



Safeguarding Policy

2019 - 2022

Safeguarding Policy

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WLBC Taking Action Flow Chart

I'm worried about a child / vulnerable adult



Is the child / vulnerable adult in immediate danger?

'No' – Lower Level Concern

'Yes' - Serious Concern

For Adult – Get Consent, refer to Adult Social Care and log observations on 'Incident Report Form' (*Safeguarding Policy, Appendix A*). If help refused, log and discuss with Line manager or Nominated Lead Safeguarding Officer (NLSO)

For Child, Discuss with Line Manager or Nominated Lead Safeguarding Officer (NLSO)

Emergency or Immediate risk to life or limb - Contact Police 999

For Adults – Get Consent or inform them of your intention to share if you override consent

NEXT STEP

Inform Nominated Lead Safeguarding Officer (NLSO)

Lol Aitchison	01695 585181	Paul Waring	01695 585127
Emma Davies	01695 585145	Michelle Williams	01695 585449
Kay Lovelady	01695 585075		

For Child - Forward completed 'Incident Reporting Form' (Appendix A) to NLSO within 24 hrs max

For Adult – Get Consent or inform them of your intention to share, if you override consent and log all observations

For Children - Inform parents prior to referral being made unless this would increase risk of harm or might impede an investigation.
For Adults - Ask them if they want help and get consent.

Contact Adult & Children's Social Care

Tel: 0300 123 6721

WLBC Designated Safeguarding Officer (DSO) or Deputy DSO Follows up and Feeds-back to Employee as Appropriate

'Incident Report Form' record (for Child) retained centrally & securely including any advice sought, action taken / decisions & rationale.

Remember – Keep Clear and Accurate Notes

Introduction

West Lancashire Borough Council is committed to safeguarding children and vulnerable adults and to delivering services that promote good practice and expects all Council representatives, colleagues and partners to share this commitment.

Children and vulnerable adults have the right to be safe in the services provided for them and the activities they choose to participate in and the Council is committed to fostering a safeguarding culture across the organisation.

This policy provides guidance on how to deal with concerns relating to the safeguarding of children and vulnerable adults and specifies the roles and responsibilities of the Council's representatives for whom this policy is mandatory.

The aim of the policy is to promote good practice, providing children and vulnerable adults with appropriate safety/protection and to allow Council representatives to make informed and confident responses to specific safeguarding issues that may arise.

Key Definitions:

Safeguarding - is the generic term which refers to ensuring that children and vulnerable adults are protected from harm.

Child Protection - the process of protecting individual children identified as either suffering or at risk of suffering, significant harm as a result of abuse or neglect.

Vulnerable Adults (18yrs +) - are people who receive or may be in need of community care services by reason of disability, age or illness; and who are or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

Children/Young people - in line with the Children Acts 1989 and 2004 a child is anyone who has not yet reached his or her 18th birthday. 'Children' therefore means 'children and young people' throughout this policy. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital, in prison or in a young offenders' institution, does not change his or her status or entitlement to services or protection under the Children Act 1989.

West Lancashire Borough Council representatives are defined as:

- Employees
- Agency and casual Staff
- Elected Members
- Contract Staff
- Volunteers (including people under 18) and Work Experience placements -

when working for and on behalf of West Lancashire Borough Council

Prevent –The Prevent strategy, published by the Government in 2011, is part of the overall Counter-terrorism strategy-CONTEST. The aim of the *Prevent* strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act, this has simply been expressed as the need to “prevent people from being drawn into terrorism”.

Channel – Channel, which is part of the Prevent strategy, is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individuals concerned

Disclosure and Barring Service (DBS) – this is the agency that administers applications for criminal records. Legislation, guidance and local job descriptions indicate which representatives need to undergo a DBS check prior to working with children and vulnerable adults.

Designated Safeguarding Officer (DSO) – the West Lancashire Borough Council Senior Officer with overall responsibility for ensuring the Council's obligations and responsibilities with regard to safeguarding issues are carried out.

Deputy Designated Safeguarding Officer (DDSO) – the West Lancashire Borough Council Senior Officers responsible for deputising for the DSO and for leading on aspects of the policy relating to Staff Training, Licensing and Community Safety.

Nominated Lead Safeguarding Officer (NLSO) – a role undertaken by identified Council officers following appropriate training. These officers act as a first point of contact for other Council employees and advise on safeguarding issues.

Lancashire County Council Children or Adult Care Services –the upper tier authority service responsible for delivering safeguarding services across the County.

Local Authority Designated Officer (LADO) – this is a specific designated officer within Lancashire County Council involved in the management and oversight of individual cases of allegations of abuse made against those who work with children. Their role is to give advice and guidance to employers and voluntary organisations; liaise with the Police and other agencies, and monitor the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. The Police also have an identified officer to fill a similar role.

Local Safeguarding Children’s Board (LSCB)/Local Safeguarding Adults Board (LSAB) – the statutory, multi-agency body that have strategic oversight for the delivery of safeguarding issues. The overall role of the LSCB/LSAB is to coordinate local work to safeguard and promote the welfare of children and vulnerable adults and to ensure the effectiveness of what the member organisations do individually and together.

Monitoring Officer – a statutory Council appointment held by the Borough Solicitor at West Lancashire Borough Council. The role includes the responsibility for ensuring Elected Members actions and activities are within set standards.

Parent is used throughout this document as a generic term to represent parents, carers and guardians.

Substantial and/or unsupervised access to children and vulnerable adults is defined as:

- Where individuals are regularly caring for, in contact with, training or supervising a child/vulnerable adult.

and/or

- Where an individual has sole charge of children or vulnerable adults.

1. Policy Statement

As a provider of public services, West Lancashire Borough Council fully accepts its legal and moral obligations to provide a duty of care and will take all reasonable steps to protect all those using Council services or working with the Council, from harm, discrimination or degrading treatment and respect their rights, wishes and feelings.

The welfare of the child or vulnerable adult is paramount and is always the primary concern of West Lancashire Borough Council. Everyone has the right to protection from abuse regardless of age, gender, disability, race, belief and sexual orientation and with respect to their marriage and civil partnership, pregnancy and maternity or gender reassignment status.

The Council is committed to the following principles and actions:

- The Council will ensure that a protective safeguarding culture is in place and is actively promoted within the organisation.
- The Council will implement procedures to safeguard children and vulnerable adults and take all reasonable steps to protect them from harm, discrimination and degrading treatment and to respect their rights, wishes and feelings.
- All representatives of West Lancashire Borough Council who work with children and vulnerable adults will be recruited with regard to their suitability for that responsibility. Representatives who have substantial and/or unsupervised access to children and vulnerable adults are subject to an Enhanced Disclosure and Barring Service check prior to appointment. An employee's DBS will be rechecked if the post holder moves to an appropriate alternative position within the authority. Where volunteers are being used for one-off events then a self-disclosure form will be required. Additional guidance on which posts require enhanced DBS checks and which activities are regulated can be found via the links contained within this policy (Appendix C).
- All representatives will be required to adopt and abide by the Council's Safeguarding Policy and will be provided with supervision, guidance and training to ensure that they are properly equipped to identify where there may be a problem and know how to obtain advice/refer concerns to relevant specialists and protect themselves from false accusations of abuse.
- All representatives have a responsibility to report concerns of suspected abuse or poor practice and the Council will provide designated points of contact within the organisation.
- Council representatives should follow the Safeguarding Code of Conduct contained in Section 5 of this policy and work in an open and transparent way avoiding any conduct that may cause a reasonable person to question their motives and intentions.
- The Council will promote good practice that encourages a safe

environment, protects all parties and avoids mistaken allegations of abuse.

- The Council will take all incidents of poor practice and allegations or suspicions of abuse seriously and these will be responded to swiftly and appropriately.
- The Council will respond promptly to suspicions or allegations involving staff and appropriate disciplinary and appeals procedures will be implemented.
- This policy will be reviewed every three years or whenever there is a major change in the organisation / relevant legislation or any other adopted standard of best practice.
- Confidentiality shall be upheld in line with current data protection and human rights legislation.

Who does the policy apply to?

The policy applies to all staff and representatives of West Lancashire Borough Council: Employees, Agency, Casual and Contract Staff, Volunteers (including young people under 18) working for and on behalf of West Lancashire Borough Council and Elected Members.

1.2 General Responsibilities/Roles

Designated Safeguarding Officer (DSO)

- Will provide a point of contact for staff who wish to test concerns about safeguarding, either seeking advice from, or making a formal referral to, statutory agencies regarding a safeguarding disclosure, report or concern.
- Will be aware of the Council's safeguarding procedures.
- Will provide a point of contact with Lancashire County Council's Children or Adult Services and hold an up-to-date list of contact details for statutory protection agencies.
- Will act as the lead Officer for the Council with responsibility for safeguarding procedures.
- Will liaise with the children and vulnerable adult agencies as appropriate.
- Detailed responsibilities are contained within Appendix B.

It is not the role or responsibility of any representative of the Council to decide whether abuse is taking place. DSO's should take advice from the relevant statutory agency before deciding to refer reports, concerns or disclosure formally. The West Lancashire Borough Council's DSO is:

- Simon Burnett - Deputy Director Leisure & Wellbeing
Tel: 01695 585157

Deputy Designated Safeguarding Officer (DDSO)

The West Lancashire Borough Council Senior Officers responsible for deputising for the DSO and for leading on aspects of the policy relating to Staff Recruitment, Learning & Development, Licensing and Community Safety.

The West Lancashire Deputy Designated Safeguarding Officers are:

- Sharon Lewis – Lead on Safer Recruitment
01695 585027
- Paul Charlson – Lead on Licensing
01695 585246
- Cliff Owens – Lead on Prevent
01695 585394

Nominated Lead Safeguarding Officer (NLSO)

Role undertaken by identified Council Officers following appropriate training. These Officers act as a first point of contact for other Council employees and advise on safeguarding issues.

The West Lancashire Nominated Lead Safeguarding Officers are:

- Lol Aitchison - Development & Regeneration Services
01695 585188
- Emma Davies - Leisure & Environment Services (Leisure)
01695 585145
- Kay Lovelady - Legal and Democratic Services
01695 585075
- Paul Waring - Housing and Inclusion Services
01695 585217
- Michelle Williams – Leisure & Environment Services (Street Scene)
01695 585449

Directors and Managers

- Are responsible for making sure that all of their staff are aware of and understand the importance of this policy and related guidance.
- Will arrange for appropriate training for their staff and maintain a log of this training.

- Must make sure that any contractors, agents or other representatives who will be engaged to undertake duties on behalf of the Council involving contact with children and vulnerable adults understand and comply with this policy.
- Should ensure that safe working practices are in place for their staff, and ensure that any staff without enhanced DBS clearance are never placed in a situation where they have significant and/or unsupervised access to children and vulnerable adults as defined in this policy and take all practicable steps to avoid any avoidable sole contact with children and vulnerable adults by any of their staff.
- Will work with HR to ensure that all staff are compliant with the Council's provisions relating to DBS Disclosure. This includes assessing whether new positions or changes to job descriptions will require DBS disclosure.

Monitoring Officer

Has responsibility for receiving safeguarding concerns and allegations made against Elected Members. The Monitoring Officer in liaison with the Designated Safeguarding Officer and Chief Executive Officer will determine the most appropriate course of action.

The West Lancashire Monitoring Officer is:

- Terry Broderick – Borough Solicitor
Tel 01695 585001

Head of Human Resources and Organisational Development

- Will ensure DBS checks and references that refer to the candidates' suitability to work with children and vulnerable adults are taken up for all appropriate posts as part of the recruitment and selection processes.
- Will include appropriate training in the corporate learning and development programme and ensure that Safeguarding training is available for Line Managers to include as part of the induction programme, for all new staff who are appointed to posts which required enhanced DBS clearances.
- Will ensure that details of DBS checks (record of date and reference number) and any details of child protection and vulnerable adults, substantiated allegations directly about our staff / representatives are kept securely and uphold confidentiality in line with best practice and relevant legislation.
- Will maintain a record of all staff that have completed a DBS check and are considered suitable for work involving substantial and/or unsupervised access to children and vulnerable adults.

The West Lancashire Head of Human Resources and Organisational

Development is:

- Sharon Lewis – Head of Human Resources and Organisational Development

Tel: 01695 585027

All Staff and Members

- Should be aware of this policy and should commit themselves to safeguarding children and vulnerable adults.
- Should undertake appropriate safeguarding training as defined in this policy under Section 4.4
- Should not begin any unsupervised activity involving substantial and/or unsupervised access to children and vulnerable adults prior to receiving a satisfactory enhanced DBS clearance.
- Should comply with this policy's guidance on best practice, appropriate and inappropriate behaviour for staff working with/or in charge of children and vulnerable adults and the Safeguarding Code of Conduct.
- Should understand the Council's procedures for reporting concerns and disclosure and know who their Nominated Lead Safeguarding Officer (NLSO) is.
- Are expected to act on any suspected or potential case of child or vulnerable adult's abuse. In line with the existing 'Whistle Blowing' Policy, West Lancashire Borough Council will support anyone who, in good faith, reports his or her concerns that a child or vulnerable adult is being abused or is at risk of abuse, even if those concerns prove to be unfounded.
- Should challenge poor practice as appropriate.

2. Recognising Abuse

Facts about abuse

Children and vulnerable adults of all ages may be abused. The abuser may be a family member or they may be someone the person encounters within the community, including during sports and leisure activities. Abusers can be found in all areas of society, and from any professional, racial and religious background.

Contrary to the popular image, abusers often appear kind, concerned and caring towards children and vulnerable adults. But this is deliberate – by forming close relationships, abusers can build their trust and help prevent adult suspicion. Often an abused child and vulnerable adult will suffer more than one type of abuse at the same time. For example, parents who physically abuse their children may also be neglectful.

Recognising abuse is not easy. It is not the responsibility of Council representatives to decide whether or not abuse has taken place or if a child or vulnerable adult is at significant risk.

However Council representatives do have a responsibility to report their concerns.

Abuse and neglect

Somebody may abuse a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Even for those experienced in working with abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place.

There are different types of abuse, and a person may suffer more than one type:

- **Physical Abuse** – actual or likely deliberate physical injury, or neglectful failure to prevent injury or suffering, to a child or vulnerable adult. It may include broken limbs and head injuries and could involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm.
- **Sexual abuse** - where an adult or another young person uses a child or vulnerable adult to meet his or her own sexual needs. This could include any sexual act. Showing children pornographic material is also a form of sexual abuse. The Sexual Offences Act 2003 now extends the abuse of trust offences to tackle on-line and off-line grooming of children.
- **Emotional abuse** - the persistent emotional ill-treatment of an individual. It may involve conveying to an individual that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children and vulnerable adults. It may involve causing an individual to feel frightened or in danger by being constantly shouted at, threatened or taunted which may make them very nervous and withdrawn. Some level of emotional abuse is involved in all types of abuse.
- **Neglect** - where adults fail to meet a child's or vulnerable adult's basic

physical and/or psychological needs, likely to result in the serious impairment of the child's or vulnerable adult's health or development (e.g. failure to provide adequate food, shelter and clothing, failure to protect an individual from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment.) It may also include refusal to give an individual love, affection and attention.

Signs and indicators of abuse

Sometimes a child or vulnerable adult who is being abused *may* show some of the following signs:

- A change in his or her general behaviour. For example, they may become unusually quiet and withdrawn, or unexpectedly aggressive. Such changes can be sudden or gradual.
- He or she appears distrustful of a particular adult, or a parent/carer/guardian or a coach with whom you would expect there to be a close relationship.
- He or she may describe receiving attention from an adult that suggests they are being 'groomed' for future abuse.
- He or she is not able to form close friendships.
- The child or vulnerable adult refuses to remove clothing for normal activities or wants to keep covered up in warm weather.
- The child shows inappropriate sexual awareness or behaviour for their age.
- The child or vulnerable adult 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.
- The child or vulnerable adult has an injury which is not explained satisfactorily or properly treated.
- Deterioration in the child's or vulnerable adult's physical appearance or a rapid weight gain or loss.
- Pains, itching, bruising, or bleeding in or near the genital area.
- Unexplained disappearances or suddenly having unexplained gifts such as mobile phones, new clothes, money.

Concern does not necessarily need to be related to a single specific incident. It may also arise from the accumulation of minor concerns.

It is important to remember that these signs do not always mean that a child or vulnerable adult is being abused – there may be other explanations. But if you think that the person may be being abused, it is important that you discuss your

concerns with your Line Manager or Nominated Lead Safeguarding Officer (NLSO).

Every child and vulnerable adult is unique and it is difficult to predict how their behaviour will change as a result of their experience of abuse.

Important Rule

It is important to remember that many children and vulnerable adults will exhibit some of these signs and indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour such as death, or the birth of a new baby in the family, relationship problems between parents/carers etc.

It is not the responsibility of a West Lancashire Borough Council representative to decide if abuse is occurring, but it is your responsibility to act on any concerns by reporting any suspicions to your line manager/ Nominated Lead Safeguarding Officer. If risk to life or immediate harm contact the POLICE.

REMEMBER: There may be other reasons that a child or vulnerable adult is exhibiting some of the signs and indicators.

Warning Signs: Behaviours Common to Abusers

Those who represent a threat of sexual abuse to children and vulnerable adults are often skilled at avoiding detection. With this in mind, the following list of warning signs should help representatives in their role of exercising vigilance to safeguarding and may alert them to the possibility that someone's intentions towards children and vulnerable adults are suspicious.

Representatives should look out for those who:

- Display inappropriate behaviour, or talk inappropriately, to children and vulnerable adults.
- Avoid co-working or supervision of their work with children and vulnerable adults.
- Seek out opportunities to spend time with either individuals or with small groups on a regular basis, particularly vulnerable children and adults, e.g. those who may be disabled.
- Encourage secretiveness about their activities with children and vulnerable adults.
- Pay an unusual amount of attention to individuals or groups and particularly the provision of presents, money or favours to children or vulnerable adults.
- Take a child or vulnerable adult or a small group of children or vulnerable adults to their own home.
- Are vague about previous employment or gaps in their employment history.

Representatives should also comply with the standards of behaviour expected of them if coming into contact with children or vulnerable adults, as covered by the

Safeguarding Code of Practice detailed in Section 5.

Child Sexual Exploitation (CSE)

The issue of CSE has become prominent in recent years and this policy recognises the particular issues around identifying behaviours that might indicate CSE is occurring.

West Lancashire Borough Council is committed to raising awareness of and tackling CSE and the guidance below should be considered to shape future working practice:

- that the Council should raise awareness of CSE amongst Elected Members and Officers through training programmes and campaigns.
- that there should be a clear understanding of referral pathways and how/when to spot CSE.
- that there should be a focus on early intervention and a partnership approach to tackling the issue.
- that the wider licensing trade should undertake CSE training.

Incidents, observations or disclosures that are of concern with regard to CSE should be recorded and reported in line with this policy, using the Incident Reporting Form (Appendix A).

If there are concerns that reports are not being acted upon, then the Council's Whistle blowing policy applies.

Child Criminal Exploitation (CCE)

This is becoming a major issue across the country where children are being groomed to undertake criminal acts on behalf of adults for example, drug dealing and theft.

Incidents, observations or disclosures that are of concern with regard to CCE should be recorded and reported in line with this policy using the Incident Reporting Form (Appendix A).

Bullying

Bullying can involve a combination of other forms of abuse such as physical or emotional abuse. Bullying can be child on child but could also be adult on child and adult on vulnerable adult, for example concerns about a coach/Council representative bullying a child or vulnerable adult.

Bullying is not easy to define, can take many forms and is usually repeated over a period of time. The three main types of bullying are: physical (e.g. hitting, kicking), verbal (e.g. racist remarks, threats, name calling) and emotional (e.g. isolating an individual from activities).

Bullying will include:

- deliberate hostility and aggression towards the victim
- a victim who is weaker than the bully or bullies
- an outcome which is painful and or distressing for the victim.

Bullying behaviour may also include:

- other forms of violence
- sarcasm, spreading rumours, persistent teasing or theft
- tormenting, ridiculing, humiliation
- racial taunts, graffiti, gestures
- unwanted physical contact or abusive/offensive comments of a sexual nature.

Emotional and verbal bullying is more likely, however it is also more difficult to cope with or prove.

Signs of bullying include:

- behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go to training or competitions
- an unexplained drop off in performance
- physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching and bruising, damaged clothes, bingeing e.g. on food, alcohol or cigarettes
- a shortage of money or frequent loss of possessions.

It must be recognised that the above list is not exhaustive but also that the presence of one or more of the indications is not proof that abuse is taking place.

The Council has a zero tolerance approach to bullying. If bullying is suspected, representatives of the Council should follow the procedure set out in Response Procedures for Incidents of Disclosure and Reporting Concerns, Suspicions and Allegations in Section 3.

If the issue is one of an adult against a child, representatives should follow the same procedures as with any other form of abuse.

For further information on the effects of abuse refer to the NSPCC helpline/website:

<https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>

Radicalisation

An emerging issue which is related to safeguarding matters is the potential for children and vulnerable adults to be radicalised. The Council has specific duties to have due regard to the need to prevent people from being drawn into terrorism. To that end the Council will:

- Have a nominated lead officer for PREVENT – The Environmental Protection and Community Safety Manager and Community Safety Officer fulfil this role for West Lancashire Borough Council.

- Train all appropriate employees on safeguarding and identifying radicalisation in accordance with the Prevent Duty as required under the Counter Terrorism and Security Act 2015 and any other legislative requirements.
- Ensure the DSO refers radicalisation concerns to the PREVENT lead officer when they arise.

If any Council representatives have concerns or suspicions regarding the radicalisation of children and vulnerable adults then they should speak to the NLSO, details of which are contained in Appendix B.

3. Response Procedures for Incidents of Disclosure and Reporting Concerns, Suspicions and Allegations

Remember to familiarise yourself with the flowchart at the beginning of this policy document and the role and responsibilities of Officers with a specific safeguarding responsibility detailed in section 1.2

You may become aware of possible abuse in various ways.

- see the abuse happening or receive a direct disclosure of abuse
- suspect or have concerns because of signs such as those listed in Section 2
- have concerns reported to you by another party

If a child or vulnerable adult indicates that he/she is being abused, or information is obtained which raises concern of abuse, you should act immediately irrespective of whether they are in receipt of services from West Lancashire Borough Council.

It is not the responsibility of a West Lancashire Borough Council representative to decide if abuse is occurring, but it is their responsibility to act on any concerns by reporting any suspicions that they have.

If you are not sure what to do, your first response should be to contact your Nominated Lead Safeguarding Officer (NLSO) will be able to provide advice. A list of contacts is available in Appendix B of this policy and on the intranet.

However, if you believe a child or vulnerable adult to be in 'immediate danger' you should contact the Police, then inform your Nominated Lead Safeguarding Officer (NLSO).

If you are not sure what to do, you can gain help from the NSPCC 24-hour help line - Tel: 0808 800 5000.

Lancashire Children or Adult Services hotline: Tel: 0300 123 6720 (8am-8pm) or Tel: 0300 123 6721 (8pm -8am)

(If abuse concerns a Council representative or Elected Member, please see sections 3.4 and 3.5).

3.1 Recording Information on the Incident Reporting Form (Appendix A)

All concerns, disclosure or incidents should be recorded on the Incident Reporting Form (Appendix A). The form maintains a record of any incident. The form should always be filled out as soon as possible after disclosure, incidents or concerns. The template is available on the intranet and hard copies are available from your Nominated Lead Safeguarding Officer (NLSO) or Line Manager.

To ensure that information is as accurate and helpful as possible, a detailed record should always be made at the time of the disclosure/concern. In

recording information you should confine yourself to the facts. Distinguish your personal knowledge from what others have told you. Do not include your own opinions.

Information should include the following:

- the person's name, age and date of birth
- the person's home address and telephone number
- whether the person completing the incident form is expressing their concern or someone else's
- the nature of the allegation, including dates, times and any other relevant information
- a description of any visible bruising or injury, e.g. location, size etc.
- details of any indirect signs of abuse, such as behavioural changes
- details of witnesses to the incident
- the individual's account, if it can be given, of what has happened and how any injuries occurred if appropriate
- have the parents/carers been contacted? - if so, what has been said?
- has anyone else been consulted? - if yes, record details
- has anyone been alleged to be the abuser? - record details

However vague the details might be, it is essential that any information you have to support your concerns, record the disclosure or document the allegation are captured on the form.

3.2 Recording Concerns and Allegations

It is not the responsibility of a West Lancashire Borough Council representative to decide if abuse is occurring, but it is their responsibility to act on any concerns by reporting any suspicions that they have.

If you are not sure what to do, your first response should be to contact your Nominated Lead Safeguarding Officer (NLSO) who will be able to provide advice. A list of contacts is available in Appendix B of this policy and on the intranet.

However, if you believe a child or vulnerable adult to be in immediate danger you should contact the Police, then inform your Nominated Lead Safeguarding Officer (NLSO).

This policy document contains guidance (Section 2) on signs and indicators of abuse and the Council's Safeguarding Code of Conduct for staff working with children and vulnerable adults (Section 5) which should inform representatives in relation to concerns about their welfare, reporting inappropriate behaviour and witnessing abuse.

All concerns and allegations should be recorded on the Incident Reporting Form (Appendix A). This applies to whether the concern or allegation refers to a member of Staff, Volunteer, Elected Member or any other person (for example a family member).

Remember: Concern does not necessarily need to be related to a single specific incident. It may also arise from the accumulation of minor concerns. Failure to report concerns early may allow abuse to continue or escalate with catastrophic consequences.

In all cases, if you are not sure what to do you should contact your Nominated Lead Safeguarding Officer (NLSO) who will be able to provide advice. A list of contacts is available in Appendix B of this policy and on the intranet.

Action to take:

Complete an Incident Reporting Form (Appendix A)

- Pass the completed form to your Nominated Lead Safeguarding Officer (NLSO) within 72 hours (or as soon as practically possible if out of hours). Reporting the matter should not be delayed by attempts to obtain further information.
- If you believe that a child or vulnerable adult is in immediate danger of harm, you should personally contact the Police ensuring that your Nominated Lead Safeguarding Officer (NLSO) is made aware at the earliest opportunity. (The Police will automatically inform the relevant LCC Services). Maintain surveillance of the individual if possible. A record should be made of the name and title of the Police Officer to whom the concerns were passed, together with the time and date of the call, in case any follow up is needed.

3.3 Responding to disclosure

If you receive information concerning disclosure you should:

- React calmly so as not to frighten the child or vulnerable adult.
- Tell them that he/she is not to blame and that he / she was right to tell you.
- Take what they say seriously, recognising the difficulties inherent in interpreting what is said by an individual who has a speech disability and/or differences in language.
- **You should not attempt to investigate the alleged abuse.** Remember that an allegation of abuse or neglect may lead to court action to protect the individual or to punish the abuser. Both could be jeopardised if you act inappropriately. Your role is to listen and record. Keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said. Do not ask closed or leading questions such as “did he / she touch you?” Allow the person to talk freely and be supportive.
- Reassure the child or vulnerable adult but do not make promises of secrecy or confidentiality, as these may not be feasible as a result of subsequent developments.
- Make a full written record of what had been said, heard and/or seen as soon as possible, ensuring that you use the exact words of the speaker.

- Complete an Incident Reporting Form as provided in Appendix A, attaching the original written record or using the form as the first record of the disclosure if available.

ACT NOW - DO NOT DELAY. Pass the referral to your Nominated Lead Safeguarding Officer (NLSO) immediately. This should be done as soon as practically possible in an 'out of hours' situation and reporting the matter should not be delayed by attempts to obtain further information.

- If the disclosure relates to a member of Staff or another Nominated Lead Safeguarding Officer (NLSO), then the issue should be passed immediately to the Designated Safeguarding Officer (DSO) and the Head of Human Resources and Organisational Development.
- Concerns relating to an Elected Member should be raised with the Monitoring Officer immediately or as soon as practically possible if out of hours.(see Section 3.5)
- If you have reason to believe an individual is in immediate danger of harm then you should personally contact the Police ensuring that your Nominated Lead Safeguarding Officer (NLSO) is made aware at the earliest opportunity. (The police will automatically inform the relevant LCC Services). Maintain surveillance of the individual if possible. A record should be taken of the name and position of the Police Officer to whom the concerns were passed along with the time and date of the call, in case any follow up is needed.
- If the immediate danger relates to suspected abuse by a parent/carer, do not allow the child or vulnerable adult to go home without calling the Police.

In some instances it may be that the child or vulnerable adult is unable to express him or herself verbally and means that it may be difficult for vulnerable victims of abuse to complain or be understood. Sometimes it is hard to distinguish the signs of abuse from the symptoms of some disabilities or conditions. However, where there are concerns about the safety of a disabled child or vulnerable adult, Council representatives should record what has been observed in detail and follow the Council's procedures to report these concerns.

If you receive a disclosure:

- Do not panic.
- Try not allow any shock or distaste to show.
- Do not probe for more information than is offered or ask closed or leading questions such as "did he / she touch you?" Allow the person to talk freely and be supportive.
- Do not speculate or make assumptions.
- Do not make negative comments about the alleged abuser.
- Do not approach the alleged abuser.
- Do not make promises or agree to keep the information secret.

In all cases, if you are not sure what to do you should contact your Nominated Lead Safeguarding Officer (NLSO) who will be able to provide

advice. A list of contacts is available in the Appendix B of this policy and on the intranet. If you are not sure what to do you can gain help from the NSPCC 24-hour help line Tel No: 0808 800 5000.

Upon receipt of an incident form, your Nominated Lead Safeguarding Officer (NLSO) must report the incident or seek advice as soon as possible but within an absolute maximum of 24 hours from the receipt of an Incident Reporting Form (Appendix A). The NLSO will advise the referrer of the action they will take and further feedback will only be provided if appropriate.

3.4 Reporting allegations or concerns of abuse relating to West Lancashire Borough Council Staff

Action to take:

Complete an Incident Reporting Form (Appendix A)

- Pass the completed form, directly and securely, to the Designated Safeguarding Officer (DSO) or the Head of HR & OD immediately or as soon as practically possible if out of hours. Contact DSO / Head of HR/OD to notify them of the submission of a pending form. In the absence of the DSO or the Head of HR & OD, pass the form to one of the Designated Deputy Safeguarding Officers (DDSO's). Reporting the matter should not be delayed by attempts to obtain further information.
- If a child or vulnerable adult is in immediate danger of harm, you should personally contact the Police ensuring that your Nominated Lead Safeguarding Officer (NLSO) is made aware at the earliest opportunity (the Police will automatically inform the relevant LCC Services). Maintain surveillance of the individual if possible. A record should be made of the name and title of the Police Officer to whom the concerns were passed, together with the time and date of the call, in case any follow up is needed- record this information on the Incident Reporting Form (Appendix A).

3.5 Reporting allegations or concerns of abuse relating to Elected Members

Should a concern, report or allegation relate to an Elected Member the first point of contact should be with the Council's Monitoring Officer, who will take advice from LCC Children or Adult Care Services or refer the matter formally see below. The Monitoring Officer may decide that the Council's Standards procedures apply as well as, or instead of this policy. Details of the Monitoring Officer can be found in Appendix B.

The Monitoring Officer in liaison with the Designated Safeguarding Officer and Chief Executive Officer will determine the most appropriate course of action.

Action to take:

Complete an Incident Reporting Form (Appendix A)

- Pass the completed form to the Council's Monitoring Officer immediately or as soon as practically possible if out of hours. Reporting the matter should not be delayed by attempts to obtain further information. Contact the Monitoring Officer to notify them of the submission of a pending form.

If a child or vulnerable adult is in immediate danger of harm, you should personally contact the Police ensuring that your Nominated Lead Safeguarding Officer (NLSO) is made aware at the earliest opportunity. (The police will automatically inform the relevant LCC Services). Maintain surveillance of the individual if possible. A record should be made of the name and title of the Police Officer to whom the concerns were passed, together with the time and date of the call, in case any follow up is needed. Record this information on the Incident Reporting Form.

3.6 Reporting poor practice, whistle blowing, sharing information & concerns

The Council has a 'Whistle Blowing Policy' in line with the Public Interest Disclosure Act 1998. It is also important to have procedures for enabling staff and volunteers to share, in confidence, with a designated person concerns they may have about a colleague's behaviour.

This may be behaviour linked to abuse or behaviour that pushes boundaries beyond acceptable limits. If this is consistently ignored a culture may develop within an organisation whereby staff and young people are 'silenced'.

The welfare of the individual is always paramount to West Lancashire Borough Council and we fully support 'whistle blowing' for the sake of the child and vulnerable adult. The Council assures all representatives and professional or voluntary organisations that it will fully support and protect anyone who, in good faith (without malicious intent), reports a concern about a colleague's practice or the possibility that a child or vulnerable adult may be being abused.

While it is difficult to express concerns about colleagues or issues relating to bad practice, it is vital that these concerns are communicated to a Nominated Lead Safeguarding Officer (NLSO) or manager. All staff and volunteers will be encouraged to talk to the NLSO if they become aware of anything that makes them feel uncomfortable. **For further information please refer to the Council's policy on 'Whistle blowing', details of which can be found on the Councils Intranet.**

Allegations about a Member of Staff or Elected Members

Any complaint or allegation made against West Lancashire Borough Council's staff regarding a child or vulnerable adult, will be managed by the relevant Director with support where required from the Head of Resources & Organisational Development, in accordance with the Council's Disciplinary Procedures, following the initial report of the incident using the procedures in

this policy. For complaints relating to Elected Members, the matter will be handled by the Council's Monitoring Officer. The Monitoring Officer may decide that the Council's Standards procedures apply.

Responding to poor practice

If, after investigation through the Incident Reporting Form process the allegation clearly stems from poor practice, the appropriate Director shall arrange for further information, training and support in accordance with procedures for improving performance. In light of the investigation, the Director will be responsible for making any recommended changes to the practices and procedures within their Service area to ensure that the welfare of children and vulnerable adults is safeguarded and remains paramount. In addition, the Designated Safeguarding Officer (DSO) will undertake a review of the Safeguarding Policy in the light of investigations into poor practice.

3.7 Allegations of previously unreported or historical abuse

Allegations of abuse may be made some time after the event (e.g. by an adult abused as a child). Where such an allegation is made the representative of West Lancashire Borough Council shall follow the Council's procedures for responding to disclosures, including completion of an incident reporting form (Appendix A).

3.8 Support following allegations of abuse

Consideration shall be given to what support may be available and appropriate to the alleged perpetrator of the abuse if they are a WLBC employee.

3.9 Approach by a potential abuser following referral

Should a member of staff be approached by someone who has been identified as a potential abuser, the staff member should not comment on the case but contact the Nominated Lead Safeguarding Officer (NLSO) as soon as possible. If the representative believes that such an approach now means that the child or vulnerable adult may be in immediate danger of harm, they should personally contact the Police ensuring that the Nominated Lead Safeguarding Officer (NLSO) is made aware at the earliest opportunity. (The Police will automatically inform LCC Services). Maintain surveillance of the individual if possible. A record should be made of the name and title of the Police Officer to whom the concerns were passed together with the time and date of the call, in case any follow up is needed.

3.10 Confidentiality and information sharing

The legal principle that the welfare of the individual is paramount may mean that usual considerations of confidentiality which would apply in other situations, should not be allowed to override the Council's exercising of a duty of care and the protection of children and vulnerable adults from harm. However, every effort shall be made to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know

basis only.

This could include sharing certain information with the following parties to safeguard children and vulnerable adults:

- Statutory protection agencies: LCC Children and Adult Services or the Police.
- Designated Safeguarding Officer and Head of HR & OD, Monitoring Officer.
- The parents of the person who is alleged to have been abused (**only following advice from LCC Children and Adult Services**).
- The person making the allegation. (Feedback will only be provided if appropriate).
- OFSTED in the case of a child or young person making a disclosure regarding a staff member of an OFSTED registered facility.
- The alleged abuser and parents if the alleged abuser is a child or vulnerable adult. (Following advice from LCC Children and Adult Services)

Information shall be stored in a secure place by the Designated Safeguarding Officer (DSO) with limited access by designated people; relevant measures will be taken to ensure confidentiality when sharing information to ensure the protection of children and vulnerable adults. If information is shared with other agencies, a secure method of transfer must be used.

3.11 Approaches from the press regarding a Safeguarding Incident

Should a Council representative be approached by a member of the press in relation to a safeguarding incident or ongoing investigation relating to a Council representative, they should not make any comment but should refer the member of the press to the Council's Communications team or the DSO or DDSO, details of which are contained in Appendix B.

4. Recruitment, Employment and Redeployment Procedures

West Lancashire Borough Council will take all reasonable steps to ensure that unsuitable people are prevented from working with children and vulnerable adults in the services it provides. This procedure extends to people who are working on behalf of the Council as well as employees; including all permanent and temporary employees, agency workers, volunteers and casual staff.

4.1 Advertising Posts

All vacancies advertised by West Lancashire Borough Council will highlight if an Enhanced DBS Clearance is an essential criterion to carry out the role.

WLBC maintains a list of all posts that require an Enhanced DBS Clearance. Any new posts created on the establishment will be assessed by Line Managers as to whether an Enhanced DBS is required. All new or adjusted posts will be subject to the Council's Vacancy Clearance Process, which require Line Managers to assess if the post requires DBS clearance and at what level.

Disclosure Type	Details Requested	Eligibility
Basic	All unspent convictions and conditional cautions	Anyone
Enhanced	All unprotected convictions and cautions, both unspent and spent as well as any non-conviction information that has a bearing on your suitability for employment	The position must be included in both the ROA Exceptions Order and the Police Act 1997 (Criminal Records) regulations

The following additional information will also be requested as part of the application process:

The applicant's consent to undertake an Enhanced DBS check.
At least two references with one being their current or most recent employer (not relatives) that comment on the applicant's previous experience and suitability for the job. References must be available for a full 3 year period prior to appointment. Consequently more referees will be required if the named referees have known the applicant for less than 3 years.

The employment interview will include specific safeguarding questions.

For applicants who are successful at the interview, the HR team will request an Enhanced DBS disclosure and two relevant references. At this stage an offer of employment will be made subject to satisfactory DBS clearance and references.

Only the applicant will receive the result of the DBS disclosure certificate. The HR team will be notified by the registered body who is obtaining the Disclosure on the Council's behalf, that the disclosure has been released to the applicant.

The applicant must then provide sight of the original copy (not a photocopy) to the HR team who will record the certificate number, the date of issue.

It is not permissible to record the actual conviction, if one is recorded on the certificate. However, where there are convictions recorded on the disclosure certificate, a record can be made about whether an offer of appointment was confirmed or not based on the content of the disclosure.

It is not possible to hold a photo copy of the actual certificate. The results are confidential, although any concerns will be highlighted to the recruiting manager and may be discussed with the individual concerned. If there are substantial concerns with the disclosure, which may preclude the applicant from the post, these cases will be discussed by all relevant parties. It will be the responsibility of the relevant appointing manager to decide on the applicant's suitability for working with children and vulnerable adults taking into account only those offences that may be relevant to the post.

Line managers should refer to the latest HR guidance on recruitment on the intranet for further details or contact the HR team.

4.2 Existing Staff

All existing West Lancashire Borough Council staff who have substantial and/or unsupervised access to children and vulnerable adults in accordance with the DBS guidelines, will be subject to an Enhanced DBS check. If a member of staff's job description changes a decision should be made by their manager as to whether their duties will involve having substantial and/or unsupervised access to children and vulnerable adults in accordance with the DBS guidelines and, if so, that an Enhanced DBS disclosure is applied for.

4.3 Induction

All West Lancashire Borough Council staff and Elected Members, will undergo Level 1 Safeguarding training via the online Emerge e learning tool, as soon as possible after commencing their employment, in which a summary of the Safeguarding Policy is included. A link to the full policy and procedures will be provided by the Line Manager as part of their local induction.

4.4 Training

Appropriate training will be provided to all West Lancashire Borough Council staff, Elected Members and volunteers who work with children and vulnerable adults or through their jobs could be in a position to recognise signs of abuse to children and vulnerable adults. The level of training required shall be identified by Line Managers for staff or Member Services for Elected Members, and affirmed by Heads of Service. For new staff, training will be provided as soon as possible after commencement.

Level 1 – All staff / Elected Members will be required to complete mandatory e-learning modules of Safeguarding Children and Vulnerable Adults. Courses can be found on the WLBC Emerge: e-learning system. Staff who do not have

access to the e-learning system will be given alternative 'Tool Box' talks by a relevant manager.

Refresher training shall take place should any significant change to this policy be made.

Level 2 – An appropriate, more in depth safeguarding awareness training , which will be provided externally – designed for all employees who have been required to have an Enhanced DBS as part of their recruitment process, along with those who have designated safeguarding responsibilities.

Coaches – Coaches working in sport will be required to attend a specific coaching-related safeguarding training such as UK Coaching -Good Practice in Child or Young Person Protection or equivalent unless they can demonstrate that they have attended a sport's governing body approved training course in Safeguarding .

Safer Recruitment training – Those staff responsible for recruiting to positions that require an Enhanced DBS will also receive Safer Recruitment training.

4.5 Services that use Volunteers

Managers of services that rely on the support of Volunteer workers should have a robust system in place to ensure children and vulnerable adults using those services are not put at safeguarding risk. It is for those Service Managers in consultation with their Head of Service, to determine what disclosures are required.

In determining the level of disclosure required, regard should be had for the general safeguarding principles and level of substantial and/or unsupervised access to children and vulnerable adults.

5. Safeguarding Code of Conduct for all Council Representatives

Although it is impractical to provide definitive instructions applying to every situation when West Lancashire Borough Council representatives come in to contact with children or vulnerable adults, the following points cover the standards of behaviour expected of all representatives in order to protect both themselves and the individuals they come in to contact with. They are supplementary to the existing West Lancashire Officers & Member Codes of Conduct.

All Staff must:

- Work within the scope of this Policy at all times.
- Never engage in rough, physical or sexually provocative games, including horseplay.
- Never share overnight accommodation with a child or vulnerable adult.
- Never allow or engage in any form of inappropriate touching. The main principles of touching are:
 - It should always be in response to the individual's needs.
 - It should always be appropriate to the individual's age/stage of development.
 - It should always be with the individual's permission.
- Never allow the use of inappropriate language to go unchallenged.
- Never physically restrain a child or vulnerable adult unless the restraint is to prevent physical injury to the individual or to another person.
- Never make sexually suggestive comments, even in fun.
- Never reduce a child or vulnerable adult to tears as a form of control.
- Never allow allegations to go unchallenged, unrecorded or not acted upon.
- Never do things of a personal nature that an individual can do for himself or herself or that a parent can do for them.
- Never invite or allow children or vulnerable adults to your home unsupervised.
- Never allow children or vulnerable adults to be left unattended or placed with members of staff, for substantial periods, who have not been subject to an Enhanced Disclosure check.

With the exception of emergencies staff must:

- Never have children or vulnerable adults in their own vehicle, unless parents/carers have been notified.
- Where circumstances require the transportation of children or vulnerable adults, another West Lancashire Borough Council staff member must be present and the driver must have adequate insurance to use their vehicle to cover business use in that capacity. In extreme medical emergencies, where it is required to transport a child or vulnerable adult on their own, it

is essential that another West Lancashire Borough Council staff member or the parent/carer is notified immediately.

- Avoid, where possible, taking an individual to the toilet unless another adult is present and where possible, remain outside the toilet and under no circumstances should you support an individual with personal care.
- West Lancashire Borough Council staff or volunteers should never be in a position where they are required to do things of a personal nature for children or vulnerable adults.

Implications for representatives

Representatives who breach the Safeguarding Code of Conduct may be subject to the Council's disciplinary procedures. If an allegation is made against representatives the matter shall be investigated.

Further Guidance

Work experience placements

Special consideration must be made with regard to young people on work experience placements with the Council.

In the first instance, both work experience students and supervisors should follow the Safeguarding Policy of the organisation which has arranged the placement with the Council, who should have their own safeguarding procedures in place.

It is the responsibility of managers to ensure that adequate provisions are made to ensure that staff working in an office-based situation employ safe working practices and are not placed in a situation where they are left unsupervised with child / vulnerable adults on a work experience placement or an employee under-18 years old.

It is good practice to ensure that Council representatives do not put themselves at risk of having allegations made against them and therefore, where possible, should limit their unsupervised access to the child or vulnerable adult. This also applies within an office environment where everyone else has left and the child or vulnerable adult may be left with just one employee.

Representatives should follow the Council's Safeguarding Code of Conduct and the guidance for safe working practices laid out in this policy.

Where this substantial and/or unsupervised access is unavoidable, representatives should always follow the Council's Safeguarding Code of Conduct and use common sense to safeguard themselves from allegations, particularly if transporting children and vulnerable adults.

Storing Data relating to Children and Vulnerable Adults

Where the Council holds personal data in relation to individuals, especially where there is sensitive personal data collected such as medical conditions, this information should be held in line with requirements for the General Protection Data Regulations (GDPR) and Data Protection Act 2018.

6. Partnership working, Community and Voluntary Sector Organisations receiving funding from the Council and Contractors

6.1 Partners, Community and Voluntary Sector Organisations

Where Council services are undertaken by partners on the behalf of West Lancashire Borough Council or the Council fund voluntary or community organisations, whose work will involve access to children and vulnerable adults through, for example, the provision of grants, the Council will seek assurance that such bodies either have their own Safeguarding Policy in place or have accepted those of the Council. In the case of organisations receiving significant funding provision from the Council to deliver services for children or vulnerable adults, the receipt of such assurances will be a prerequisite for funding and form part of the application process if appropriate.

6.2 Contractors

Any contractor or sub-contractor, engaged by the Council in areas where workers may have substantial and/or unsupervised access to children or vulnerable adults should ensure that their procedures are in accordance with this policy. Contractors will be responsible for ensuring that workers with substantial and /or unsupervised access to children or vulnerable adults are subject to the necessary Disclosure and Barring Service disclosure. This includes sub-contracted workers employed through agencies.

Where managers are commissioning services and awarding contracts, consideration should be given to the nature of the work to be undertaken and whether this will involve contractors having substantial and/or unsupervised access to children or vulnerable adults. If so, managers are responsible for ensuring contracts / tenders comply with this policy and all documentation is provided as part of the pre-contract / tender negotiations and documentation.

Managers should ensure that the provisions of Appendix D are contained in any contract/tender agreements.

Where a contract is to be tendered, the above stipulations should form part of any tender document. Production of the contractor's Safeguarding Policy must form part of any tender submission and must be received and considered satisfactory by the Council prior to any formal engagement. Should the Council not be satisfied with the contractor's Safeguarding Policy, the contractor shall adopt the Council's policy and be required to sign a self-declaration (Appendix D). Alternatively for smaller contracts not requiring a tender, a signed disclosure must be submitted (Appendix E). The manager engaging the contractor is responsible for ensuring that the above procedures are adhered to.

Users/Hires of Council Assets

Part of the terms and conditions for hirers or lease holders of Council managed or owned Community Centres or other Council buildings for events / activities aimed at children or vulnerable adults must include a requirement to comply with the Council's Safeguarding Policy or have one of their own.

Licensing and Related Regulation

The Council has regulatory responsibilities that directly relate to safeguarding. Much of these relate to the Council's licensing functions that ensure those individuals that hold a licence are 'safe and suitable' to undertake the work the licence permits. The most significant of these are the licensing of taxis and drivers, but the Council undertakes similar functions relating to street trading, gambling and alcohol sales.

The Council maintains detailed policies which describe how these licensing duties are put into practice, including related enforcement. These policies can be found at www.westlancs.gov.uk/licensing

7. Guidelines for Use of Photographic Equipment at Organised Events Including Mobile Phone Technology and e-Communications

There is evidence that some people have used public events as an opportunity to take inappropriate photographs or film footage of children. All staff organising events where children will be participating must remain vigilant and ensure the following guidelines are adhered to. The guidelines apply to all forms of technology that can be used to record images including mobile phones, many of which now include digital cameras, and staff should be aware of the opportunity this affords for misuse.

In addition, when using an external venue, you need to check the venue's policy on the use of photographic equipment. For example a leisure centre should not allow the use of filming equipment in the changing rooms or swimming pool areas.

If a professional photographer, the press or representatives are invited to cover services, events, activities, the event organiser must:

- Inform participants and parents/carers that a photographer will be in attendance and ensure they consent to both the taking and publication of films or photographs by asking them to complete a consent form (Appendix F)
- Ensure that the photographer wears their identification or is provided with identification at the event.
- Ensure that the photographer has no substantial and/or unsupervised access to children or vulnerable adults.
- Ensure that the surnames of children or vulnerable adults are not used in photographs or film footage, unless with the express permission of the child or vulnerable adults parent/carer.

Public information: the specific details concerning event photography should, where possible, be published prominently in event programmes and must be announced over the public address system prior to the start of the event.

The recommended wording is:

"In the interests of safeguarding children and vulnerable adults and in line with the West Lancashire Borough Council Safeguarding Policy, the promoters of this event request that any person wishing to engage in any photography, for professional or media purposes, should register their details with the event staff at the entry desk before carrying out any such photography. The promoters of this event reserve the right of entry to this event and reserve the right to decline entry to any person unable to meet or abide by the promoter's conditions."

If you have concerns:

If you are concerned about any photography taking place at an event, contact the promoter or event organiser and discuss it with them. If appropriate, the person about whom there are concerns should be asked to leave and the event manager should be informed.

e- Communications

The use of 'e-communications' is often a means for abusers to gain access to children and vulnerable adults. Council representatives who work with children and vulnerable adults should ensure that the Council's 'ICT and Data Security Policy' is strictly adhered to. Where staff have concerns that e-communications are being used inappropriately to access children and vulnerable adults, they should raise those concerns with an NLSO, details of which are contained in Appendix B.

8. Further Enquiries and Policy Review

All further enquiries regarding this policy should be directed to:

Simon Burnett
Deputy Director of Leisure & Wellbeing
West Lancashire Borough Council
Robert Hodge Centre
Stanley Way, Skelmersdale
West Lancashire
WN8 8EE

Tel: 01695 585157

This policy and associated documentation will be reviewed every 3 years.

Policy Dated:

April 2019

Review Date:

April 2022

Appendix A: Incident Reporting Form

Appendix B: Roles and Responsibilities of Designated Officers

Appendix C: Relevant Legislation

Appendix D: Self declaration for contractors engaged in work on behalf of West Lancashire Borough Council

Appendix E: Self Disclosure Form for volunteers and smaller contractors

Appendix F: Photographic Registration Form

Appendix A: Incident Reporting Form

Please give as much information as possible, using extra sheets if necessary.

All information will be treated in strict confidence.

If you are not sure what to do, your first response should be to contact your Nominated Lead Safeguarding Officer (NLSO) who will be able to provide advice. A list of contacts is available in Appendix B of the Safeguarding Policy and on the intranet. If you are not sure what to do you can gain help from the NSPCC 24-hour help line Tel No: 0808 800 5000.

However, if you believe a child or vulnerable adult to be in immediate danger you should contact the Police, then inform your Nominated Lead Safeguarding Officer (NLSO).

Date:	Time:	Venue [Place where reported]:
Name of Child/Vulnerable Adult:	DOB:	Age:
Address:		
Postcode:	Tel Number:	
As the officer completing the form, are you reporting your own concerns or passing on those of someone else?		
Child-Vulnerable Adult/ Own/Other		
Name and contact details of person raising/reporting suspicions of abuse to the officer, if different from Child/Vulnerable Adult/ Officer:		
Brief description of what has prompted the concerns: include dates, times, locations etc. of any specific incidents. Please write only facts and avoid interpretation e.g. Physical e.g. visible bruising or injury, e.g. location, size etc. / behavioural / indirect signs?		

Have you spoken to the child/vulnerable adult? Yes/No (if yes, what was said?)

Has anybody been alleged to be the abuser? Yes/No (if yes, give details)

Have you consulted anybody? Yes/No

If so, give details of contact i.e. Police Officer Name, Badge No, Social Worker details, dates.

Have the parents/carers been contacted ahead of this referral? This should be done unless you feel it would increase risk of harm. If yes, what has been said?

If relating to a vulnerable adult, have they given consent for this referral? Yes/No

Does the child/vulnerable adult have a disability Yes/No

Your Name: *Position:*

To Whom reported: *Position:*

Date of reporting:

Signature: *Date:* *Time:*

Next Steps:

- 1) Contact DSO / NLSO verbally to notify them of the pending submission of this form
- 2) send form within 24 hours.

REMEMBER TO MAINTAIN CONFIDENTIALITY.

DO NOT DISCUSS THE MATTER WITH ANYONE OTHER THAN THOSE THAT NEED TO KNOW.

APPENDIX B

Roles and Responsibilities of Designated Officers

Each West Lancashire Borough Council Service Area with the potential for access to children or vulnerable adults has one person who will act as the main contact for safeguarding, a Nominated Lead Safeguarding Officer (NLSO). There are also an overall West Lancashire Borough Council Designated Safeguarding Officer (DSO) and Deputy Designated Safeguarding Officers (DDSO). These three roles and their responsibilities are detailed below.

Designated Safeguarding Officer (DSO)

This role is that of the overall Designated Safeguarding Officer for West Lancashire Borough Council. Simon Burnett, Deputy Director of Leisure & Wellbeing is nominated to take on this role and is responsible for:

- Reporting incidents and seeking advice from the relevant agencies (Police/ LCC Children or Adults Services) within 24 hours of receipt of an Incident Reporting Form
- Liaising with all Service areas to maintain and update the West Lancashire Borough Council Safeguarding Policy at a minimum of once every three years.
- Keeping an up-to-date knowledge and understanding of the area of child or vulnerable adult protection. This will include attending relevant identified training.
- Acting as a first point of contact for the Council on safeguarding issues, both internally, for members of the public and other external contacts.
- Ensuring all relevant information is communicated to the Deputy Designated Safeguarding Officers (DDSO) and the Nominated Lead Safeguarding Officers (NLSO) where applicable. Regular meetings will be co-ordinated by the DSO, in order that experiences be shared, updates be given, and issues be raised and dealt with as appropriate.
- Providing guidance on relevant matters to Deputy Designated Safeguarding Officers (DDSO) and Nominated Lead Safeguarding Officers (NLSO) as and where necessary.
- Representing West Lancashire Borough Council on local safeguarding groups.
- Promoting safeguarding throughout the Council in conjunction with Directors and Heads of Service. For example publicising new editions of the Policy. Delegating responsibilities as and when this proves necessary.
- Receiving and acting upon any reports or incidents of suspected or actual abuse.
- Storing information in a secure place with limited access by designated people and taking relevant measures to ensure confidentiality and security when sharing information.
- Advising the referrer of the action they will take (further feedback will only be provided if appropriate).

Deputy Designated Safeguarding Officers (DDSO's)

These roles are those of Deputy Designated Safeguarding Officer (DDSO). These Officers hold the lead responsibility for Licensing, Prevent, and Safer Recruitment. The persons in these roles are responsible for:

- Receiving reports or incidents of suspected or actual abuse in liaison with the Designated Safeguarding Officer (DSO) where necessary and according to the terms of the Policy.
- Reporting the incident / seeking advice from the relevant agencies within 24 hours of receipt of an Incident Reporting Form.
- Advising the referrer of the action they will take (further feedback will only be provided if appropriate).
- Ensuring that staff in their service are familiar with the Policy.
- Passing on records and reports of any incidents of suspected or actual abuse to the Designated Safeguarding Officer (DSO) for secure storage.
- Providing guidance on any other relevant matters to staff in their service.
- Acting in support and deputising for the Designated Safeguarding Officer (DSO) as appropriate, and undertaking any necessary actions in their absence.

Nominated Lead Safeguarding Officers (NLSO's)

These roles are those of Nominated Lead Safeguarding Officers.

The persons in these roles are responsible for:

- Being the first point of contact for staff within the relevant Service area who have any safeguarding concerns.
- Receiving reports or incidents of suspected or actual abuse in liaison with the Designated Safeguarding Officer (DSO) where necessary and according to the terms of the Policy.
- Reporting the incident / seeking advice from the relevant agencies within 24 hours of receipt of an Incident Reporting Form.
- Advising the referrer of the action they will take (further feedback will only be provided if appropriate).
- Ensuring that staff in their service are familiar with the Policy.
- Passing on records and reports of any incidents of suspected or actual abuse to the Designated Safeguarding Officer (DSO) for secure storage.
- Providing guidance on any other relevant matters to staff in their service.

CONTACTS

Safeguarding Role	Job Description	Contact
Designated Safeguarding Officer (DSO): Simon Burnett	Deputy Director of Leisure & Wellbeing	01695 585157
Deputy Designated Safeguarding Officers (DDSO): Clifford Owens Paul Charlson Sharon Lewis	Community Safety Officer Commercial, Safety & Licensing Manager Head of Human Resources & Organisational Development	01695 585394 01695 585246 01695 585027
Nominated Lead Safeguarding Officers (NLSO): Emma Davies Kay Lovelady Paul Waring Michelle Williams Lol Aitchison	Partnership Officer Principal Solicitor Senior Housing Officer Street Scene Operations Manager Building Control Manager	01695 585145 01695 585075 01695 585127 01695 585449 01695 585188
Monitoring Officer : Terry Broderick	Borough Solicitor	01695 585001
Police	Non-Emergency Contact Emergency Contact (if a child or vulnerable adult is in danger) General	101 999 0845 1253545

Appendix C: Relevant Legislation/Guidance

Working Together to Safeguard Children (2006, 2013 & 2015)

A guide to inter-agency working to safeguard and promote the welfare of children. The Department for Education published an updated version of the key statutory guidance for anyone working with children in England in March 2015. It sets out how organisations and individuals should work together and how practitioners should conduct the assessment of children, with the key message that safeguarding is everyone's responsibility. The latest guidance updates the previous version published in 2013 and does include changes:

- Referral of allegations against those who work with children
- Clarification requirements on local authorities to notify serious incidents
- A definition of serious harm for the purposes of serious case reviews.

<https://www.nspcc.org.uk/preventing-abuse/child-protection-system/england/legislation-policy-guidance/>

Children and Families Act 2014

Introduced a number of reforms including:

- Encourages 'fostering for adoption' which allows approved adopters to foster children while they wait for court approval to adopt
- Introduces a 26 week time limit for the courts to decide whether or not a child should be taken into care. In some cases this limit is extended to 8 weeks
- 'Staying put' arrangements which allow children in care to stay with their foster families until the age of 21 years with both parties' agreement.
- Introduces a single assessment process and an Education, Health and Care (EHC) plan to support children, young people and their families from birth to 25 years which replaces Statements of Special Educational Need.

<http://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

The Children Act 2004

The Children Act 2004 strengthens the 1989 Act. It puts into practice the proposals set out in the Green Paper Every Child Matters (2003) and places a duty on key statutory agencies to safeguard and promote the welfare of children.

The Act embodies five principles that are key to well-being in children and young people and later life:

- Being healthy • Staying safe • Enjoying and achieving • Making a positive contribution
- Achieving economic wellbeing

The Council has a responsibility to provide a safe environment for children and young people in which their welfare is of paramount importance.

<https://www.nspcc.org.uk/preventing-abuse/child-protection-system/england/legislation-policy-guidance/>

Care Act 2014

The Care Act 2014 replaces a host of out-of-date care laws. The legislation sets out how people's care and support needs should be met and introduces the right to an assessment for anyone, including carers and self-funders, in need of support.

<http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

The Protection of Children Act 1999

Creates a framework operating across the different sectors that work with children to identify those considered unsuitable to work with children. Includes listing their names on the POCA list and the (former) education List 99.

<http://lx.iriss.org.uk/content/protection-children-act-1999-practical-guide-act-all-organisations-working-children>

The Children Act 1989 (England and Wales)

The act that currently provides the legislative framework for child protection in England. Key principles established by the Act include:

- The paramount nature of the child's welfare
- The expectations and requirements around duties of care to children

<http://www.legislation.gov.uk/ukpga/1989/41/contents>

Prevent Duty Guidance 2015

Guidance for specified authorities in England and Wales on the duty in the Counter Terrorism and Security Act 2015 to have due regard to the need to prevent people (including children and young people) from being drawn into terrorism.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

Criminal Justice and Court Services Act 2000 & 2015

Provides a comprehensive definition of working with children. Refers to the responsibility of public bodies to prevent unsuitable people from working with children and provides criminal sanctions for those who breach the disqualification.

<http://services.parliament.uk/bills/2014-15/criminaljusticeandcourts.html>

Protection of Freedoms Act 2012

Merged the Independent Safeguarding Authority with the Criminal Records Bureau (CRB) to form a single, non-Nominated public body called the Disclosure and Barring Service (DBS).

<http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

Education Act 2011

Made changes to provisions on school discipline and places restrictions on the public reporting of allegations made against teachers.

<http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>

Safeguarding Vulnerable Groups Act 2006

Established a single body to make decisions about individuals who should be barred from working with children and young people and to maintain a list of these individuals.

<http://www.legislation.gov.uk/ukpga/2006/47/contents>

Sexual Offences Act 2003

Introduced a package of measures to give children the greatest possible protection from sexual abuse, extending the abuse of a position of trust offences, and creating a new offence to tackle off line and online grooming.

http://www.cps.gov.uk/legal/p_to_r/rape_and_sexual_offences/soa_2003_and_soa_1956/

The Police Act 1997

Changes the route by which employers can check whether a potential employee has committed criminal offences against children, or whether there is a reason for that person to be considered inappropriate to work with children. Contains provision for the creation of the Disclosure and Barring Service (DBS) for England and Wales.

<https://www.health-ni.gov.uk/articles/police-act-1997>

The Human Rights Act 1998

Sets out the rights of children to be protected by a series of Articles covering specific areas.

<https://www.equalityhumanrights.com/en/human-rights/human-rights-act>

The Data Protection Act 2018

Relate to the recording of information, including information about children. States that information must be obtained fairly and processed lawfully, shared only in certain circumstances and kept securely.

<http://www.legislation.gov.uk/ukpga/1998/29/contents>

Adult Workforce Guidance

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/577320/Adult_workforce_guidance_v9.0_111216.pdf

Children's Workforce Guidance

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/577077/Child workforce guidance v9.0 091216.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/577077/Child%20workforce%20guidance%20v9.0%20091216.pdf)

Other Workforces Guidance

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/577079/Other workforce guidance v7.0 091216.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/577079/Other%20workforce%20guidance%20v7.0%20091216.pdf)

Regulated Activities with Children

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

Regulated Activities with Adults

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/216900/Regulated-Activity-Adults-Dec-2012.pdf

Safer Recruitment

Recruitment and Selection Code can be found on Staff Intranet.

Appendix D:

Self declaration for contractors engaged in work on behalf of West Lancashire Borough Council

(To be completed by contractors likely to have substantial and /or unsupervised access to children or vulnerable adults)

Name of Contractor:

I have read and understood the Council's Safeguarding Policy and agree to abide by the procedures set out in the document. (Delete as appropriate)

I confirm that I/we hold a current Safeguarding Policy that is available to view on request. (Delete as appropriate)

I confirm that all workers engaged by the above named contractor and who are likely to come into contact with children or vulnerable adults have been subject to the appropriate level of Disclosure and Barring Service check, as defined by the Disclosure and Barring Service guidance.

Name:

Position:

Date:

Signature:

Managers should ensure that the provisions of this Appendix are contained in any contract/tender agreements.

Appendix E:

CONFIDENTIAL: Self Disclosure Form

Personal disclosure form for all volunteers and smaller contractors working with or in contact with Children or Vulnerable Adults on behalf of West Lancashire Borough Council.

Have you ever been convicted of a criminal offence or been the subject of a Caution or Bind Over Order? - please tick one below:

NO I have never been convicted of a criminal offence or been the subject of a Caution or Bind Over Order

YES I have been convicted of a criminal offence or been the subject of a Caution or Bind Over Order

If Yes, please state the nature and date(s) of the offence(s) in the space provided.

Signed

Print Name

Position / Company or Organisation

Date

Appendix F:

Registration Form for the use of Cameras and other Image Recorders

Venue/ Area
Description of Equipment
Reason for Photography
Forename
Surname
Address
Postcode
Contact Tel no.
Email Address
Date

