

## Safeguarding Children and Adults at Risk Policy

### CONTENTS

- 1.0 Introduction**
- 2.0 Scope**
- 3.0 Recruitment, Employment of Staff**
  - 3.1 Introduction
  - 3.2 Pre-recruitment requirements and information
  - 3.3 DBS
  - 3.4 References
  - 3.5 Interview and induction
  - 3.6 Training
  - 3.7 Complaints procedures
- 4.0 Code of Ethics and Conduct**
  - 4.1 Do's and don'ts of working with children
  - 4.2 Do's and don'ts of working with adults at risk
  - 4.3 Use of photographic/filming equipment
- 5.0 Recognition of Poor Practice, Abuse and Bullying**
  - 5.1 Introduction
  - 5.2 Poor practice
  - 5.3 Abuse
  - 5.4 Bullying
  - 5.5 Action to be taken if bullying is suspected
  - 5.6 Abuse and adults at risk
- 6.0 Responding to Disclosure, Suspicions and Allegations**
  - 6.1 Introduction
  - 6.2 Responding to disclosure
  - 6.3 Responding to suspicions
  - 6.4 Allegations against staff
- 7.0 E-Safety**
- 8.0 Contractor / Provider Arrangements**
- 9.0 Implementation**

## 1.0 Introduction

1.1 All organisations that make provision for children and adults at risk must ensure that:

- the welfare of the child or adult at risk is paramount
- all children and adults at risk, whatever their age, culture, disability, gender, language, racial origin religious beliefs and/or sexual identity have the right to protection from abuse and neglect
- all suspicions and allegations of abuse and neglect will be taken seriously and responded to swiftly and appropriately
- all staff and volunteers working for Huntingdonshire District Council have a responsibility to report concerns to the appropriate officer

Staff and volunteers are not trained to deal with situations of abuse or to decide if abuse or neglect has occurred – that is the responsibility of professional safeguarding children and adults at risk experts.

## 2.0 Scope

This policy applies to all staff, Members and Volunteers within the Council.

For the purpose of this policy (irrespective of the age of consent for consensual sexual contact) the term child or children means, any child or young person under the age of 18 and is inclusive of staff and volunteers under the age of 18 (Children Act 1989, 2004).

For the purpose of this policy adults at risk are people who are, or may be, in need of community care services because of mental disability or other disability, age or illness, and who are, or who may be, unable to take care of themselves or unable to protect themselves against significant harm or exploitation (Care Act 2014).

## 3.0 Recruitment and Employment of Staff

3.1 All reasonable steps will be taken to ensure unsuitable persons are prevented from working with people including children and adults at risk. As far as possible, identical procedures will be carried out for all staff and volunteers.

### 3.2 Pre-recruitment requirements and information

The following procedures will apply prior to recruitment.

#### a) Advertising

When advertising to recruit staff or volunteers the advertisement will state:

- responsibilities of the role
- level of experience and any qualifications required
- the Council's pro-active approach to safeguarding of children and adults at risk

#### b) Applications

All applicants (including volunteers) for any positions will complete an application form from which the following information can be determined:

- name, address and National Insurance number (confirming identity and right to work)
- relevant experience, qualifications and details of any training undertaken
- any criminal convictions
- a self-disclosure question to reveal any history regarding action taken against them in relation to safeguarding of children and adults at risk
- At least two employment references who will be asked to comment on the applicant's previous experience of, and suitability to work with children and adults at risk. If the applicant is unable to provide two employment references, educational references, character reference details must be provided
- an explanation for any gaps in employment in the last five years (except volunteers)
- the applicant's consent to a relevant disclosure barring service (DBS) check

### 3.3 DBS

If a job role involves carrying out Regulated Activity (see appendix 2), Huntingdonshire District Council will require an Enhanced Disclosure prior to the individual undertaking any work, whether on a paid or unpaid basis. If there are to be any exceptions to this, a risk assessment must be undertaken and signed off by the Head of Service and the Managing Director.

If an employee/volunteer has joined the DBS update service and provides their consent to HDC, HDC will accept this in place of a new DBS check providing the online check confirms the original DBS is still valid. The original DBS certificate must be seen by HDC. If an employee/volunteer has had a DBS check with another organisation but is not registered with the update service, and is to be deployed into a role undertaking Regulated Activity with HDC, a new check will have to be conducted. If a volunteer has had a DBS check with HDC and then becomes employed by HDC, it may be possible to accept the previous DBS check, depending on how similar the roles are and providing that it is no longer than three years since the original certificate was issued. If there has been longer than three months a decision will be made by the relevant Head of Service in consultation with HR

DBS checks will normally be renewed every three years, although HDC may ask individuals to be re-checked more frequently than that.

It is the responsibility of the employee/volunteer to alert their manager or HR to any changes in their circumstances which may affect the information disclosed on their DBS check. Failure to do so may be considered a disciplinary offence.

If a positive trace is disclosed on a DBS check, a full risk assessment will be carried out before the individual is allowed to carry out any Regulated Activity. This will be conducted by the relevant manager in consultation with HR and signed off by the Head of Service.

### **3.4 References**

References covering the last five years employment history will be sought and at least one should be associated with working with children and young people/adults at risk (where applicable). Where less than two employment references can be obtained a minimum of two references shall be sought which will include educational or character references.

### **3.5 Interview and induction**

All potential employees and volunteers will be interviewed prior to appointment. The interviewer must have completed the appropriate training in recruitment and selection. For certain roles, evidence of qualifications must be provided – original documents to be produced. See Appendix 2

### **3.6 Training**

All staff and volunteers will undergo a formal induction at the commencement of employment which will include training in:

- Safeguarding Children and Adults at Risk (validated level 1) (this training is not compulsory for volunteers)
- Huntingdonshire District Council Safeguarding Children & Adults at risk Policy
- First Aid Arrangements
- Normal Operating Procedures and Emergency Action Plans (as appropriate)
- See Appendix 3

### **3.7 Complaints procedures**

Huntingdonshire District Council complaints and appeals procedures will be used to deal with any formal complaints and/or appeals. Managers will be sensitive to any concern about poor practice or abuse and act on them at an early stage.

## **4.0 Code of Ethics & Conduct**

Staff and volunteers working for Huntingdonshire District Council must always observe the following requirements where children and adults at risk are concerned

### **4.1 Do's and don'ts for working with children**

#### **DO:**

- remember the child comes first
- behave professionally

- treat everyone with respect
- communicate on their level
- listen to children
- be aware of policy and procedures
- report any suspicions in line with procedures outlined in this document
- be aware, approachable and understanding

**DON'T:**

- touch inappropriately
- use inappropriate language
- harm or frighten a child
- be alone if possible
- threaten or be aggressive, shout
- mistreat, demean, ignore, make fun of
- force a child to do something they do not want to do
- let a child expose themselves to danger
- take photographs of a child without the required permission

**4.2 Do's and don'ts of working with adults at risk**

**DO:**

- be respectful and professional
- listen and communicate
- use common sense – be caring, attentive and aware
- act in an appropriate manner
- be sympathetic to their needs
- be aware of policy and procedures
- know the appropriate contacts and act accordingly

**DON'T:**

- treat adults at risk as children
- be aggressive or physically restrain a person
- do anything of a personal nature that they can do themselves
- engage in inappropriate behaviour
- put yourself in a vulnerable position

**4.3 Use of photographic/filming equipment**

Photographs of people should only be used if written consent has been obtained from the adult, carer a parent, guardian, or, in the case of school groups the relevant school authority. Permission should be obtained for the taking of the photograph and for its reproduction. HDC marketing may from time to time take photographs which may be used as long as no individual can be identified by reason of any attached data.

Images or video recordings of children must be kept securely. Hard copies of images should be kept in a locked drawer and electronic images should be in a protected folder with restricted access. Images should not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones. Avoid using any personal equipment to take photos and recordings of children and use only cameras or devices belonging to the organisation.

Appropriate signage will be displayed in each of our buildings to advise customers of any site specific restrictions regarding taking photographs and video footage.

There is evidence that some people have used public events (sport in particular) as an opportunity to take inappropriate photographs or film footage of children and adults at risk at events in a manner that compromises their privacy and dignity. All staff should be vigilant about this possibility. Any concerns during an event should be reported to your manager or other responsible person without delay.

If a professional photographer or the press are invited to an event, it is important that they understand your expectations of them in relation to safeguarding of children and adults at risk. You should:

- provide a clear brief about what is considered appropriate in terms of their behaviour and the content of the photography
- issue them with identification which they must display at all times
- participants and parents must be informed that a photographer will be present at the event and ensure they complete a consent form to filming and/or photography and to its publication
- do not allow photographers unsupervised access to children or adults at risk, or one-to-one photo sessions during the event
- do not approve photo sessions outside the events or at a participant's home

## 5.0 Recognition of Poor Practice, Abuse & Bullying

### 5.1 Introduction

It is not always easy to recognise a situation where abuse may occur, or has already taken place – even for those experienced in working with children and adults at risk. The staff and volunteers at Huntingdonshire District Council are no exception but do have a responsibility to act if they have any concerns about the behaviour of someone (an adult or another child) towards a child or adult at risk. Huntingdonshire District Council will encourage and expect staff and volunteers to discuss any concern they may have about the welfare of a child or adult at risk with their line manager immediately.

### 5.2 Poor practice

Poor practice includes any behaviour that contravenes the adopted Code of Conduct to which all staff have signed and agreed to. This includes the rights and responsibilities of the child, young person, adult at risk, member of staff, parent, educator, coach, instructor and volunteers and respect for others, officials and their decisions, coaches and the rules of the activity in general.

### 5.3 Abuse

#### a) Children and adults at risk with a disability

There is significant research to suggest that children and adults with a disability are at increased risk of abuse. Various factors contribute to this; isolation from mainstream facilities and services, inequality of power, more reliant on personal and intimate care, limited mobility or a limited ability to communicate that abuse is taking place.

#### b) Abuse types

Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a child or adult regardless of their age, gender, race or ability. Abusers can be adults (male or female) and other young people, and are usually known to and trusted by the child or adult at risk and family.

There are four main types of abuse for children: **physical abuse, sexual abuse, emotional abuse** and **neglect**. The abuser may be a family member, or they may be someone the person encounters in residential care or in the community, including during sports, cultural and leisure activities. An individual may abuse or neglect a child directly, or may be responsible for abuse because they fail to prevent another person harming that child.

- **Physical abuse:** where adults or other young people physically hurt or injure children, including by hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating or drowning. This category of abuse can also include when a parent or carer reports non-existent symptoms of illness or deliberately causes ill health in a child they are looking after, as in induced illness.
- **Sexual abuse:** when adults (male or female) or other young people use children to meet their own sexual needs. This could include: full sexual intercourse; masturbation; oral sex, anal intercourse; fondling. Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.
- The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual

images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

- Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.
- Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Emotional abuse:** The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.
- It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
- **Neglect:** is when adults or carers fail to meet a person's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the child's health or development and well-being. For example, failing to provide adequate food, shelter and clothing, failing to protect a person from physical harm or danger, or failing to ensure access to appropriate medical care or treatment. Refusal to give children respect, love, affection and attention can also be a form of neglect.

### c) Indicators of abuse

Every person is unique, so behavioural signs of abuse and neglect will vary from person to person. In addition, the impact of abuse is likely to be influenced by the persons' age, mental capacity, the nature and extent of the abuse or neglect, and the help and support the person receives. However, there are some behaviours that are commonly seen in children and adults at risk who have been abused:

- the person appears distrustful of a particular adult or person with whom you would expect there to be a bond or relationship
- he or she has unexplained injuries such as bruising, bites or burns - particularly if these are on a part of the body where you would not expect them
- if he or she has an injury which is not explained satisfactorily or properly treated
- deterioration in his or her physical appearance, personal hygiene or a rapid weight gain or loss
- someone else expresses concern about the welfare of a person – either an adult or another young person
- a change in the persons' general behaviour, for example, they may become unusually quiet and withdrawn, or unexpectedly aggressive; such changes can be sudden or gradual
- if he or she refuses to remove clothing for normal activities or wants to keep covered up in warm weather
- if he or she shows inappropriate sexual awareness or behaviour for their age
- has difficulty making friends
- is prevented from socialising with other people

Remember that the above signs should be seen as a possible indication of abuse and not as a confirmation. Changes in a persons' behaviour can be the result of a wide range of factors. However, if you are concerned about the welfare of a child or adult at risk **you have a responsibility to act** on those concerns.

#### 5.4 Bullying

Bullying can be psychological, verbal, or physical in nature. It involves an imbalance of power in which the powerful attack the powerless, and occurs over time rather than being a single act. Examples of bullying behaviour include:

- being called names, insulted or verbally abused
- being deliberately embarrassed and humiliated by other people
- being made to feel different or like an outsider
- being lied about
- being physically assaulted or threatened with violence
- being ignored

Bullying may not always be carried out by a young person on another young person but in some cases may be being carried out by an adult or carer. For example:

- being deliberately embarrassed or humiliated
- being unfairly treated or verbally abused
- being ignored or not spoken to
- a parent or carer who pushes the person too hard

The damage inflicted by bullying is frequently underestimated. It can cause considerable distress to people of any age, to an extent that it affects their health, development and well-being, or in extreme cases, cause them significant harm (including self-harm).

#### 5.5 Action to be taken if bullying is suspected (children)

The procedures outlined below will be followed if bullying is suspected.

##### a) Actions to prevent bullying and to help the victim:

- take all signs of bullying seriously
- encourage the child to voice their concerns – create an open environment
- investigate all allegations and take action to ensure that the victim is safe
- speak with the victim and the bully(ies) separately
- reassure the young person but do not promise to keep things secret
- keep a written record of what is said and by whom
- report any concerns to the person in charge or the Designated Safeguarding Officer

##### b) Actions towards the bully:

- talk with the bully and explain the situation and try to get them to understand the consequences of their behaviour
- inform the bully's parents/carer
- provide support for the person in charge of the victim
- impose any necessary sanctions
- encourage the bully to change their behaviour
- regularly update the parents/carer to report progress
- inform all appropriate members of staff of the actions taken and to be taken
- keep a written record of any action taken

#### 5.6 Indicators of abuse and Adults at risk

There are eight main categories of abuse for adults:

- **Physical abuse:** Examples include: Slapping, pushing, kicking, rough handling, twisting of limbs/ extremities, misuse of medication, or inappropriate sanctions or restraint.
- **Sexual abuse:** Examples include: Rape and sexual assault or sexual acts to which the adult at risk has not consented, could not consent or was pressured into consenting. Non-contact abuse such as voyeurism, involvement in pornography.
- **Psychological / Emotional abuse:** Examples include: verbal assault or intimidation, emotional abuse, deprivation of contact verbal abuse, threats of harm or abandonment, humiliation or blaming, overriding of consent, choices or wishes, felling worthless, frightened or unloved.

NB: Psychological/emotional abuse will usually occur in conjunction with other forms of abuse.

- **Financial abuse:** Examples include: theft, fraud, exploitation, and pressure in connections with wills, property, possessions or benefits.
- **Neglect and acts of omission:** Examples include: ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Discriminatory abuse:** This abuse is usually motivated by discriminatory and oppressive attitudes towards race gender, culture background, religion physical and/ or sensory impairment, sexual orientation and age.
- **Institutional abuse, neglect and poor practice:** This may take the form of isolated incidents of poor or unsatisfactory professional practice at one end of the spectrum, through to persuasive ill treatment or gross misconduct.
- **Self neglect** has been recognised within the Care Act 2014 as part of the safeguarding framework

## 6.0 Responding to disclosure, suspicions and allegations

### 6.1 Introduction

False allegations of abuse do occur but children and young people rarely lie about abuse. However, if a child or adult at risk says or indicates that he/she is being abused, or information is gained which gives concern that a child or adult at risk is being abused, you should react immediately and follow the instructions included in this document.

### 6.2 Responding to disclosure

#### a) Action to take

If a child or adult at risk tries to talk to you about something that is worrying them, it is important to listen carefully and respond sensitively:

- if the child or adult at risk tells you about abuse they are experiencing, listen carefully to what they tell you or communicate
- do not ask direct questions: avoid who?, what?, when?, where?
- keep calm and even if you find what they are saying difficult or painful keep listening
- be honest with them - tell them you are not able to keep what they have told you secret and that you will try to find them the help they need
- ensure that you have a clear and accurate understanding of what has been said or communicated
- when they have finished make a detailed note in the log of concern form (see Appendix X (TBC)) of what they have said using their own exact words or communicated, what you have heard and what you have seen. Make sure that the notes are signed and dated and you record how long after the disclosure you made the record.
- This then needs to be reported to a designated safeguarding officer as soon as possible.

Remember that a child or adult at risk may not be able to communicate clearly to you or be unable to express themselves verbally. However, if there are any concerns regarding a child or adult at risk, record what has been observed in detail and follow the procedures below to report any concerns.

#### b) Actions to avoid

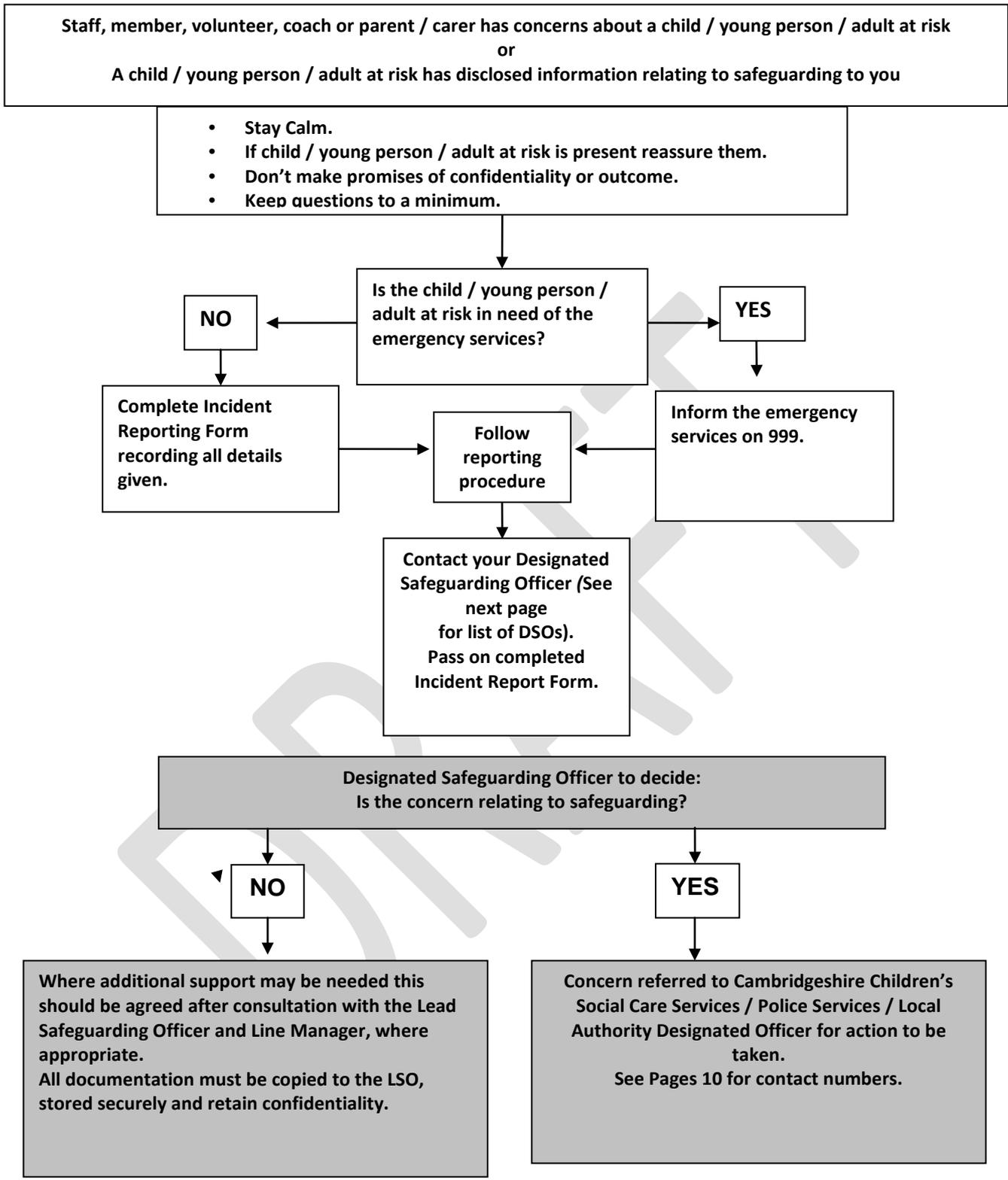
The person receiving the disclosure should not:

- panic or allow their emotions of shock, horror or distaste to become apparent
- probe for information
- make any assumptions about what they are being told or communicated to them
- make any comments negative or otherwise about the alleged perpetrator
- make any promises or agree to keep any secrets

### 6.3 Responding to suspicions

It is not the responsibility of anyone working for Huntingdonshire District Council to take responsibility or to decide whether or not abuse is taking, or has taken, place. However there is a responsibility to protect children and adults at risk and to inform the appropriate agencies so that they can carry out enquiries and take any necessary action.

**FLOWCHART FOR DEALING WITH CONCERNS RELATING TO CHILDREN AND ADULTS AT RISK**



*Out of office hours contact:*

*Social Care out of hours service on 01733 234724  
Police 101 or 999*

**If the child or adult at risk is in immediate danger then you should call the police.**

There are limited situations in which a child or adult at risk may be placed at greater risk if concerns are shared with parents or carers, for example, if the parent or carer is the alleged abuser. In these situations or where concerns still exist, any suspicion, allegation or incident of abuse must be reported directly to a HDC designated safeguarding officer as soon as possible. It is the role of the DSO to decide who this information is shared with.

There are some situations where it would be important to talk to parents or carers where there are concerns about their children to help clarify any initial concerns e.g. if a child seems withdrawn, there may be a reasonable explanation. He or she may have experienced an upset in the family such as; bereavement, parents separating, divorce or perhaps the birth of a sibling. It is not the role of HDC staff or volunteers to have these conversations.

**If the child or adult at risk is in immediate danger then you should call the police.**

**a) HDC Designated Safeguarding Officers (DSO)**

It is the responsibility of the DSO's to gather all the relevant information, assess the facts and without delay inform Social Services of the concern. If the Social Services nominated person in charge is not available the DSO should contact Social Services Emergency Duty Team or Police.

**HDC Designated Safeguarding Officers:**

To be updated when additional DSO's recruited

**Huntingdonshire District Council:**

Lead Safeguarding Officer		Pete Corley	388269
Designated Safeguarding Officers	One Leisure Facilities	Chris Davidson	387801
		Jon Clarke	388505
		Pete Corley	388269
		Paul France	388705
	One Leisure Active Lifestyles	Jo Peadon	388048
		Martin Gray	388244
	Countryside Services	Alison Gray	388666
		Judith Arnold	388807

**Children's Social Care Team –**

**Professionals** – 0345 045 1362 (Office hours)

**Members of the Public** – 0345 045 5203 (Office hours)

**Emergency Duty Team** – 01733 234724 (Out of Hours)

<https://www.cambslscb.co.uk/report-a-safeguarding-concern/>

**Vulnerable Persons (Adult Safeguarding concerns) Cambridgeshire Health & Social Care Services @ Cambridgeshire Direct**

Adult Safeguarding Manager 0345 045 5202 (choose - Adult Social Services)

Referrals regarding adults at risk during working hours should be made to **Peterborough Direct** on: 01733 747474

Out of office hours in an emergency, the **Emergency Duty Team Social Worker** can be contacted on: 01733 234724

<http://www.safeguardingpeterborough.org.uk/adults-board/reporting-a-concern/>

**Social Services Assessment & Referral Team**

01733 864180/170 (Peterborough Children's Social Care (CSC))

To be used if it is not possible to contact the Safeguarding Lead for advice on safeguarding concerns

**Police (Cambridgeshire Police Child Abuse Investigation Unit)**

0345 456 4564 / 01480 847743

**NSPCC Helpline (24 hours)**

0800 800 5000

**Cambridgeshire LSCB**

01480 376699

[www.cambslscb.org.uk](http://www.cambslscb.org.uk)

**b) Records and information**

Information passed on to the DSO, Social Services or Police must be as helpful as possible hence why a detailed record should be made at the time of disclosure or concern. Information wherever possible should contain the following :

- the nature of the concern or allegation
- a description of any visible bruises or other injuries
- a record of the child's or adult at risk's account of the explanation of bruises or other injuries and how they occurred and what happened
- details of any witnesses to the incident/s
- any relevant dates and times
- young person's or adult at risk's details – name, age, date of birth, address, parental/carer details
- details of alleged abuser

**At the earliest convenience complete a log of concern form (include link)**

The DSO will forward copies of any records to Social Services within 24 hours as confirmation of the report. A record will be kept of the Duty Officer's name the referral was made to if passed on to Social Care or Police.

**6.4 Allegations against staff, Members and volunteers**

Abuse can and does occur outside of the family setting and within other settings such as sports and social activities. All allegations will be taken seriously and appropriate action taken. It is important that any concerns about a colleague's behaviour or actions are reported immediately.

The behaviour that you have seen is obviously outside the permitted parameters under section 3 of this policy and is contrary to working practices. The issue to be resolved will be whether the incident was bad practice, forgetfulness, enthusiasm, simply a mistake or something more serious. Objective and discreet observation should determine which the case is.

**Do not discuss your concern with or report them to anyone other than the Designated Safeguarding Officer.**

Any person who reports a concern (without malicious intent) about a colleague's behaviour will receive full support and anonymity subject to any legal requirements.

The matter will be investigated in one or more of the following ways:

- an internal investigation
- a child/adult at risk protection investigation
- a criminal investigation

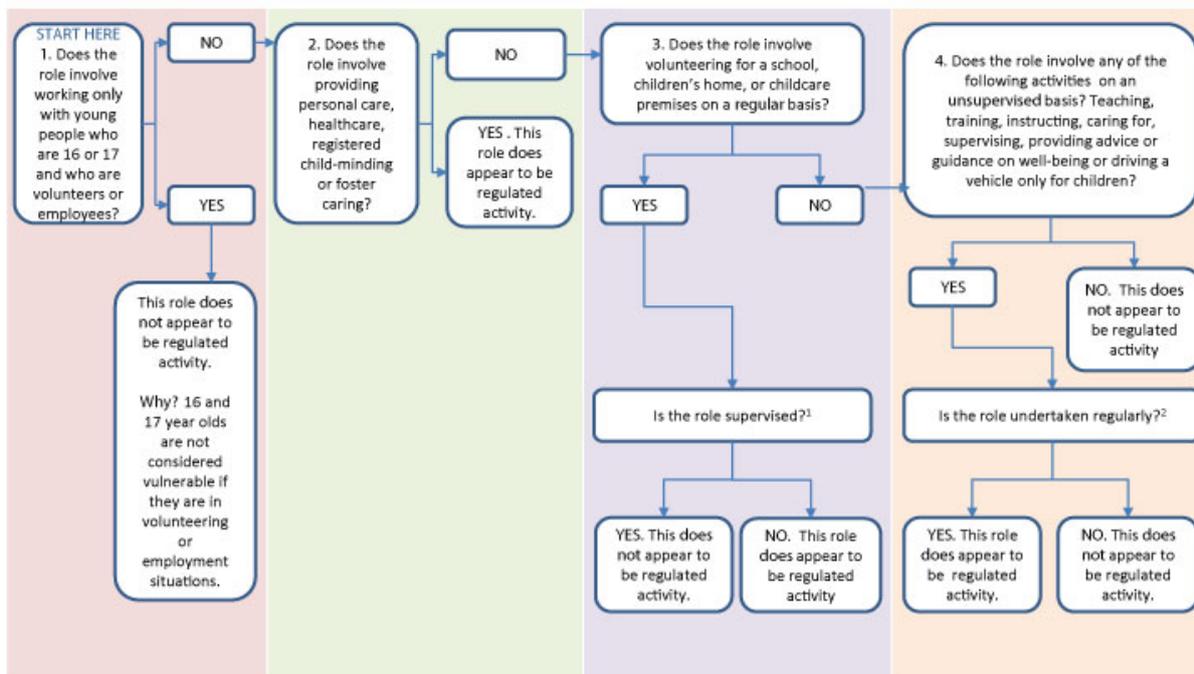
Where an allegation is made about someone who is working with children the case must be referred to the LADO (Local Authority Designated Officer) for their consideration.

Any member of staff who is the subject of an investigation is liable to be suspended on pay. Volunteers would be suspended for the duration of the investigation. Suspension is not an assumption of guilt.

Full support will be given to all staff in the aftermath of an investigation and its outcome.

## Regulated Activity relating to children and young people

Important - this chart does not apply to family arrangements and personal non-commercial arrangements (these are not covered by the DBS system) and should be read in conjunction with the full guidance from the Department for Education, available via [www.education.gov.uk/childrenandyoungpeople/safeguardingchildren/a00209802/disclosure-barring](http://www.education.gov.uk/childrenandyoungpeople/safeguardingchildren/a00209802/disclosure-barring)



<sup>1</sup> Supervised means regular supervision by someone who themselves is in Regulated Activity. See the Department for Education's guidance on supervision, available via [www.education.gov.uk/childrenandyoungpeople/safeguardingchildren/a00209802/disclosure-barring](http://www.education.gov.uk/childrenandyoungpeople/safeguardingchildren/a00209802/disclosure-barring)

<sup>2</sup> Regular means carried out by the same person frequently (once a week or more) or on four or more days in a 30-day period (or in some cases overnight).

### 7.0 E-Safety

All buildings use a filtered internet feed which, as far as possible, blocks offensive websites. This applies to all buildings offering Wi-Fi as well, however, it is not a guarantee that offensive or inappropriate materials will not be accessed.

It is not possible to stop anyone accessing any websites in our buildings if they are using their own 3/4G internet on personal devices.

If staff or volunteers become aware of any inappropriate use of the internet in our buildings, they should ask the individual to cease. If they refuse, the matter should be reported to their Line Manager.

If staff or volunteers become aware of children or adults at risk becoming victims of cyber-bullying or grooming, they should share their concerns with the DSO as soon as possible. Cyber-bullying includes: Harassment, Denigration, Impersonation, Flaming, Outing, Trickery, Stalking, Exclusion, Revenge Porn, Blackmail and Threats.

### 8.0 Arrangements for Contractors / Providers and Grant Arrangements

#### 8.1 Safeguarding Provisions in Huntingdonshire District Council Contracts/Grant Arrangements

Any service engaged by Huntingdonshire District Council should be provided on the basis of agreed terms or a contract. Safeguarding compliance should be included in all arrangements.

#### 8.2 Safeguarding Adults at risk and Children

The Lead Officer / Project Manager is responsible for ensuring that any contract makes proper provision for the safeguarding of Adults at risk and Children. The Lead Officer / Project Manager must seek advice from the Lead

Designated Safeguarding Officer or other nominated officer with responsibility for safeguarding at the Council if the contracted work either:

- involves direct contact with children and young people or adults at risk, or access to data about them **or**
- the work to be contracted takes place in, or overlooks, an area which children and young people or adults at risk regularly use:

In either circumstance, a clause should be inserted into the contract requiring the contractor to make appropriate and proportionate provision of the protection of Adults at risk and Children.

The distinctions are defined below, with the respective Huntingdonshire District Council expected standards outlined.

#### **Providers/Contractors with direct contact with adults at risk or children and young people**

Expected Standards:

- Contractor/Provider has safeguarding policies and procedures, as declared in any grant application/tendering process. (With long-term arrangements to evaluate continued compliance, use check list of required criteria)
- Contractor does not have own safeguarding policy and procedures: Written evidence presented to show compliance with, and promotion of, the principles contained in the Huntingdonshire District Council Safeguarding Policies and Procedures (children and adults at risk), pending development of their own safeguarding policy and procedures.

#### **Work to be contracted takes place in, or overlooks, an area which children and young people or adults at risk regularly use**

Expected Standards:

- Existence of appropriate screening/separation system (eg timing/access) from vulnerable group to be installed/devised **or**
- Supervision of staff by appropriately vetted supervisor at all times with knowledge of safeguarding best practice

#### **Evaluation Procedure for Compliance**

- Contract/arrangement to be reviewed by appropriate Huntingdonshire District Council officer responsible for the contract/arrangement within their arranged timescales.
- Contractor/Provider to present evidence of policies and procedures or other evidence of compliance to the standards as required above.
- In each case, Huntingdonshire District Council officer to verify that policies and/or practices conform to the required standards using one or other of the two check lists in Appendix 4 as appropriate.

## **9.0 Implementation**

All staff will receive training in this policy and procedures. An annual update will be sent to all staff by email, unless there are any significant changes which need to be communicated.

This policy will be revised bi-annually by the Safeguarding Governance Board.

## 9.0 Appendix 1

### Promoting Good Practice with Children & Young People

#### Good practice guidelines

All staff and volunteers will be encouraged to demonstrate exemplary behaviour in order to promote children's welfare and reduce the likelihood of allegations being made. The following are common sense examples of how to create a positive culture and climate.

#### Good practice means:

- always working in an open environment (e.g. avoiding private or unobserved situations)
- encouraging an open environment with no secrets
- maintaining a safe and appropriate distance with service users (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with a child or to share a room with them)
- making activities fun, enjoyable and promoting fair play
- ensuring that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the National Governing Body (NGB). Care is needed, as it is difficult to maintain hand positions when the child is constantly moving. Young people should always be consulted and their agreement gained. Parents'/carers' views will also be considered
- keeping up to date with technical skills, qualifications and insurance
- involving parents/carers wherever possible, for example, encouraging them to take responsibility for their children in changing rooms. If groups have to be supervised in the changing rooms, always ensure parents / teachers / coaches' work in pairs
- ensuring that if mixed teams are taken away, they should always be accompanied by a male and female member of staff (NB: remember that same gender abuse can also occur)
- ensuring that at tournaments or residential events, adults should not enter children's rooms or invite children into their rooms
- being an excellent role model – this includes not smoking or drinking alcohol in the company of young people
- giving enthusiastic and constructive feedback rather than negative criticism
- recognising the developmental needs and capacity of young people and disabled adults – avoiding excessive training or competition and not pushing them against their will

All participants will be registered and which will include;

- securing parental consent in writing to act in 'loco parentis', if the need arises to give permission to administer emergency first aid and / or other medical treatment
- awareness of any medicines being taken by participants or any existing injuries that must be considered
- keeping a written record of any injury that occurs, along with the details of any treatment given.

#### Practices to be avoided

The following should be **avoided** except in emergencies. If the case arises where a situation is unavoidable it should be with the full knowledge and consent of someone in charge in the organisation or the child's parents or carers. For example, a child sustains an injury and needs to go to hospital, or a parent/carer fails to arrive to pick a child up at the end of a session.

#### Practices never to be sanctioned

The following should **never** be sanctioned:

- engage in rough, physical or sexually provocative games, including horseplay
- share a room with a child
- allow or engage in any form of inappropriate touching
- allow children to use inappropriate language unchallenged
- make sexually suggestive comments to a child, even in fun
- reduce a child to tears as a form of control
- fail to act upon and record any allegations made by a child
- do things of a personal nature for children or disabled adults, that they can do for themselves
- invite or allow children to stay with you at your home unsupervised

**N.B.** It may sometimes be necessary for staff to do things of a personal nature for children, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of

parents or carers and the young persons involved. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

Parents or carers should be informed of the incident:

- If you accidentally hurt a young person
- If he / she seems distressed in any manner
- If a young person appears to be sexually aroused by your actions
- If a young person misunderstands or misinterprets something that you have done.

DRAFT

**10.0 Appendix 2**  
**Roles Currently Identified As Requiring A DBS Check**

<b>Role</b>	<b>Status</b>	<b>Type of Check</b>
Appeals officer		Basic
Assessment officer		Basic
Assessment team leader		Basic
Benefits assessment manager		Basic
Customer service assistant		Basic
Fraud intelligence & analyst officer		Basic
Fraud investigation manager		Basic
Head of customer services		Basic
Housing benefit overpayment recovery assistant		Basic
Housing needs & resource manager		Basic
Housing needs assistant		Basic
Housing service administrator		Basic
Nominations assistant		Basic
Nominations officer		Basic
Application support officer		Basic
Application support team leader		Basic
Desktop analyst		Basic
Desktop analyst team leader		Basic
Digital developer		Basic
Network/infrastructure manager		Basic
Network/ infrastructure officer		Basic
Service desk manager		Basic
Service desk officer		Basic
Service desk officer team leader		Basic
Duty manager		Enhanced with barred list check
Crèche assistant		Enhanced with barred list check
Crèche assistant level 1		Enhanced with barred list check
Crèche assistant level 2		Enhanced with barred list check
Fitness and sports instructor		Enhanced with barred list check
Junior activity leader		Basic
Level 1 instructor		Basic
One leisure assistant		Enhanced with barred list check
One leisure lifeguard		Enhanced with barred list check
Outreach coach I2/3 (OLAL)		Enhanced with barred list check
Outreach coach L4 (OLAL)		Enhanced with barred list check
Outreach worker (OLAL)		Enhanced with barred list check
Physical activity locality Co-Coordinator		Enhanced with barred list check
Sports activity officer		Enhanced with barred list check
Sports development officer		Enhanced with barred list check
Swimming instructor		Enhanced with barred list check
Assistant ranger		Enhanced with barred list check
Ranger		Enhanced with barred list check
Senior ranger		Enhanced with barred list check

**11.0 Appendix 3**  
**Roles Currently Requiring Specific Safeguarding Training**

<b>Role</b>	<b>Training Required</b>
HR Recruitment Team	Safer Recruitment Training
Volunteer Recruitment Team	Safer Recruitment Training
Designated Safeguarding Officers	Signs and Indicators of Abuse and Thresholds of Harm

All front line staff and front line volunteers are to receive training in Safeguarding Children and Adults at risk.

DRAFT

**12.0 Appendix 4  
Contractors Checklist**

**Providers/contractors safeguarding policies & procedures checklist  
Providers/contractors with direct contact with adults at risk or children and young people**

This Safeguarding Checklist must be completed by the Huntingdonshire District Council staff member with responsibility for the Contract. All criteria must be in place and a copy of this signed checklist completed and returned to the Lead Professional for Safeguarding at Huntingdonshire District Council.

<b>Organisation/company Name:</b>			
<b>Criteria</b>	<b>Please</b> <input type="checkbox"/> <b>as appropriate</b>		
	<b>YES</b>	<b>NO</b>	<b>Planned date</b>
<p>Does the organisation/company have their own safeguarding policy &amp; procedures? If Yes, see complete sections 1 to 6 below. If No,</p> <p>a. Have they provided written evidence to show compliance with, and promotion of, the principles contained in the Huntingdonshire District Council Safeguarding Policies and Procedures? b. Have they presented evidence of their own safeguarding policy development plans?</p>			
<p><b>1. Child / adults at risk safeguarding policy</b> Does the organisation have a safeguarding policy that all involved in the activity are required to adhere to? Is the policy publicised and promoted to all staff, volunteers and stakeholders?</p>			
<p><b>2. Child / adults at risk safeguarding procedures</b> Do the procedures contain clear instructions on what to do in the event of concerns about the welfare or protection of a child, young person or adult at risk? Are there clear guidelines for recording concerns about the welfare or protection of a child, young person or adult at risk, the organisation's response and reasons? Are there clear guidelines for reporting concerns where appropriate to external agencies such as Social Care or Police and partner agencies (This should include the contact details for the Local Authority Designated Team – formerly the LADO) Do the procedures contain clear instructions on what to do in the event of an allegation, incident or suspicion of abuse or poor practice? Are there complaints and disciplinary procedures to manage concerns about the behaviour of staff, coaches, volunteers, etc?</p>			
<p><b>3. Prevention</b> Has the organisation identified staff with designated responsibility for safeguarding and protecting children, young people and adults at risk ? e.g. Designated Safeguarding Officer Are there procedures for recruitment and selection of staff and volunteers including safeguarding checks (Disclosure Barring Service) for those working with children, young people and adults at risk? Are there codes of conduct and ethics for staff, coaches, volunteers, and participants?</p>			

<p>Are there operating procedures in relation to the organisation's duty of care to children, young people and adults at risk in place where appropriate? Specifically:</p> <ul style="list-style-type: none"> <li>• Emergency accident procedure</li> <li>• Transport/travel risk assessment</li> <li>• Activity risk assessment</li> <li>• Equipment/resource safety checks</li> <li>• Use of photographic images</li> </ul>			
<p><b>4. Communication and partnership</b>  Have all reasonable steps been taken to ensure that children, young people and adults at risk and carers are informed about the policy and procedures, and how they can raise concerns?  Are there processes for holding and sharing information?</p>			
<p><b>5. Education and training</b>  Are all those working with children, young people, adults at risk and those with responsibility for running activities appropriately trained in safeguarding and protecting children, young people and adults at risk?  Are coaches, staff and volunteers appropriately skilled and qualified to undertake their role in providing the activity?</p>			
<p><b>6. Review and monitoring</b>  Is it clear when and by whom the policy was formally adopted on behalf of the organisation?  Is it clear how, by whom and when the policy and its implementation will be monitored and reviewed?</p>			

**As Huntingdonshire District Council officer responsible for the establishment and monitoring of this contractual arrangement I hereby confirm that the information supplied within this checklist is accurate to the best of my knowledge.**

**Name:**

**Signed:**

**Position:**

**Date:**

DRAFT