

Sevenoaks District Council

**Safeguarding Children, Young People and Adults
at Risk Policy 2022-2025**

If you see it, say it!



Contents

	Page
Executive summary	3
What is safeguarding?	3
Introduction	4
Safeguarding flowchart	6
Safeguarding dos and don'ts	8
How to contact Kent County Council's Safeguarding team	9
Fulfilling the Council's safeguarding obligations	10
Definition of abuse	12
Definitions and responsibilities	15
Safeguarding children	15
Adults at Risk	16
The Counter-terrorism Act	18
Modern Slavery	19
Female genital mutilation	19
Mental Health Act 2020	19
Reporting abuse	19
Allegations about a member of staff	22
Allegations or concerns about any other person	23
Appropriate training for employees	24
Safe recruitment practices	24
Disclosure and Barring Services (DBS)	25
Procurement, third party service providers and tenants	25
Sevenoaks District Council's approach to implementing the Policy	26
The Sevenoaks District Safeguarding Group	29
Partnership arrangement	29
Record keeping	29
Updating the policy	30
Appendix A – Further information and guidance	31
Appendix B – Useful telephone numbers	33
Appendix C – Safeguarding Leading Officer Contacts	35
Appendix D – Carers Assessment	38

1. Executive Summary

- 1.1 Sevenoaks District Council is committed to working in partnership with others to safeguard its residents from all forms of abuse, neglect or exploitation.
- 1.2 The Council will raise awareness of safeguarding issues to ensure that the needs and interests of children, young people and adults with care and support needs are incumbent in decision making processes and through service provision.
- 1.3 This Policy aims to ensure that an overarching approach to safeguarding is embedded within all Council services and that staff, elected members, volunteers and those delivering contracts on behalf of the Council understand their role and responsibilities in supporting all residents to live a life free from abuse, exploitation and intimidation.
- 1.4 The Council will create an environment where staff, volunteers and elected members are adequately trained and encouraged to think of safeguarding as being their responsibility, understanding the need for them to play a full and active part in the delivery of the Council's response. External training providers will be used to deliver training where necessary.

2. What is Safeguarding?

- 2.1 Safeguarding is about protecting people's health, wellbeing and right to live free from harm, abuse or neglect.
- 2.2 It is about people and organisations working together to prevent and stop the risk and experience of abuse or neglect.
- 2.3 Some services can play an important role in safeguarding and promoting the welfare of children as part of their day-to-day work – recognising child welfare issues, sharing information, making referrals and subsequently managing or reducing risks.
- 2.4 Staff may come into contact with children and Adults at Risk in a variety of different situations and roles at the Council. This might be someone you see

on the front desk in reception, a child in a family you see on a home or site visit, or a resident you speak to on the phone.

- 2.5 The Council's safeguarding policy sets out what the potential risks are to children and Adults at Risk, the ways you can report a concern, how you deal with concerns, or information/allegations of harm disclosed to you.
- 2.6 **"If you see it, say it"** is the key message in this policy. We want to give staff the confidence to know how recognise, report and get support in dealing with safeguarding concerns, along with good understanding of safeguarding guidelines and good and consistent practice.

3. Introduction

- 3.1 We believe that the action we take to promote the welfare of children, young people and Adults at Risk and protect them from harm is everyone's responsibility. Everyone who comes into contact with children and Adults at Risk has a role to play.
- 3.2 The purpose of this policy is to protect and promote the welfare of children, young people and Adults at Risk using or receiving services who are provided or commissioned by Sevenoaks District Council. This policy supports the Council, its officers, elected members and volunteers in fulfilling their statutory responsibilities.
- 3.3 Sevenoaks District Council (from hereon referred to as 'the Council') is not a Children's Services Authority and it is not the role of the Council to investigate allegations of abuse by third parties. However, all Elected Members, employees, volunteers and contracted services providers have a clear responsibility to take action when they suspect or recognise that a child, young person or adult at risk may be a victim of significant harm or abuse.
- 3.4 It is your responsibility to read this information carefully and if you are a manager, ensure it is distributed to all relevant individuals or groups before they have contact with children, young people and/or Adults at Risk.
- 3.5 Information sharing plays a critical role in safeguarding, in both prevention and detection. Serious case reviews consistently highlight information sharing as a key issue to be addressed by partners. We believe that robust interagency working and partnerships between local council services, health, the family

justice system and the voluntary sector, encourages openness and learning from interventions and are used to inform and improve current and future practice and policies. The Council is committed to strengthening this working practice.

- 3.6 The following flowchart in section 4 gives an overview of the safeguarding procedure while section 5 provides staff with a practical list of Dos and Don'ts for dealing with safeguarding issues.

4. Referrals Process Flowchart

Sevenoaks District Council employee witnesses or has suspected concerns or receives a disclosure regarding abuse or neglect involving a child/young person or adult at risk

Is there an immediate risk of harm or is it an emergency?

Yes

If someone has threatened to commit suicide or intend to harm themselves, please call the Police on 101 for a welfare check. Ensure you complete this on our Safeguarding System

Call the Police on 999. Ensure you complete the form on our Safeguarding Referral System

No

If you have concerns about a vulnerable adult, child or young person, discuss the matter with your Line Manager in the first instance. If you have had the appropriate training, you might be able to make a direct referral to the relevant service. **If you are unable to speak to your line manager, please speak to your Designated Safeguarding Officer** and complete everything on the Safeguarding System, **Remember if you are dealing with a vulnerable adult check if they are any children that need safeguarding, they are the priority**

If your concern relates to a member of staff, follow the procedure above. However, you must notify Human Resources and send your notification form to human.resources@sevenoaks.gov.uk.

It may be necessary to call Kent County Council's (KCC) Central Duty Team for guidance:

03000 41 11 11 for Children and Young People

03000 41 61 61 for Adults

You can also e-mail them on social.services@kent.gov.uk for both Adults, Children and Young People.

If your concerns relate to children or young people, your Designated Safeguarding Officer will advise you if a [Single Request for Support](#) form needs to be made to Social Services. This replaces previous Inter-Agency referral and Early Help notification forms. This can only be done for intensive and specialist [support levels](#) and [full guidance](#) on support levels and the form is available on the [Kent Safeguarding Children Multi-Agency Partnership website](#).

It will be necessary to follow-up the report.

4.1 Confirmation that the referral has been actively dealt with

- Reporting the matter should not be delayed by an attempt to obtain more information. A summary of any consultation with, or referral to, the Front Door Service/ Adults Central Duty Team should be recorded by the referring officer. This ought to be retained on file in case any follow-up is needed.
- The onus is on the referring officer, to ensure that Sevenoaks District Council fulfils its statutory obligation to receive confirmation from Kent County Council within 72 hours that they have actively considered the referral.
- Once confirmation is received with information on the outcome of the referral, the Designated Safeguarding Lead Officer should be updated so the record of concern entry can be updated
- If a response on the outcome of the referral is not received within 72 hours of making a referral, the referring officer should follow up with the Front Door Service/ Adults Central Duty Team or the relevant Case Management Team if it is an adult referral and the adult is already known to services, as outlined in the Referrals Process Flowchart. If a case has been referred to the Police due to an immediate risk of harm or emergency, the Police crime report number should be noted and placed on file.

4.2 Escalating a referral or concern

- If a member of staff feels that the course of action outlined by Kent County Council following a referral doesn't represent, in their opinion, the best course of action in relation to that case or about the action, or inaction, of another agency then there should be a professional challenge. The aim should be to resolve it at a practitioner level and then at a team manager level. But if it can't be resolved, then concerns should be raised with the Executive Lead or Designated Safeguarding Leader Officer.
- The Executive Lead or Designated Safeguarding Leader Officer will make the final decision as to whether a case will be referred back to Kent County Council or other agency expressing Sevenoaks District Council's

concerns in relation to the welfare of that individual. If at that stage it cannot be resolved then the case will be further escalated to the Chief Executive of both organisations. For more information on how KCC escalate Adult Safeguarding please see their policy here [Kent and Medway Escalation policy; resolving practitioner differences for referrals and adult safeguarding \(kmsab.org.uk\)](https://www.kmsab.org.uk)

5. Dos and Don'ts

5.1 The following list of Dos and Don'ts has been produced as a quick and practical guide to dealing with safeguarding issues.

Do

- If you see it, say it – report anything that you feel could be a safeguarding issue
- Call the Police on 999 if you think someone is in immediate risk of harm or danger
- Speak to your line manager about any concerns
- Tell your client that you will need to inform people and write things down if they make a disclosure
- Remember that once you have spoken to your line manager, you can speak to a Designated Officer for further guidance. You can call the Contact Centre on x7001 and they will put you through to an available officer. There is a list of Designated Officers on inSite and on posters throughout the building
- Complete our [Safeguarding Notification Form](#) on inSite which will trigger a discussion with a Designated Officer. The matter may then have to be reported to Social Services
- Remember that the Council's role is not to investigate but to report our concerns to Social Services
- Record all calls with your clients, whether from landlines or mobiles
- Only provide the support specified within your role
- Be self-aware - particularly of your body language and tone
- Ensure you set your privacy settings on any personal social media accounts

- Always remember to ask for help and support if you need it.

Don't

- Promise to keep anything secret in the event of a safeguarding disclosure
- Wait to report something if something feels wrong or makes you uncomfortable – trust your instincts
- Undertake home visits if they have not been approved by your line manager – it is better to see clients in authorised Council meeting rooms
- Be worried about asking for support from another colleague to sit in on a meeting with you if a client makes a disclosure
- Arrange to meet a client outside work hours or in any circumstances that could be misconstrued by clients, e.g. coffee, lunch
- Offer help which is not part of your role – it might be appropriate to signpost or clarify the boundaries of your support
- Give out personal phone numbers or emails – only use work phones
- Give out details of your personal life outside of work
- Confide in your client
- Give any personal opinions on questions/issue your client may ask engage in discussions with your clients on any form of social media.

6. How to contact the Kent Safeguarding Team

- Kent County Council have staff available 24 hours a day 7 days a week and can be contacted during the day and out of hours regarding safeguarding concerns.
- Remember that if someone is in immediate danger, please call 999.
- The [Kent Safeguarding Children Multi-Agency Partnership](#) also keep a list of other organisations safeguarding contacts
- Details on making a referral about a child to Kent County Council are also available on KCC's website.
- Details about adult protection and reporting abuse relating to adults are also contained on the KCC website.
- A list of useful contact details can be found at Appendix B.

7. Fulfilling the Council's Safeguarding Obligations

7.1 In order to fulfil its commitment to ensure good working practice in protecting children and Adults at Risk the Council will undertake the following:

- Senior Management Commitment: The Chief Executive and Chief Officers are committed to the importance of safeguarding and promote the Council's Safeguarding Policy. The Designated Safeguarding Officer/s will be member/s of the Strategic Management Team and the Strategic Management Team will receive regular updates on safeguarding matters.
- Endeavour to keep residents and service users safe from abuse. Suspicion of abuse will be responded to promptly and appropriately. We will always act in the best interests of the child, young person or adult at risk.
- Proactively seek to promote the welfare and protection of all children, young people and adults at risk living in the Sevenoaks District.
- With regard to recruitment, ensure that unsuitable people are prevented from working with children, young people and Adults at Risk through robust recruitment procedures.
- Deal with any concern raised by a Member, employee, volunteer, contracted service provider, or member of the public appropriately and sensitively.
- Safeguarding referrals made by a Member, employee, volunteer or contracted service provider cannot be anonymous and should be made in the knowledge that, during the course of enquiries, the referrers may be required as witnesses.
- Not tolerate harassment of any person who raises concerns of abuse or neglect.
- Work in co-operation with KCC as required under the relevant legislation and make appropriate changes and amendments to improve the Council's safeguarding policies and procedure in light of changes to the legislative framework or as recommended by the relevant multi-agency Safeguarding Board.
- Prevent abuse by using good practice to create a safe and healthy environment and avoid situations where abuse or allegations of abuse could occur.

- Establish a working group of Officers, which engages with officers from appropriate teams across the Council to make necessary improvements around this agenda, led by the Designated Safeguarding Officer. Where appropriate, this work will be reported on regularly Strategic Management Team.
- Ensure that all new staff who have a safeguarding responsibility and who are likely to come into contact with children, young people or Adults at Risk have read and understood a copy of this Policy.
- Ensure that children, young people and Adults at Risk are involved with making decisions about policies and services that may affect them.

7.2 The key responsibility for safeguarding lies with the County Council, and it is important to note the following:

- It is **not** the responsibility of any District Council Member, employee, volunteer or contracted service provider to determine whether abuse is taking or has taken place.
- The role of the member, employee, volunteer or contracted service provider is to *inform*, not to *investigate* or *judge*.
- The District Council is not responsible for investigating any safeguarding incidents or allegations, involving a child, young person or vulnerable adult, except where allegations are made against a member of staff where usual HR policies will apply.
- If presented by a safeguarding concern, for *most* staff who do not engage with safeguarding on a regular basis, the priority is to record the details using the initial notification form as soon as possible, and liaise with the Designated Safeguarding Lead, a Safeguarding Lead Officer or their line manager in order to inform the relevant authority regarding the safeguarding incident.
- Where the District Council is engaged with partner agencies around cross-cutting issues such as domestic violence, tackling racism and hate crimes or troubled families, issues regarding safeguarding may also emerge and need to be considered by these agencies or partners.
- Where allegations are made against a member of staff, volunteer or contracted service provider, the matter will be referred to Human

Resources in the first instance. If appropriate, they will liaise with the Local Authority Designated Officer (LADO). More information of the role of the Local Authority Designated Officer can be found on the [Kent Safeguarding Children Multi-Agency Partnership website](#).

7.3 Shaping services: All consultations affecting children, young people or Adults at Risk will be undertaken using methods that are accessible and appropriate. The views of children, young people and Adults at Risk will be taken into account when shaping services that affect them.

8. Definition of abuse

8.1 The procedure for reporting a concern or allegation informs all Council Members, employees, volunteers and those contracted service providers, what actions they should take if they have concerns or suspicions, or encounter a case of abuse or neglect in any child, young person or Adults at Risk.

8.2 Even for those experienced in working with child or adult abuse it is not always easy to recognise a situation where abuse may occur or already has taken place. Whilst it is accepted that staff are not experts at such recognition all staff have a duty to act if they have any concerns and discuss with an appropriate Safeguarding representative within the Council.

8.3 Abuse is a form of maltreatment that can occur in several forms which are not mutually exclusive. It includes the following types of abuse:

- **Physical:** The non-accidental use of physical force that results (or could result) in bodily injury, pain or impairment including: assault, hitting, slapping, pushing, misuse of medication and restraint.
- **Psychological:** Acts or behaviour which impinges on the emotional health of, or which causes distress or anguish, to individuals.
- **Sexual:** Direct or indirect involvement in sexual activity without consent. Inappropriate behaviour from an adult.
- **Grooming:** This is when someone builds an emotional connection with an individual to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking.

- **Child Sexual Exploitation:** Forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware what is happening.
- **Female Genital Mutilation:** A collective term used for illegal procedures, such as female circumcision, which include 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.
- **Online Abuse:** Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones, inappropriate sexting. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.
- **Cyberbullying/Bullying:** is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.
- **Domestic abuse:** Incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family member regardless of gender or sexuality. Domestic abuse is not just about partners but all family relationships.
- **Self-neglect/Self-injurious:** This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- **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's not the same as an

arranged marriage where people have a choice as to whether to accept the arrangement or not.

- **Extremism:** Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.
- **Discrimination:** When values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals.
- **Financial:** Unauthorised, fraudulent obtaining and improper use of funds, property or any resources of an adult at risk.
- **Organisational:** Where the culture of the organisations places the emphasis on the running of the establishment above the needs and care of the person.
- **Domestic Slavery:** Domestic servitude is a specific form of labour exploitation covering nannies, carers, housekeepers etc. Victims of domestic servitude can suffer imprisonment within the confines of the home as well as verbal, physical and sexual abuse.
- **Modern slavery/Human trafficking:** Encompasses slavery, human trafficking, forced labour and domestic servitude. 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.
- **Neglect and acts of Omission:** Ignoring or withholding physical or medical care needs which result in a situation or environment detrimental to individual(s).
- **Adverse Childhood Experiences (ACEs)** are stressful or traumatic events that happen in childhood and can affect people as adults. They include events that affect a child or young person directly, such as abuse or neglect. ACEs also include things that affect children indirectly through the environment they live in. This could be living with a parent or caregiver who has poor mental health, where there is domestic abuse, or where

parents have divorced or separated. ACEs can be single events, long-term or repeated experiences.

- 8.4 It is important to understand that a vulnerable adult may be abused by another vulnerable adult, and equally, a child or young person may be abused by another child or young person.
- 8.5 Tools and guidance to help further define and identify abuse are set out at Appendix A.

9. Definitions and responsibilities

9.1 Safeguarding Children

- 9.1.1 Everyone has a responsibility to ensure that concerns about the abuse of children and Adults at Risk are addressed. The lead responsibility for managing child and adult protection lies with Kent County Council Social Services Agency although the Council works in partnership with them to identify and respond to suspected abuse.
- 9.1.2 For the purposes of the Safeguarding Policy the term ‘child’ or ‘children’ applies to children and young people under 18 years of age and statemented (“vulnerable”) young people under the age of 25.**
- 9.1.3 Under the Children Act 2004 and Working Together to Safeguard Children 2015 (statutory guidance on inter-agency working to safeguard and promote the welfare of children), the Council has a duty to co-operate with Kent County Council in discharging its duties as a Children’s Services Authority and to promote the well-being of children and young people.
- 9.1.4 The Children Act 1989 states that every child has a right to protection from abuse, neglect and exploitation. Statutory guidance on making arrangements to safeguard and promote the welfare of children under the Children Act 2004 as published in August 2005. The guidance came into force on 1 October 2005.
- 9.1.5 Statutory guidance on making arrangements to safeguard and promote the welfare of children under Sections 10, 11 and 13 of the Children Act 2004 specifies what is required of the Council, including:
- Senior management commitment to the importance of safeguarding and promoting the welfare of children and young people

- A clear statement of the Council's responsibilities towards children and young people be available for staff, members, volunteers, contracted services and the public
- A clear line of accountability within the organisation for reporting safeguarding concerns
- Service development that takes account of the need to safeguard and promote welfare – and is informed by the views of children, young people, and their families
- Safe recruitment procedures
- Training on safeguarding and promoting the welfare of children and young people available for all members, staff and volunteers
- Clear protocols on safe working practice known to members, staff and volunteers
- All contracted services and grant funded organisations have appropriate safeguarding policies and procedures in place
- Safeguarding policies and procedures of contracted services and grant funded organisations are regularly monitored
- Effective inter-agency working to safeguard and promote the welfare of children and young people
- Effective information sharing
- The voice of children and young people is heard in service planning, decision-making and service delivery

9.2 **Adults at Risk**

9.2.1 A vulnerable adult is defined as any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

9.2.2 A person's need for additional support to protect them may be increased when complicated by additional factors, such as physical frailty or chronic illness,

sensory impairment, challenging behaviour, drug or alcohol problems, social or emotional problems, poverty or homelessness.

9.2.3 More recently, the Care Act 2014 added responsibility for adult safeguarding into legislation – codifying the principle of wellbeing and placing safeguarding adults duties on a statutory basis. The Council's policies and procedures are governed by this Care Act, which provides the legal framework for how local authorities (in this case Kent County Council) and other parts of the system such as relevant partners (which includes the Council as a district authority) should protect adults at risk of abuse or neglect.

9.2.4 The Council has a duty to co-operate with Kent County Council in the exercise of:

- their respective functions relating to adults with needs for care and support
- their respective functions relating to carers, and

9.2.5 The Care Act sets down a general duty on all local authorities to promote wellbeing in relation to how adults are treated - and the following must form part of that:

- personal dignity and respect
- physical and mental health and emotional well-being
- protection from abuse and neglect
- control by an adult over their day-to-day life (including care and support and how it is provided)
- participation in work, education, training or recreation
- social and economic well-being
- domestic, family and personal relationships
- suitability of living accommodation
- the individual's contribution to society

9.2.6 In exercising this function the local authority must have regard to:

- the importance of beginning with the assumption that the adult is best-placed to judge their own well-being
- the adult's views, wishes, feelings and beliefs

- the importance of preventing or delaying the development of needs for care and or support and the importance of reducing needs that may already exist
- the need to ensure that decisions about an adult are made having regard to all of their circumstances and are not based only on age, appearance, condition or behaviour which might lead others to make unjustified assumptions about the adult's well-being
- the importance of the adult participating as fully as possible in decisions and being provided with the information and support to enable this to happen
- achieving a balance between the adult's well-being and that of their representative, involved in care
- the need to protect people from abuse and neglect
- the need to ensure that any restriction on the adult's rights or freedom is kept to the minimum

9.2.7 The Care Act places a requirement (Section 42) on a local authority, to make or cause safeguarding enquiries, if there is concern that an adult with care and support needs (met or unmet) is experiencing, or is at risk of abuse and or neglect. This applies regardless of mental incapacity or capacity and setting. The safeguarding duties need to establish the desired outcomes for the adult (or their representative) and their wishes regarding actions that may need to be taken to stop or prevent the abuse or neglect and if so by whom.

9.2.7 SARs (Safeguarding Adult Reviews) Safeguarding Adult Reviews are not inquiries into how someone died or suffered injury, or to find out who is responsible. They look at any

1. Lessons we can learn from the case about the way all local professionals and agencies worked together.
2. Review the effectiveness of our safeguarding adults policy and protocols.

3. Inform and improve local safeguarding practice for all agencies involved
4. Deliver an overview report and recommendations for future action

9.3 The Counter-Terrorism Act 2015

- 9.3.1 This dictates that local authorities are vital to the Prevent work which exists to reduce the risk of people being drawn into terrorism. Local authorities must use the existing counter-terrorism local profiles (CTLPs) provided by Kent Police, to assess the risk of individuals being drawn into terrorism. The Council incorporates this duty into existing policies and procedures to fulfil safeguarding responsibilities - ensuring there are clear and robust policies to identify and safeguard children, young people and adults at risk. Furthermore, the Council has developed a Prevent action plan should there be a risk identifying interventions to be actioned. The Council must also ensure that appropriate frontline staff, including those of its contractors, have a good understanding of Prevent and are trained to recognise vulnerability to being drawn into terrorism and are aware of available programmes to deal with the issue.

Procedures, Guidance and a SAR referral process can be found on the [Kent and Medway SAB - Safeguarding Adult Reviews \(kmsab.org.uk\) website](https://www.kmsab.org.uk).

9.4 Modern Slavery Act 2015

- 9.4.1 Under the Modern Slavery Act 2015 the Council has a statutory duty to report and provide notification to the National Crime Agency about any potential victims of modern slavery or trafficking that staff encounter. Adult victims are

able to remain anonymous should they wish to do so. The Council is under a duty to co-operate with the Commissioner.

9.4.2 Taken together, these pieces of legislation provide local authorities and their partners with strong responsibilities to the general safeguarding of both children and adults at risk.

9.5 Female Genital Mutilation – (FGM)

9.5.1 Female genital mutilation (FGM) is child abuse and a form of violence against women and girls, and therefore covered within the remit of the Council's Safeguarding Policy.

9.5.2 FGM is illegal in the UK and it is important that everyone is aware of the issues around FGM including identifying risk factors. Suspicions may arise in a number of ways that a child is being prepared for FGM to take place abroad. These include knowing both that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school. The child may also talk about a special procedure/ceremony that is going to take place.

9.6 Mental Health Act 2003

The code of practice gives guidance to people who:

- work with people who can't make decisions for themselves
- care for people who can't make decisions for themselves
- It says what you must do when you act or make decisions on behalf of people who can't act or make those decisions for themselves.

The Mental Capacity Act 2005 (MCA) says certain people must think about the code of practice when they act or make decisions on the other person's behalf. This includes:

- an attorney appointed under a lasting power of attorney
- a deputy appointed by the Court of Protection
- an independent mental capacity advocate
- a person doing research approved in accordance with the MCA
- a person who acts in a professional capacity for, or in relation to, people who can't make decisions for themselves
- a person who is paid to act for or in relation to people who can't make decisions for themselves

Referrals may need to be made to Mental Health Teams, Police, KCC Adult Social Services to help an individual. You should report to your line manager and check with DSOs to get advice. Stay with that person if possible and they are happy with this until help is sought, check if they have a referral or a carer, make sure that they feel safe.

We are not trained to investigate but to refer only. Our Designated Officers have had extra training to help support you.

10. Reporting abuse

10.1 When a child, young person or adult at risk makes an allegation of abuse or bullying, you should:

- Remember that you may be the first person that a child, young person or adult at risk has trusted and it has probably taken a great deal of courage to tell you that something is wrong
- Remember that it is rare for children, and particularly young children, to lie about abuse.
- Stay calm and try to get another witness if it does not compromise the situation
- **If you believe the person is 'at risk' of immediate significant harm**, which includes situations which any Member, employee or volunteer would reasonably believe requires the emergency services, **then** you must contact the relevant emergency service and notify the Designated Safeguarding Lead, a Safeguarding Lead Officer or your line manager
- Listen carefully to what is said and allow the person to talk at their own pace, being careful not to compromise potential evidence
- Find an appropriate opportunity to explain it is likely that information will need to be shared with other responsible people, **do not promise to keep secrets**
- Only ask questions for clarification, the use of open questions e.g. what, where, when, who? is advisable, do not ask leading questions (that suggest certain answers as this could compromise evidence)
- Do not interrogate or question other than to clarify your understanding. If the matter is to be investigated further, it will be done by trained professionals. No matter how well you know the person, spare them

having to repeat themselves over and over. Apart from anything else, the person may begin to think you do not believe them.

- Be aware that the child or vulnerable adult may have been seriously threatened not to tell.
- Remain calm, no matter how difficult it is to listen to the person – think of how hard it must be to say it. You have been chosen because that person feels they can talk to you. If you show anger, disgust or disbelief then they may stop talking for fear of upsetting you further or feel that your negative feelings are being directed towards them.
- Let them know what you are going to do next and why it is necessary.
- As soon as practical, write down everything you have been told, using the Council's [Safeguarding Notification Form](#) on inSite
 - Note what was said, using the exact words and phrases spoken if possible.
 - Describe the circumstances in which the disclosure came about.
 - Note the setting and anyone else who was there at the time.
 - Separate out factual information from your own opinion.
 - Use a pen or biro with black ink, so that the report can be photocopied.
 - Be aware that your report may be required later as part of a legal action or disciplinary procedure.
 - Make every effort to preserve any evidence which may be relevant to a police investigation, however taking into account that the wellbeing of the person is your first priority.
- Consider your own feelings and seek support if it is needed by contacting the Human Resources Team to arrange for confidential counselling.
- Respect the confidentiality of the situation and do not share or discuss information with anyone except on a “need-to-know” basis, as outlined in this document.
- Immediately report to and inform the Designated Safeguarding Officer, Safeguarding Lead, Line Manager or Head of Service (as appropriate and where possible).

- Record all details you are aware of on the initial notification form (SN1) as soon as possible, which is available on the Intranet.
- The Designated Safeguarding Officer may have a consultation with Kent Contact and Assessment Service (KCAS) or may ask you to help complete a formal referral
- **A list of all Sevenoaks District Council Safeguarding Officers and Designated Officers is available on the Council's intranet site, inSite.**
- The outcome of the consultation/referral will be recorded on the Council's Safeguarding Register.
- A summary of reporting concerns can be found in section 6 of this policy.

10.2 **Allegations or concerns about a Member, employee or contracted service provider:**

- These procedures should be followed where it is alleged that a person who works with children or adults at risk
 - behaved in a way that harmed a child or adult at risk, or may have harmed a child or adult at risk
 - Possibly committed a criminal offence against or related to a child or adult at risk
 - Behaved towards a child or adult at risk in a way that indicates he or she may pose a risk to them.
- You should take the allegation or concern seriously.
- Record all details you are aware of on the initial notification form as soon as possible, which is available on the Council's intranet.
- In these cases any allegation, concern or suspicion about a Sevenoaks District Council member of staff, member, volunteer or contractor should be reported immediately to your Line Manager, Head of Service and the Executive Lead or Designated Safeguarding Lead Officer for Safeguarding. Alternatively, you can also report any suspicion through the Sevenoaks District Council's Whistleblowing Policy.
- If the Line Manager, Head of Service, Executive Lead or Designated Safeguarding Lead Officer for Safeguarding is the subject of the

allegation/suspicion the report must be made directly to the Chief Executive.

- The Designated Safeguarding Officer, alongside Human Resources will follow the Council's Safeguarding Policy and personnel procedures.
- The Council's Disciplinary Policy takes this into consideration.
- Staff are given confidence through a positive open culture to report any safeguarding (or other) concerns and the Council's **whistle-blowing policy** (available on the Council's intranet site, "inSite"), staff who have genuine cause for raising concerns in the workplace.
- The corporate Complaints Procedure sets out how we deal with customers who wish to complain; safeguarding complaints will be directed to the Lead Designated Safeguarding Officer/s in the first instance.
- Any employee accused of abuse will, if necessary, be suspended or redeployed pending further Police, Kent County Council and/or internal investigation.
- The Executive Lead or Designated Safeguarding Lead Officer will consider whether a referral needs to be made to the Disclosures & Barring Service using the guidance and consulting with the LADO (for children)
- A summary of reporting concerns can be found in section 6 of this policy.

10.3 When allegations or concerns are expressed about any other person (e.g. parent, carer, other service user), you should:

- Take the allegation or concern seriously
- If you believe the child, young person or adult is 'at risk' of immediate significant harm, which includes situations which you would reasonably believe requires the emergency services, then you should contact the relevant emergency service and then notify the Designated Safeguarding Lead, the Deputy Chief Executive, a Safeguarding Lead Officer or your line manager
- Record details on the initial notification form, which can be found through the Council intranet.

- The Designated Safeguarding Officer may have a consultation with Kent Contact and Assessment Service (KCAS) or may ask you to help complete a formal referral
- Outcome of the consultation/referral to be recorded on the [Safeguarding Notification Form](#) on inSite.

10.4 A short list of safeguarding Dos and Don'ts for staff is included in section 4 of this document This covers dealing with a disclosure and how staff can protect themselves through professional boundaries.

11. Appropriate training for employees

- 11.1 Safeguarding is everyone's business. While Members, employees, volunteers and contracted services providers have varied levels of contact with children, young people and Adults at Risk as part of their duties and responsibilities for the Council, everyone should be aware of the potential indicators of abuse and neglect and be clear about what to do if they have concerns.
- 11.2 This general policy therefore applies to all staff. All staff are responsible for ensuring that the activities in which they are involved during the course of their work are carried out in accordance with this general policy and related procedures. Safeguarding is included within the Conditions of Service of all staff.
- 11.3 Appendix A to this policy sets out further guidance, information and advice on spotting the signs of abuse and neglect.
- 11.4 Employees must accept and be able to recognise their responsibilities with regard to their own good practice and the reporting of signs of suspected abuse or neglect according to the arrangements set out in this policy.
- 11.5 Training needs and opportunities relating to child and vulnerable adult safeguarding and protection issues will be identified and addressed through the Council's Induction and Appraisal Procedures, and in response to any changes in legislation. Training may include internal courses/workshops, externally accredited courses/seminars or workshops organised by relevant

agencies. The Council Human Resources Team will organise and keep a record of all staff and volunteers who have received training.

- 11.6 Training Guidance will be produced for Human Resources (HR) to take forward all safeguarding training needs of Sevenoaks District Council staff and contractors.

12. Safe recruitment practices

- 12.1 The Council will adopt safe recruitment practices to reduce the likelihood of recruiting unsuitable staff or volunteers. This includes ensuring that a statement about the organisation's commitment to safeguarding is included in all recruitment and selection materials including reference to regular DBS checks. Satisfactory explanations for any gaps in employment will be sought. References will always be obtained direct from the referee, never through the applicant. Appropriate levels of Disclosure and Barring Service checks will be obtained.

13. Disclosure and Barring Service (DBS) Criminal Records Check Policy

- 13.1 The Council requires staff to have an enhanced DBS check if they have unsupervised contact with children, young people and Adults at Risk. Chief Officers and Heads of Service, in consultation with Human Resources, are responsible for deciding which of their staff require a DBS check, the level of check required and for ensuring that DBS checks are kept up to date.
- 13.2 Organisations or contractors undertaking work on behalf of the Council should confirm that they have appropriate DBS checks in place.
- 13.3 More information is available on the [Government's Disclosure and Barring Service website](#).

14. Procurement, third party service providers and tenants

- 14.1 Where the Council works with, commissions or grant-funds other organisations which come into contact with those groups covered by this

policy, they will be required to have safeguarding arrangements in place or subscribe to the policies and procedures set out in this policy.

14.2 There is an obligation on the Council to ensure that any third party service providers, whose services are commissioned, procured or grant funded by the Council, discharge their duties under the relevant legislation. As noted above, this general policy statement on safeguarding covers all employees of the authority – including contracted service providers.

14.3 All contracts and Service Level Agreements will also take account of the need of those Service Providers in contact with children, young people and adults at risk to be responsible for discharging their duties for safeguarding children, young people and adults at risk.

14.4 Grant application forms will also include a requirement for the organisation to supply evidence of their safeguarding policy if responsible for children, young people or adults at risk.

14.5 Where organisations are delivering services affecting children or Adults at Risk on behalf of the Council:

- They will be expected to have robust safeguarding procedures in place.
- Contracts, Service Level Agreements or grant approval letters will set out the safeguarding arrangements required. As a minimum, this will be that where adults work or volunteer with children or Adults at Risk they should be subject to a Disclosure and Barring Services (DBS) check or be supervised by a person with a DBS check. More information on DBS can be obtained from the Council's Human Resources department and from the [Government's disclosure and barring service](#).

15. Sevenoaks District Council's approach to implementing the Policy

15.1 Whilst other partnerships and organisations have roles in co-ordinating and ensuring the effectiveness of the Council's work to safeguard and promote the welfare of children and adults with care and support needs, they are not accountable for the Council's operational work. The Council retains its own lines of accountability for safeguarding and promoting the welfare of children and adults with care and support needs through its own service delivery and provision.

15.2 All staff, volunteers and elected members are to ensure they familiarise themselves and comply with the Council's Safeguarding Policy and associated procedural documents.

15.3 All staff, volunteers and elected members must participate in relevant training to recognise the varying forms of abuse and report any concerns,

incidents or allegations to the Council’s Designated Safeguarding Officers in line with the relevant procedures.

- 15.4 It is the responsibility of staff and elected members to consider safeguarding implications in their decision making processes, including the procurement of services.
- 15.5 All external organisations and contractors providing services to the Council are required to comply with the Council’s Safeguarding Policy as a minimum standard. Where relevant they should have their own safeguarding policy and procedures in place.
- 15.6 Whilst safeguarding is the responsibility of all Council staff, volunteers, elected members and contractors, there are a number of safeguarding roles within the Council with specific responsibilities briefly set out below:

Role	Responsibilities
Executive Lead	<ul style="list-style-type: none"> • Raise the profile, support the Policy and promote the development of initiatives to ensure the protection of residents within the district. • Allocate resources to enable the Council to meet its responsibilities. • Chair the Officer Safeguarding Group, submitting updates to SMT.
Designated Safeguarding Lead	<ul style="list-style-type: none"> • Review Policy every year issuing operational guidance and promoting good practice and making policy recommendations to SMT and relevant Committees. • Make referrals to KCC safeguarding referral channels as appropriate. • Ensure that action taken is coordinated and monitored. • Coordinate audits and assessments for submission to the Kent Safeguarding Children and Adult Boards. • Development of an annual safeguarding action plan, working with the HR team who will lead on the delivery

Role	Responsibilities
	and monitoring of training, DBS checks and retain a log of all staff training.
Designated Safeguarding Officers	<ul style="list-style-type: none"> • Support the implementation of the annual safeguarding action plan. • Support the co-ordination of audits and assessments for submission to the Kent Safeguarding Children and Adult Boards. • Ensure that action taken is coordinated and monitored. • Support and advise the Council's contractors, leaseholders and grant recipients on the development of safeguarding policies, where necessary.
Elected Members	<ul style="list-style-type: none"> • Scrutinise the Council's Safeguarding Policy and safeguarding reports to relevant Committees. • Portfolio Holder with responsibility for safeguarding has responsibility for approving any policy amendments. • Portfolio Holder with responsibility for safeguarding will act as the Council's safeguarding champion. • Training to be undertaken as necessary.
Heads of Service/Managers	<ul style="list-style-type: none"> • Make staff aware of their duty to report any allegations or suspicions of abuse to a Designated Safeguarding Officer and the procedure for doing so. • Operate safe recruitment practices and routinely take up and check references. • Adhere to and operate within the Council's Whistleblowing Policy and support staff who raise concerns. • Ensure all staff receive training in safeguarding consistent with their job roles and responsibilities. • Monitor compliance with Council's Safeguarding Policy with contractors, leaseholders and grant recipients as appropriate.

15.7 See Appendix C for the current staff contacts.

16. The Sevenoaks District Safeguarding Group

16.1 The Sevenoaks District Council Safeguarding Group brings together members of staff who are practitioners most likely to encounter safeguarding issues in their day-to-day work. It meets every 2 months to help ensure that the Council is taking its safeguarding responsibility seriously and complying with legal requirements. It provides a forum for practitioners to discuss issues and concerns relating to safeguarding. This Policy will be monitored through the Council's Safeguarding Group.

17. Partnership arrangements

17.1 Organisations receiving funding from the District Council will be required to provide evidence that they have a suitable child and vulnerable adult protection policy and practice in place.

17.2 The Council will take part in any County or District-wide forum to which they are invited that exists to co-ordinate multi-agency arrangements relating to safeguarding matters.

18. Record Keeping

18.1 According to Data Protection principals, records containing personal information should be:

- adequate, relevant and not excessive for the purpose(s) for which they are held;
- accurate and up to date; and,
- only kept for as long as is necessary (Information Commissioner's Office, 2017(a) and 2017(b)).

18.2 In order to ensure that all the details of the allegation are maintained accurately for use in possible future Court proceedings, the Designated Safeguarding Lead shall ensure that the following documentation is collated:

- The written report
- Any notes, memoranda, telephone transcripts or other correspondence dealing with the matter and copies of completed forms

- Any other relevant materials
- 18.3 Information about safeguarding concerns and referrals should be kept in a separate file for each individual, rather than in one 'concern log'.
- 18.4 These copies will be stored securely at all times and kept for a period of six years after the last contact with the individual.
- 18.5 Records will be retained for the same amount of time regardless of whether the allegations were unfounded. However if it is found that allegations are malicious, the record will be destroyed immediately.
- 18.6 Documents associated with allegations against a member of staff should be kept according to usual HR practices.
- 18.7 Where there are concerns about the length of time for which individual records should be kept, the advice of the Council's Data Protection Officer will be sought.

19. Updating the Policy

- 19.1 The Sevenoaks District Council Safeguarding Group will review this Policy every four years or as appropriate in light of significant legislative changes.

Reviewed: December 2022

By: Sarah Robson and Kelly Webb

Next Review data: December 2025

Appendix A: Further guidance and information

Children and young people

Further guidance including definitions of abuse is available on the [Government's website](#) and includes:

- [Preventing neglect, abuse and exploitation](#)
- Keeping children safe in education and other settings
- Safeguarding disabled children
- Runaway and homeless children
- Gang activity
- Cross-border child protection

Guidance is available from the [Kent Safeguarding Children Multi Agency Partnership](#):

- Single Request for Support form and guidance (replaces Inter-agency referral and Early Help Notification). Please speak to a Designated Safeguarding Officer for help and guidance
- Kent Support Levels Guidance
- Physical and Emotional Wellbeing
- Domestic Abuse
- Trafficking
- Online Safety
- Child Protection Conferences
- Family and Relationships
- Bullying
- Prevent.
- Child Sexual Exploitation (CSE)
- Faith Communities
- National legislation – GOV.UK

[The Kent Safeguarding Children Multi-Agency Partnership](#) website useful guidance and details of other safeguarding organisations.

Adults

Kent County Council's website contains details of [adult protection legislation and guidance](#) and details useful national legislation and guidance. It includes:

- Self-neglect Policy and Procedures
- Joint Police, Social Services and Health Protocol for dealing with cases of domestic abuse where adults at risk are involved
- Mental capacity act
- Protocols for Kent and Medway to safeguard adults who are at risk of sexual exploitation, modern slavery and human trafficking
- Human trafficking and National Referral Mechanism guidance
- Safeguarding Adults Checklist for Practitioners in Kent (only)
- Adults at risk of abuse guidance
- Financial abuse toolkit
- Government guidance – controlling or coercive behaviour in an intimate or family relationship

Information Sharing

- [Kent and Medway Information Sharing Agreement](#)

Assessment

Self-assessment Framework (SAF): was developed by the Kent & Medway Safeguarding Adults Board and provides a consistent framework to assess, monitor and improve safeguarding adults arrangements. The SAF sets out best practice standards and provides a mechanism for the Council to evaluate what it is doing well and identify areas for improvement.

Section 11 of the Children's Act 2004: places duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children. The Council undertakes a self-assessment audit to ensure it meets the standards to safeguard and promote the self of children and young people.

Appendix B: Useful contact numbers

If someone is in immediate danger of risk of harm call 999

During the day in office hours

- If you are concerned about a child? Call 03000 41 61 61
- If you are concerned about an adult? Call 03000 41 61 61
- Out of hours an in an emergency

If you need to contact the Kent Safeguarding Team outside normal office hours, call 03000 41 91 91

Education Safeguarding Team

The Education Safeguarding Team (EST) provide support, guidance and challenge to schools, services and Early Years settings and services

- Headquarters: 03000 41 57 88
- West Kent: 03000 41 22 84
- Child Protection/ e-safety: 03000 41 57 97

Local Authority Designated Officer: 03000 41 08 88 or email

GCSXsafeguardingunit@kent.gcsx.gov.uk

Early Help

- If you would like to make a referral to the Early Help and Preventative Services, they can be contacted using 03000 41 92 22 or email earlyhelp@kent.gov.uk.
- Further [information and the notification form is available from the KELSI website](#).

Child Sexual Exploitation

- Kent has recently launched a campaign to raise awareness of child sexual exploitation called Operation Willow. If you have concerns about a child or

young person whom you believe is at risk of sexual exploitation. Call Kent Police on 101 quoting Operation Willow.

- National Child Sexual Exploitation Helpline: 11 60 00

Child Exploitation and Online Protection

- You can make a make a report by visiting the [CEOP website](#) or by calling Childline 0800 1111
- Other contact information for NHS and other organisations can be found at www.kscb.org.uk/about-kscb/contact-us

Appendix C: Designated Safeguarding Officers

Role	Officer	Contact details
Executive Lead	Sarah Robson, Chief Officer, People and Places	Tel: 01732 22 7129 Email: sarah.robson@sevenoaks.gov.uk
Designated Safeguarding Lead Officer	Kelly Webb, Health and Communities Manager	Tel: 01732 227474 Email: kelly.webb@sevenoaks.gov.uk
Designated Safeguarding Officer	Jim Carrington-West. Chief Officer, Customer & Resources	Tel: 01732 227286 Email: jim.carrington-west@sevenoaks.gov.uk
Designated Safeguarding Officer	Margaret Carr, Policy Officer,	Tel: 01732 227341 Email: margaret.carr@sevenoaks.gov.uk
Designated Safeguarding Officer	Diana Chaloner, Head of HR & Organisational Development	Tel: 01732 227169 Email: diana.chaloner@sevenoaks.gov.uk
Designated Safeguarding Officer	Dorota Pajsert, Human Resources Project Manager	Tel: 01732 227092 Email: dorota.pajsert@sevenoaks.gov.uk
Designated Safeguarding Officer	Miranda Forrest, PA to Sarah Robson	Tel: 01732 227430 Email: miranda.forrest@sevenoaks.gov.uk
Designated Safeguarding Officer	Jessica Foley, Senior Licensing Officer	Tel: 01732 227480 Email: jessica.foley@sevenoaks.gov.uk
Designated Safeguarding Officer	Evelyn Gilder, Planning Improvements & Standards Manager	Tel: 01732 227306 Email: evelyn.gilder@sevenoaks.gov.uk
Designated Safeguarding Officer	Jenny Weston, Accommodation Team Leader	Tel: 01732 227431 Email: jenny.weston@sevenoaks.gov.uk

Role	Officer	Contact details
Designated Safeguarding Officer	Sue Cressall, Revenues Manager	Tel: 01732 227041 Email: sue.cressall@sevenoaks.gov.uk

Appendix D - Kent County Council Social Care, Health and Wellbeing – Care Assessment

To complete a professional referral using KCC's online form you must:

- Be referring in your professional capacity
- Ensure the person is aware of your referral to us
- Ensure the person is over 18 and lives in Kent.

By making a referral online, you will be providing KCC with the relevant information and this will allow them to support in the right way, as quickly as possible.

KCC review all referrals within 2 working days. If sufficient information is included, the referral will be fast-tracked.

[Care needs assessments - Kent County Council](#)

Appendix E: Local Services

West Kent Mind	www.westkentmind.org.uk
North Kent Mind	www.northkentmind.co.uk
DAVSS	www.davss.org.uk
Citizens Advice (Sevenoaks & Swanley)	www.citizensadvicenwk.org.uk
Citizens Advice (Edenbridge & Westerham)	www.citizensadvice.org.uk
KCC Public Health	www.kent.gov.uk/social-care-and-health
Kenward Trust	www.kenwardtrust.org.uk