



# **Safeguarding**

## **Children, Young People and Adults at Risk**

### **Policy and Guidance**

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## Introduction

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Babergh and Mid Suffolk District Councils (B&MSDC) recognises that it plays a vital role in keeping people safe across our districts and is committed to working in partnership with others to safeguard children and young people and adults at risk. The Councils provide a range of services and facilities to the community, the nature of the provision means inevitably employees (permanent, temporary, or contracted), councillors and volunteers of the organisation will meet children, young people, adults at risk and their families in a variety of settings.

The Councils will raise awareness of safeguarding issues to ensure that the needs and interests of children, young people and adults at risk are incumbent in decision making processes and through service provision.

In so doing B&MSDC acknowledges it is not its responsibility to investigate whether a child, young person or an adult at risk is in need or that abuse has taken place but that all employees and councillors should:

- take responsibility for reporting disclosures, concerns, incidents or allegations as set out in the Safeguarding reporting flowchart – **Appendix C**
- treat all Safeguarding matters seriously
- be aware of and adhere to relevant policies; and
- complete Safeguarding training relevant to their role.

The Councils will provide communication and training to ensure councillors and employees know the referral criteria and that employees' concerns are received and understood.

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## Purpose and Scope

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The purpose of this document is to ensure that an overarching approach to safeguarding is embedded across the councils, identifying roles and responsibilities of employees, councillors, and volunteers. This policy will outline the procedures to be adopted by both councils in ensuring the safety of children, young people, and adults at risk.

This Policy applies to all services within the scope of B&MSDC. In addition to employees and councillors, it also applies to organisations delivering on behalf of both Councils, including contractors, agency staff, volunteers, suppliers, consultants and grant funded organisations.

In accordance with the Children and Social Care Work Act 2017, councils working together across Suffolk deliver the corporate parenting principles. Corporate parenting is a term used to recognise that local authorities have a legal duty to support care leavers making the transition from care into adulthood. Local authorities have a responsibility to ensure that young people know what services are available to care leavers. The act improves support for looked after children and care leavers, promotes the welfare and safeguarding of children and makes provisions about the regulation of social workers. Information is available on the [support for care leavers](#) being offered by Suffolk County Council.

This Policy aims to ensure the council protects the welfare of all children, young people and adults at risk 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 adults at risk 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 and Elected Members, 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 as part of the annual Section 11 audit and any associated procedures on a regular basis.

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## Definitions

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Safeguarding is a term used to describe the function of protecting people's health, wellbeing and right to live free from harm, abuse or neglect.

For the purpose of this policy and accompanying guidance, the following definitions apply:

**Safeguarding Adults** – is defined in the Care Act 2014 as protecting an adult's right to live in society, free from abuse and neglect and working together to prevent and stop both the risks and experiences of abuse or neglect, while at the same time making sure that the adult's wellbeing is being promoted.

The Care Act was published in 2014, setting out a clear legal framework on the protection of adults at risk of abuse or neglect. The Act adopts a person-centred approach.

**Safeguarding and promoting the welfare of children** is defined in ['Working Together to Safeguard Children'](#) 2018 as:

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

The guidance sets out the legislative requirements and expectations placed on individual services within local authorities.

For the purpose of this policy an adult is someone aged 18 or over and a child or young person is defined as anyone who has not yet reached their 18<sup>th</sup> birthday.

**Adverse Childhood Experiences (ACEs)** – are stressful events occurring in childhood, including, domestic abuse, parental separation or divorce, a parent with a mental health condition, being the victim of abuse or neglect, a member of the household being in prison, a member of the household experiencing alcohol and drug problems. ACEs have been found to have lifelong impacts on health and behaviour

**Children & Young people** is defined as anyone who has not yet reached their 18<sup>th</sup> birthday.

**A young person** is aged between 18 and 25 who are covered by the Children and Families Act 2014 and the Care Act 2014.

**An adult at risk** of abuse or neglect is defined as someone aged 18 or over who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs - is unable to protect themselves.

This applies even if the adult may be receiving what may be thought of as a 'children' or 'young people's' service.

## 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 meet 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. This will be the responsibility of the police and or Suffolk County Council Safeguarding team.

Safeguarding concerns will usually fall into one or more of these categories: and could happen to any child, young person or adult at risk. Several different types of abuse may be being committed at the same time.

There are four categories of abuse relating to Children and ten categories for adults as defined within Working Together to Safeguard Children, the Children's Act 1989 and Care Act 2014:

<b>Types of Abuse – Children</b> (Source: Working Together to Safeguard Children 2018 and Children's Act 1989)	<b>Types of Abuse – Adults</b> (Source: Care Act 2014)
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<ol style="list-style-type: none"> <li>1. Neglect</li> <li>2. Emotional</li> <li>3. Physical</li> <li>4. Sexual</li> </ol>	<ol style="list-style-type: none"> <li>1. Physical</li> <li>2. Sexual</li> <li>3. Psychological</li> <li>4. Self-Neglect</li> <li>5. Modern Slavery</li> <li>6. Domestic Violence</li> <li>7. Neglect/Acts of Omission</li> <li>8. Financial/Material</li> <li>9. Discriminatory</li> <li>10. Organisational</li> </ol>
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A summary of signs and indicators is included below as a guide and is not exhaustive.

Type of abuse	Description	Possible indicator(s)
<b>Emotional or psychological</b> - Emotional acts or behaviour resulting in distress or trauma	<ul style="list-style-type: none"> <li>• Bullying, intimidation, manipulation</li> <li>• Humiliation, shaming and ridicule Control or coercion</li> <li>• Deliberate isolation</li> <li>• Deprivation</li> <li>• Threats of harm or abandonment</li> </ul>	<ul style="list-style-type: none"> <li>• Disturbed sleep and tendency to withdraw</li> <li>• Loss of confidence</li> <li>• Loss of appetite, loss of weight</li> <li>• Anxiety, confusion</li> <li>• Extreme submissiveness</li> <li>• Changes in behaviour</li> <li>• Excessive craving for attention</li> <li>• Self-abusing behaviour, selfharming</li> </ul>
<b>Sexual</b> – Direct or indirect involvement with sexual activity, under duress or without consent / ability to consent	<ul style="list-style-type: none"> <li>• Rape</li> <li>• Indecent assault</li> <li>• Indecent exposure</li> <li>• Exposure to inappropriate material</li> </ul>	<ul style="list-style-type: none"> <li>• Unexplained changes in behaviour</li> <li>• New tendency to withdraw</li> <li>• Recent development of overly sexual behaviour</li> <li>• Deliberate self-harm</li> <li>• Incontinence / bed wetting</li> <li>• Disturbed sleep patterns</li> <li>• Discomfort in walking</li> <li>• Unexplained bruising, injuries in personal areas</li> <li>• Excessive washing</li> <li>• Stained or torn clothes</li> <li>• Sexually transmitted or urinary tract infections</li> <li>• Pregnancy</li> </ul>
<b>Physical</b> Non accidental infliction of force resulting in injury or impairment	<ul style="list-style-type: none"> <li>• Inflicted physical injury not satisfactorily explained</li> <li>• Injury where it is known or suspected that it was inflicted intentionally or through lack of care</li> <li>• Assaults, hitting, slapping, pushing, kicking, burns, abrasions, fractures, welts,</li> </ul>	<ul style="list-style-type: none"> <li>• Injury that is inconsistent with explanation given</li> <li>• Cowering and flinching</li> <li>• Bruises/ marks</li> <li>• Abrasions, especially to wrists and / or ankles</li> <li>• Unexplained burns, scalds or fractures</li> <li>• Hair loss in one area</li> </ul>

	<ul style="list-style-type: none"> <li>• mutilation, wounds or marks of physical restraint</li> <li>• Misuse of medication or medical processes</li> <li>• Inappropriate restraint</li> </ul>	<ul style="list-style-type: none"> <li>• Frequent minor incidents without seeking help</li> <li>• Unusually sleepy or docile</li> <li>• Frequently moving GP or care providers Emotional distress, low self esteem</li> </ul>
<b>Neglect or acts of omission</b> – Ignoring or withholding physical or medical care to the detriment of wellbeing	<ul style="list-style-type: none"> <li>• Failure of a person who has responsibility, care or custody to provide access to health, social or educational care services (unintentional or deliberate)</li> <li>• Withholding necessities of life, including nutrition, medication, heating, shelter</li> <li>• Failure to intervene</li> </ul>	<ul style="list-style-type: none"> <li>• Poor hygiene or cleanliness</li> <li>• Unkempt or unsuitable clothing for the weather conditions/ environment</li> <li>• Untreated illness</li> <li>• Dehydration, weight loss, malnutrition, hunger</li> <li>• Repeated infections</li> <li>• Unexplained trips/ falls</li> <li>• Incontinence issues not addressed</li> <li>• Inconsistent or reluctant contact with health or social care agencies</li> <li>• Withholding needed items such as hearing aids, glasses, medication etc</li> </ul>
<b>Financial</b> – Unauthorised or fraudulent obtaining and improper use of funds, property or resources	<ul style="list-style-type: none"> <li>• Misuse or misappropriation of property, possessions or benefits</li> <li>• Theft, fraud, exploitation</li> <li>• Pressure in connection with wills, property or inheritance</li> <li>• Extortion of money, property or possessions by threat, coercion or fraudulent means</li> <li>• Refusal to let the vulnerable person have access to their own money, property or possessions</li> </ul>	<ul style="list-style-type: none"> <li>• Unexplained or sudden inability to pay bills</li> <li>• Unexplained or sudden withdrawal of money from accounts</li> <li>• Personal possessions of value go missing without explanation</li> <li>• Contrast between known income and actual living conditions</li> <li>• Someone responsible for paying bills is not doing so</li> <li>• Unusual interest by a relative, friend or neighbour in financial assets</li> <li>• Where services are refused under pressure from potential beneficiaries</li> <li>• Unusual purchases unrelated to the known interests of vulnerable person</li> </ul>
<b>Institutional</b> – When the culture of the organisation, such as a care or medical facility, doesn't prioritise care	<ul style="list-style-type: none"> <li>• Abuse due to imposing rigid and insensitive regimes or routines</li> <li>• Poor practices embedded in systems</li> <li>• Unskilled or untrained staff</li> <li>• Intrusive or evasive interventions</li> <li>• Environment allowing inadequate privacy or comfort</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of or inappropriate care plans</li> <li>• Contact with the outside world not encouraged</li> <li>• Restricting visitors</li> <li>• Not accounting for individual preferences</li> <li>• Lack of choice or consultation</li> <li>• Lack of privacy</li> <li>• Subdued behaviour</li> <li>• Lack of personal clothing/ belongings</li> <li>• Strong smell of urine, linen not changed regularly</li> <li>• Furniture positioned to restrict movement</li> </ul>

<p><b>Discriminatory</b> – When values, beliefs or culture result in a misuse or power that denies opportunities</p>	<ul style="list-style-type: none"> <li>• Unequal treatment</li> <li>• Inappropriate use of language</li> <li>• Exclusion</li> <li>• Harassment</li> </ul>	<ul style="list-style-type: none"> <li>• The vulnerable person is subject to racist, sexist, gender or homophobic abuse or relating to their age, illness or disability</li> <li>• Not meeting cultural or religious needs</li> <li>• Imposing unwanted political, cultural or religious beliefs</li> <li>• Acts or comments motivated to harm or intimidate</li> <li>• Inciting others to commit abuse</li> <li>• Lack of effective interpreter provision</li> </ul>
<p><b>Digital exploitation</b></p>	<ul style="list-style-type: none"> <li>• Increased exposure to online activities due to World Pandemic</li> <li>• Negative influences</li> <li>• Promotion of hateful views, for example through conspiracy theories</li> </ul>	<ul style="list-style-type: none"> <li>• Exploring new and unusual websites, chat forums and platforms. Harmful influences may push individuals towards platforms with a greater degree of anonymity.</li> <li>• Joining new or secret groups since isolation.</li> <li>• Speaking with new friends or being secretive about chats during online gaming or in forums.</li> <li>• A strong desire to seek new meaning, identity and purpose.</li> <li>• Using language, you wouldn't expect them to know.</li> <li>• Watching, sharing or creating films online linked to religious, political or racial hate.</li> <li>• Becoming increasingly argumentative or refusing to listen to different points of view.</li> </ul>

\*It is important to recognise the early signs of self-neglect through such indicators as related changes that result in functional decline, cognitive impairment, frailty or psychiatric illness because these can increase the individual's vulnerability to abuse, neglect and exploitation as well as increase the potential for developing a number of underlying health conditions.

**Domestic Abuse** is 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.

**Female Genital Mutilation (FGM)** - A collective term used for illegal procedures, such as female circumcision, which includes the partial or total removal of the external female genital organs, breast ironing or injury to the female genital organs for a cultural or non-therapeutic reason.



**Forced Marriage** - In a forced marriage, victims are coerced into marrying someone against their will. They may be physically threatened or emotionally blackmailed to do so. It is an abuse of human rights and cannot be justified on any religious or cultural basis.

It is not the same as an arranged marriage where people have a choice as to whether to accept the arrangement or not. The tradition of arranged marriages has operated successfully with many communities and countries for several years.

**Honour Based Abuse** - Honour based abuse is a term used to describe harmful behaviours used to control and punish a member of a family or social group to protect cultural and religious beliefs, in the name of honour.

**Modern Slavery (including human trafficking)**- Encompasses slavery, human trafficking, domestic servitude and forced or compulsory labour. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**PREVENT** Prevent is one part of the government's overall counter-terrorism strategy, CONTEST. The aim of Prevent is to, tackle the causes of radicalisation, respond to the challenges that terrorist ideology may present, provide early intervention to safeguard and support those most at risk of radicalisation and to support those who have already engaged in terrorism to disengage and rehabilitate.

Section 26 of the Counter Terrorism and Security Act 2015 placed a duty on specified agencies including district councils to have "due regard to the need to prevent people from being drawn into terrorism".

**Criminal Exploitation (county lines and gangs)**- The way street gangs exploit vulnerable younger adolescents, in both the major cities and the destination locations, to distribute narcotics across large areas of the country.

**Child Sexual Exploitation** A form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive 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. The victim may have been exploited even if the sexual activity appears consensual. Child exploitation does not always involve physical contact; it can also occur through the use of technology.

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## **Roles and Responsibilities**

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The council is committed to ensuring that any vulnerable person who comes into contact with an employee, volunteer or any aspect of the council's activities feels safe and protected, is listened to and has their views taken into account.

[The Children Act 2004](#) places a statutory obligation on District/Borough Councils to ensure they have in place suitable arrangements to safeguarding and promoting the welfare of children (either

directly or via their families) who may access or use Council services. In summary, the Act requires the Council to ensure that:

- a) Its functions are discharged with due regard to the need to Safeguard and promote the welfare of children; and
- b) Through working with others, arrangements are put into place to Safeguard and promote the welfare of children.

The council requires all employees, volunteers and councillors in the organisation to understand their responsibility to share concerns about the welfare of any vulnerable person with the designated Safeguarding Officer. Designated officers are there essentially to provide advice, guidance and support when a referral or allegation is made. The council will endeavour to equip appointed officers with the necessary skills, information and confidence to carry out this role.

The legislation Working Together to Safeguard Children 2018 sets out that the three safeguarding partners (local authority, Chief Officer of Police and Integrated Care Boards) must work together with relevant agencies to safeguard and protect the welfare of children. All three partners have equal and joint responsibility for local safeguarding arrangements. In Suffolk, the new Suffolk Safeguarding Partnership arrangements came into force on 29 September 2019.

The council's housing and homelessness services have a duty under Section 11 of the Children Act 2004. Any person working on behalf of the council in these services may become aware of conditions that could have or are having an adverse impact on children. Part 1 of the Housing Act 2004 sets out that authorities must 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. Housing authorities have an important role to play in safeguarding vulnerable young people, including young people who are pregnant or leaving care or a secure establishment.

BMSDC's is responsible for a variety of licensing functions and ensuring sufficient measures are in place to promote the licensing objective of 'protection of children from harm' in particular when licensing premises under the Licensing Act 2003 or the Gambling Act 2005. In relation to the licensing of hackney carriages and private hire, under the Police and Crime Act 2017, the Secretary of State for Transport has issued statutory guidance on exercising taxi and private hire vehicle licensing functions to protect children and vulnerable adults who are over 18 from harm when using these services. As a result, the licensing authority has a statutory duty to have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children.

The council accepts responsibility for ensuring its employees, volunteers, councillors, partners and contractors are aware of this policy and guidance. It is also responsible for ensuring that employee, volunteer and councillor concerns about the welfare of children, young people and adults at risk are received and acted upon.

Even though many councillors, employees and contractors have limited contact with children and adults with needs for care and support as part of their duties and responsibilities, everyone should be aware of the potential indicators of abuse and clear about what to do if they have concerns.

#### **Internal staff**

**Deputy Chief Executive** - has overall accountability for Safeguarding in relation to paid services and is the Suffolk District and Borough Council Representative on the Local Safeguarding Partnership's Children's Board.

**Designated Safeguarding Lead Officers** - Suffolk Safeguarding Partnership requires B&MSDC to appoint named Safeguarding Leads. The names and officer details are set out below:

<b>Safeguarding Lead Names</b>	<b>BMSDCs Role and Contact details</b>	<b>Role in Safeguarding</b>
Kathy Nixon	Deputy Chief Executive Tel No. 01449 724964	Babergh and Mid Suffolk Representative on the Strategic Safe and Strong Communities group  Raise the profile, support the policy and promote the development of services to ensure the protection of children and young people and adults at risk.
Vicky Moseley	Corporate Manager Communities. Tel No. 01449724642	Review the policy each year issuing operational guidance and promoting good practice and making policy recommendations to Senior Leadership Team.  Provide advice, guidance and support when a referral or allegation is made.  Contribute to the Section 11 audit.
Rachael Young	Assistant Manager-Community Safety and Resilience. Mobile No. 07599 102586	Review the policy each year issuing operational guidance and promoting good practice and making policy recommendations to Senior Leadership Team.  Provide advice, guidance and support when a referral or allegation is made.  Co-ordinate the annual Section 11 Review and the 3-year comprehensive audit to Suffolk Safeguarding Partnership.  Development of an annual safeguarding action plan.  Responsible for planning and implementing training to all councillors and retaining a log of all training.
Victoria Bond	Prevention and Homelessness Lead. Tel No. 01449 724972	Review the policy each year issuing operational guidance and promoting good practice and making policy recommendations to Senior Leadership Team.

		<p>Provide advice, guidance, and support when a referral or allegation is made.</p> <p>Contribute to the Section 11 audit.</p> <p>Development of an annual safeguarding action plan.</p>
Suzanne Hughes	Human Resources Tel No. 01449 724631	<p>Responsible for administering the Councils Recruitment Policy and Induction, including DBS checks.</p> <p>Responsible for planning and implementing training for all employees and retaining a log of all staff training and refresher dates.</p> <p>Provide advice, guidance, and support when a referral or allegation is made.</p> <p>Contribute to the Section 11 audit.</p>
Ifty Ali	Human Resources and Law & Governance Tel No. 01449 724694	Responsible for ensuring relevant policies and procedures are in place and kept up to date e.g., Recruitment, Whistleblowing, Disciplinary Procedures and Code of Conduct.
Ian Rafferty	Community Safety Team Tel No. 01449724679	Provide advice, guidance, and support when a referral or allegation is made.
Peter Watson	Community Safety Team Tel No. 01449 724627	Provide advice, guidance, and support when a referral or allegation is made.
Taiwo Ajayi	Community Safety Team Tel No. 01449724951	Provide advice, guidance, and support when a referral or allegation is made.
Rachel Cattermole	Communities Team Tel No. 01449724952	Provide advice, guidance, and support when a referral or allegation is made.
Susannah Farrer	Housing Solutions Team Tel No. 01449 724974	Provide advice, guidance, and support when a referral or allegation is made.
Mikaila Hopley-Poole	Housing Solutions Team Tel No. 01449724975	Provide advice, guidance, and support when a referral or allegation is made.

## Councillors

The Councils are committed to ensuring that its Councillors are appropriately trained and are aware of their safeguarding responsibilities and those of the two authorities. This includes awareness of the Council's safeguarding duties under Section 11 of the Children Act 2004 and The Care Act 2014. The Portfolio Holders for Communities hold the position of Member Champion for Safeguarding and are responsible for promoting the importance of safeguarding amongst all Members.

All Councillors are required to adhere to this policy. If a safeguarding issue occurs relating to a Councillor, the Officer or Councillor informed of the breach should contact the Monitoring Officer or Deputy Monitoring Officer. Where there is evidence of illegal activity, the Councillor will be reported to the relevant authorities and may face criminal investigation.

### **Senior Leadership Team**

The Senior Leadership Team (SLT), with support and advice from the Assistant Manager for Community safety and the Safeguarding Leads, will:

- encourage, embed, and maintain up to date safeguarding practice across all services and teams to ensure continuous improvement and compliance with national and local policies.
- ensure that the Safeguarding of Children and adults at risk or adults with needs for care and support are considered in strategies, plans and services.
- ensure all future contracts include Safeguarding provision in line with this Policy and make current contractors aware of this Policy.
- ensure that Safeguarding requirements are set out for organisations making grant applications for services involving children and adults with needs for care and support. Please see Procurement and Commissioning Safeguarding agreement at **Appendix A**
- support staff on all aspects of Safeguarding and ensure procedures are adhered to as set out in this Policy
- ensure Staff complete the appropriate Safeguarding training and attend the 3 -year refresher training

### **External agencies**

#### **MARAC (Multi Agency Risk Assessment Conference)**

A Multi Agency Risk Assessment Conference (MARAC) is a victim focused information sharing and risk management meeting attended by all key agencies, where high risk cases are discussed. The role of the MARAC is to facilitate, monitor and evaluate effective information sharing to enable appropriate actions to be taken to increase public safety. In a single meeting, MARAC combines up to date risk information with a timely assessment of a victim's needs and links those directly to the provision of appropriate services for all those involved in a domestic abuse case: victim, children and perpetrator.

#### **MASH (Multi Agency Safeguarding Hub)**

The MASH has been developed to ensure close working arrangements between relevant agencies to ensure referrals and referrers get the right response first time. The MASH receives and processes all child and adult safeguarding contacts via Customer First, in addition to providing a Professional Consultation Line for professionals to speak with a member of staff from the MASH to discuss the most appropriate course of action for any concerns.

#### **Suffolk Safeguarding Partnership (SSP)**

The Suffolk Safeguarding Partnership (SSP) is a multi-agency partnership that works to protect children, young people and adults at risk of harm, neglect and exploitation in Suffolk.

The Partnerships consists of senior officers nominated by each of the main agencies who will be responsible for developing and maintaining strong and effective inter agency protocols to safeguard children, young people and adults at risk from neglect and exploitation,

Members of the SSP include Suffolk County Council's Adult and Community Services (ACS), Suffolk County Council's Children and Young Peoples Services, Integrated Care Boards (ICBs), Suffolk Constabulary, all statutory agencies in Suffolk involved in Safeguarding Adults and children, including NHS providers, District and Borough Councils, Suffolk County Fire and Rescue Service, independent and voluntary sector providers, advocacy services and Lay representation.

They bring a range of knowledge, experience, and expertise under the leadership of an Independent Chairperson.

The role of the SSP is to provide guidance and support as well as challenge and scrutiny of safeguarding practice.

Please see the website: [www.suffolksp.org.uk](http://www.suffolksp.org.uk)

### **Procurement and third-party service providers.**

The council commissions, 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.

All suppliers and contractors are required to demonstrate their commitment to and understanding of safeguarding. This includes robust safeguarding procedures, a comprehensive safeguarding policy, staff training and clear reporting procedures. All commissioned services/organisations that deliver services directly with children need to sign a declaration form to declare all staff and volunteers working with them hold a current DBS check no older than three years and that they have completed safeguarding training. A monitoring system of safeguarding arrangements is in place as part of the commissioning process.

### **Procurement & Commissioning**

It is the role of the Procurement and Commissioning Team to ensure that suppliers understand their role in relation to Safeguarding including modern slavery in supplier chains and they take appropriate action to identify and address potential risks. **Please see APPENDIX A & B.** Any safeguarding risks including modern slavery will be managed via the contract manager.

### **Leisure Centres**

In Partnership with B&MSDC, Abbeycroft Leisure manage the leisure centres in the Babergh District; Kingfisher Leisure Centre and Hadleigh Pool and Everyone Active manages the leisure centres in the Mid Suffolk District Councils; Mid Suffolk Leisure Centre and Stradbroke Swimming Pool and Fitness Centre. Each of the four leisure centres manages and monitors Safeguarding training for all staff employed at the leisure centres where workers are likely to come into contact with children or adults with needs for care and support and should adhere to the B&MSDC Safeguarding Agreement.

The Assistant Manager- Community Safety and Resilience is responsible for obtaining safeguarding training quantitative and qualitative data from each of the leisure centres on an annual basis for inclusion of the annual SSP Section 11 Audit.

### **Grant applications**

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 adults at risk may wish to adopt the councils Safeguarding Policy and procedures if deemed suitable.

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### **Safe Recruitment Practices**

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The council will take all reasonable steps to ensure unsuitable people are prevented from working or volunteering in settings that bring them into close direct contact with children or adults at risk. The Protection of Freedoms Act 2012 has scaled back the requirement to undertake disclosure and barring service (DBS) criminal record checks, to focus on those working unsupervised or in regular close contact with vulnerable people.

Where a post is identified as requiring a DBS check and the new employee does not already hold a valid DBS check, the council will undertake a DBS check as part of its recruitment process. DBS checks will be reviewed in line with our 'Disclosure and Barring Service (DBS) and Employment of Ex-Offenders Policy'.

Human Resources will:

- ensure the effective implementation of the Councils' Recruitment Policy and Induction and that all staff employed who as part of their duties, may be required to work with children and adults with needs for care and support are subject to the appropriate external checks including Disclosure and Barring Service checks (DBS), prior to appointment.
- hold details on a database of all posts within the Councils', the date each postholder completed Safeguarding Adult and Safeguarding Children training and run reports from the database as to which postholders have/have not attended Safeguarding training or refresher training (every 3 years).
- ensure that relevant policies and procedures are in place and kept up to date e.g. Recruitment and Disciplinary Procedures.
- support managers in the use of these policies
- contribute to the annual Section 11 Review and 3- year comprehensive review.

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### **Safeguarding Training**

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BMSDCs Human Resources team alongside managers are responsible for ensuring all staff and councillors are aware of their obligation to undertake Safeguarding training. This is to ensure they are well informed, trained, supervised and supported so that they are better able to identify potential indicators of abuse, less likely to become involved in actions that may cause harm to children and adults at risk and are less likely to do anything which could put themselves at risk or

may be misinterpreted. HR manage and monitor staff and councillor attendance in relation to Safeguarding training.

All staff are required to complete the Level 2 Safeguarding Children training and the Introduction to Safeguarding Adult training and the refresher training every 3 years.

All councillors are required to complete the Combined Safeguarding Adult, Children and Young People training and the refresher training every 3 years.

## Information Sharing

Babergh and Mid Suffolk District Councils has signed up to the Suffolk Information Sharing Agreement. If you are in any doubt about information sharing, speak to a Safeguarding Lead Officer or BMSDCs Information Governance Officer.

There are 7 Golden Rules:

1. **Remember that the Data Protection Act is not a barrier to sharing information** but provides a framework to ensure that personal information about living persons is shared appropriately.
2. **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with who information will or could be shared and seek their agreement unless it is unsafe or inappropriate to do so.
3. **Seek advice** from the information governance lead, if you are in any doubt, without disclosing the identity of the person
4. **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 places a child, young person or adult at risk of significant harm. You will need to base your judgement on the facts of the case
5. **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
6. **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.
7. **Keep a record of your decision and the reasons** – 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.



The Data Protection Act 2018 controls how organisations, business and governments use personal information. It is through this act that the General Data Protection Regulation (GDPR) was implemented by Government.

## **Recording and Reporting Concerns**

In the event that an employee, volunteer or councillor has grounds to be concerned about the welfare of a vulnerable person, they should act immediately.

When a vulnerable person is making a disclosure, they will be informed of their right to talk to an independent person, for example social services, about any possible abuse. This is of particular importance where the allegation concerns a council employee.

The council has adopted the procedures set out by Suffolk County Council for reporting concerns with information provided in the following links:

[Report Abuse of an Adult](#)

[Reporting a Child at Risk of Harm, Abuse or Neglect](#)

[Suffolk Safeguarding Partnership Concerned Page](#)

If a child, young person or adult at risk is at immediate risk of significant harm, dial 999 as in any emergency.

Should an employee, volunteer, contractor or councillor be dissatisfied with how the council has responded to an incident, allegation or concern, they may report their concerns directly to the MASH or the police.

Where an employee, volunteer or councillor is dissatisfied with how a professional in a partner agency has dealt with their concerns regarding a child or young person, they may raise these by using the Suffolk Local Safeguarding Partnership's Escalation Process, details of which can be found at [www.suffolksp.org.uk](http://www.suffolksp.org.uk)

The first step when considering escalating concerns should be to discuss the matter with the council's Designated Safeguarding Officer. However, the first key principle in any dispute should be that it is everyone's professional responsibility to problem solve and come to an agreed resolution at the earliest opportunity, always keeping in mind the child's or vulnerable adult's safety and welfare.

## **Safeguarding Allegations**

### **Local Authority Designated Officers (LADO)**

The role of the LADO – allegations against people in the position of trust.

'Working Together to Safeguard Children' refers to local authorities having a designated officer, or a team of designated officers involved in the management and oversight of allegations against people that work with children. For Suffolk, the LADOs are employed by Suffolk County Council (SCC).

Allegations against professionals refers to allegations that a professional, in the course of their work (including volunteering) with children has behaved in a way that has harmed a child or may have harmed a child. All such allegations should be referred to the LADO (Local Authority Designated Officer).

The role of the LADO:

- The LADO has management and oversight of the investigation process from beginning to end following an allegation against people in a position of trust who work with children.
- The LADO is not the decision maker – this remains with the employer, but they will provide advice and guidance to employers and voluntary organisations, liaise with police and other agencies and monitor progress of cases to ensure they are dealt with as quickly as possible, consistent with a fair and thorough process.
- The LADO process applies to everyone who works or volunteers with children.

Local Authority Designated Officers can be contacted for allegations against all staff and volunteers via:

Email on [LADO@suffolk.gov.uk](mailto:LADO@suffolk.gov.uk) or LADO central telephone number 0300 123 2044

### **Whistleblowing**

The Councils have a Whistleblowing policy which should be read in conjunction with this policy.

All employees have a duty of care to draw attention to bad or poor practice in the workplace. This includes practice that may be abusive and/or neglectful.

This Safeguarding Policy is intended to supplement, rather than to replace the Whistleblowing Policy whereby employees of the Councils and other persons may raise complaints or matters of concern with the Council. It may also be followed where reports are made of Safeguarding allegations against staff suspected of wrongdoing or malpractice that they reasonably believe is in the public interest.

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### **Section 11 Review**

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The Suffolk Safeguarding Partnership (SSP) have a remit to ensure that there are effective arrangements in place to protect children, young people and adults at risk from harm. This self-assessment is designed to provide partner agencies with the opportunity to highlight areas of strength, as well as to identify areas for development, in respect of their duties and responsibilities for safeguarding children, young people and adults at risk.

The Self-Assessment Tool is a yearly review of safeguarding practice, which will help partners, identify strengths and weaknesses and to develop an action plan to further enhance their effectiveness.

The Annual Review will enable the SSP to provide a level of scrutiny and monitoring across the partnership and the review will feed into the priorities for the SSP Business Plan.

BMSDCs have a statutory duty to undertake the annual Section 11 Review. This is completed and presented by a Safeguarding Lead for Community Safety with input from several service areas at BMSDCs and externally from the leisure providers and contractors.

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## Policy Review

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BMSDCs will review this policy every four years or as appropriate in light of significant legislative changes.

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## Further Information

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### In relation to Adults:

Suffolk Safeguarding Partnership  
[www.suffolksp.org.uk](http://www.suffolksp.org.uk)

Suffolk County Council – adult safeguarding  
<https://www.suffolk.gov.uk/care-and-support-for-adults/protecting-people-at-risk-of-abuse/adult-abuse-and-safeguarding/>

Suffolk Mental Capacity Act and DOLS website:  
<https://www.suffolk.gov.uk/mca>

The Care Act 2014 – Care and Support statutory guidance (safeguarding)  
<https://www.gov.uk/guidance/care-and-support-statutory-guidance/safeguarding>

SCIE Adult Safeguarding questions:  
<http://www.scie.org.uk/care-act-2014/safeguarding-adults/adult-safeguarding-practice-questions/>

### In relation to Children:

National Society for the Prevention of Cruelty to Children  
[www.nspcc.org.uk](http://www.nspcc.org.uk)

Child Exploitation Protection – Online  
[Home » Suffolk Safeguarding Partnership \(suffolksp.org.uk\)Reporting a child at risk of harm, abuse or neglect \(safeguarding\) | Suffolk County Council](#)

# Appendix A

## Procurement and Commissioning Safeguarding Agreement

### Contents

1. Key personnel
2. Declaration
3. Purpose of the Agreement
4. Child Protection/Safeguarding Adults Policies
5. Training
6. Supervision and Safeguarding
7. Management of Allegations
8. Monitoring
9. Sub-Contracting
10. Attestation

### 1. Key Personnel

Person	Role
<b>Project Commissioning Officer</b>	The person who is responsible for the commissioning of the party undertaking the works / services and is ultimately responsible for their performance under the contract.
<b>Supplier</b>	The party undertaking the relevant works and/or services, the undertaking of which is subject to this safeguarding schedule.
<b>Contract Manager</b>	The person who has been appointed by the Project Commissioning Officer to manage the project and undertake the project manager /contract administrator duties under the contract formed with the party undertaking the works / services.

### Other Key Terms

Person	Role
<b>Children</b>	Is anyone who has not yet reached the official minimum school leaving age (MSLA).
<b>Young Person</b>	Any person aged under 18 years
<b>Adult at risk</b>	Any person aged over 18 years

### 2. Declaration

At the commencement of the Contract / Framework Agreement, or at any stage during the Contract / Framework period if as a result of an amendment, and prior to any works or services being undertaken, the **Supplier** will sign and return this agreement to: **the Project Commissioning Officer**

The **Supplier** shall comply with the requirements of this safeguarding Schedule.

### 3. Purpose of Agreement

The **Supplier** must ensure they have robust and well managed safeguarding arrangements in place. The safeguarding arrangements must be compliant with the current and in force regulations and legislation. It is the **Supplier's** responsibility to ensure all staff and volunteers employed, engaged or working under the directions of the **Supplier** (the "Employees") are safely recruited, trained, managed and supervised to ensure compliance with the above-mentioned requirements.

This Schedule will be held as part of the safeguarding arrangements for the Council to fulfil its duties to safeguard and protect Children, Young People and Adults at risk. This agreement will be renewed on an annual basis to ensure that it remains current and up to date.

### 4. Child Protection/Safeguarding Adults Policies

The **Supplier** shall have a Safeguarding Policy in place with detailed procedures, covering the protection / safeguarding of Children, Young People and Adults at risk, for:

- Safer recruitment and selection
- Training, including induction
- Supervision and Safeguarding Procedure
- Management of allegations against staff and making referrals
- Whistleblowing

The **Supplier** shall ensure that all Employees and Volunteers have read and understood the policies and guidance that are in place.

The **Supplier** shall keep a register of all Employees and against each Employee the **Supplier** shall record the policies which the Employee has been given copies of and the date such policies were provided to the Employee. The **Supplier** shall also ensure the Employee signs and dates the register to attest the fact that they have read and understood such policies.

Babergh and Mid Suffolk District Councils (BMSDCs), may at any time require additional checks for contracts undertaken on premises where Children, Young People or Adult who may be vulnerable are, or might be present (e.g. Leisure Centres) as detailed below.

For all positions that fall within the definition of Regulated Activity as currently set out within the Safeguarding Vulnerable Groups Act 2006 (and as amended by the Protection of Freedoms Act 2012), the **Supplier** shall be required to carry out an Enhanced Disclosure and Barring Service Check either, depending on the specific facts, with or without a check of the barred lists.

The Disclosure and Barring Service provides clear guidelines relating to posts that fall within definition of Regulated Activity and that are eligible for an Enhanced Disclosure.

Unless specifically permitted under the terms of the **Supplier's** employment, the **Supplier** shall not be entitled to any additional payment from Babergh and Mid Suffolk District Councils for carrying out the checks.

The **Supplier** shall carry out checks to a commensurate standard to the ones required for all UK nationals for Employees that are not UK Nationals. In circumstances where the **Supplier** is

prevented, for reasons outside of their control, from obtaining commensurate checks then the **Supplier** shall inform Babergh and Mid Suffolk District Councils and carry out such checks as the Councils may reasonably require.

Information, advice and guidance relating to criminal record checking; positive disclosures and suitability decisions; providing services prior to a **Supplier** receiving a disclosure and any legislative changes as a result of the recent Protection of Freedoms Act (2012) can be obtained from HR.

In addition, **Suppliers** are required to liaise with and comply with any on-site policies that are in place. Where such policies conflict with the requirements set out within this document the **Supplier** shall notify **Contract Manager** and the **Contract Manager** shall inform the **Supplier**, in writing, which policy takes precedence. The **Supplier** shall not be entitled to any additional payment from Babergh and Mid Suffolk District Councils for compliance with the on-site policies.

## 5. Training, including induction

As a minimum, training/inductions should always include an explanation of the organisation's safeguarding policies including the context and implementation; this will usually be carried out during staff induction and will be supported by regular refresher sessions. Training for all staff and volunteers should cover:

- being aware of the importance, and their responsibility in appropriately sharing their concern where they are worried that a Child, Young person or Adult who may be vulnerable may be suffering, or at risk of, abuse or neglect;
- being aware of how to record and report concerns when concerned about the behaviour of a colleague/ member of staff;
- understanding and being able to implement safe working practices for individual workers;
- knowing who in the organisation has lead responsibility for safeguarding.

**Suppliers** are required to ensure all Employees have undertaken appropriate and up to date training, including where required to comply with all relevant legislation. The **Supplier** will keep a record that details all Employees and against each Employee the **Supplier** shall record the policies which the Employee has been given copies of and the date such policies were provided to the Employee. This record can be requested at any time by Babergh and Mid Suffolk District Councils.

## 6. Supervision and Safeguarding Procedure

When working on the delivery of this contract / framework agreement, the **Supplier** shall comply with all current and in force statutory guidance for their sector and any site-specific policies that are in place.

The **Supplier** shall comply with the Procurement and Commissioning Code of Conduct shown in **Appendix B**

## 7. Management of allegations against staff and making referrals

If the **Supplier** is working in environments where Children, Young People or Adults who maybe venerable are present, they must be mindful of the Suffolk Safeguarding Partnership Safeguarding and Child Protection Procedures 'managing allegations' procedures.

<https://www.suffolksp.org.uk/working-with-children-and-adults/children/policies-procedures-and-guidance-children-and-young-people/>

Additionally, Employees must be made aware of the process for seeking advice and guidance or making referrals to the Multi Agency Referral Unit (MARU) service detailed in Appendix B and the **Supplier** shall keep a centralised register evidencing this fact.

The **Supplier** must have a clear procedure in place for handling concerns/allegations of abuse or neglect.

Responsibility for compliance rests with the contracted organisation which should have a named senior manager, identified in the Safeguarding Policy, to whom all allegations should be initially referred.

## **8. Monitoring Arrangements**

Where the Supplier is working on a site which is not their own; the site representative shall be responsible for monitoring the safeguarding arrangements in place for any project taking place on the site for which they are responsible against that sites safeguarding policy.

Babergh and Mid Suffolk District Councils will monitor the safeguarding arrangements of **Supplier's** should it be felt necessary or proportionate to the risk.

All **Supplier's** policies shall be regularly reviewed and updated to ensure they capture the most recent and in-force guidance, compliance and legislative requirements

Further safeguarding checks may be undertaken and information requested from the **Supplier** as Babergh and Mid Suffolk District Councils deems appropriate

The **Supplier** shall forward any statutory safeguarding report[s] to Babergh and Mid Suffolk District Councils within 48hrs of such report being created and/or received by the **Supplier**.

## **9. Subcontracting Arrangements**

Both those directly employed or engaged by the **Supplier**, including sub-Contractors, shall comply with the above requirements.

It is the **Supplier's** responsibility to ensure that all subcontractors have in place a commensurable safeguarding policy and procedure as detailed above or that the subcontractor adopts the policy and procedure of the primary **Supplier** for the duration of their work on this contract.

The **Supplier** is liable for the performance of all subcontractors appointed by them. Any failure by the subcontractor to comply with the requirements of this Schedule shall be deemed a failure by the **Supplier**.

## **10. Attestation**

### **Supplier's Agreement to Schedule**

On behalf of the organisation stated below, I hereby agree to comply with contents of this document and to complete all the required checks in respect of all workers deployed to work under this agreement and that I will provide Babergh and Mid Suffolk District Councils with the information required.

**Name of organisation** \_\_\_\_\_

**Name** \_\_\_\_\_

**Position held** \_\_\_\_\_

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

**Agreement to Schedule**

Signed on behalf of Babergh and Mid Suffolk District Councils.

**Name of organisation:** Babergh and Mid Suffolk District Councils

**Name** \_\_\_\_\_

**Position held** \_\_\_\_\_

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_



## Appendix B

### Babergh and Mid Suffolk Councils Code of Conduct for suppliers

#### Please Display on Site

Please help us to ensure the safety of our service users by ensuring that all personnel working on the project are notified of and comply with this code of conduct. It is the responsibility of all adults to safeguard and promote the welfare of Children, Young People and Adults who may be vulnerable. The Supplier is asked to ensure that any person directly employed by them (or through each sub-Contractor) or any volunteer acting on behalf of the supplier agrees to comply with the following:

- a) Sign in and out of site each day in the notebook/work log provided (where appropriate to do so).
- b) Work safely and take responsibility for own actions and behaviour.
- c) Avoid any contact with persons which would lead any reasonable person to question your motivation and intentions.
- d) Unless during contract delivery; avoid all contact with Children, Young Person or Adults, who may be vulnerable.
- e) NEVER give your personal contact details to children, young people or adults who may be vulnerable, including your mobile phone number. Contact via social network sites is also unacceptable.
- f) Work and be seen to work, in an open and transparent way.
- g) Stay within the agreed work area and access routes (where appropriate)
- h) Keep your Employer informed of where you are and what you are doing.
- i) Do not use profane or inappropriate language.
- j) Dress appropriately, i.e. dress in a way that:
  - Is unlikely to be viewed as offensive, revealing or sexually provocative
  - Does not distract, cause embarrassment, or give rise to misunderstanding
  - Is absent of any political or contentious slogans
  - Is not considered to be discriminatory and is culturally sensitive

**REMEMBER: Your actions, however well intended could be misinterpreted. Be mindful of the need to avoid placing yourself in vulnerable situations**

**Identification:** A suitable means of identification for all Employees / sub-Contractors / visitors, should always be agreed by the Supplier in advance of contract commencement and be worn.

Signed Supplier: \_\_\_\_\_

At pre-contract meeting on (insert date): \_\_\_\_\_

## Appendix C

### Flowchart for reporting concerns

Babergh and Mid Suffolk District Councils

# Safeguarding

children, young people and adults at risk flowchart for reporting concerns

