Social Behaviour, which could be used as sanctions to safeguard victims. Also introduced the Community Trigger case review process and Community Remedy to encourage greater transparency for victims.</p>
Protection of Freedoms Act 2012	<p>Made amendments to criminal records checking processes, to ensure more rigorous relevance. Formerly known as Criminal Records Bureau (CRB) now Disclosure and Barring Service (DBS)</p> <p>Also introduced an update service, allowing employers to check for changes since last record check.</p>
Crime and Security Act 2010	Introduced Domestic Violence Protection Orders (DVPO), from March 2014, Police and magistrates can issue a DVPO where there is insufficient evidence to charge a perpetrator, but conditions can be placed on them by way of this order, much like bail, to protect victims for up to 28 days.

Apprenticeships, skills, Children and Learning Act 2009	Section 9 makes amendments to the Children's Act 2004, regarding the establishment of Children's Trust Boards. Names 'relevant partners' (Which includes district councils) as having a duty to cooperate in making arrangements to improve wellbeing and have power to pool budgets and share resources.
Safeguarding Vulnerable Groups Act 2006	Created the Independent Safeguarding Authority (ISA) which aims to prevent unsuitable people working with children, young people and vulnerable adults across all services.
Mental Capacity Act 2005	Made it an offence to neglect or deliberately ill-treat a person who lacks capacity
Children Act 2004	Section 11 places a statutory duty on district councils to make arrangements to ensure that in discharging their functions they consider the need to safeguard and promote the welfare of children. Section 10 outlines the duty to promote inter-agency cooperation between named agencies (including district councils) Section 13 requires each local authority to be a statutory partner in Local Safeguarding Children's Boards.
Sexual Offences Act 2003	Replaced the Sex Offenders Act (1997) and incorporated 50 new offences including a new 'Grooming' offence. Offences also included the use of the internet in child abuse and to abuse positions of trust, as well as a new definition of rape.
Female Genital Mutilation Act 2003	This act made Female Genital Mutilation (FGM) illegal in this country. It is an offence to undertake the procedure and assist others, including UK nationals overseas, except in specific medical grounds.
Homelessness Act 2002	It is a requirement for the Council to refer homeless people with dependent children, who are ineligible for homelessness assistance or who are intentionally homeless to Children's Social Services, as the child could be at risk of harm.
Adoption Act 2002	Expanded the definition of harm, in the Children Act 1989, to include witnessing domestic violence.
Sexual Offences (amendment) Act 2000	Introduced the concept of 'abuse of trust', whereby an adult could commit an offence in engaging in sexual activity with someone younger than them if they are seen to be in a position of trust, even if the young person is above the age of consent (16).
Care Standards Act 2000	Sets out a regulatory framework and service standards for regulated services such as residential care. Part 7 makes provision for the Protection of Vulnerable Adults (POVA) scheme to prevent abusers working with vulnerable adults.
Local Government Act 2000	The Council has a responsibility to address the needs of children and young people living in the area.
Protection of Children Act 1999	Sets out the framework to enable employers to check on the suitability of employees to work with children, and builds upon the Police Act 1997 which established the Criminal Records Bureau (Now Disclosure and Barring Service)
Human Rights Act 1998	Sets out the rights of children and families to challenge what they perceive to be infringements.
Children Act 1989	Section 17 – Children in need. The Local Authority has a duty to safeguard and promote the welfare and wellbeing of children within their area who are in need. Section 47- Children at risk. The Local Authority has a duty to make enquiries when there is reasonable cause to suspect that a child or young person living in their area is suffering or is likely to suffer significant harm. The Children Act 1989 defines 'harm' in section 31 as: ill-treatment, impairment of health or development, including impairment suffered from seeing or hearing the ill treatment of another.

Appendix III :

Guide to safe working practices

In addition to the Employee and Member codes of Conduct and working protocols, the following practices should serve as a guide to employees, members, volunteers and contracted service providers who have contact with children, young people and vulnerable adults.



Best practice

- ✓ The wellbeing, safety and security of the child, young person or vulnerable adult should remain the paramount to any other objective of a project or initiative.
- ✓ Utilise recognised agencies such as schools, youth clubs, sports clubs to communicate and engage with children, as opposed to lone ventures for projects.
- ✓ Always ensure you can be seen and observed publically when working with children, young people and vulnerable adults, and avoid situations when you could be left alone.
- ✓ If someone reports a concern – best to pass something on. “If you see [or hear] something, Say something!”
- X Try not to set up meetings with children, young people or vulnerable adults outside of organised activities
- X Avoid lone visits, ensure another responsible person remains with you, where possible
- X Don't take photographs of children, young people or vulnerable adults unless it is through consultation with the Communications Team, written consent from an individual, parent/carer has been obtained and it is for a very specific purpose which has been clearly explained.



Social media

- Avoid adding or accepting on personal social media accounts, (eg Facebook, twitter, Instagram) children, young people or vulnerable adults, you have come into contact with through council employment or volunteering.
- All social media engagement as part of your council role, should take place via approved social media platform. (The Communications Team are able to give further guidance around this)
- Do not post any comments or images of children, young people or vulnerable adults.
- Be aware that other users could ‘tag’ you in inappropriate content. If this happens, you should immediately ‘de-tag’ yourself and contact the user to ask for this to be removed
- If you come across inappropriate content you should report this to the social media platform.
- If the inappropriate content contains a localised safeguarding risk, you should report this using the process within the Safeguarding Policy.



Privacy

- Everyone has the right to privacy, but ensure that personal activity, including that online, does not compromise any professional position.
- Ensure that your privacy settings are set correctly
- As a minimum it is recommended that you set your security levels to approve content posted by others that includes you, and set your privacy to ‘friends only’ (or the equivalent on different platforms)

Appendix IV: Key contacts

- KEY SAFEGUARDING CONTACTS -

THANET DISTRICT COUNCIL

Community Safety Team

Community.safety@thanet.gov.uk

Community.safety@thanet.gcsx.gov.uk

01843 577910

01843 577000

Designated Safeguarding Officers

Penny Button – Head of Safer Neighbourhoods

Jessica Bailey – Community Safety Team Leader

penny.button@thanet.gov.uk

Jessica.bailey@thanet.gov.uk

Safeguarding Officer

Jo-Anna Beckingham – Safeguarding Officer

safeguarding@thanet.gcsx.gov.uk

KENT COUNTY COUNCIL

Childrens Social Services (Duty team)

Out of hours

Fax (Last resort)

03000 41 1111

03000 41 9191

03000 412345

Adult Social Services (Duty team)

Out of hours

Fax (Last resort)

03000 41 6161

03000 419191

03000 412345

HEALTH

Community Mental Health Trust (The Beacon)

Mental Health Crisis Team

Thanet Mental Health Care Trust Team (QEQM)

01843 855200

0300 222 0123

01843 225544

Local Authority Designated Officers (LADO)

Kroner House, Eurogate Business Park, Ashford, TN24 8XU

KentChildrensLado@kent.gov.uk

03000 41 0888

OTHER

Channel Panel

Channel@kent.pnn.police.uk

Operation Willow : Child Sexual Exploitation Team

Cse.team.kent.and.medway@kent.pnn.police.uk

Cse.intelligence@kent.pnn.police.uk

01622 652668

NSPCC Child abuse Whistleblowing Helpline

help@nspcc.org.uk

0800 0121 700

Modern Slavery – duty to notify

DutyToNotify@homeoffice.gsi.gov.uk

0800 028 0285