

Gravesham Borough Council

Safeguarding Policy

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1. Executive Summary

1.1. Overview

The safeguarding of all children and vulnerable adults within Gravesham is a fundamental principle in the delivery of all council services.

All children and vulnerable adults have the right to live their lives to the fullest potential, to be protected, to have the opportunity to participate in and enjoy any activity, and to be treated with dignity and respect. Gravesham Borough Council has both a moral and legal obligation to ensure the safeguarding of children and vulnerable adults across its services and this Safeguarding Policy sets out the council's ambition to this agenda.

1.2 Aim

The ultimate aim of this policy, and its associated procedures, is to help protect and promote the welfare of all children and vulnerable adults within the borough that come into contact with council services, whilst ensuring the council meets its statutory safeguarding responsibilities.

To achieve this aim, this policy provides council officers, elected Members and volunteers with a sound understanding of their Safeguarding responsibilities and the support to recognise and respond to concerns via the council's adopted reporting procedures.

1.3 Delivery

This policy outlines how, on an operational level, Gravesham Borough Council will ensure the Safeguarding agenda is a primary consideration for all employees and corporate decision making. Practically this will be delivered by a number of commitments made by Gravesham Borough Council to this agenda which include:

- **Partnership working:** Case studies in the Safeguarding agenda have revealed the complexity of deciding when and how to intervene to protect and promote the welfare of children and vulnerable adults. Recommendations from these studies have highlighted that successful intervention depends on robust interagency partnership working between district council services, children and adult social services, police, health, the family justice system and the voluntary sector. Gravesham Borough Council is committed to working in partnership with all key stakeholders to safeguard all vulnerable local residents.
- **Training and Raising Awareness:** This policy aims to ensure that an overarching approach to safeguarding is embedded within all council services and that employees, members, those delivering contracts on behalf of the council and volunteers understand their role and responsibilities in supporting all residents to live a life free from abuse, exploitation and intimidation. A rolling programme of online and face-to-face training available to all officers and members.

2. Policy Aims and Scope

2.1 Policy aims

The aims of this policy are that;

- The council's approach and commitment to the safeguarding agenda are embedded across the organisation, through considering the needs of the residents and ensuring their voices are heard and included in future plans;
- All children or vulnerable adults that access services organised and delivered by Gravesham Borough Council are protected against abuse, neglect and/or exploitation to the extent of the council's knowledge, control and influence.

Safeguarding pledge:

As we are made aware, we will ensure that any children or vulnerable adults that access services organised and delivered by Gravesham Borough Council are protected, kept safe from harm and wherever possible have the support they need to make the choices they want.

We believe that safeguarding is everybody's responsibility and we will work with all residents, partner agencies, contractors and volunteers to fulfil this pledge.

Where there is a conflict of agendas, the welfare of the child or vulnerable adult is paramount.

2.2 Policy scope

This policy covers all council functions and services and the operations of partners, contractors and voluntary organisations that deliver services on its behalf. The council recognises that everyone has a responsibility for safeguarding children and protecting vulnerable adults.

Work that addresses the Safeguarding agenda has a wide reach across council services. This would include completing an urgent referral to social services to report a disclosure of abuse; action to address damp and mould in a property that a vulnerable adult will be living and breathing in; including green space in a development to ensure the children living in the future development have somewhere to play outside (leading to a number of positive health outcomes), recognising the signs of modern slavery in a local business and working with our partner agencies to support the victims and address the wider criminality. The pandemic response to support vulnerable residents can be viewed as a large-scale Safeguarding effort - ensuring residents receive sustenance and protecting their health by supporting them to stay away from places they could catch coronavirus.

2.3 Children

Safeguarding is a term that covers a wide range of activity with the purpose of protecting children and vulnerable adults from harm, and promoting their welfare. The definition of a child for the purposes of Safeguarding includes any child or young person up to the age of 18 years old. The Working Together to Safeguard Children (2018) guidance defines Safeguarding children as:

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

2.4 Adults

Adult Safeguarding is concerned with addressing the priorities above, but has a slightly different approach at times given the ultimate right of an adult to make their own decisions about their lives. It is defined in the Care Act (2014) 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.”

2.5 What defines a “Vulnerable Adult”?

It is important to note that the role of Safeguarding as it applies to adults is focused on ‘vulnerable’ adults. The Care Act (2014) defines this as any person aged 18 or above who:

1. Has needs for care and support (regardless of the level of need and whether or not these needs are being met),
2. Is experiencing, or is at risk of abuse or neglect, and
3. As a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

As it is not always obvious if a person has care and support needs, concerns about any adult (or child) who is at risk of abuse or exploitation should be raised with a line manager/safeguarding leads as per Safeguarding procedures. The level of support they may be able to access may depend on whether or not they meet the definition for a ‘vulnerable adult’.

2.6 Domestic Abuse survivors

The Domestic Abuse Act of 2021 recognised that victims of domestic abuse have an additional need for protection and support, whether or not they have additional care needs. The Act has placed a duty on local authorities in England to provide accommodation based support to victims of domestic abuse and their children in refuges and other safe accommodation.

2.7 No Recourse To Public Funds (NRPF) status

This policy covers all children and vulnerable adults whether or not they are entitled to access public funds. No Recourse to Public Funds (NRPF) status is a standard condition applied to many people in the UK with a temporary immigration status, which blocks access to specific benefits to themselves and their children. However social services support is not classed as a public fund for immigration purposes, and safeguarding legislation and procedures still apply. Whatever an individual's immigration status may be, their human rights remain, and local government's responsibility to safeguard children and vulnerable adults remains.

2.8 Lead agencies

The council recognises that the Kent Safeguarding Children Multi-Agency Partnership, Kent and Medway Safeguarding Adults Board, Kent County Council and the Police are the lead agencies in the Borough with regard to the protection of children and vulnerable adults and will work with these agencies and, where relevant, their associated procedures to deliver on its '*Safeguarding pledge*'.

3. Recognising Abuse

3.1 In order to identify situations that present a safeguarding concern, staff will have an understanding of the main types of abuse that may be impacting children and adults in the borough.

The four main types of abuse of children are:

- Physical abuse – non accidental infliction of physical force that results, or could result, in bodily injury, pain or impairment;
- Sexual abuse - forcing or enticing participation in sexual activities (regardless of whether or not the child or young person is aware of what is happening);

- Emotional abuse - persistent emotional maltreatment;
- Neglect - persistent failure to meet basic physical and/or psychological needs.

Children may also need protection from a wider range of often community-based abuse, including:

- Child Sexual Exploitation (CSE) - Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, deceive or force a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator;
- Criminal Exploitation - a young person or adult at risk of being groomed into undertaking criminal activities, such as drug dealing/trafficking and working in cannabis farms, etc. It is often perpetrated by an adult through the threat or use of violence;
- Female Genital Mutilation (FGM) – a collective term for illegal procedures which include the removal of part/all external female genitalia for cultural or other non-therapeutic reasons.

3.2 The same types of abuse can also impact adults, although some tend to be specific to adults. These include:

- Physical abuse - non accidental infliction of physical force that results, or could result, in bodily injury, pain or impairment;
- Sexual abuse - involvement, either direct or indirect, in sexual activity without consent. It could also be the inability to consent, pressured or induced to consent or take part;
- Emotional or psychological abuse - acts or behaviour which impinge on emotional health or, which cause distress or anguish;
- Financial abuse - unauthorised, fraudulent obtaining and/or improper use of funds, property or any resources;
- Neglect, wilful neglect and acts of omission - ignoring or withholding physical or medical care needs;
- Discriminatory abuse - values, beliefs or culture result in a misuse of power that denies mainstream opportunities. It includes discrimination on the basis of race, sex, age, sexuality, disability or religion, or any of the other protected characteristics;
- Institutional or Organisational abuse - an organisation imposing rigid and insensitive routines; poor practices embedded in systems; unskilled, intrusive or invasive interventions, or an environment allowing inadequate privacy or physical comfort;

- Self-neglect – A wide range of behaviour including neglecting to care for one's personal hygiene, health or surroundings and behaviour such as hoarding.

Other safeguarding concerns impacting adults include:

- **Domestic abuse**
Domestic Abuse is defined as “any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to psychological, physical, sexual, financial, emotional abuse.”
- **Modern Slavery and Human Trafficking**
Involves the recruitment, transportation, transfer, harbouring or receipt of people who, with the threat or use of force, coercion, abduction, abuse of power or deception are exploited for the purposes of prostitution, forced labour, slavery, forced criminality or other similar practices. Victims are trafficked all over the world, including in and around the UK, and even throughout the borough.

Under the Modern Slavery Act 2015 the council has a duty to notify the National Referral Mechanism (a Home Office body) of potential victims of Modern Slavery and Human Trafficking. The council is also expected to exercise due diligence to ensure that modern slavery is not present in within its own workforce or within any of its supply chains as a matter of good practice.

- **Forced marriage**
A Forced Marriage “is a marriage conducted without the valid consent of both parties, where duress is a factor” (‘A Choice by Right’ HM Government 2000). It is illegal under the Anti-Social Behaviour, Crime and Policing Act 2014 for any person to:
 - a) use violence, threats or any other form of coercion for the purposes of causing another person to enter into a marriage; and
 - b) believe, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.
 Duress can involve physical, psychological, sexual, financial and/or emotional pressure.

3.3 Anyone can carry out abuse or neglect; partners, other family members, neighbours, friends, acquaintances, and local residents, organised gangs, paid officers or professionals, volunteers and strangers. It is important to remember that a vulnerable adult may be abused by another vulnerable adult, and equally, a child or young person may be abused by another child or young person.

4.Roles and Responsibilities

4.1 Everyone has a responsibility to ensure that concerns about the potential abuse of children and vulnerable adults are addressed. The lead agency for managing both child and adult protection in Kent is Kent County Council’s Social Services. Gravesham Borough Council, in fulfilling its statutory duties, works in partnership with Kent County Council to identify, refer and respond to suspected abuse, and to provide additional support as required.

4.2 In order to ensure the Safeguarding agenda is embedded throughout the council, there are a range of responsibilities shared across different roles:

Role	Responsibilities
Chief Executive Officer	<ul style="list-style-type: none"> ▪ Raise the profile and embed safeguarding processes, support the policy and promote the development of services to ensure the protection of children and adults at risk within the borough. ▪ Corporate Management Team will commit to a resource of relevant officers to act as the council’s ‘Safeguarding Champions’ for their respective areas ▪ Allocate resources to enable responsibilities to be met.
Designated Safeguarding Lead / Lead Safeguarding Officer	<ul style="list-style-type: none"> ▪ Development of policy and strategy, issuing operational guidance, promoting good practice and making policy recommendations to Senior Leadership Team. ▪ Ensure the Corporate Management Team is effectively briefed on the safeguarding agenda ▪ Ensure safeguarding training is available to meet requirements and the needs of staff. ▪ Representative at multi-agency safeguarding meetings. ▪ Work with key officers to deliver relevant Safeguarding responsibilities ▪ Provide advice and guidance to staff regarding safeguarding concerns. ▪ Provide advice and guidance to HR in the event of an allegation of abuse made against a member of staff ▪ Co-ordinate requests for information regarding Serious Adult Reviews, Child Safeguarding Practice Reviews, Partnership Learning Reviews, Section 47 and Section 17 enquiries, Section 11 Audit. ▪ Offer advice and assistance to Members and support Members to make safeguarding referrals as appropriate.
Community Safety Unit /	<ul style="list-style-type: none"> ▪ Provide advice and guidance to staff regarding safeguarding concerns.

Safeguarding Champions	<ul style="list-style-type: none"> ▪ Offer advice and assistance to Members and support Members to make safeguarding referrals as appropriate. ▪ Representative at multi-agency safeguarding meetings ▪ Complete NRM referrals for victims of Modern Slavery as appropriate
Human Resources	<ul style="list-style-type: none"> ▪ Manage the Disclosure and Barring Service (DBS) process in conjunction with recruiting managers. ▪ Make a referral to the Local Authority Designated Officer (LADO) when a member of staff has acted in a way which may have harmed a child, in liaison with the Designated Safeguarding Lead. ▪ Inform Designated Safeguarding Officer and Lead Safeguarding Officer if an allegation is received that a member of staff has acted in a way that has harmed an adult. KMSAB guidance to be followed. ▪ Ensure delivery of corporate safeguarding training to all staff, including new starters.
Managers	<ul style="list-style-type: none"> ▪ Support staff to recognise and understand their roles and responsibilities. ▪ Ensure staff have read, understood and signed their acknowledgment of this Policy and the associated procedures of reporting safeguarding concerns ▪ Provide suitable supervision to staff dealing with safeguarding concerns. ▪ Consider safeguarding implications when developing policies and procedures, procuring services on behalf of the council and in their decision making processes. ▪ Ensure staff are appropriately trained and aware of their responsibilities. ▪ Identify training needs of staff to support them to undertake their duties. ▪ Ensure contractors have the appropriate safeguarding policies in place. ▪ Ensure volunteers working on behalf of the council are aware of their safeguarding responsibilities. ▪ Ensure reference to the DBS Guide to Eligibility to assess whether a role requires a DBS
All employees	<ul style="list-style-type: none"> ▪ Ensure safeguarding training is undertaken to an appropriate level. ▪ Comply with the Safeguarding Policy and procedures. ▪ Report any concerns through the appropriate referral process. ▪ Report allegations against a member of staff or volunteer through the council's Whistleblowing Procedure.
Consultants, Contractors, Agency staff	<ul style="list-style-type: none"> ▪ Compliance with council's Safeguarding Policy and procedures. ▪ Reporting of any concerns through the appropriate referral process. ▪ Reporting of allegations against a member of staff through the council's Whistleblowing Procedure

Lead Member for Safeguarding	<ul style="list-style-type: none"> ▪ Ensure safeguarding training is undertaken to an appropriate level. ▪ Approve Safeguarding Policy and procedures. ▪ Report any concerns through the appropriate referral process. ▪ Promoting the safeguarding agenda
All Members	<ul style="list-style-type: none"> ▪ All elected Members are expected to attend relevant safeguarding training. This will be, as a minimum, one session for each Member during each administration period. ▪ Report any concerns through the appropriate referral process.

4.3 All external organisations and contractors providing services to and on behalf of the council are required to comply with the council’s Safeguarding Policy. Where appropriate they should have their own Safeguarding Policy and procedures in place that adhere to the KSCMP and KMSAB guidelines.

4.4 Service design

In determining and reviewing corporate policy and ultimately future service delivery, all consultations and performance monitoring activity affecting children or vulnerable adults will be undertaken using methods that are accessible and appropriate to account for their views in shaping the service design process. In addition, all reports presented to Cabinet and Corporate Management Team for a decision will include the safeguarding agenda as a key consideration.

4.5 Safe recruitment practices

The council’s Code of Conduct for Employees outlines that: *“the council expects and obtains high standards from its employees because council services can affect the health, wealth and well-being of local people.”* The council will therefore adopt safe recruitment practices to reduce the likelihood of recruiting unsuitable officers. This includes:

- The principle of safe recruitment will also be applied to any contract drawn up between the council and contractors or agencies that provide council services for, or adults to work with, children and vulnerable adults [see paragraph 5.2.8].
- Ensuring that a statement about the organisation’s commitment to safeguarding is included in all appropriate recruitment and selection materials, including reference to regular Disclosure and Barring Service (DBS) checks for relevant posts.
- Appropriate levels of DBS checks obtained whenever applicable as determined by legislation and supporting government guidance.¹ □

Satisfactory explanations for any gaps in employment will be sought. □
References will always be obtained direct from the referee.

4.6 Training provision:

Gravesham Borough Council officers:

In order to ensure compliance with statutory responsibilities, officers identified by the council's Human Resources Team whose service, or with the responsibility of commissioning a service, provides access to children and vulnerable adults shall have appropriate and regular training on safeguarding matters, in keeping with the requirements of the Kent Safeguarding Children Board. Training may include internal courses/workshops, externally accredited courses/seminars or workshops organised by relevant agencies, and will be proportionate to the level of responsibilities and the role of each officer. The council's Human Resources Team will keep a record of all officers and volunteers who have received relevant training.

- Refresher training relating to this policy and the associated procedures will be provided to all identified officers every two years or with immediate effect due to legislative requirements, whichever is sooner.
- Accredited training for the Designated Safeguarding Officer and appointed Safeguarding Officer(s) to ensure compliance with the required s11 standards, as identified by the Kent Safeguarding Children Multi-Agency Partnership.

4.7 Publicity

All photographers working on behalf of the council will seek verbal permission from a parent or guardian to take close up photographs/film footage of children under the age of 18 participating in council events. Wherever possible written permission should be sought; a photography and filming consent form is available at Appendix 5. In complying with data protection regulations, any participant will be informed as to how their image is to be used and how long it will be maintained.

Schools that are taking part in council organised events such as parades will be informed that photographers and press will be present and that photographs will be made available for publicity purposes. It is assumed that participating schools will seek parental permission before attending.

An exception to the above will be open invite community events where it is not possible to get comprehensive prior consent. In such instances visible signs will be established advising attendees that photography and/or filming is being carried out that could be used for publicity purposes.

Regardless of the route of consent, the council recognises the right of a participant to withdraw consent for the use of their image at a later point.

Website Hub: The council is committed to advertising the safeguarding agenda. Through its web-hub internet page, users can access the council's Safeguarding Policy and adopted reporting procedure, as well as details of key external agencies and wider content relating to the agenda.

5. Partnership Working

5.1 Due to the often hidden and complex nature of abuse, neglect, and community-based exploitation, partnership working is a critical element of Safeguarding. No single professional can have a full picture of a child's needs and circumstances and, if children, families and vulnerable adults are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Many serious case reviews have shown that a lack of partnership working between organisations has meant that serious safeguarding issues were not identified or acted on appropriately and the worst has happened. As a result, working in partnership with other organisations and sharing information when there are safeguarding concerns, is extremely important.

5.2 Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

The Children and Social Work Act (2017), section 16, requires a Safeguarding Partnership to be established in each area led by three safeguarding partners;

- Local Authority (Kent County Council)
- Police
- Health

They must make arrangements to work together with relevant agencies (as they consider appropriate) to safeguard and protect the welfare of children in the area. Within Kent, these responsibilities are met through the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) of which Gravesham Borough Council is a represented Member.

KSCMP provide training across a wide range of Safeguarding topics, provide guidance for professionals and partner agencies, create the Child Protection Procedures, monitor partner agencies for compliance, and more. Please see their website <https://www.kscmp.org.uk/> for further information.

5.3 Kent and Medway Safeguarding Adults Board (KMSAB)

KMSAB co-ordinate adult safeguarding across the county (including Medway). The statutory agencies that comprise the KMSAB are:

- Medway Council

- Kent County Council
- Kent Police
- NHS Kent and Medway Clinical Commissioning Groups

Partner agencies are also part of the board and its working groups, including District council representation.

The key principles that underpin all of Gravesham Borough Council's adult safeguarding work as defined by the government are:

- **Empowerment** – *Personalisation and the presumption of person-led decisions and informed consent;*
- **Prevention** – *It is better to take action before harm occurs;*
- **Proportionality** – *Proportionate and least intrusive response appropriate to the risk presented;*
- **Protection** – *Support and representation for those in greatest need;*
- **Partnership** – *Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse; and*
- **Accountability** – *Accountability and transparency in delivering safeguarding.*

5.4 In delivering operational activities, the council will also contribute to relevant themed working groups and forums e.g. Domestic Abuse Forum. These bring together officers across the council and partner agencies that are most likely to encounter safeguarding issues in their day-to-day work with the aim of ensuring the council fully considers its safeguarding responsibilities.

5.5 External arrangements: The council's Working in Partnership Framework sets out that before entering into any formal partnership working commitment, where it is relevant a key consideration should be how the establishment of the arrangement is likely to aid the council in fulfilling its statutory safeguarding responsibilities.

Organisations that are grant-aided by the council to deliver projects with a direct impact on children or vulnerable adults, will be required to demonstrate that they have in place appropriate safeguarding arrangements as a condition of financial support.

5.6 Reporting arrangements: The council maintains an adopted Corporate Complaints and Whistleblowing Policy to encourage and enable individuals to feel confident in raising concerns. For any safeguarding concerns relating to a fellow council officer or elected Member or contractor officers should refer to the council's Whistleblowing Policy and its reporting procedure to identify a suitable route for their concern.

5.7 Personal information: Where in line with formally adopted protocols and government advice, any request for information made to the council will be received as openly as possible. If information can be shared for the purposes of safeguarding an individual, it will be shared.

5.8 Commissioned services and contractors:

Commissioned services: In acknowledgement of the council's procurement procedures, any officer seeking to procure or commission a service with a direct impact on children or vulnerable adults will outline in the appropriate tender specification/Service Level Agreement the requirement for details of relevant

safeguarding arrangements and polices for review in the determining of their relevant tender application/business case. On nominating the successful tender, the council will specify within the appropriate contract the requirement for the service provider to adhere to the provisions as set out in this policy (e.g. reporting concerns), along with relevant checks relating to other safeguarding concerns e.g. right to reside in the UK.

6. Reporting Procedure

6.1 This Safeguarding Policy is designed to empower employees, elected Members, contractors and volunteers to carry out their roles effectively. Whatever happens as a result of the reporting procedures detailed below should reflect an individual's wishes wherever possible, and be in their best interests if they are not able to make the decision, whilst being proportionate to the level of concern.

6.2 It is important that stakeholders in this agenda understand that abuse is a complex issue and that validating allegations of abuse is not the role of council employees or Members. The role of employees, Members and all related representatives of the council, is to:

- **Recognise** concerns as they are identified;
- **Report** concerns to line managers inside 2 hours or in a case of immediate harm to contact emergency services;
- **Refer** to the relevant agency on the same day;
- **Record** incidents to facilitate investigations; and
- **Respond** to requests for information and involvement in case reviews.

6.3 What should be considered and reported?

Every reported incident of abuse, suspected abuse, or general safeguarding concern must be taken seriously and addressed and reported with immediate urgency.

Safeguarding queries are likely to fall into the following two areas:

6.4 General safeguarding concerns: In carrying out their frontline activities, officers may suspect abuse of a child or vulnerable adult has or could take place, based upon relevant intelligence they have gathered e.g. the living conditions identified within a resident's home that could indicate the neglect of a child.

6.5 Disclosures of abuse: A child or vulnerable adult may confide to a council employee or Member that they are being abused or mistreated – this is known as a 'disclosure'. In addition, other residents who may suspect that abuse is occurring to a child or vulnerable adult may also confide in a council employee. Appendix 7 to this policy

provides guidance on administering public disclosures before accessing the reporting procedure.

Allegations against officers:

Any concerns about the welfare of a child or vulnerable adult arising from alleged abuse by an employee or Member of the council must be reported immediately to the HR team which will lead an investigation in consultation with the Chief Executive, Designated Safeguarding Officer and KCC Local Authority Designated Officer (LADO) in the case of a child.

In the case of alleged abuse in the case of an adult, HR will immediately notify the CEO, Designated Safeguarding Officer and Lead Safeguarding Officer, who will make an immediate report to Adult Social Care under section 42 of the Care Act. Please see The KMSAB guidance 'Managing Concerns around People in Positions of Trust' for further information.

The allegation could come from a member of the public, service user or be reported by a fellow employee. It can often be difficult to report a fellow employee, but in line with the council's Whistleblowing Policy and Corporate Complaint principles, the council will fully support and protect anyone who reports their concerns about a colleague's practice or the possibility that a child or vulnerable adult may be being abused or harassed. False allegations do sometimes occur. However, if a child or vulnerable adult indicates they have been abused, or information suggests abuse, this should never be ignored.

6.6 How should concerns be reported?

If a child or vulnerable adult is injured, in imminent risk of harm or danger, the Police should always be contacted immediately on 999. Only after the safety of a child or vulnerable adult has been secured should the procedure detailed at Appendix 6 be completed.

An officer with a Safeguarding concern must report this to their Line Manager immediately. They should complete a referral to Social Services, the Police, or another agency if required. The officer should then complete the DASH form available on the staff intranet within the same day. If the officer's Line Manager is not available, they should contact another manager within their department, or directly contact the Lead Safeguarding Officer/ the council's Safeguarding Champions Group as time is of the essence.

This contact should include the details of an incident/general enquiry. As required, the Lead Safeguarding Officer/ the council's Safeguarding Champions Group will provide supporting evidence, relevant case details and a recommended course of action for the originator to pursue, in line with Appendix 6.

If a referral is required, the officer will be responsible for completing this with as much information as possible. They will be supported in doing so by the Lead Safeguarding Officer/Community Safety Managers. The officer is also responsible for following the referral up if they have not had a response within 72 hours.

- [Kent Child Safeguarding Referral Form](#) Once you/your line manager have decided to make a formal referral, following consultation with the Safeguarding Champions and, potentially, the Kent County Council Central Duty Team, the Child Protection Form must then be completed and forwarded to the Kent County Council Central Duty Team within two working days.

- [Kent Adult Safeguarding Alert Form](#): Once you/your line manager have decided to make a referral following consultation with the Safeguarding Champions and, potentially, the Kent County Council Central Duty Team, this form is to be used to report concerns of possible adult abuse against an individual.

Completion of this process for all reports will ensure the council has a rigorous audit trail of all cases as presented for any potential future use e.g. a Serious Case Review. The Lead Safeguarding Officer will maintain a secure 'Safeguarding Log' of all records referred to the Safeguarding Champions.

6.7 If your line manager or the Safeguarding Champions do not agree with you that anything further needs to be done but you still have strong concerns that a child or vulnerable adult is in danger, you should still contact Kent County these agencies in line with their procedures. Council and in some cases the Police. The council will co-operate fully with any investigation carried out by these agencies.

6.8 Please be aware that it is always better to share a concern, even if it seems small or silly. Please listen to your instincts, if something feels wrong then please raise it.

6.9 Consent in sharing concerns

As this Policy makes clear, the welfare of children and vulnerable adults is the paramount concern. In this respect therefore, any disclosure from a child or vulnerable adult or concern raised by an employee must be acted upon by referral to the appropriate agency. A child or vulnerable adult seeking to make a direct disclosure to a council officer should be advised from the outset that, due to the council's statutory requirements, it will not be possible to maintain confidentiality and that the relevant information will, ultimately, be shared with appropriate agencies. Kent County Council a lead body for investigating referrals has formal procedures and guidelines in place for involving parents / guardians and carers in those investigations where necessary.

Where a child or vulnerable adult is perceived to be at risk of harm, seeking consent to share confidential information for referral purposes, although an ideal, is not required. In those more acute cases for example, officers are not expected to discuss their concerns in the first instance with parents or carers for the following reasons:

- to do so may actually place the individual at even greater risk, particularly where it is suspected that a parent or carer may be responsible for the abuse;
- to do so may compromise the investigation by KCC or a criminal investigation; or
- to do so may put the employee at risk.

7. Safeguarding Data Management

7.1 The sensitive nature of the Safeguarding agenda ensures that it is essential all personal and case history details are maintained accurately to complete a formal audit trail. This approach will enable managers to look for past incidents, concerns, risks and patterns of behaviour for use in possible future Serious Case Reviews for example.

7.2 The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) set out the legal requirement for the processing of personal data. Article 5 of the GDPR sets out seven key principles for the processing of personal data:

- lawfulness, fairness and transparency;
- purpose limitation;
- data minimisation;
- accuracy;
- storage limitation;
- integrity and confidentiality (security); and
- accountability

7.3 In holding and exchanging information with other bodies/departments during the exercise of the functions under this Policy, officers are required to act in accordance with the provisions of the General Data Protection Regulation and Data Protection Act, albeit the regulations must not be used as an obstacle (see paragraph 7.7 on data sharing). For clarity, queries can be addressed by the council's Data Protection Officer.

7.4 To ensure an effective audit trail is established, all copies of the following information and documentation are required to be presented to the council's Safeguarding Officers, electronically via the Safeguarding Champions, for any reported suspicion/allegation or safeguarding concern:

- Any relevant notes, memoranda, telephone transcripts or other correspondence dealing with the case, or other relevant historical information;
- Any formal written report/email to management;
- Any formal referral notice;
- Any decision received regarding referral notification (Kent County Council Central Duty Team etc.); and
- Any other relevant materials that evidence the actions taken by Gravesham Borough Council officers (inc. decision on sharing information with another agency on a case).

7.5 In line with adopted statutory guidance relating to data protection, on receipt of the sources of intelligence listed under paragraph 7.4 all records will be assigned to a secure database, accessible to the Safeguarding Champions. All records will be kept secure at all times and maintained in line with the timescales adopted by the council's Records Retention Schedule.

7.6 Documents associated with allegations against an officer will be kept according to adopted HR policies.

7.7 Data sharing

What information can be requested and what can be shared?

7.7.1 Statutory requirements: Gravesham Borough Council has a duty to share information with other agencies if requested in connection with an assessment of a child's needs under s17 of the Children Act (1989), or an enquiry under s47 of that Act, or in connection with court proceedings. This equally applies in the case of a vulnerable adult where for example under s45 of the Care Act (2014) information must be supplied on request to the Kent and Medway Safeguarding Adults Board in consideration of a Serious Case Review.

7: Safeguarding data administration

7.7.2 Cases of serious or immediate harm: The legal principle that *'the welfare of a child or vulnerable adult is paramount'* means that the considerations of confidentiality, under the GDPR for example, that might apply to other situations within the council, should not be allowed to override the right of a child or vulnerable adult to be protected from harm.

Data protection restrictions between relevant agencies should not be an obstacle if:

- You have immediate concerns about the welfare of a child or vulnerable adult;
- You disclose information to social services or to another professional; and
- The disclosure is justified under the common law 'duty of confidence'.

7.7.3 General safeguarding enquiries: Where requests for information are being made or referrals are being prepared for general safeguarding enquiries i.e. not necessarily for potential life threatening cases or incidences of immediate harm, Gravesham Borough Council has committed as a signatory to the current Kent and Medway Information Sharing Agreement. This Agreement provides a framework for fair and lawful information sharing and is binding on organisations that sign. Further information on signatory agencies can be found via the council's Data Protection Officer.

7.8 In line with statutory responsibilities and local information sharing agreements, the council adopts the government's *'seven golden rules for information sharing'* as good practice:

- **Remember** that the GDPR and DPA are not barriers to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.
- **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- **Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.
- **Share with consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base judgement on the facts of the case.
- **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the person who may be affected by their actions.
- **Necessary, proportionate, relevant, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- **Keep a record** of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

7.9 Where there are concerns relating to records management, such as the collection, storage and sharing of personal data, the advice of the council's Data Protection Officer should be sought.

Appendix

7.10 Further guidance on data sharing

Where there are concerns about the length of time for which individual records should be kept, or whether any course of action relating to personal data may be in breach of the GDPR, the advice of the council's Data Protection Officer will be sought.

7.11 Policy review

Gravesham Borough Council will review this Safeguarding Policy and associated procedures on a biennial basis and in line with any prescribed legislative changes to the safeguarding agenda, whichever is sooner.

7.12 In the event of significant changes to the policy, the process of approval will consider the opinion of relevant stakeholders (including young people and vulnerable adult representatives) prior to the requirement of Cabinet approval. All minor changes to this policy will be delivered on the approval of the Designated Safeguarding Officer, the council's Chief Executive Officer and the council Leader, as the appointed Member Champion for the safeguarding agenda.

7: Safeguarding data administration

1: Glossary of terms

Appendix 1 outlines a glossary of the key terms referenced throughout this Safeguarding Policy.

Terms	Definition
Abuse and neglect	Form of emotional, physical or sexual maltreatment of a child or vulnerable adult.
Child(ren)	Applies to children and young people under 18 years of age.
'Child in need'	A child that <i>"is unlikely to achieve or maintain a reasonable standard of health or development" and/or "health or development is likely to be significantly impaired"</i> : Section 17 of the Children Act (1989).
DBS	A Disclosure and Barring Service check. A tool used by the council for recruitment purposes and other areas of activity to help prevent unsuitable people from working with vulnerable groups.
Disclosure	Where a child or vulnerable adult 'confides' to a council employee or Member that they are being abused or mistreated.
Employees/officers	Those employed by Gravesham Borough Council and partners, contractors and volunteers involved in the delivery of council services or in council premises or facilities.
GDPR	General Data Protection Regulation (2018). The GDPR forms part of the data protection regime in the UK, together with the new Data Protection Act 2018 (DPA 2018).
Housing related support	Is a Kent County Council support service (i.e. funding, planning, monitoring and improving housing-related issues) for vulnerable people - homeless, older people and people fleeing domestic violence.
KMSAB	Kent and Medway Safeguarding Adults Board.
KSCB	Kent Safeguarding Children Board.
LADO	Local Authority Designated Officer
Local authority/council	Gravesham Borough Council, Kent County Council.
Members	Elected Gravesham Borough Council Councillors.
Neglect	The persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development.
Parent/carer	Generic term to include birth parents, step-parents, guardians and carers. The term will specify parental responsibility where necessary.
Referral	The act of passing on the case details of a resident to another agency for consultation, review or further action.
Safeguarding	The process of protecting from abuse or neglect, preventing impairment of health and development, and ensuring the promotion of quality of life chances.
Vulnerable adult	An adult at risk is any person 18 years or over who is, or appears to be; eligible for local authority / mental health services' assistance by reason of mental ill health, physical or learning disability, illness or age related frailty and/or, may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation.

Appendix 2: A guide to types of abuse

How to define and identify abuse

Appendix 2 provides the main categories of abuse and their indicators. The table should be read to refer to children and vulnerable adults unless otherwise stated. The table can be used as a guide to assist with recognising abuse in domestic homes, care homes, day centres, workplaces and other community settings.

The categories of abuse are not mutually exclusive; a child or a vulnerable adult may be subjected to more than one type of abuse at the same time. Officers are advised against establishing abuse merely due to the presence of one of the listed indicators; instead this document should be used for providing descriptive information for reporting duties.

Type of abuse	Definition	Indicators of abuse
<p>Physical</p> <p><i>“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 or vulnerable adult.”</i></p>	<ul style="list-style-type: none"> Hitting, slapping, scratching, pushing, shaking, suffocating, scalding, throwing, poisoning, drowning or otherwise causing physical harm; Restraint without justifiable reason (may include misuse of medication); Inappropriate sanctions (deprivation of food, clothing, warmth, health care needs); May include a caregiver fabricating or deliberately inducing illness (Münchhausen by Proxy Syndrome); Female Genital Mutilation. 	<ul style="list-style-type: none"> Bruises, fractures, bites, burns, scalds, hair loss in one area, urine burns, bed sores, scars, lack of mobility aids where applicable; Cowering, flinching, general fearfulness; Injuries especially in well protected areas of body (e.g. inside of thighs or upper arms); Injuries of uniform or unusual type; Accumulation of nonadministered medicine; History of unexplained falls or minor injuries; Frequent changing of General Practitioners (GPs) or reluctance against GP consultation/visit.
<p>Sexual</p> <p><i>“Occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or vulnerable adult into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.”</i></p>	<ul style="list-style-type: none"> Sexual activity involving force, coercion or enticement equating to exploitation [see ‘modern slavery’]; Violence is not necessarily involved; Sexual activity where the child or vulnerable adult lacks the mental capacity to understand and/or give consent; Rape or attempted rape; Sexual exploitation; Non-contact abuse (e.g. voyeurism, pornography, grooming over the internet—explained in more detail in this Appendix). 	<p>As a perpetrator may not solely be an adult male(s), it could be female and/or another child or vulnerable adult, recognition can often be hard to identify unless disclosed. Indicators are most likely to be: a) Behavioural: e.g. attention seeking, withdrawal and isolation, sexually explicit behaviour/language, sleep disturbance, self-harm, drug/alcohol misuse, running away from home, unexplained sources of money or ‘gifts’.</p> <p>b) Physical: bruising, bleeding or itching around the genitals, bedwetting, torn or blood/semen stained underclothing, sexually transmitted infections, pregnancy,</p>

Appendix 2: A guide to types of abuse

		eating disorder/anorexia, stomach problems.
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Type of abuse	Definition	Indicators of abuse
<p>Psychological / Emotional</p> <p><i>“The persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the person’s emotional development.”</i></p>	<ul style="list-style-type: none"> • Behaviour that has a harmful effect on emotional health, wellbeing and/or development; • Verbal abuse; bullying (inc. cyber bullying); humiliation, ridicule, intimidation, threat of punishment, abandonment; • Isolation or withdrawal from services or supportive networks; • Deliberate denial of religious or cultural needs; • Failure to provide access to appropriate social skills and educational opportunities; • By-product of all forms of abuse. 	<ul style="list-style-type: none"> • Any sudden changes to mood, behaviour, appetite, sleep patterns, continence, use of eye contact; • Anxiety, confusion or general resignation; • Fear of making mistakes; • Sucking, biting or rocking; • Easily frightened; • Loss of self-esteem; • Uncharacteristically becoming manipulative, uncooperative and aggressive; • Obsessions or phobias; • Radicalised views/encouragement to adopt extremist (violent or non-violent) views (Prevent); • Impairment of intellectual, emotional and social development; • Dysfunctional relationships with family members/caregivers.

Appendix 2: A guide to types of abuse

<p>Neglect</p> <p><i>"The persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development."</i></p> <p>[Not necessarily deliberate, may also include neglect of, or unresponsiveness to basic emotional needs.]</p>	<p>Failure to:</p> <ul style="list-style-type: none"> • provide adequate food and clothing or shelter of an adequate standard (including exclusion from home or abandonment); • protect a child from physical and emotional harm or danger; • ensure adequate supervision (including the use of inadequate caregivers); • ensure access to appropriate medical care or treatment; • provide access to appropriate health, care and support or educational services. 	<ul style="list-style-type: none"> • Inadequate heating, lighting, hygiene, clothing, food or fluids; • Constantly tired; • Begging/stealing food; • Poor physical condition (e.g. bed sores, weight loss); • Failures to give prescribed medication or obtain appropriate medical care; • Sensory deprivation (e.g. no access to glasses, hearing aids); • Thriving outside the home/care environment; • Children may be frequently absent or late to school; • Rarely an act of deliberate cruelty in a home, often an indirect result of unmet needs of the parent(s) e.g. young carers (IMAGO).
<p>Discriminatory</p> <p><i>"An offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a personal characteristic."</i></p>	<ul style="list-style-type: none"> • When values, beliefs or culture result in a misuse of power; • Discrimination on basis of age, disability, sexual orientation, race/ethnicity, sex, language, culture, religion or politics; 	<ul style="list-style-type: none"> • Tendency to withdrawal and isolation; • Fearfulness and anxiety; • Being refused access to services or being excluded inappropriately; • Loss of self-esteem;

Appendix 2: A guide to types of abuse

Type of abuse	Definition	Indicators of abuse
Discriminatory [cont.]	<ul style="list-style-type: none"> Degrading harassment and slurs; Hate crime. 	<ul style="list-style-type: none"> Resistance or refusal to access services that are required to meet need; Expressions of anger and frustration; Extreme/radicalised views.
Financial <i>“Financial recorded abuse can occur in isolation, but as research has shown, where there are other forms of abuse, there is likely to be financial abuse occurring.”</i>	<ul style="list-style-type: none"> The use of personal resources without informed consent or authorisation; Theft, fraud and/or extortion of material assets including internet scamming; Exploitation, pressure in connection with wills, property or inheritance; Misappropriation of property, possessions or benefits; Misuse of power of attorney or appointeeship. 	<ul style="list-style-type: none"> Anxiety about money; Living conditions substandard and unsatisfactory in contrast to adult’s apparent financial position; Extreme interest and involvement by the family, carer, friend or stranger; Lack of heating, clothing or food; Inability to pay bills/unexplained shortage of money; Unexplained withdrawals from an account; Unexplained loss/misplacement of financial documents or personal possessions; The recent addition of authorised signers on a client or donor’s signature card; Sudden or unexpected changes in a will or other financial documents.

As paragraph 3 sets out there are a number of forms and settings in which abuse may take place. Whether an on-going relationship, or an abusive service setting, and even potentially involving more than one person, these factors make it vitally important to look beyond single incidents to identify underlying dynamics and patterns of harm. Any or all types of abuse may be perpetrated as the result of deliberate intent and targeting of children or vulnerable adults.

Situation-based abuse

Whilst the table above describes six core manifestations of abuse, there are so-called ‘situation based’ types of abuse which have significant implications for the safeguarding of

Type of abuse	Definition	Indicators of abuse
<u>Modern slavery</u> <i>“Can include victims that have been brought from overseas and vulnerable people in the UK, being forced to illegally work against their will in many diverse sectors including; brothels, agriculture and illegal drugs.”</i>	<ul style="list-style-type: none"> Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use all means they have at their disposal to coerce, deceive and force individuals into a life of abuse and servitude. 	<ul style="list-style-type: none"> Victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn. Victims may not be allowed to travel on their own, appear unfamiliar with their surroundings. Victims may have limited I.D.

children and vulnerable adults. These types of abuse are set out below:

Appendix 2: A guide to types of abuse

Type of abuse	Definition	Indicators of abuse
<p><u>Domestic abuse</u></p> <p><i>“Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between intimate partners or family members regardless of gender or sexuality.”</i></p>	<ul style="list-style-type: none"> • 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. • People may experience domestic abuse regardless of ethnicity, religion, class, age, sexuality, disability or lifestyle etc. • Can encompass but is not limited to any one of the six manifestations of abuse outlined in the previous table. 	<ul style="list-style-type: none"> • Frontline workers throughout the council have the potential to encounter signs of domestic abuse and possibly even a disclosure; • It is vital that any indicator, explicit or otherwise, is taken seriously and reported – this act saves lives; • Officers who suspect domestic abuse must consider safeguarding issues: <ul style="list-style-type: none"> ○ Who else is at risk? ○ Are children or vulnerable adults present? ○ What preventative action is needed? • Police through domestic abuse protocols will be addressed under child and adult protection processes if a child or vulnerable adult is in immediate danger.
<p>Forced marriage</p> <p><i>“Forced marriage denotes a situation where one or both of the spouses do not consent and some element of external pressure is involved.”</i></p>	<p>□ Must be seen as distinct from arranged marriage (where families organise marriage but the choice whether to accept lies with the adult or young person).</p>	<p>□ May exhibit signs of physical, psychological, financial, sexual and emotional abuse.</p>
<p>Institutional</p> <p><i>“Including neglect and poor care practice within an institution or specific care setting like a hospital or care home, for example. This may range from isolated incidents to continuing ill-treatment.”</i></p>	<ul style="list-style-type: none"> • Children or vulnerable adults placed in any kind of care home or day care establishment are potentially vulnerable to abuse and exploitation; • Shows lack of respect for dignity and human rights; • When care standards and practices fall below an acceptable level, institutional abuse is more common; • May result from poor standards of care, lack of knowledge, understanding and training. 	<ul style="list-style-type: none"> • Regimented regimes, unusually subdued residents, anxiety in the presence of social care workers; • Users may exhibit signs of physical, sexual, financial, psychological or discriminatory abuse; • Whistleblowers must know how to access support and protection; anonymous reports are permitted and should be taken seriously.

Appendix 2: A guide to types of abuse

Type of abuse	Definition	Indicators of abuse
Restraint <i>“Mistreatment of people brought about by poor care or support whereby an individual’s needs or wishes are neglected for the smooth running of a house, a home, service or organisation.”</i>	<ul style="list-style-type: none"> It is illegal and unprofessional to use any form of physical, mechanical, emotional or any other form of restraint as a means of punishment; Restraint may only be considered in situations where there is a clear or perceived risk of an adult injuring themselves, or others, or seriously damaging property. 	<ul style="list-style-type: none"> Children and vulnerable adults who have been unlawfully restrained are most likely to exhibit signs of physical or psychological abuse; Depending on the circumstances, restraint could also be considered institutional abuse.
Self-neglect <i>“Any conscious failure of an adult to take care of himself or herself that causes, or is reasonably likely to cause within a short period of time, serious physical.”</i>	<ul style="list-style-type: none"> Self-neglect differs from the other forms of abuse listed here because it does not involve a perpetrator. Self-neglect can be life threatening and can pose a risk to others if fire and housing regulations are not being followed for example. 	<ul style="list-style-type: none"> □ Hoarding disorder is a persistent difficulty discarding or parting with possessions because of a perceived need to save them, often creating such cramped living conditions that homes may be filled to capacity. Some people also collect animals/pets in unsanitary conditions.

E-based abuse

The growth of the Internet has brought with it a mass of opportunities and also complex and diverse risks to safeguarding; for example exploitation of vulnerable residents for the purposes of radicalisation, countered by the council’s commitment to the PREVENT agenda. The council has an obligation to help keep children and vulnerable adults safe online by being adequately equipped to understand, identify and mitigate the risks of new technology outlined below wherever possible.

Type of e-abuse	Examples
Financial	<ul style="list-style-type: none"> Phishing scams, designed to obtain personal and/or financial information and possibly steal your identity. Gifts of expensive smart phones which can be used in exchange for gang membership, sexual favours and abuse.
Fraud	Fake shopping, banking, charity, dating, social networking, gaming, gambling and other websites.
Psychological	<ul style="list-style-type: none"> Exposure to inappropriate content; sexually explicit, racist, violent, extremist or other harmful material, either through choice or in error. Naming of rape victims online.
Inappropriate contact	<ul style="list-style-type: none"> People who may wish to abuse, exploit or bully. Digital stalking.
Inappropriate conduct	<ul style="list-style-type: none"> Due to their own and others’ online behaviour, such as the personal information they make public, for example on social networking sites.

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Sexual	<ul style="list-style-type: none"> • Exposure to sexually explicit content. • “Sexting” (exchange of sexual messages or images). • Grooming in web forums and chat rooms. • Online predators, cyber-stalking and risk of abuse.
Physical	<ul style="list-style-type: none"> • Access to legal highs and illegal drugs. • Online predators, cyber-stalking and risk of abuse.

Appendix 3 outlines specific statutory legislation and associated duties relevant to Gravesham Borough Council’s corporate safeguarding responsibilities.

Operationally the council has in place a framework of policies that set out how the council’s activities are delivered in consideration of the wider safeguarding agenda and other specific duties (e.g. Housing Allocations Policy) and these are available via the council’s website.

Act	Section	Duty/Explanation
Children Act (1989)	s17(1)	<i>Duty to promote and safeguard the welfare of children</i> It shall be the general duty of every local authority; (a) <i>to safeguard and promote the welfare of children within their area who are in need; and</i> (b) <i>so far as is consistent with that duty, to promote the upbringing of such children by their families, by providing a range and level of services appropriate to those children’s needs.</i>
	s27	<i>Duty to co-operate (Help with children in need)</i> A duty on other local authorities, local authority housing services and health bodies to cooperate with a local authority in the exercise of that authority’s duties under Part 3 of the Act which relate to local authority support for children and families (Kent County Council).
	s47	<i>Duty to investigate (Help with significant harm enquiries)</i> Where a local authority: (a) <i>are informed that a child who lives, or is found, in their area (i) is the subject of an emergency protection order, or (ii) is in police protection; or</i> (b) <i>have reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm:</i> the authority must make, or cause to be made, such enquires as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child’s welfare.
Housing Act (1996)	s177(1)	<i>Whether it is reasonable to continue to occupy accommodation</i> It is not reasonable for a person to continue to occupy accommodation if it is probable that this will lead to domestic violence against him, or against: (a) a person who normally resides with him as a member of his family, or (b) any other person who might reasonably be expected to reside with him.

Appendix 3: Legislative framework

	s213A	<p>Co-operation in certain cases involving children</p> <p>Requires housing authorities to refer to adult social care services persons with whom children normally reside or might reasonably be expected to reside, who they have reason to believe may be ineligible for assistance, or who may be homeless and may have become so intentionally or who may be threatened with homelessness intentionally, as long as the person consents.</p>
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Act	Section	Duty/Explanation
Children Act (2004)	s10	<p>Duty to co-operate to improve children's wellbeing</p> <p>Requires each local authority with responsibility for education and children's service (Kent County Council) to make arrangements to promote co-operation between the authority, each of the authority's relevant partners and such other persons or bodies working with children in the local authority's area as the authority considers appropriate.</p> <p>The arrangements are to be made with a view to improving the wellbeing of children in the authority's area, which includes protection from harm or neglect.</p>
	s11	<p>Duty to safeguard and promote the welfare of children</p> <p>Requires a range of organisations (including District Councils) to make arrangements for ensuring that their functions, and services provided on their behalf, are discharged with regard to the need to safeguard and promote the welfare of children.</p> <p>This Safeguarding Policy outlines how Gravesham Borough Council practically delivers on its responsibilities under this duty.</p>
	s13	<p>Establishment of LSCBs</p> <p>Requires each local authority to establish a Local Safeguarding Children Board (LSCB) for their area and specifies the organisations and individuals that must be represented on the Board.</p> <p>Within Kent, these responsibilities are discharged through the Kent Safeguarding Children's Board of which Gravesham Borough Council is a Member.</p>
Housing Act (2004)	s9	<p>Housing Conditions</p> <p>Part 1 of the Housing Act (2004) gives local authorities powers and duties to take action against bad housing conditions, and introduces a new Housing Health and Safety Rating System under which environmental health professionals will assess the impact of health and safety hazards in the light of the occupants most vulnerable.</p>

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Care Act (2014)	s42	<p>Enquiry by local authority</p> <p>(1) Where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there):</p> <p>(a) has needs for care and support (whether or not the authority is meeting any of those needs),</p> <p>(b) is experiencing, or is at risk of, abuse or neglect, and</p> <p>(c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.</p> <p>(2) The local authority must make (or cause to be made) whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case (whether under this Part or otherwise) and, if so, what and by whom.</p>
Act	Section	Duty/Explanation
Care Act (2014) (cont.)	s43	<p>Establishment of SABs</p> <p>Each local authority must establish a Safeguarding Adults Board (SAB) for its area. Within Kent, responsibilities are discharged through the Kent and Medway Safeguarding Adults Board of which Gravesham is a Member.</p>
	s44	<p>Safeguarding Adults Reviews</p> <p>An SAB must arrange for there to be a review of a case involving an adult in its area with needs for care and support (whether or not the local authority has been meeting any of those needs) if:</p> <p>(a) there is reasonable cause for concern about how the SAB, members of it or other persons with relevant functions worked together to safeguard the adult, and</p> <p>(b) condition 1 or 2 (see s44(2) and s44(3)) is met.</p> <p>Each member of the SAB must co-operate in and contribute to the carrying out of a review.</p>
	s45	<p>Supply of information</p> <p>This section outlines the conditions whereby council officers are to supply relevant case information about vulnerable residents to SABs when undertaking a SAR.</p>
Modern Slavery Act (2015)	s52	<p><u>Duty to notify</u></p> <p>If a public authority to which this section applies has reasonable grounds to believe that a person may be a victim of slavery or human trafficking it must notify—</p> <p>(a) the Secretary of State, or</p> <p>(b) if regulations made by the Secretary of State require it to notify a public authority other than the Secretary of State, that public authority.</p>

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Counter Terrorism and Security Act (2015)	s26	General duty on specified authorities <i>a specified authority (which includes Local Authorities) 'must, in the exercise of its functions, have due regard to the need to prevent people from being drawn into terrorism'.</i>
Domestic Abuse Act (2021)	s57	Accommodation Duty <i>Place a duty on local authorities in England to provide accommodation based support to victims of domestic abuse and their children in refuges and other safe accommodation</i> <i>Duty for local authority to establish DA Local Partnership Board</i>

Gravesham Borough Council: Policy framework

This Safeguarding Policy and the associated procedures should be interpreted in consideration of the council's corporate policy framework and specifically;

- Accessibility for All Policy;
- Code of Conduct for Employees;
- Corporate Complaints Procedure;
- Dignity at Work Procedure;
- Disciplinary and Grievance Procedures;
- Equality Policy;
- Health and Safety Policy;
- Information Security Policy;
- Internet Acceptable Use Policy;
- Recruitment and Selection Policy and Procedures;
- Records Retention Schedule; and
- Whistleblowing Policy.

Core safeguarding guidance documents

Document title	Purpose	Source
<i>Care and Support Statutory Guidance:</i> Dept. of Health	A guide to the local authority responsibilities under the Care Act (2014).	https://www.gov.uk/guidance/care-and-support-statutory-guidance/safeguarding
<i>Working Together to Safeguard Children:</i> Dept. for Education	A guide to inter-agency working to safeguard and promote the welfare of children. (2018) <i>NOTE: covers duties relating to Children Act (1989) and</i>	https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
<i>Safeguarding practitioners: information sharing advice:</i> Dept. for Education	Advice for practitioners providing safeguarding services to children, young people, parents and carers.	https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

Appendix 3: Legislative framework

<p><i>What to do if you're worried a child is being abused:</i> Dept. for Education</p>	<p>Guidance to help practitioners identify the signs of child abuse and neglect and understand what to do.</p>	<p>https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2</p>
<p><i>Criminal Exploitation of children and vulnerable adults: County Lines guidance</i> Home Office</p>	<p>Guidance for professionals on dealing with county lines, part of the government's approach to ending gang violence and exploitation.</p>	<p>https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines</p>
<p><i>Guidance for Professionals:</i> Kent Safeguarding Children Multi-Agency Partnership & Kent and Medway Safeguarding Adults Board</p>	<p>Practical guidance for local professionals on making referrals and other key material covering;</p> <ul style="list-style-type: none"> • Self-neglect • Sexual exploitation • Human trafficking • Mental capacity • Domestic abuse • Modern slavery • Financial abuse • Religious exploitation <p>NOTE: also covers the Kent and Medway Information Sharing Protocol</p>	<p>http://www.kscmp.org.uk/guidance https://www.kent.gov.uk/social-care-and-health/information-for-professionals/adult-protection/adult-protection-forms-and-policies/national-adult-protection-legislation</p>
<p><i>Kent Family Support Framework:</i> KELSI</p>	<p>A framework used by Early Help and Preventative Services to support families with needs defined as intensive.</p>	<p>www.kelsi.org.uk/support-for-children-and-young-people/early-help-and-preventative-services/kent-family-support-framework</p>

Appendix 4: Service responsibilities

The duty to safeguard and promote the welfare of children and vulnerable adults is applicable corporately across the authority. Through their activities, some services are likely to play a more prominent role in safeguarding and promoting the welfare of children and vulnerable adults as part of their day-to-day work – recognising welfare issues, sharing information, making referrals and subsequently managing or reducing risks. Appendix 4 sets out some of those areas and services with likely interaction in the Safeguarding agenda.

Human Resources

- Working to maintain a corporate record of those posts requiring a DBS disclosure together with the level of disclosure required.
- Ensuring that recruitment procedures are robust and that information pertinent to working with vulnerable groups is obtained during the recruitment procedure.
- Ensuring that DBS Disclosures are carried out in compliance with legislation and DBS guidance.
- Referring information to the DBS about employees who have been dismissed or removed from working with vulnerable groups (or would have been had they not left/ resigned) as a result of a relevant caution/conviction, conduct that has harmed or put a child/vulnerable adult at risk of harm, or satisfied the 'Harm Test' in relation to vulnerable groups.

Communications and Digital Team

- Officers should be aware of safeguarding and be mindful of how images of children and vulnerable adults are used in council publications, including Social Media, with due consideration of data protection regulations.

Revenues and Benefits

- Visiting officers may become aware of conditions that impact adversely on a child or vulnerable adult.
- Officers may be alerted to adverse situations by telephone/processing Benefit applications.
- Investigations may reveal safeguarding issues particularly in concern of customers with financial difficulties.
- Housing Benefits officers will need to have regard to the council's duty to safeguard children and vulnerable adults, particularly where direct claims are made by 16 and 17 year olds, victims of domestic abuse etc.

Customer Services/Reception

- Vulnerable adults, some with complex needs, may visit the Civic Centre/Gateway with service requests or seeking help.
- Procedures should be in place to deal with people with special or specific needs such as mental health issues which impact on their ability to communicate effectively.
- Often Customer Services/Reception officers will be required to escort from the Civic Centre vulnerable adults or families who have made service requests but where it has been identified that no council service provision is to be made. Officers are to use this policy to recognise and report broader safeguarding issues as they are identified than perhaps the original service request (i.e. a resident's needs may require a number of different services and therefore before requiring someone to leave consider other relevant/potential needs).

Appendix 4: Service responsibilities

Planning Regeneration & Development Management

- Planning and enforcement employees, in their day-to-day site visits may become aware of needs or welfare issues.
- Specifically, officers should ensure that all contracts and grants to organisations are required to demonstrate that they have in place an appropriate Safeguarding Policy as a condition of financial support.

Leisure/public health activities

Staff, volunteers and contractors who provide or administer the following services will have various degrees of contact with children and vulnerable adults:

- Leisure Centres;
- Public health programmes via the Gr@nd;
- Healthy living activities and programmes in the community;
- Community events and attractions;
- Play facilities;
- Parks and gardens.

The council's Leisure Centre management contractors and the Gr@nd's officers are key partners in identifying potential abuse to children and vulnerable adults and this policy should be advertised accordingly to provide a direct link to their individual Safeguarding duties and policies.

Housing

All Housing employees (and partners delivering aspects of the council's housing services) are well placed to observe situations that may warrant referral:

- Day-to-day contact with families and tenants, may become aware of needs or welfare issues that they can either tackle directly (for instance, by making repairs or adaptations to homes) or by assisting the family in accessing help through other organisations.
- Homelessness officers play a front line emergency role managing re-housing or repossession when adults and children become homeless or at risk of homelessness including formal reporting procedures when homelessness as a result of abuse.
- Housing Officers who interact with tenants, often in their homes, have a direct line of potential intelligence into safeguarding concerns.
- Complaints received from tenants in the Private Rented Sector may uncover safeguarding issues, e.g. Houses of Multiple Occupation, that require investigation.

Environmental Health/Licensing

- Environmental Health officers may become aware of conditions that impact adversely on a child or vulnerable adult – particularly through investigations / response to complaints.
- Under Part 1 of the Housing Act (2004), authorities will take account of the impact of health and safety hazards in housing on vulnerable occupants, including children, when deciding on the action to be taken by landlords to improve conditions.
- Employees need to be especially aware of the risk of neglect, emotional abuse and domestic abuse.
- Licensing officers have a duty to consider the welfare and protection of children and vulnerable adults when making licensing decisions, and report any safeguarding breaches (suspected or otherwise) of owners and officers of licensed premises and for taxi licensing functions (Hackney/Private Hire).

Appendix 4: Service responsibilities

- The council's waste and recycling service is a key service in identifying potential areas of concern to children and vulnerable adults.

Community Safety

- Through Police intelligence received at the daily tasking and co-ordination meetings with the Police, KCC Community Wardens, Housing Association and other partner agencies. Will help the council fulfil a multi-agency approach in response to suspicions of abuse to children or vulnerable adults.
- Officers working to reduce anti-social behaviour should liaise with other organisations to reduce unacceptable activities and be particularly mindful that children and vulnerable adults can be the target of serious anti-social behaviour, physical and sexual abuse.
- Multi-agency Gravesham Families First (Troubled Families project) – involves regular contact with both vulnerable children and adults. Many of these families are experiencing multiple issues, for example unemployment, absence from school, involvement in anti-social behaviour or involved with Children's Specialist Services.

Procurement

- In overseeing the tender process for council contracts, the Procurement service will work with officers seeking to procure a service that potentially has a direct impact on children or vulnerable adults. There is a commitment for the lead officer (commissioner) to outline in the appropriate specification the requirement for details of relevant safeguarding arrangements and polices for review in the determining of the tender application.
- Procurement processes should also include steps to mitigate against the risk of certain forms of abuse e.g. modern slavery, being present within its supply chains.

Appendix 5: Photography and filming consent form

Project:

For the purposes of Gravesham Borough Council's marketing and publicity material, I give permission for a photograph of:

Name 1: Age:
PRINT NAME

Name 2: Age:
PRINT NAME

Name 3: Age:
PRINT NAME

Name 4: Age:
PRINT NAME

Signed.....

Date: Print

Name:

Address.....

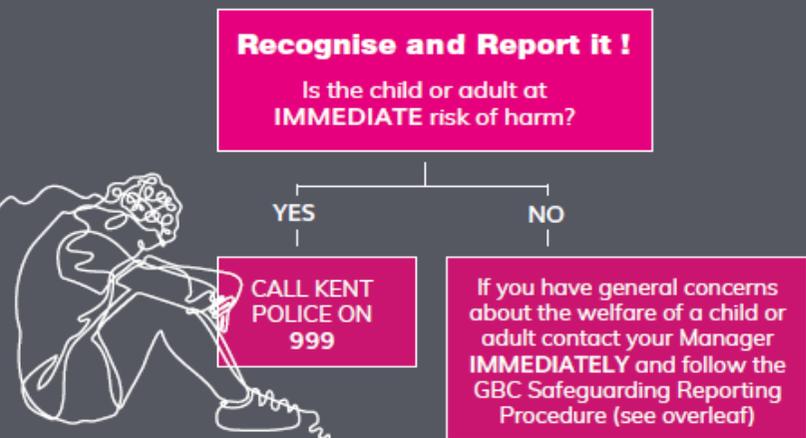
(A parent or guardian must give authorisation for children under the age of 18)

NOTE: Names and ages of children will only be printed with your consent. Addresses and other personal details will remain confidential.

NOTE: All images and details will be maintained in line with data protection regulations. All participants have the right to withdraw consent for the use of their image at a later point.

SAFEGUARDING GRAVESHAM - Protecting children and vulnerable adults

Safeguarding Children and Vulnerable Adults



Safeguarding Champions

Designated Safeguarding Officer: Melanie Norris
01474 337324

Natalie Brown
01474 337440

Kudu Omogbai
01474 337175

Kath Donald
01474 337809

Mark Lees
01474 337651

Sean Steer
01474 337178

Liz Read
01474 320123

Charlotte Collins
01474 337374

Georgia Roche
01474 337187

Jackie Denton
01474 337725

Lynn Wilders
01474 337817

Jane Gutteridge
01474 33 7501

Sharon Temme-Powell
01474 337192

Sharon Anderson
01474 337416



Contact the KCC Central Duty Team on:

Child: 03000 411111

Adult: 03000 416161

Out of office hours:
03000 419191

Email:
social.services@kent.gov.uk

Further information can be found at:
www.gravesham.gov.uk/safeguarding

GBC's Safeguarding Reporting Procedure



STAGE 01

Do you suspect someone/yourself is being abused?
OR
Has someone told you about an incident of abuse?

- 1 After consulting with your Manager, email the Safeguarding Champions with the case details at: safeguarding@gravesham.gov.uk
- 2 The Safeguarding Champions will consider the case and provide any supporting intelligence with a recommended course of action.

STAGE 02

When to make a referral

- 1 Following consultation with the Safeguarding Champions, to make a referral you should immediately complete the Inter-Agency Referral Form.
- 2 If you would like further advice before submitting a referral you have the option to consult the KCC Central Duty Team. All forms emailed to KCC should also be emailed to the Safeguarding Champions.

STAGE 03

Follow-up action

- Have you heard back from KCC within 72 hours of your referral?
- Yes - contact Safeguarding Champions and advise on case outcome.
 - No - contact KCC Centre Duty Team for an update. Advise Safeguarding Champions on eventual case outcome.

It is YOUR responsibility, as the referring officer, to ensure Gravesham Borough Council fulfils its statutory obligation to receive confirmation that KCC has considered your referral.

Please note that Safeguarding champions may change from time to time, so for latest info please check the intranet

For more information on Safeguarding visit:
www.gravesham.gov.uk/safeguarding

Appendix 7: Notification and referral forms

Appendix 7 sets out the key considerations (e.g. disclosures from the public, intervention thresholds) and forms required for completion (e.g. notifications) as part of any safeguarding referrals that are to be made.

Stage 1: Initial notification and considerations

- **Guidance notes for officers when dealing with a 'disclosure':** These guidance notes provide some considerations for dealing both with someone disclosing information relating to a safeguarding and also when seeking to report an incident of abuse or safeguarding concern.
 - Do:**
 - Stay calm.
 - Provide a listening ear and an open mind.
 - Be reassuring, particularly that the individual is doing the right thing by telling you.

 - Record the information you are provided with and report as quickly as possible to your line manager and the Safeguarding Champions. This information will potentially be passed to an external agency and should include a record of the time, date and persons present.
 - Don't:**
 - Promise to keep the information secret. Make it clear that you have a duty to refer the matter on.
 - Stop the individual who is freely recalling significant events. ○ Make the individual tell anyone else. S/he may have to be formally interviewed later and it is important to minimise the number of times information is repeated.
 - Make any suggestions to the individual about how the incident may have happened.
 - Question the individual, except to clarify what they are saying.
 - Discuss the information with anyone other than your line manager, a Safeguarding Champion or an appropriate external agency.

- **Threshold criteria**

Abuse of children can take many forms. [Kent support levels guidance](#) includes illustrative examples about how need may present itself for formal intervention. It can help to decide whether to refer a child and whether the child will meet either the 'child in need' or 'child protection' thresholds:

- **Child in need:** the child is unlikely to achieve or maintain a reasonable standard of health or development or development is likely to be significantly impaired (section 17 of the 1989 Children Act).

- **Child protection:** where a child has suffered or is likely to suffer significant harm, through neglect, physical, emotional or sexual abuse (section 47 of the 1989 Children Act).

The Inter-Agency Threshold document explains the signs and symptoms that may be consistent with abuse and illustrates good practice when working with children.

Stage 2: Further investigation and/or making a referral

- [Kent Child Safeguarding Referral Form](#) Once you/your line manager have decided to make a formal referral, following consultation with the Safeguarding Champions and, potentially, the Kent County Council Central Duty Team, the Child Protection Form must then be completed and forwarded to the Kent County Council Central Duty Team within two working days.
- [Kent Adult Safeguarding Alert Form](#): Once you/your line manager have decided to make a referral following consultation with the Safeguarding Champions and, potentially, the Kent County Council Central Duty Team, this form is to be used to report concerns of possible adult abuse against an individual.

NOTE: The more information received at the first point of contact, the more likely it is that appropriate services will be delivered at the earliest opportunity to help children and vulnerable adults.

NOTE: For both elements, if you need to contact social services outside of normal office hours, for example during the night, call **03000 419191**.

NOTE: There are separate procedures in place for referrals relating to the Modern Slavery, PREVENT and domestic abuse agendas, and also for young people caring for adult family members. Please consult Appendix 2, or contact the Safeguarding Champions for further details.

Appendix 8: Accountability framework - key contacts

Appendix 8 provides a list of key points of contact that will be of use in fulfilling the reporting procedure set out in this Safeguarding Policy.

Safeguarding role	Service/Job title	Contact
Chief Executive Officer		Stuart Bobby
Designated Safeguarding Officer	Director of Communities	Melanie Jorris
Lead Safeguarding Officer	Lead Safeguarding Officer	Natalie Brown
Safeguarding Champions	Customer Services	Jackie Denton
	Community Safety Unit	Kath Donald & Sean Steer
	Direct Service Organisation	Jane Gutteridge
	Environmental Health & Licensing	Mark Lees
	Housing	Lynn Wilders
	Supported Housing	Kudu Omogbai
	The Gr@nd	Liz Read
	Revenues and Benefits	Sharon Temme-Powell & Sharon Anderson & Georgia Roche
	Human Resources	Charlotte Collins
Data Protection Officer	Information Governance Manager	Gayle Jones

Referrals:

KCC Central Duty Team:

Children: **03000 411111** / Adults: **03000 416161**

Out of hours: **03000 419191** email:

social.services@kent.gov.uk

KCC Local Authority Designated Officer Team: 03000 410888

Police: Emergency: 999 Non-emergency – general enquiries: 101

Appendix 8: Accountability framework - key contacts

Other external agencies

Imago: 0300 111 1110 / <http://www.imago.community/Children-and-Young-People/Kent-Young-Carers>

Crimestoppers: 0800 555 111 / <https://crimestoppers-uk.org/>

Modern Slavery: 0800 0121 700 / <https://www.modernslaveryhelpline.org>

UK Visas and Immigration: 01303 247 088 / Kent&Sussex@homeoffice.gsi.gov.uk

National Domestic Violence Helpline: 0808 2000 247 / <http://www.nationaldomesticviolencehelpline.org.uk/>

Domestic Abuse (support services in Kent): <http://www.domesticabuseservices.org.uk/> **NSPCC:**

0808 800 5000 / <http://www.nspcc.org.uk/>

Child Exploitation and Online Protection Centre: 0870 000 33 44 / <https://www.ceop.police.uk/>

Shelter: 0808 800 4444 / <http://www.shelter.org.uk/>

Porchlight: 0800 567 76 99 / <http://www.porchlight.org.uk/>

Citizen's Advice Bureau: 01474 878 639 / <http://www.citizensadvice.org.uk/>

Kent and Medway Safeguarding Adults Board: <http://www.kent.gov.uk/about-the-council/partnerships/kent-and-medway-safeguarding-adults-board>

Kent Safeguarding Children Board: <http://www.kscb.org.uk/policies.aspx>

