Appendix 1

South Northamptonshire Council
Safeguarding Children and Vulnerable Adults

Policy and Procedures

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1. Introduction

1.1 This policy is for all employees and councillors who may come into contact with children and vulnerable adults in the course of their work, whether it is in someone’s home, on council premises or in the community. Contractors, volunteers or other organisations working on behalf of the council will also have regard to this policy on the basis that if we were to receive a concern relating to their organisation we will follow this procedure.

1.2 This Policy will inform you what abuse is, the signs to look out for and what actions to take. You are advised to read it and keep it somewhere safe and accessible in case you need it.

1.3 South Northamptonshire Council (SNC) is a statutory agency of the Northamptonshire Safeguarding Children’s Board and Northamptonshire Safeguarding Vulnerable Adults Board. This Policy takes into account the guidelines and recommendations of both and as such employees and councillors should follow the procedures laid out in this document.

1.4 Section 11 of the Children Act 2004 is supported by a Common Assessment Framework which is a national standard assessment. Its purpose is to assess the additional needs of children and young people at an early stage to facilitate early identification, intervention, inter-agency referral and multi-agency working.

1.5 The policy of the Northamptonshire Safeguarding Vulnerable Adults Board states that: “Safeguarding is a shared responsibility for everyone including statutory, independent and voluntary agencies as well as every citizen. We will work to alleviate it together and if we know or suspect that a vulnerable adult is being abused will do something about it. Doing nothing is not an option”.

If you have any concerns you should write down what you have seen or heard that has given you concern; keep the document safe and confidential and contact one of SNC’s Designated Safeguarding Officers as soon as possible. An incident report form can be found on SNC’s intranet and is available at http://www.lscbnorthamptonshire.org.uk/reporting_concerns_home.html
2. Policy Statement

2.1 South Northamptonshire Council recognises that in providing services for children and vulnerable adults we have a moral and legal obligation to ensure a duty of care. We are committed to ensuring that all children and vulnerable adults are protected and kept safe from harm whilst engaged in all of our services.

2.2 SNC will ensure that:
- All employees and councillors involved in working with children and vulnerable adults implement good working practices to ensure a safe and healthy environment;
- All employees and councillors are aware of safeguarding issues both in the context of organised activities and within the home and community;
- Standard procedures are in place to protect the child or vulnerable adult when suspected abuse or actual abuse is reported;
- All employees providing services for children and vulnerable adults understand these procedures;
- When abuse is reported, it is recognised that the safety of the person at risk is paramount;
- We respond to any allegations of misconduct or abuse of children and vulnerable adults in line with this policy and procedures, Local Area Safeguarding Board procedures and where appropriate the relevant disciplinary and appeals procedures.

2.3 SNC recognises that in providing services for children and vulnerable adults there is a need to provide and maintain a high degree of physical and emotional wellbeing. We will implement the following procedures:
- ensure all employees and councillors are aware of the safeguarding children and vulnerable adults policy and procedures;
- ensure employees, councillors and members of the public can effectively report concerns about children and vulnerable adults at risk;
- operate sound recruitment and selection procedures for employees to ensure suitability for working with children and vulnerable adults;
- identify and enable appropriate welfare protection training to take place for employees who work with children and vulnerable adults;
- demonstrate best practice in ensuring the safety of children and vulnerable adults.

2.4 Principles underpinning this policy and procedures

This policy and procedures are based on the following principles:
- The welfare of children and vulnerable adults is the primary concern.
- All children and vulnerable adults irrespective of their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual orientation have the right to protection from abuse.
- It is everyone's responsibility to report any concerns about abuse.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.
- The term vulnerable adult can include people with learning disabilities, older people (irrespective of age), people with physical or sensory disabilities, people with mental ill health, people with certain physical illnesses or people with drug or alcohol problems.
- The term parent is used as a generic term to represent parent, carer or guardian.
- The terms employees and councillors are used to refer to SNC staff, elected members, agency workers/contractors, volunteers and anyone working on behalf of, delivering a service for, or representing the Council.
3. Recruitment and Selection of Employees

3.1 The Council’s CRB policy ensures there has been CRB clearance for employees in posts on the list agreed by Appointments and Personnel Committee. These posts are those which may involve employees being in sole charge of children or vulnerable adults.

3.2 The CRB policy must be adhered to and sets out clear guidelines for recruitment. The CRB policy should be read in conjunction with this Safeguarding Children and Vulnerable Adults Policy.

4. Training

4.1 Raising awareness and training is a crucial element for helping employees and councillors meet their responsibilities towards safeguarding children and vulnerable adults.

4.2 Councillors will be made aware and provided with a Copy of this Policy and Procedures as part of the induction process organised by HR and Democratic Services.

4.3 The Human Resources Team is responsible for arranging a dedicated training programme for employees. There are two levels of awareness/training which respond to the specific types of contact employees have with children and vulnerable adults.

4.4 New employees will be provided with a basic understanding of the principles and their responsibilities towards safeguarding children and vulnerable adults via this Safeguarding Policy and a Safeguarding presentation. This will form part of the induction process for which is organised by HR. Line managers will also be responsible for discussing safeguarding responsibilities relevant to the job, as part of the local induction for new employees (or agency workers/contractors).

4.5 Northamptonshire County Council facilitates a range of training courses for employees who work with or have contact with children and adults during the course of their role. Topics covered include definitions of abuse, types of abuse and managing concerns. Training courses will be promoted via internal communication networks and staff will be encouraged to attend.

5. Definitions and Signs of Abuse

5.1 Recognising abuse is not easy but if you have any concerns that a child is subject to abuse or neglect, you must act to make sure that your concerns are looked into.

5.2 Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a person for whom they are caring.

5.3 Emotional abuse is the persistent emotional ill-treatment such as to cause severe adverse effects.
- It may involve conveying to children and vulnerable adults that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person.
- It may feature age or developmentally inappropriate expectations being imposed.
- It may involve causing children and vulnerable adults to frequently feel frightened or in danger, or their exploitation or corruption.

5.4 Sexual abuse involves forcing or enticing a person to become involved in any way in sexual activities, whether or not they are aware of what is happening.
• Activities may involve physical contact, including penetrative and non penetrative acts
• Sexual activities may also include non-contact activities such as involving a child in looking at, or producing, sexual activities or encouraging a child to behave in sexually inappropriate ways

5.5 **Neglect** is the persistent failure to meet basic physical and/or psychological needs, and is likely to result in the serious impairment of health or development. Neglect may involve failure to provide:

• adequate food, clothing or shelter
• protection from harm or danger
• access to appropriate medical care or treatment

It may also include failure to meet or respond to basic emotional needs or to ensure that educational needs are met.

5.6 **Child Sexual Exploitation** is illegal activity by people who have power over young people and use it to sexually abuse them. This can involve a broad range of exploitative activity from seemingly consensual relationships and informal exchanges of sex for attention, accommodation, gifts or cigarettes, through to very serious organised crime. Young people may be groomed by boyfriends or girlfriends – the young person may believe they are in a loving relationship; they can also be groomed by a family member, or friend of the family. Youngsters who are living with known sex workers can be at a higher risk. Because it usually involves secretive behaviour by the young person, sexual exploitation is difficult to recognise, however, there are some signs that a young person may be a victim of sexual exploitation:

• Running away-going missing
• Self-harming behaviours
• Exclusion from school or poor school attendance
• Physical symptoms such as sexually transmitted infection (STIs) or bruising suggestive of physical or sexual abuse
• Unexplained clothes, money or other gifts
• Substance, drug and/or alcohol abuse
• Poor relationship with family and peers
• Low self-esteem
• Having keys to unknown premises
• Being contacted by unknown adults or associating with older men
• Having more than one mobile phone or using different SIM cards

5.7 **Financial or material abuse**, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits of vulnerable adults.

5.8 The following factors should also act as indicators in situations of potential or actual abuse:

• unexplained or suspicious marks, bruises, fractures, burns/scalds or injuries to the mouth and eyes;
• poor physical condition or delayed speech and language development in children
• a change in behaviour or appearance;
• a statement by a child or person that he or she has been victimised;
• distrust of others, particularly those with whom a close relationship would normally be expected;
• difficulty making friends or socialising;
• prevention from socialising with other children, young people or adults.
It should be recognised that this list is not exhaustive and the presence of one or more of these indicators is not proof that abuse is actually taking place.

6. Operational Procedures and Responsibilities

6.1 A quick reference guide for dealing with concerns relating to child and vulnerable adult abuse is available at Appendix 1 of this document.

6.2 Responding to Disclosure, Suspicions and Allegations of Abuse

It is not the responsibility of SNC employees or councillors to decide whether or not abuse is taking place. False allegations of abuse do occur, although they are extremely rare. If a person says or indicates that they are being abused, or information is obtained which gives cause for concern that a person may be being abused, immediate action should be taken.

6.3 Confidentiality

Confidentiality is a key issue in safeguarding children and vulnerable adults. Whilst information generally should not be shared, it must be shared with appropriate agencies to ensure that a person is not left unprotected.

6.4 Information Sharing and Data Protection

Sharing information about children, young people and vulnerable adults is key to building up a picture of their needs, but it is important that information is shared in a way that respects individuals' and families’ rights.

Data protection law helps to strike a balance between the benefits of public organisations sharing information while maintaining safeguards around the privacy of the individual. The following guidance should help you to use your professional judgement to decide on when it’s appropriate to share information.

- Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living people 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. 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.
- Get permission to share confidential information 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 your 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 and others 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
  - Shared only with those people who need to have it
  - Accurate and up to date
  - Shared in a timely fashion
  - Shared securely
• Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decided to share, then record what you have shared, with whom and for what purpose.

6.5 Reporting Concerns

Employees and Councillors should record what they have seen or heard to cause concern; The Document should be kept safe and confidential and one of SNC’s Designated Safeguarding Officers should be contacted as soon as possible. Incident report forms are available on SNC’s intranet and on the internet at

http://www.lscbnorthamptonshire.org.uk/reporting_concerns_home.html

6.6 Designated Safeguarding Officers

The Designated Safeguarding Officers at SNC are:

Chris Rothwell
Head of Community Services
0300 003 0104 or 07875 078181 or extn 1722

Paula Judd
Community Development Manager
01327 322371 extn 2371

These officers are available to give advice to employees and Councillors and are required to:
• be familiar with protection procedures;
• ensure there are effective internal procedures to handle concerns;
• act as a link with other relevant agencies;
• attend appropriate training.

In the event that these officers cannot be contacted in an emergency, employees are advised to telephone the safeguarding teams at Northamptonshire County Council on 0300 126 1000 and report the incident to the DSO as soon as possible afterwards.

6.7 SNC has appointed a Lead Local Authority Designated Officer (LADO) to be involved in the management and oversight of individual cases. This LADO is responsible for:
• Ensuring that SNC operates procedures for dealing with allegations in accordance with the Northamptonshire Safeguarding Board’s guidance;
• Liaison with the Northamptonshire Safeguarding Boards on any issues.

SNC’s Lead Local Authority Designated Officer (LADO) is:

Chris Rothwell
Head of Community Services
Tel: 0300 003 0104 or 07875 078181 or extn 1722

6.8 Suspected Abuse or Bullying by Council Employees

If an allegation of abuse is made against an employee, the Council’s Grievance and/or Disciplinary Procedures will be followed and appropriate action taken.

All allegations of abuse against an employee must be reported to one of the Designated Safeguarding Officers. In cases involving employees in an allegation of sexual abuse, including the observing, handling or distributing of materials in any media that involve the sexual abuse of
children and vulnerable adults, the matter will be immediately referred to the police by the Designated Safeguarding Officer.

SNC assures all employees that it will fully support and protect anyone who, in good faith (without malicious intent), reports his or her concerns about a colleague’s practice or the possibility that a person may be being abused or bullied.

6.9 Allegations against an external member of the community

Employees and Councillors may come across cases of suspected abuse either through direct contact with children and vulnerable adults, for example, running a holiday activity or when visiting homes as part of their day to day work. It is not the responsibility of the employee or councillor to decide whether or not a child, young person or vulnerable adult has been abused. The employee or councillor does have a duty to report concerns and ensure that any relevant information is passed to the Designated Safeguarding Officer.

6.10 Child Death Review Process

If an employee or councillor becomes aware of the death or a child, young person or vulnerable adult in the course of their professional duties they should immediately contact the LADO, or if not available, one of the other Designated Officers.

The LADO will act as the first point of contact for any deaths of children and vulnerable adults that South Northamptonshire Council may be the first to be aware of and is responsible for ensuring that there is an effective response.

7. Code of Behaviour for Council Employees

7.1 This Code has been developed to help protect children and vulnerable adults, and to help employees identify any practices which could be mistakenly interpreted and perhaps lead to false allegations of abuse (although this is very rare). Good practice will also protect SNC by reducing the possibility of anyone using their role within the Council to gain access to children and vulnerable adults in order to abuse them, since all employees should report any breaches of this Code by any other member of staff that they may observe or of which they are made aware.

7.2 While it is not intended that this Code should restrict employees from the normal ways of working that are appropriate to their role e.g. comforting a distressed child or vulnerable adult or using touch to help with the correct positioning in sport; there is much which may give rise to misinterpretation. If in doubt, consider how an action may be perceived as opposed to how it is intended.

7.3 When you are working for SNC you do so in a position of trust by the public, who expect the highest standards from us. Employees should be aware that there are also rules and legislation which apply such as those forbidding staff from any sexual relationship with a child or vulnerable adult even if they are of, or above, the age of consent and in regard to the giving and receiving of gifts.

7.4 This code is issued under SNC’s protection procedures and you should always follow it. Employees working in the areas of sport and leisure should also comply with any County sports related procedures specific to their roles.

7.5 Basic guidance that is applicable to all employees:

- Develop a culture in which you feel comfortable enough to point out inappropriate attitudes and behaviours to each other
Always work with children and vulnerable adults in an open and transparent way. Your actions should be appropriate and safe in relation to the work you are undertaking.

Respect children and young adults at all times. Don’t discriminate or show signs of approval or prejudice.

Never let allegations by a child or vulnerable adult go unreported, including any made against you.

Never trivialise abuse.

7.6 Specific guidance for those working directly with children and vulnerable adults:

- The focus of your professional relationship with a child or vulnerable adult you have met through your work should always remain on work. The aim should never become to develop that into a friendship or personal relationship.
- Be aware that children and vulnerable adults do develop both heterosexual and homosexual infatuations towards adults working with them. If you become aware of this happening towards yourself, you should inform your manager and then respond to the situation in a way which maintains the dignity of all concerned.
- Consider your appearance at work. Adults working with children and vulnerable adults should dress decently and appropriately for the task they undertake, and the age group they work with.
- Never invite or allow a child or vulnerable adult you have met through your work into your home.
- Never give a child or vulnerable adult you have met through your work your personal contact details such as personal mobile number or email address.
- Avoid unobserved situations of one to one contact with a child or vulnerable adult. If it is unavoidable, always ensure another adult knows where you are, with whom and why.
- If you need to comfort a child or vulnerable adult who has become distressed it is important that you do so in a way which is both age appropriate and respects their personal space. Never act in a way which may be perceived as threatening or intrusive. Check with them before you act.
- Never agree to keep confidential any information relating to harm to a child or vulnerable adult. Always follow the procedures for reporting concerns.
- Do not offer to transport a child or vulnerable adult alone in your car.
- Never enter a child or vulnerable adults home unless there is a responsible adult present. Do not go in to wait for their return.
- Never make suggestive remarks or comments to or in front of a child or vulnerable adult or engage in or allow any sexually proactive games involving or observed by children or vulnerable adults, whether based on talking or touching.
- Don’t engage in or tolerate any inappropriate physical activity involving children or vulnerable adults or any bullying of a child or vulnerable adult by an adult, child or vulnerable adult.
- While the use of humour can help to diffuse a situation, the use of sarcasm, demeaning or insensitive comments to a child or vulnerable adult is never acceptable.

8. Procedures for Obtaining, Storing and Using Images of Children and Vulnerable Adults

8.1 Nationally and internationally there have been concerns about the risks posed directly to children, young people and vulnerable adults through the use of photographs on web sites and in other publications. Photographs can be used as a means of identification when they are accompanied with personal information. This detailed information may make a child or vulnerable adult accessible to an individual who may wish to start to “groom” them for abuse. Secondly the content of the photograph can be used or adapted for inappropriate use. There is evidence of this adapted material finding its way onto websites consisting of abusive images.
8.2 As an organisation committed to providing safe services and activities for children and vulnerable adults SNC has developed this guidance for the use of images on our website and/or in any publications we produce.

8.3 Staff will need to make decisions about the type of images they consider suitable and that appropriately represent the activity or service they are trying to promote without putting children and vulnerable adults at increased risk. They must always ensure that parents or guardians are aware of, and have formally agreed to the image being taken and how it will be used.

8.4 The rules to remember are:

- If the child or vulnerable adult is fully named and located, avoid using their photograph.
- If a photograph is used, avoid fully naming and locating the child or vulnerable adult.
- Never use an image of a child or vulnerable adult that has sexual connotations or overtones.
- Unless you are using professional models supplied by a reputable model agency, always obtain parental permission prior to using an image. This ensures that parents or guardians are aware of the way the image is going to be used to represent the Council or activity. A Permission Form is available at Appendix 3 of this document; it should be completed for any images of individual children or vulnerable adults that are being obtained for specific initiatives or events. See below for additional guidance relating to larger social events.
- To reduce the risk of inappropriate use, only use images of children or vulnerable adults in suitable dress. With regard to the actual content it is difficult to specify exactly what is appropriate given the wide diversity of activities offered by the Council. However there are clearly some activities – swimming, gymnastics and athletics for example when the risk of potential misuse is much greater than others. With these activities the content of the photograph should focus on the activity, not on a particular individual and should avoid full face and body shots. So for example shots of children in a pool would be appropriate or if poolside, waist or shoulder up.

8.5 First steps and things to think about

Establish the type of images that appropriately represent SNC and the activity being portrayed on the website. Apply an increased level of consideration to images of children and vulnerable adults used in the website as these can more easily be misused.

Think about the level of consideration you give to the use of images of children in other publications, for example, the processes involved in choosing images for a newsletter or magazine. What is the relevance of the image to the service or activity being shown? Does it reflect SNC’s respect for children and vulnerable adults?

8.6 Guidelines for use of photographers at events

- Provide a clear brief about what is considered appropriate in terms of content and behaviour.
- Issue the photographer with identification, which must be worn at all times.
- Ensure, for example through event publicity, that the public are aware that a photographer will be in attendance at a public event (no individual consent to either taking or publication of films or photographs at public events is required)
- Do not allow unsupervised access to children and vulnerable adults or one to one photo sessions at SNC events
- Do not approve/allow photo sessions outside the event or at a child or vulnerable adults home
8.7 Storage of and access to, images of children and vulnerable adults

Good data protection practice limits the normal period of retention of photos and consent forms to two years and we should not exceed this without good reason.

Images and consent forms/identifying information should not be stored together (most images are held electronically on the shared and can simply have a code relating them to the appropriate file which will be held by the Communications Manager. Anyone wishing to use that image for any purpose should contact the Communications Manager to ensure appropriate consent for such usage.

Consent forms will specify what the purpose will be used for and we must ensure that they are only used for this purpose. Any other use would require additional consent.

You should not reproduce for, or forward these images to any other person, including yourself, to be used in any other way either paper or electronically.
Appendix 1

Reporting Concerns about a Child or Vulnerable Adult

In an Emergency

If the child/vulnerable adult is in immediate danger or left alone you should contact the police directly on 101 and where in need of medical assistance also call an ambulance on 999.

Non Emergency

If you want to discuss your concerns or need advice e.g. if you are not sure whether your concerns are justified, you would like more information about issues of confidentiality or you would like to know what happens next (after you have reported your concerns) do one of the following

Either

Speak to one of SNCs Designated Safeguarding Officers

**Chris Rothwell**
Head of Community Services
0300 003 0104 or 07875 078181 or extn 1722

**Paula Judd**
Community Development Manager
01327 322371 extn 2371

Or

Speak to Northamptonshire County Council's Initial contact team on 0300 126 1000

Putting your concerns in writing

It is likely that you will be asked to put your concerns in writing so that they can be used to collate evidence.

**For children and young people**

use the Inter-Agency Referral Form which you can find in the Safeguarding Section of Nellie or via the link below

http://www.lscbnorthamptonshire.org.uk/reporting_concerns_home.html

**For vulnerable adults**

use the Adult Safeguarding Referral Form which is available via the following link

https://northamptonshire.firmstep.com/default.aspx/RenderForm/?F.Name=jveJqHjZc6r

Remember that in any event

Employees, volunteers, councillors or contractors carrying out work on behalf of SNC should inform one of the Designated Safeguarding Officers about any referrals that have been made in the course of their duties or which relate to SNC staff.
Appendix 2:

South Northamptonshire Council Consent Form for the Use of Images of Children and Vulnerable Adults

I/we, ........................................................................................................ the parent(s)/guardian(s) of:

(Child/vulnerable adults full name) ........................................................................................................

(Child/vulnerable adults full name) ........................................................................................................

(Child/vulnerable adults full name) ........................................................................................................

hereby give South Northamptonshire Council permission to use any still and/or moving image being video footage, photographs and/or frames and/or audio footage depicting those named above.

Taken by (name of photographer) ........................................................................................................

on behalf of South Northamptonshire Council on (date) .................................................................

at (place) ...........................................................................................................................................

for any of the following uses:

- Advertisements, marketing, leaflets, or any other use such as for training, educational or publicity purposes.

The above consents will apply throughout the world and be for an *indefinite period/expire on (date) ........................................... *delete as appropriate

Signed ........................................ Date .................................................................

Signed ........................................ Date .................................................................

Address .............................................................................................................................................

..........................................................................................................................................................

Postcode .............................................................................................................................................