Gravesham Borough Council

Safeguarding Policy

Document control

Organisation	Gravesham Borough Council
Document Type	Policy Document
Title	Safeguarding Policy
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Owner	Lead Safeguarding Officer
Review date	October 2031

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1. Overview and Aims

1.1 The safeguarding of all children and vulnerable adults within Gravesham is a fundamental principle in the delivery of all Council services. All children and adults at risk have the right to live their lives to their full potential, to be protected, to have the opportunity to participate and enjoy any activity and to be treated with dignity and respect. Gravesham Borough Council has both a moral and legal obligation to ensure the safeguarding of children and adults at risk across the services it provides, and this Safeguarding Policy sets out the Council's ambition to this agenda.

'Safeguarding means protecting people's health, well-being and human rights and enabling them to live free from harm, abuse and neglect. It's fundamental to high-quality health and social care'.

Safeguarding People – Care Quality Commission 2026

1.2 The aim of this policy and its associated procedures is to help protect and promote the welfare of all children and adults at risk within the borough that come into contact with Council services and ensuring that the Council fully meets all its safeguarding responsibilities. To achieve this aim this policy provides Council officers, elected Members and volunteers with a sound understanding of their safeguarding obligations and the support to recognise and respond to concerns effectively via the Council's adopted reporting procedures.

1.3 The Council recognises that the Kent Safeguarding Children Multi-Agency Partnership, Kent and Medway Safeguarding Adults Board, Kent County Council and Kent Police are the lead agencies in the Borough in respect of the protection of children and adults at risk and the Council will work with these agencies and where relevant, their associated procedures to deliver on its 'Safeguarding Pledge'.

1.4 This policy outlines how, at an operational level, Gravesham Borough Council will ensure the Safeguarding agenda is a primary consideration for all employees and part of corporate decision-making. Practically, this will be delivered by a number of commitments made by the Council which include:

- **Partnership working** – case studies in the Safeguarding agenda have revealed the complexities of deciding when and how to intervene to protect and promote the welfare of children and adults at risk. Recommendations from these studies have demonstrated that successful intervention depends on robust inter-agency partnership working between District Council services, the County Council's Children and Adult Social Services, Police, Health, the Family Justice System and the voluntary sector. Gravesham Borough Council is committed to working in partnership with all key stakeholders to safeguard all local residents.

- **Training and Raising Awareness** – this policy aims to ensure that an overarching approach to safeguarding is embedded within all of Gravesham Borough Council's services and that employees, Members, those delivering contracts on behalf of the Council and volunteers, all understand their roles and responsibilities in supporting all residents to live a life free from abuse, exploitation and intimidation. A rolling programme of training is not only available but expected to be completed as a mandatory requirement by all officers and Members with refresher training completed every two years.

1.4 The aims of this policy are that:

- The Council's approach and commitment to the Safeguarding agenda are embedded across the organisation, taking into consideration the needs of local residents and ensuring that their voices are heard, and opinions are built into future plans.

- All children or adults at risk that access services organised and delivered by Gravesham Borough Council are protected against abuse, neglect and/or exploitation to the extent of the Council's knowledge, control and influence.

Safeguarding Pledge

As we are made aware, we will ensure that any children or adults at risk that access services organised and delivered by Gravesham Borough Council are protected, kept safe from harm and wherever possible, are provided with the support they need to make the choices they want.

We believe that safeguarding is everybody's responsibility, and we will work with all residents, partner agencies, contractors, and volunteers, to fulfil this pledge.

Where there is a conflict of agendas, the welfare of the child or adult at risk is paramount.

2. Policy Scope

2.1 This policy covers all Council functions and services and the operations of partners, contractors and voluntary organisations that deliver services on its behalf. The Council recognises that everyone has a responsibility for safeguarding children and protecting adults at risk.

2.2 Work that addresses the Safeguarding agenda has a wide reach across Council services. This would include: completing an urgent referral to Social Services to report a disclosure of abuse; action to address damp and mould in a property that an adult at risk would be living and breathing in; including green space in a development to ensure that children living in that future development will have somewhere to play outside (leading to a number of positive health outcomes); and, recognising signs of modern slavery in a local business and working with our partner agencies to support the victims and address any wider criminality.

2.3. Children

2.3.1 Safeguarding is a term that covers a wide range of activity with the purpose of protecting children and adults at risk from harm and promoting their welfare. The definition of a child for the purposes of Safeguarding includes any child or young person up to the age of 18 years old or 25 years old if they have special educational needs and disabilities (SEND).

2.3.2 The *Working Together to Safeguard Children (2026)* guidance defines Safeguarding children as:

- Providing help and support to meet the needs of children as soon as problems emerge

- Protecting children from maltreatment, whether that is within or outside the home, including online

- Preventing impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

- Promoting the upbringing of children with their birth parents, or otherwise their family network through kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

'Nothing is more important than children's welfare. Every child deserves to grow up in a safe, stable, and loving home. Children who need help and protection deserve high quality and effective support. This requires individuals, agencies and organisations to be clear about their own and each other's roles and responsibilities and how they work together'.

HM Government: Working Together to Safeguard Children 2026

2.4. Adults

'Safeguarding adults is everybody's business. We all have a role to play in ensuring that everyone in our communities is treated with dignity and respect, can make informed decisions about their lives without being subject to undue pressure and will be protected from harm and abuse wherever possible'.

LGA Publication: Safeguarding Adults 2023

2.4.1 Adult safeguarding is concerned with addressing the priorities above but has a slightly different approach at times given the ultimate right of an adult to make their own decisions about their lives. It is defined in the Care Act 2014 as:

'Protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances'.

Social Care Institute for Excellence (SCIE)

2.5. What defines an Adult at Risk?

2.5.1 It is important to note that the role of Safeguarding as it applies to adults is focussed on adults at risk. The Care Act 2014 defines this as any person aged 18 or above who:

i) Has needs for care and support (regardless of the level of need and whether or not these needs are being met)

ii) Is experiencing or is at risk of abuse or neglect, and

iii) As a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

2.5.2 As it is not always obvious if a person has care and support needs, concerns about any adult (or child) who is at risk of abuse or exploitation should be raised with a line manager/safeguarding leads as per Safeguarding procedures. The level of support they may be able to access may depend on whether they meet the definition of an adult at risk.

2.6. Making Safeguarding Personal

2.6.1 The Council will undertake a person-centred approach and endeavour to work sympathetically with any person requiring safeguarding support. This includes listening to the voice of the child and voice of the adult, considering their wishes (as far as possible). It has been possible to demonstrate some of this feedback though the safeguarding audits that the Council participates in. KMSAB have further information relating to Making Safeguarding Personal.

2.7. Trauma-Informed Practice

2.7.1 Trauma-informed practice is about understanding the reasons that may have led to a person needing care/support needs. The Council will adopt a trauma-informed approach and ensure that we take into account how trauma can negatively impact on individuals and communities, and their ability to feel safe or develop trusting relationships, which could be with us as Council staff or volunteers. Trauma-informed practice acknowledges the need to see beyond an individual's presenting behaviours. KMSAB have further information on trauma-informed practice.

2.8. Domestic Abuse Survivors

2.8.1 The Domestic Abuse Act 2021 recognises that victims of domestic abuse have an additional need for protection and support, whether or not they have additional care needs. The Act places a duty on Local Authorities in England to provide accommodation-based support to victims of domestic abuse and their children in refuges and other safe accommodation.

2.9. No Recourse to Public Funds

2.9.1 This policy covers all children and adults at risk whether or not they are entitled to access public funds. No Recourse to Public Funds (NRPF) status is a standard condition applied to many people in the UK with a temporary immigration status which blocks access to specific benefits for themselves and their children. However, Social Services support is not classed as a public fund for immigration purposes and safeguarding legislation and procedures still apply. Whatever an individual's immigration status may be, their human rights remain and equally Local Government's responsibility to safeguard children and adults at risk also remains.

2.10. Lead Agencies

2.10.1 The Council recognises that the Kent Safeguarding Children Multi-Agency Partnership, Kent and Medway Safeguarding Adults Board, Kent County Council and Kent Police are the lead agencies in the Borough in respect of the protection of children and adults at risk and the Council will work with these agencies and where relevant, their associated procedures to deliver on its 'Safeguarding Pledge'.

2.10.2 As a lower tier authority, Gravesham Borough Council has an important role in identifying safeguarding concerns, sharing information appropriately, and making timely referrals to the relevant statutory agencies. Our responsibility is to remain vigilant to indicators of abuse, neglect, exploitation, or harm, and to ensure that concerns are reported through the appropriate safeguarding procedures. While we work closely with safeguarding partners and

contribute to multi-agency arrangements, we do not hold the lead statutory responsibility for safeguarding children or adults at risk.

2.10.3 The statutory safeguarding duties sit with the upper tier authority, namely Kent County Council (KCC), which is the lead authority for children's social care and adult's social care services. As the statutory safeguarding authority, KCC is responsible for receiving and assessing safeguarding referrals, taking any necessary protective action, and exercising legal powers where required. Therefore, whilst Gravesham Borough Council plays a vital role in recognising concerns and referring them appropriately, we do not undertake statutory safeguarding investigations or social care assessments.

3. Recognising Abuse

3.1 In order to identify situations that present a safeguarding concern, staff will understand the main types of abuse that may be impacting children and adults in the Borough.

The 4 main types of abuse of children are:

- **Physical abuse** – non-accidental infliction of physical force that results, or could result, in bodily injury, pain or impairment.
- **Sexual abuse** – forcing or enticing participation in sexual activities (regardless of whether or not the child or young person is aware of what is happening).
- **Emotional abuse** – persistent emotional maltreatment.
- **Neglect** – persistent failure to meet basic physical and/or psychological needs.

3.2 Children may also need protection from a wider range of often community-based abuse, including:

- **Child Sexual Exploitation (CSE)** – Child Sexual Exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, deceive or force a child or young person under the age of 18 into sexual activity (a) in exchange for something that the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.
- **Criminal Exploitation** – a young person or adult is at risk of being groomed into undertaking criminal activities such as drug dealing/trafficking and working in cannabis farms etc. It is often perpetrated by an adult through the threat or use of violence.
- **Female Genital Mutilation (FGM)** – a collective term for illegal procedures which include the removal of part/all external female genitalia for cultural or other non-therapeutic reasons.
- **Child Trafficking** – A trafficked child is coerced or deceived by an adult who brings them into the country or is moved within the UK. They are denied their rights and are forced into exploitation. Trafficked children may experience many types of abuse and neglect. Traffickers use physical, sexual and emotional abuse as a form of control. Children and young people are also likely to be physically and emotionally neglected and may be sexually exploited (NSPCC).

- **Grooming** – Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so that they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked. Anyone can be a groomer, no matter their age, gender or race.

- **Cyber Bullying and Online Abuse** – this concerns bullying with the use of digital technologies. It can take place on social media, messaging platforms, gaming platforms and mobile phones. It is repeated behaviour aimed at scaring, angering or shaming those who are targeted.

- **Gangs and Youth Violence** – A child who is affected by gang activity or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. The risk or potential risk of harm to the child may be as a victim, perpetrator or both – in relation to their peers or to a gang-involved adult.

3.3 The same types of abuse can also impact adults, although some tend to be specific to adults. These include:

- **Physical abuse** – non-accidental infliction of physical force that results or could result in bodily injury, pain or impairment.

- **Sexual abuse** – involvement, either direct or indirect, in sexual activity without consent. It could also be the inability to consent or being pressured or induced to consent or take part.

- **Emotional or psychological abuse** – acts or behaviour which impinge on emotional health or which cause distress or anguish.

- **Financial abuse** – unauthorised, fraudulent obtaining and/or improper use of funds, property or any resources held by the victim.

- **Neglect, wilful neglect and acts or omission** – ignoring or withholding physical or medical care needs.

- **Discriminatory abuse** – where values, beliefs or culture result in a misuse of power that denies mainstream opportunities. It includes discrimination on the basis of race, gender, age, sexuality, disability or religion or any other protected characteristics.

- **Institutional or organisational abuse** – where an organisation imposes rigid and insensitive routines, has poor practices embedded in system, makes unskilled, intrusive or invasive interventions or is an environment allowing inadequate privacy or physical comfort.

- **Self-neglect** – a wide range of behaviours may constitute self-neglect including neglecting to care for one's personal hygiene, health or surroundings and behaviour such as hoarding. (You can refer to KMSAB Self Neglect and Hoarding Policy and Procedures).

3.4 Other safeguarding concerns impacting adults include:

- **Domestic abuse** – domestic abuse is defined as 'any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged

16 or over and who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can include but is not limited to psychological, physical, sexual, financial or emotional abuse.

- **Modern Slavery and Human Trafficking (MSHT)** – This involves the recruitment, transportation, transfer, harbouring or receipt of people who, with the threat or use of force, coercion, abduction, abuse of power or deception, are exploited for the purposes of prostitution, forced labour, slavery, forced criminality or other similar practices. Victims are trafficked all over the world, including in and around the UK and even throughout the Borough. Under the Modern Slavery Act 2015, the Council has a duty to notify the National Referral Mechanism (a Home Office body) of potential victims of MSHT. The Council is also expected to exercise due diligence to ensure that modern slavery is not present within its own workforce or within any of its supply chains as a matter of good practice.

- **Forced marriage** – a forced marriage is 'a marriage conducted without the valid consent of both parties, where duress is a factor' (*A Choice by Right, HM Government 2000*). It is also illegal under the Anti-Social Behaviour, Crime and Policing Act 2014, for any person to:

  (a) Use violence, threats or any other form of coercion for the purposes of causing another person to enter into a marriage, and
  (b) Believe or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

  Duress can involve physical, psychological, sexual, financial and/or emotional pressure.

- **Honour-Based Abuse (HBA)** – HBA is an incident or crime involving violence, threats of violence, intimidation, coercion or abuse which has or may have been committed to protect or defend the honour of an individual, family and/or community for alleged or perceived breaches of the family and/or the community's code of conduct (*Safeguarding Network*). HBA is mostly carried out against women and who are killed for perceived immoral behaviour or who are deemed to have breached the honour code of a family or community, bringing shame. A child who is a potential victim of HBA is at significant risk of physical harm and/or neglect and may also suffer significant emotional harm through the threat of violence or witnessing violence directed towards a sibling or other family member.

- **Exploitation** – where opportunistically or with premeditation, a person is manipulated for profit or personal gain e.g. 'cuckooing', which is when criminals target the homes of adults at risk in order to use their property for drug dealing and other criminal activities.

3.5 Other safeguarding concerns impacting both adults and children include:

- **Mate Crime** -Mate crime occurs when someone 'makes friends' with a person and goes on to abuse or exploit that relationship.

- **Hate Crime** – an adult or child could be a victim of hate crime if the offence directed towards them is driven by views or prejudice about their race, religion, disability, age,

sexuality or gender. Hate crime can also be motivated simply by the offender's hatred of people who are seen as 'different'.

- **Radicalisation** – children and adults can be exposed to different views and receive information from various sources. Some of these views may be considered radical or extreme. Radicalisation is the process through which a person comes to support to be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is in itself a form of harm. The Government-led, multi-agency Prevent programme aims to stop individuals becoming terrorists.

- **Mental Health** – mental health is a state of mental wellbeing that enables people to cope with the stresses of life, realise their abilities, learn and work well and contribute to their community. Mental health conditions include mental disorders and psychosocial disabilities as well as other mental states associated with significant distress, impairment in functioning or risk of self-harm. People with mental health conditions are more likely to experience lower levels of mental well-being but this is not always or necessarily the case. Risks can manifest themselves at any stage of life but those that occur during developmentally sensitive periods, especially early childhood, are particularly detrimental. Specifically in respect of mental health:

  - Suicide prevention and promoting child and adolescent mental health are both global priorities.
  - Promoting and protecting mental health in the workplace is now increasingly being recognised as a priority.

- **Mental Capacity** – mental capacity refers to a person's ability to understand information and make decisions about their life. It can also mean the ability to communicate decisions about their life. The Mental Capacity Act 2005 (MCA) is the law that protects a person who is not able to make decisions because they lack the capacity.

- **Suicidal Threats** – Suicidal feelings can mean that a person has abstract thoughts about ending their life or feels that people would be better off without them. A person who is suicidal may be thinking about different methods used to commit suicide or may actually be making clear plans to take their life. Suicide impacts not only immediate family and friends but also colleagues and wider society. Those bereaved by suicide are also more at risk themselves and are more likely to experience poor mental health.

3.6 Anyone can carry out abuse or neglect – partners, family members, neighbours, friends, acquaintances, local residents, organised gangs, paid officers or professionals, volunteers and strangers. It is important to also remember that an adult at risk may be abused by another adult at risk and equally, a child or young person may be abused by another child or young person.

4. Roles and Responsibilities

4.1 Everyone has a responsibility to ensure that concerns about the potential abuse of children and adult at risk are addressed. The lead agency for managing both child and adult protection in Kent is Kent County Council's Social Services. Gravesham Borough Council, in fulfilling its statutory duties, works with Kent County Council to identify, refer and respond to suspected abuse and to provide additional support as required.

4.2 In order to ensure the Safeguarding agenda is embedded throughout the Council, there are a range of responsibilities shared across different roles.

Role	Responsibilities
Chief Executive Officer	• Raise the profile and embed safeguarding processes, support the policy and promote the development of services to ensure the protection of children and adults at risk within the Borough. • Corporate Management Team will commit to a resource of relevant officers to act as the Council's Safeguarding Champions for their respective areas. • Allocate resources to enable responsibilities to be met.
Local Authority Designated Lead (LADO)/Lead Safeguarding Officer	• Development of policy and strategy, issuing operational guidance, promoting good practice and making policy recommendations to Senior Leadership Team. • Ensure the Corporate Management Team is effectively briefed on the Safeguarding agenda. • Ensure safeguarding training is available to meet requirements and the needs of staff. • Representative at multi-agency safeguarding meetings. • Work with key officers to fulfil relevant safeguarding responsibilities. • Provide advice and guidance to staff regarding safeguarding concerns. • Provide advice and guidance to HR in the event of an allegation of abuse made against a member of staff. • Coordinate requests for information regarding Safeguarding Adult Reviews, Child Safeguarding Practice Reviews, Partnership Learning Reviews, Section 17 and Section 47 enquiries, Section 11 Audit. • Offer advice and assistance to Members and support Members in making safeguarding referrals as appropriate.
Community Safety Unit	• Provide advice and guidance to staff regarding safeguarding concerns.
Safeguarding Champions	• Offer advice and assistance to Members and support Members in making safeguarding referrals as appropriate. • Representative at multi-agency safeguarding meetings. • Complete NRM referrals for victims of Modern Slavery and Human Trafficking. • Review recommendations from both local and other areas Safeguarding Adult Reviews and Domestic Homicide Reviews, ensuring that Gravesham-specific recommendations are met and adopt good practice based on other areas Reviews.
Human Resources	• Manage the Disclosure and Barring Service (DBS) process in conjunction with recruiting managers. • Make a referral to the Local Authority Designated Officer (LADO) when a member of staff has acted in a way that may have harmed a child, in liaison with the Lead Safeguarding Officer. • Inform the LADO and Lead Safeguarding Officer if an allegation is received that a member of staff has acted in a way that has harmed an adult. KMSAB guidance to be followed. • Ensure the delivery of corporate training on Safeguarding.
Managers	• Support staff to recognise and understand their roles and responsibilities.

	• Ensure staff have read, understood and signed their acknowledgement of this policy and the associated procedures for reporting safeguarding concerns. • Provide suitable supervision to staff dealing with safeguarding concerns. • Consider safeguarding implications when developing policies and procedures, procuring services on behalf of the Council and in their decision-making processes. • Ensure staff are appropriately trained (checking that training has been completed as part of annual appraisals with staff) and that staff are aware of their responsibilities. • Identify training needs of staff to support them in undertaking their duties. • Ensure contractors have appropriate safeguarding policies in place. • Ensure volunteers working on behalf of the Council are aware of their safeguarding responsibilities. • Ensure reference to the DBS Guide to Eligibility to assess whether a role requires a DBS check.
All employees	• Ensure safeguarding training is undertaken to an appropriate level. • Comply with the Safeguarding Policy and procedures. • Report any concerns through the appropriate referral process. • Report allegations against a member of staff or volunteer through the Council's Whistleblowing Procedure if necessary.
Consultants, contractors and agency staff	• Compliance with the Councils Safeguarding Policy and procedures. • Report any concerns through the appropriate referral process. • Report allegations against a member of staff through the Council's Whistleblowing Procedure if necessary.
Lead Member for Safeguarding	• Ensure safeguarding training is undertaken to an appropriate level. • Approve the Safeguarding Policy and procedures. • Report any concerns through the appropriate referral process. • Promote the Safeguarding agenda.
All Members	• All elected Members are expected to attend relevant safeguarding training. This will be, as a minimum, one session for each Member during each administration period. • Report any concerns through the appropriate referral process.

4.3 All external organisations and contractors providing services to and on behalf of the Council are required to comply with the Council's Safeguarding Policy. Where appropriate, they should also have their own safeguarding policies and procedures in place that adhere to the KSCMP and KMSAB guidelines.

Support for carers

4.4 Gravesham Borough Council recognises the importance of carers and the challenge that carers face daily, whether that be giving unpaid care to someone who is over the age of 18, caring for a child with additional needs/disabilities or caring for a vulnerable family member. Support is available through Gravesham Borough Council's partnership with KMSAB Information and Support for Carers and also at Kent Support for Carers.

Dual Diagnosis Protocol

4.5 The purpose of this protocol is to support effective and well-coordinated services for people with co-occurring mental health and substance misuse disorders. Gravesham Borough Council aims to ensure that all individuals with such co-occurring issues receive appropriate support that is suitable for their individual needs Kent and Medway Joint Working Protocol for Co-occurring Mental Health and Substance Misuse Disorders.

Service Design

4.6 In determining and reviewing corporate policy and ultimately future service delivery, all consultations and performance monitoring activity affecting children or adults at risk will be undertaken using methods that are accessible and appropriate to account for their views in shaping the service design process. In addition, all corporate report templates presented to Members and Corporate Management Team will include the Safeguarding agenda as a key consideration.

Safe recruitment

4.7 The Council's Code of Conduct for Employees outlines that: '*the Council expects and obtains high standards from its employees because Council services can affect the health, wealth and wellbeing of local people*'. The Council will, therefore, adopt safe recruitment practices to reduce the likelihood of recruiting unsuitable officers. This includes:

- The principle of safe recruitment will also be applied to any contract drawn up between the Council and contractors or agencies that provide Council services as well as to contracts entered into with adults who will be working with children and adults at risk (see paragraph 5.2.8).

- Ensuring that a statement about the organisation's commitment to safeguarding is included in all appropriate recruitment and selection materials, including reference to regular DBS checks for relevant posts.

- Appropriate levels of DBS checks are obtained whenever applicable as determined by legislation and supporting Government guidance. Satisfactory explanations for any gaps in employment will be sought. References will always be obtained direct from the referee.

4.8. Training provision

In order to ensure compliance with statutory responsibilities, officers identified by the Council's Human Resources Team whose service either directly or through the commissioning of a service, provides access to children and/or adults at risk, shall have appropriate and regular training on safeguarding matters in keeping with the requirements of the KSCMP. Training may include internal courses/workshops, externally accredited courses/seminars or sessions organised by relevant agencies and will be proportionate to the level of responsibilities and role of each officer. The Council's Human Resources Team will keep a record of all officers and volunteers who have received relevant training. In addition:

- Refresher training relating to this Policy and its associated procedures will be provided to all identified officers every 2 years or as soon as practicable due to legislative requirements, whichever is sooner.

- Accredited training will be provided for the Local Authority Designated Officer and appointed Safeguarding officers to ensure compliance with the Section 11 required standards as identified by the KSCMP.

4.9 Publicity

4.9.1 All photographers working on behalf of the Council will seek verbal permission from a parent or guardian to take close photographs/film footage of children under the age of 18 participating in Council events. Wherever possible written permission should be sought; a photography and filming consent form is available at Appendix 5. In complying with data protection regulations, any participant will be informed as to how their image is to be used and how long it will be maintained.

4.9.2 Schools that are taking part in Council organised events such as parades will be informed that photographers and press will be present and that photographs will be made available for publicity purposes. It is assumed that participating schools will seek parental permission before attending.

4.9.3 An exception to the above will be open invite community events where it is not possible to get comprehensive prior consent. In such instances, visible signs will be established advising attendees that photography and/or filming is being carried out that could be used for publicity purposes. Regardless of the route of consent, the Council recognises the right of a participant to withdraw consent for the use of their image at a later point.

4.9.4 Website – the Council is committed to advertising the Safeguarding agenda. Through dedicated pages on its website, users can access the Council's Safeguarding Policy and adopted reporting procedure as well as details of key external agencies and wider content relating to the agenda.

5. Partnership Working

5.1 Due to the often hidden and complex nature of abuse, neglect and community-based exploitation, partnership working is a critical element of Safeguarding. No single professional can have a full picture of a child's needs and circumstances and, if children, families and adults at risk are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Many safeguarding case reviews have shown that a lack of partnership working between organisations has meant that serious safeguarding issues were not identified or acted upon appropriately and the worst has happened. As a result, working in partnership with other organisations and sharing information when there are safeguarding concerns, is extremely important.

5.2. Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

5.2.1 The Children and Social Work Act 2017 Section 16 requires a Safeguarding Partnership to be established in each area led by 3 safeguarding partners:

- Local Authority (Kent County Council)
- Police
- Health

They must make arrangements to work together with relevant agencies (as they consider appropriate) to safeguard and protect the welfare of children in the area. Within Kent, these responsibilities are met through the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) of which Gravesham Borough Council is a represented Member.

5.2.2 KSCMP provide training across a wide range of Safeguarding topics, provide guidance for professionals and partner agencies, create Child Protection procedures, monitor partner agencies for compliance and more. Please see their website KSCMP for further information.

5.3. Kent and Medway Safeguarding Adults Board (KMSAB)

5.3.1 KMSAB coordinate adult safeguarding across the county (including Medway). The statutory agencies that comprise the KMSAB are:

- Medway Council
- Kent County Council
- Kent Police
- NHS Kent and Medway Integrated Care Board

Partner agencies are also part of the Board and its working groups including District Council representation.

5.3.2 The key principles that underpin all of Gravesham Borough Council's adult safeguarding work as defined by Government are:

- ***Empowerment*** *– Personalisation and the presumption of person-led decisions and informed consent*
- ***Prevention*** *– It is better to take action before harm occurs*
- ***Proportionality*** *– Proportionate and least intrusive response appropriate to the risk presented*
- ***Protection*** *– Support and representation for those in greatest need*
- ***Partnership*** *– Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse*
- ***Accountability*** *– Accountability and transparency in delivering safeguarding.*

5.4 In delivering operational activities, the Council will also contribute to relevant themed working groups and forums e.g. Domestic Abuse Forum, Gravesham Vulnerability Panel and Gravesham's Modern Slavery Working Group. These bring together officers across the Council and partner agencies that are most likely to encounter safeguarding issues in their day-to-day work with the aim of ensuring the Council fully considers its safeguarding responsibilities.

5.5 External arrangements: The Council's Working in Partnership Framework sets out that before entering any formal partnership working commitment, where it is relevant a key consideration should be how the establishment of the arrangement is likely to aid the Council in fulfilling its statutory safeguarding responsibilities. Organisations that are grant-aided by the Council to deliver projects with a direct impact on children or adults at risk, will be required to demonstrate that they have in place appropriate safeguarding arrangements as a condition of financial support.

5.6 Reporting arrangements: The Council maintains an adopted Corporate Complaints and Whistleblowing Policy to encourage and enable individuals to feel confident in raising concerns. For any safeguarding concerns relating to a fellow council officer or elected Member or contractor officers should refer to the council's Whistleblowing Policy and its reporting procedure to identify a suitable route for their concern.

5.7 Personal information: Where in line with formally adopted protocols and Government advice, any request for information made to the Council will be received as openly as possible. If information can be shared for the purposes of safeguarding an individual, it will be shared.

5.8 Commissioned services and contractors: In acknowledgement of the Council's procurement procedures, any officer seeking to procure or commission a service with a direct impact on children or adults at risk will outline in the appropriate Tender Specification/Service Level Agreement the requirement for details of relevant safeguarding arrangements and policies for review in the determining of their relevant tender application/business case. Commissioned services are also expected to comply with the KMSAB Policies and Procedures and these will be provided to potential commissioned service providers/contractors as standard during the procurement process. On nominating the successful tender, the Council will specify within the appropriate contract the requirement for the service provider to adhere to the provisions as set out in this policy (e.g. reporting concerns), along with relevant checks relating to other safeguarding concerns e.g. right to reside in the UK.

5.9 Advocacy Services

The Advocacy People are an independent charity providing free and confidential services in Kent, they help to understand individual situations and provide tailored support and advice. This includes advocacy for people with mental health or who lack capacity, advocacy for children and young people, and care, support, and safeguarding advocacy.

6. Reporting Procedure

6.1 This Safeguarding Policy is designed to empower employees, elected Members, contractors, and volunteers to carry out their roles confidently and effectively. Whatever happens, the reporting procedures detailed below should ensure that an individual's wishes are reflected wherever possible, and actions taken are in the individual's best interests if they are not able to make the decision, whilst being proportionate to the level of concern.

6.2 It is important that stakeholders in this agenda understand that abuse is a complex issue and that validating allegations of abuse is not the role of Council employees or Members. The role of employees, Members, and all related representatives of the council, is to:

- **Recognise** concerns as they are identified.
- **Report** concerns to line managers inside 2 hours or in a case of immediate harm to contact emergency services.
- **Refer** to the relevant agency on the same day.
- **Record** incidents to facilitate investigations; and
- **Respond** to requests for information and involvement in case reviews.

6.3 **What should be considered and reported?**

6.3.1 Every reported incident of abuse, suspected abuse, or general safeguarding concern must be taken seriously and addressed and reported with immediate urgency. Safeguarding queries are likely to fall into the following two areas:

- **General safeguarding concerns** - in carrying out their frontline activities, officers may suspect abuse of a child or vulnerable adult has or could take place, based upon relevant intelligence they have gathered e.g., the living conditions identified within a resident's home that could indicate the neglect of a child.

- **Disclosures of abuse** – a child or adult at risk may confide to a Council employee or

Member that they are being abused or mistreated – this is known as a 'disclosure'. In addition, other residents who may suspect that abuse is occurring to a child or adult at risk may also confide in a Council employee. Appendix 7 to this policy provides guidance on administering public disclosures before accessing the reporting procedure.

6.3.2 **Allegations against officers**

Any concerns about the welfare of a child or adult at risk arising from alleged abuse by an employee or Member of the council must be reported immediately to the HR team which will lead an investigation in consultation with the Chief Executive, Designated Safeguarding Officer and KCC Local Authority Designated Officer (LADO) in the case of a child.

In the case of alleged abuse in respect of an adult (with an appearance of care and support needs) HR will immediately notify the CEO, Designated Safeguarding Officer and Lead Safeguarding Officer, who will make an immediate report to Adult Social Care under section 42 of the Care Act. If a crime has been committed, then the Police should also be contacted. Please see The KMSAB guidance Managing Concerns around People in Positions of Trust. Managing allegations around people in a position of trust also includes volunteers.

The allegation could come from a member of the public, service user or be reported by a fellow employee. It can often be difficult to report a fellow employee, but in line with the council's Whistleblowing Policy and Corporate Complaint principles, the council will fully support and protect anyone who reports their concerns about a colleague's practice or the possibility that a child or adult at risk may be being abused or harassed. False allegations do sometimes occur. However, if a child or adult at risk indicates they have been abused, or information suggests abuse, this should never be ignored.

6.6 **How should concerns be reported?**

If a child or vulnerable adult is injured, in imminent risk of harm or danger, the Police should always be contacted immediately on 999, and any other emergency services as appropriate, such as the Ambulance service. Only after the safety of a child or adult at risk has been confirmed should the procedure detailed at Appendix 6 be completed.

6.6.1 An officer with a Safeguarding concern must report this to their Line Manager immediately. The officer should raise the Safeguarding concern on our Safeguarding Case Management system QES Case Review within the same day. They should complete a referral to Social Services, the Police, or another agency if required. If the officer's Line Manager is not available, they should contact another manager within their department, or directly contact the Lead Safeguarding Officer/the Council's Safeguarding Champions Group as time is of the essence.

6.6.2 This contact should include the details of an incident/general enquiry. As required, the Lead Safeguarding Officer/ the Council's Safeguarding Champions Group will provide supporting evidence, relevant case details and a recommended course of action for the originator to pursue, in line with Appendix 6.

6.6.3 If a referral is required, the officer will be responsible for completing this with as much information as possible. They will be supported in doing so by the Lead Safeguarding Officer/Domestic Abuse & Safeguarding Officer. The officer is also responsible for following the referral up if they have not had a response within 72 hours.

- Kent Child Safeguarding Referral Form Once you/your line manager have decided to make a formal referral, following consultation with the Safeguarding Champions and,

potentially, the Kent County Council Central Duty Team, the Child Protection Form must then be completed and forward on to the Kent County Council Central Duty Team within two working days.

- Kent Adult Safeguarding Alert Form: Once you/your line manager have decided to make a referral following consultation with the Safeguarding Champions and, potentially, the Kent County Council Central Duty Team, raise a safeguarding concern using the relevant form.

Completion of this process for all reports will ensure the Council has a rigorous audit trail of all cases as presented for any potential future use e.g., a Safeguarding Adult Review.

6.6.4 Care Needs Assessments – If you think someone requires any care and/or support needs they are entitled to a free care needs assessment. People can either complete a needs assessment themselves or ask for a referral from a professional e.g., council employees or their GP.

6.6.5 Safeguarding Adult Review (SAR) – Gravesham Borough Council must arrange for there to be a review of a case involving an adult in the Borough with needs for care and support, if there is reasonable cause for concern about how the Council, Council Members or other persons, worked together to safeguard the adult, and condition 1 or 2 is met.

Condition 1 is met if—
(a)the adult has died, and

(b)the council knows or suspects that the death resulted from abuse or neglect.

Condition 2 is met if—
(a)the adult is still alive, and

(b)the council knows or suspects that the adult has experienced serious abuse or neglect.

All employees of the Council must fully co-operate and contribute to the carrying out of a review with a view to identifying the lessons to be learnt from the adult's case, and also applying those lessons to future cases.

6.6.6 If your line manager or the Safeguarding Champions do not agree with you that anything further needs to be done but you still have strong concerns that a child or adult at risk is in danger, you should contact Gravesham Borough Council's Lead Safeguarding Officer for advice, and if you're still concerned that a case needs to be escalated or referred, then you can escalate to the Director, and ultimately a referral can always be made to the relevant agency in line with their procedures.

6.7. Escalation Policy

6.7.1 Gravesham Borough Council have a two-stage complaint process and aim to resolve complaints at the earliest opportunity, please refer to GBC Corporate Complaints Procedure and Policy and you can also refer to KMSAB Escalation Policy and KSCMP Escalation and Professional Challenge Policy.

6.7.2 Please be aware that it is always better to share a concern, even if it seems minor or irrelevant. Please listen to your instincts if something feels wrong, then please raise it.

6.8. Consent in sharing concerns

6.8.1 As this Policy makes clear, the welfare of children and adults at risk is the paramount concern. In this respect therefore, any disclosure from a child or adult at risk or concern raised by an employee must be acted upon by referral to the appropriate agency. A child or adult at risk seeking to make a direct disclosure to a council officer should be advised from the outset that, due to the council's statutory requirements, it will not be possible to maintain confidentiality and that the relevant information will, ultimately, be shared with appropriate agencies.

6.8.2 Kent County Council is the lead body locally for investigating referrals and has formal procedures and guidelines in place for involving parents/guardians and carers in those investigations where necessary. Where a child or adult at risk is perceived to be at risk of harm, seeking consent to share confidential information for referral purposes, although an ideal, is not required. In those more acute cases for example, officers are not expected to discuss their concerns in the first instance with parents or carers for the following reasons:

- to do so may actually place the individual at even greater risk, particularly where it is suspected that a parent or carer may be responsible for the abuse, or
- to do so may compromise the investigation by KCC or a criminal investigation, or
- to do so may put the employee at risk.

If the decision is to take action without the adult's consent, then unless it is unsafe to do so, the adult should be informed that this is being done and of the reasons why.

7. Safeguarding Data Management

7.1 The sensitive nature of the Safeguarding agenda requires that it is essential all personal and case history details are maintained accurately to complete a formal audit trail. This approach will enable managers to look for past incidents, concerns, risks and patterns of behaviour for use in possible future Safeguarding Case Reviews for example.

7.2 The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) set out the legal requirements for the processing of personal data. Article 5 of the GDPR sets out seven key principles for the processing of personal data:

- **lawfulness, fairness, and transparency**
- **purpose limitation**
- **data minimization**
- **accuracy**
- **storage limitation**
- **integrity and confidentiality (security) and,**
- **accountability**

7.3 In holding and exchanging information with other bodies/departments during the exercise of the functions under this Policy, officers are required to act in accordance with the provisions of the General Data Protection Regulation and Data Protection Act, albeit the regulations must not be used as an obstacle (see paragraph 7.7 on data sharing). For clarity, queries can be addressed by the Council's Data Protection Officer.

7.4 To ensure an effective audit trail is established, all copies of the following information and documentation are required to be presented to the council's Safeguarding Officers,

electronically via the Safeguarding Champions, for any reported suspicion/allegation or safeguarding concern:

- Any relevant notes, memoranda, telephone transcripts or other correspondence dealing with the case, or other relevant historical information
- Any formal written report/email to management
- Any formal referral notice
- Any decision received regarding referral notification (Kent County Council Central Duty Team etc.) and,
- Any other relevant materials that evidence the actions taken by Gravesham Borough Council officers (inc. decision on sharing information with another agency on a case).

7.5 In line with adopted statutory guidance relating to data protection, on receipt of the sources of intelligence listed under paragraph 7.4 all records will be assigned to a secure database, accessible to the Safeguarding Champions. All records will be kept secure at all times and maintained in line with the timescales adopted by the council's Records Retention Schedule.

7.6 Documents associated with allegations against an officer will be kept according to adopted HR policies.

7.7 **Data Sharing – What information can be requested and what can be shared?**

7.7.1 **Statutory requirements**: Gravesham Borough Council has a duty to share information with other agencies if requested in connection with an assessment of a child's needs under s17 of the Children Act (1989), or an enquiry under s47 of that Act, or in connection with court proceedings. This equally applies in the case of an adult at risk where for example under s45 of the Care Act (2014) information must be supplied on request to the Kent and Medway Safeguarding Adults Board in consideration of a Safeguarding Case Review.

7.7.2 **Cases of serious or immediate harm**: The legal principle that *'the welfare of a child or adult at risk is paramount'* means that the considerations of confidentiality, under the GDPR for example, that might apply to other situations within the council, should not be allowed to override the right of a child or adult at risk to be protected from harm. Data protection restrictions between relevant agencies should not be an obstacle if:

- You have immediate concerns about the welfare of a child or adult at risk
- You disclose information to Social Services or to another professional and,
- The disclosure is justified under the common law 'duty of confidence'.

7.7.3 **General safeguarding enquiries**: Where requests for information are being made or referrals are being prepared for general safeguarding enquiries i.e. not necessarily for potential life threatening cases or incidences of immediate harm, Gravesham Borough Council has committed as a signatory to the current Kent and Medway Information Sharing Agreement. This Agreement provides a framework for fair and lawful information sharing and is binding on organisations that sign. Further information on signatory agencies can be found via the council's Data Protection Officer.

7.8 In line with statutory responsibilities and local information sharing agreements, the Council adopts Government's '*seven golden rules for information sharing*' as good practice:

- **Remember** that the GDPR and DPA are not barriers to sharing information but provide a framework to ensure that personal information about living persons is shared appropriately.

- **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

- **Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.

- **Share with consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.

- **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the person who may be affected by their actions.

- **Necessary, proportionate, relevant, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to- date, is shared in a timely fashion, and is shared securely.

- **Keep a record** of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

7.9 Where there are concerns relating to records management, such as the collection, storage and sharing of personal data, the advice of the Council's Data Protection Officer should be sought.

7.10 **Further guidance on data sharing** - where there are concerns about the length of time for which individual records should be kept, or whether any course of action relating to personal data may be in breach of the GDPR, the advice of the Council's Data Protection Officer will be sought.

7.11 **Policy Review** – Gravesham Borough Council will review this Safeguarding Policy and associated procedures every five years and in line with any prescribed legislative changes to the safeguarding agenda, whichever is sooner.

7.12 In the event of significant changes to the policy, the process of approval will consider the opinion of relevant stakeholders (including young people and adult at risk representatives) prior to the requirement of Cabinet approval. All minor changes to this policy will be delivered on the approval of the Designated Safeguarding Officer, the council's Chief Executive Officer and the Council Leader, as the appointed Member Champion for the safeguarding agenda.

Appendix 1 – Glossary of Terms

Appendix 1 outlines a glossary of the key terms referenced throughout this Safeguarding

Policy.

Term	Definition
Abuse and neglect	Form of emotional, physical or sexual maltreatment of a child or adult at risk.
Adult at risk	An adult at risk is any person 18 years or over who is, or appears to be, eligible for local authority / mental health services' assistance by reason of mental ill health, physical or learning disability, illness or age-related frailty and/or, may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation.
Child(ren)	Applies to children and young people under 18 years of age.
Child in need	A child that *"is unlikely to achieve or maintain a reasonable standard of health or development" and/or "health or development is likely to be significantly impaired*": Section 17 of the Children Act (1989).
DBS	A Disclosure and Barring Service check. A tool used by the council for recruitment purposes and other areas of activity to help prevent unsuitable people from working with vulnerable groups.
Disclosure	Where a child or adult at risk 'confides' to a Council employee or Member that they are being abused or mistreated.
Employees/officers	Those employed by Gravesham Borough Council and partners, contractors and volunteers involved in the delivery of council services or in Council premises or facilities.
GDPR	General Data Protection Regulation (2018). The GDPR forms part of the data protection regime in the UK, together with the new Data Protection Act 2018 (DPA 2018).
Housing-related support	This refers to a Kent County Council support service (i.e., funding, planning, monitoring and improving housing-related issues) for vulnerable people - homeless, older people and people fleeing domestic abuse.
KMSAB	Kent and Medway Safeguarding Adults Board.
KSCMP	Kent Safeguarding Children Multi-Agency Partnership.
LADO	Local Authority Designated Officer.
Local Authority/Council	Gravesham Borough Council, Kent County Council.
Members	Elected Councillors serving at Gravesham Borough Council.
Neglect	The persistent failure to meet a child or adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development.
Parent/carer	Generic term to include birth parents, stepparents, guardians and carers. The term will specify parental responsibility where necessary.
Referral	The act of passing on the case details of a resident to another agency for consultation, review, or further action.
Safeguarding	The process of protecting from abuse or neglect, preventing impairment of health and development, and ensuring the promotion of quality of life chances.

Gravesham Borough Council

Appendix 2 – How to define and identify abuse

This Appendix provides the main categories of abuse and their indicators. The table should be read to refer to children and adults at risk unless otherwise stated. The table can be used as a guide to assist with recognising abuse in domestic homes, care homes, day centres, workplaces and other community settings.

The categories of abuse are not mutually exclusive; a child or an adult at risk may be subjected to more than one type of abuse at the same time. Officers are advised against establishing abuse merely due to the presence of one of the listed indicators - instead this document should be used for providing descriptive information for reporting duties.

Type of abuse	Definition	Indicators of abuse
Physical *"A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or adult at risk."*	• Hitting, slapping, scratching, pushing, shaking, suffocating, scalding, throwing, poisoning, drowning or otherwise causing physical harm. • Restraint without justifiable reason (may include misuse of medication). • Inappropriate sanctions (deprivation of food, clothing, warmth, health care needs). • May include a caregiver fabricating or deliberately inducing illness (Münchausen by Proxy Syndrome). • Female Genital Mutilation.	• Bruises, fractures, bites, burns, scalds, hair loss in one area, urine burns, bed sores, scars, lack of mobility aids where applicable. • Cowering, flinching, general fearfulness. • Injuries especially in well protected areas of body (e.g., inside of thighs or upper arms). • Injuries of uniform or unusual type. • Accumulation of non-administered medicine. • History of unexplained falls or minor injuries. • Frequent changing of General Practitioners (GPs) or reluctance against GP consultation/visit.
Sexual *"Sexual abuse is abusive sexual behaviour by one person upon another. It is often perpetrated using force or by taking advantage of another."*	• Adult sexual abuse is any contact or non-contact sexual activity that happens without consent or understanding or with forced consent. • When a child or young person is sexually abused, they're forced, tricked, or manipulated into sexual activities. They might not understand that what's	As a perpetrator may not solely be an adult male(s), it could be female and/or another child or adult at risk, recognition can often be hard to identify unless disclosed. Indicators are most likely to be: a) Behavioural: e.g., attention seeking, withdrawal and isolation, sexually explicit

	happening is abuse or that it's wrong for the abuser to do this to them. They might be afraid to tell someone or behave as though this is normal for them to experience. • Sexual abuse can happen anywhere – it can happen in person or online. • Violence is not necessarily involved. • Sexual activity where the child or adult lacks the mental capacity to understand and/or give consent; • Rape or attempted rape. • Sexual exploitation. • Non-contact abuse (e.g., voyeurism, pornography, grooming over the internet–explained in more detail in this Appendix).	behaviour/language, sleep disturbance, self-harm, drug/alcohol misuse, running away from home, unexplained sources of money or gifts. b) Physical: bruising, bleeding or itching around the genitals, bedwetting, torn or blood/semen-stained underclothing, sexually transmitted infections, pregnancy, eating disorder/anorexia, stomach problems.
Psychological / Emotional *"The persistent emotional maltreatment of a child or adult at risk such as to cause severe and persistent adverse effects on the person's emotional development."*	• Behaviour that has a harmful effect on emotional health, wellbeing and/or development. • Verbal abuse; bullying (inc. cyber bullying); humiliation, ridicule, intimidation, threat of punishment, abandonment. • Isolation or withdrawal from services or support networks. • Deliberate denial of religious or cultural needs. • Failure to provide access to appropriate social skills and educational opportunities. • By-product of all forms of abuse.	• Any sudden changes to mood, behaviour, appetite, sleep patterns, continence, use of eye contact. • Anxiety, confusion, or general resignation. • Fear of making mistakes. • Sucking, biting, or rocking. • Easily frightened. • Loss of self-esteem. • Uncharacteristically becoming manipulative, uncooperative, and aggressive. • Obsessions or phobias. • Radicalised views/encouragement to adopt extremist (violent or non-violent) views (Prevent). • Impairment of intellectual, emotional and social development. • Dysfunctional relationships with family

		members/caregivers.
Neglect *"The persistent failure to meet a child or adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development."* [Not necessarily deliberate, may also include neglect of, or unresponsiveness to basic emotional needs.]	Failure to: • provide adequate food and clothing or shelter of an adequate standard (including exclusion from home or abandonment). • protect a child from physical and emotional harm or danger. • ensure adequate supervision (including the use of inadequate caregivers). • ensure access to appropriate medical care or treatment. • provide access to appropriate health, care and support or educational services.	Failure to: • provide adequate food and clothing or shelter of an adequate standard (including exclusion from home or abandonment). • protect a child from physical and emotional harm or danger. • ensure adequate supervision (including the use of inadequate caregivers). • ensure access to appropriate medical care or treatment. • provide access to appropriate health, care and support or educational services.
Discriminatory *"An offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a personal characteristic."*	• When values, beliefs or culture result in a misuse of power. • Discrimination on basis of age, disability, sexual orientation, race/ethnicity, sex, language, culture, religion or politics; Degrading harassment and slurs. • Hate crime.	• Tendency to withdrawal and isolation. • Fearfulness and anxiety. • Being refused access to services or being excluded inappropriately. • Loss of self-esteem • Resistance or refusal to access services that are required to meet need. • Expressions of anger and frustration. • Extreme/radicalised views.
Financial *" Financial abuse is a type of abuse which includes having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misuses. Financial abuse can take many forms. It's a type of abuse that can start subtle and is often hard to detect."*	• The use of personal resources without informed consent or authorisation. • Financial abuse can be committed by anyone anywhere, even people employed to provide care, and it can affect anyone. • Theft, fraud and/or extortion of material assets including internet scamming. • Exploitation, pressure in connection with wills, property, or inheritance. • Misappropriation of property, possessions, or benefits. • Misuse of power of attorney or appointee-	• Anxiety about money. • Living conditions substandard and unsatisfactory in contrast to adult's apparent financial position. • Extreme interest and involvement by the family, carer, friend, or stranger. • Lack of heating, clothing, or food. • Inability to pay bills, rent, food, etc. and unexplained shortage of money. • Unexplained withdrawals from an account. • Unexplained loss/misplacement of

	ship.	financial documents or personal possessions. • The recent addition of authorised signers on a client or donor's signature card. • Inability to access or check bank accounts and bank balance. • Changes of deterioration in standard of living e.g., not having items or things they would usually have. • Unusual or inappropriate purchases in bank statements. • Isolation and withdrawal from friends and family. • Lack of things you'd expect someone to be able to afford e.g., TV, toiletries, clothing, etc. • Sudden or unexpected changes in a will or other financial documents.

As stated previously, there are a number of forms and settings in which abuse may take place. Whether an on-going relationship, or an abusive service setting, and even potentially involving more than one person, these factors make it vitally important to look beyond single incidents to identify underlying dynamics and patterns of harm. Any or all types of abuse may be perpetrated as the result of deliberate intent and targeting of children or adults at risk.

<u>Situation-based abuse</u>
Whilst the table above describes six core manifestations of abuse, there are so-called 'situation based' types of abuse which have significant implications for the safeguarding of children and adults at risk. These types of abuse are set out below.

Type of situation-based abuse	Definition	Indicators of abuse
Modern slavery *"When an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. People can become enslaved making our clothes, serving our food, picking our crops, working in factories, or working in houses as cooks, cleaners or nannies."*	• Victims of modern slavery might face violence or threats, be forced into inescapable debt, or have their passport taken away and face being threatened with deportation. • Human trafficking - The use of violence, threats or coercion to transport, recruit, or harbour people to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal. • Forced labour - Any work or services people are forced to do against their will, usually under threat of punishment. • Debt bondage/bonded labour - The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt • Descent–based slavery (where people are born into slavery) - A very old form of slavery, where people are treated as property, and their "slave" status has been passed down the maternal line. • Child slavery - When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery. • Forced and early marriage - When someone is married against their will and cannot leave. Most child marriages can be considered slavery. • Domestic servitude – When someone is working in another person's home, they may be particularly vulnerable to abuses,	• Victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn. • Victims may not be allowed to travel on their own, appear unfamiliar with their surroundings. • Victims may have limited I.D. • Isolating themselves, appearing to be under the control of others and not interacting with people • Reluctance to seek help, avoiding eye contact, appearing frightened and not wanting to seek help. • Poor living conditions, living in dirty, cramped, and overcrowded accommodation and often working at the same address.

	exploitation, and slavery, as they might be hidden from sight and lack legal protection.	
Domestic Abuse *"Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between intimate partners or family members regardless of gender or sexuality."*	• Any 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 members regardless of gender or sexuality. • People may experience domestic abuse regardless of ethnicity, religion, class, age, sexuality, disability or lifestyle etc. **Can encompass but is not limited to any one of the six manifestations of abuse outlined in the previous table.**	• Making an excuse for injuries • Personality changes • Low self-esteem in someone who always seemed confident. • Constantly checking in with their partner • Never having money on hand • Overly worried about pleasing their partner. • Skipping out on work, school or social outings for no apparent reason. • Wearing clothes that don't fit the season, like long sleeves in the summer to conceal bruises. • The same signs/symptoms would likely apply for male victims of domestic abuse, and could also include emotional/verbal abuse like taking away keys, medicines, phone, etc. Or things like constantly putting you down in public or on social media. • They may also abuse your children/family pets. • In LGBT relationships the abuse may also target sexual orientation or gender identity and the abuser may tell you that you're not really how you identify or threaten to out you to your family and/or friends.

Forced marriage *"Forced marriage denotes a situation where one or both of the spouses do not consent and some element of external pressure is involved."*	• A forced marriage is where one or both people do not or cannot, consent to the marriage. Forced marriages can happen to anyone from any background and nationality and can affect both males and females. • It doesn't only happen to young people; it can happen to adults too. It's different to an arranged marriage where there's a choice and both people agree to it. • Forced marriage is often linked to honour-based abuse, although this isn't always the case. It is illegal in the UK to force someone to marry. • This can include taking someone overseas to force them to marry (whether the forced marriage takes place or not) or marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not).	• May exhibit signs of physical, psychological, financial, sexual and emotional abuse. Some signs that someone could soon be (or is already) a victim of forced marriage: • running away from home • self-harming or attempted suicide • depression, or becoming worried or withdrawn • poor performance at work, school or college or unexplained absence • a surprise engagement to a stranger you've not heard of before • a sudden holiday (some people are tricked into going abroad for a holiday or to see relatives) • no control over their own money • not returning from a visit to another country
Institutional/Organisational *"Including neglect and poor care practice within an institution or specific care setting like a hospital or care home, for example. This may range from isolated incidents to continuing ill-treatment."*	• Organisational abuse refers to abusive and poor care and or clinical practices that may develop when an adult is living or staying in a care home, receiving respite, attending a day care establishment, or is receiving treatment or assessment in a hospital or other NHS service, or in relation to care provided in their own home, where they are potentially vulnerable to abuse and exploitation. • Shows lack of respect for dignity, privacy, and human rights.	• Regimented regimes, unusually subdued residents, anxiety in the presence of social care workers. • Users may exhibit signs of physical, sexual, financial, psychological, or discriminatory abuse. • Whistleblowers must know how to access support and protection. anonymous reports are permitted and should be taken seriously. • Misuse of medication. • Failure to respond to complaints. • Failure to respond to abuse as expected. • Inappropriate use of restraints.

	• Lack of leadership and supervision • When care standards and practices fall below an acceptable level, institutional abuse is more common. • May result from poor standards of care, lack of knowledge, understanding and training.	• Discouraging visits or the involvement of relatives/friends.
Restraint "*Mistreatment of people brought about by poor care or support whereby an individual's needs or wishes are neglected for the smooth running of a house, a home, service or organisation*."	• It is illegal and unprofessional to use any form of physical, mechanical, emotional or any other form of restraint as a means of punishment. • Restraint may only be considered in situations where there is a clear or perceived risk someone injuring themselves, or others, or seriously damaging property.	• Children and adults at risk who have been unlawfully restrained are most likely to exhibit signs of physical or psychological abuse. • Depending on the circumstances, restraint could also be considered institutional abuse.
Self-Neglect ***"****Any conscious failure of an adult to take care of himself or herself that causes or is reasonably likely to cause within a short period of time, serious physical."*	• Self-neglect may happen because the person is unable to manage to care for themselves or their home or because they are unwilling to do so, or both. • Self-neglect differs from the other forms of abuse listed here because it does not involve a perpetrator. • Self-neglect can be life threatening and can pose a risk to others e.g. fire and housing regulations are not being followed.	• Lack of self-care – neglect of personal hygiene, nutrition, hydration and/or health, thereby endangering safety and wellbeing and/or lack of care of one's environment – squalor and hoarding, and/or refusal of services that would mitigate risk of harm. • Inability to avoid self-harm. • Inability or unwillingness to manage one's personal affairs. • Failure to seek help or access services to meet health and social care needs
Hoarding	• Hoarding is the excessive collection and retention of any material to the point that living space is sufficiently cluttered to preclude activities for what they are designed for.	• Hoarding disorder is a persistent difficulty discarding or parting with possessions because of a perceived need to save them, often creating such cramped living conditions that homes may be filled to capacity. Some people also collect animals/pets in unsanitary conditions.

Female Genital Mutilation (FGM)	*"Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. The practice has no health benefits for girls and women and can cause severe bleeding and problems urinating and later, cysts, infections, as well as complications in childbirth and increased risk of newborn deaths".* World Health Organisation 2024	• A girl at immediate risk may not know what is going to happen but might disclose that: - She is going on a long holiday abroad or 'going home'. - She is attending a special occasion or ceremony to 'become a woman'. - A female relative has been or will be cut-sister, cousin, mother or aunt.
Exploitation/Sexual Exploitation	Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator.	Signs include: • Going missing for periods of time or returning home late. • Skipping school or being disruptive in class. • Appearing with unexplained gifts or possessions that can't be accounted for. • Having mood swings and changes in temperament. • Using drugs and/or alcohol.
Mate Crime	• Mate crime occurs when someone 'makes friends' with a person and goes on to abuse or exploit that relationship. The founding intention of the relationship, from the point of view of the perpetrator, is likely to be criminal. • The relationship is likely to be of some duration and, if unchecked, may lead to repeat and worsening abuse.	• Mate crime can happen to anyone but children and adults with learning difficulties are especially vulnerable. • May be talking about a new friend that they are suddenly seeing all the time • May appear to be involved in unwanted or unlawful tasks on behalf of their new friend or doing favours for them that they don't feel comfortable with.
Hate Crime *"Any criminal offence which is perceived by the victim, or any other person, to be motivated by*	• Hate crimes and incidents can be against the person or property.	• Feeling isolated and vulnerable. • Loss of faith in the police and criminal justice system. • Feeling like retaliating but fearing

hostility or prejudice towards someone based on a personal characteristic"	• Hate crime hurts and it can be motivated by the offender's hatred of people who are seen as being different. • An adult or child may be a victim because of race, religion, disability, age, sexuality, or gender.	reprisals. • A breakdown in family relationships. • Finding it difficult to cope. • Having a sense of despair. • Feeling hated by others. • Afraid to let their children out. • Feeling afraid to go out and/or stay in. • Suffering from emotional/mental stress • Wanting to move home • Being overwhelmed by panic or anxiety.
Gangs and Youth Violence	• A child who is affected by gang activity or serious youth violence can be at risk of significant harm through physical, sexual, and emotional abuse. The risk or potential risk of harm to the child may be as a victim, a perpetrator or both – in relation to their peers or to a gang-involved adult.	• Graffiti, hand signs, colours, and tattoos are indicators of gang affiliation. • Gang members have their own language, which contains phrases, hand signs, tattoos, markings, and graffiti. • Frequently absent from and doing badly in school. • Going missing from home, staying out late and travelling for unexplained reasons. • In a relationship or hanging out with someone older than them. • Being angry, aggressive, or violent.
Missing Children	• Children are "missing" when the person responsible for them does not know where they are. • Children who are most vulnerable to going missing from care and home include those missing from school, looked after children and asylum-seeking children.	• When a child goes missing from care or home, they could be at risk of significant harm through physical or sexual abuse.
Prevent	• The government-led, multi-agency Prevent programme aims to stop individuals becoming terrorists. The aim	There are many factors that can makesomeone vulnerable to radicalisation. They can apply to any age, social class,

	of Prevent is to stop people from becoming terrorists or supporting terrorism. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism. • The Prevent duty requires specified authorities such as education, health, local authorities, police, and criminal justice agencies (prisons and probation) to help prevent the risk of people becoming terrorists or supporting terrorism. It sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.	religion, ethnic or educational background. Some signs of radicalisation could include: • Being influenced or controlled by a group. • An obsessive or angry desire for change. • Spending an increasing amount of time online and sharing extreme views on social media. • Personal crisis. • Need for idenity, meaning and belonging. • Mental health issues. • Recently come out of prison. • Desire for status, need to dominate. • Displaying or advertising terrorist propoganda.
Mental Health *"Mental health conditions include mental disorders and psychosocial disabilities as well as other mental states associated with significant distress, impairment in functioning, or risk of self-harm"*	• Our mental health is how we're feeling inside, or how we are emotionally. Our mental health may change because of situations we're in, things we're doing and things beyond our control, including other people, our physical health, our finances and even the weather and world events. All of us are affected by what happens to us, past and present. Things that happened even many years ago can affect our mental health today. • It is vital to not only protect and promote the mental well-being of all, but also to address the needs of people with mental health conditions. Mental Health problems	• Feeling anxious or worried. • Feeling depressed or unhappy. • Emotional outbursts. • Sleep problems. • Weight or appetite changes. • Being quieter or more withdrawn than usual. • Substance abuse. • Feeling guilty or worthless. • Feeling excessively high. • Neglect and performing less well. • High risk behaviour. • Bizarre or strange thoughts.

	are difficult experiences that make it harder for us to get on with our lives. They include the painful feelings and thoughts that we all have at times – including periods of sadness, hopelessness, and fear.	
Mental Capacity	• Our mental capacity means our ability to understand information and make decisions about our life. It can also mean the ability to communicate decisions about our life. •	• Being withdrawn or lost in thought • Struggling to understand or comprehend what is being said • Struggling to focus or concentrate • Low energy • Easily distracted
Suicidal threats/ideation	• With some mental health problems, a person may express a desire to hurt or kill themselves. They may have harmed themselves or be thinking about ways to die. Some people may have thoughts of harming others. • If someone is suicidal or planning to harm themselves or others, they need urgent help, and the emergency services should be called. • Suicidal feelings can mean having abstract thoughts about ending your life or feeling that people would be better off without you. Or it can mean thinking about methods of suicide or making clear plans to take your own life. Suicide impacts not only immediate family and friends but also colleagues and wider society.	Those bereaved by suicide are more at risk themselves and are more likely to experience poor mental health. Signs could include: • Restlessness/agitation. • Tearful. • Tired/lacking energy. • Not talking to friends/family. • Using alcohol/drugs. • Not coping with everyday things. • Sleeping/eating more or less than usual. • Making risky choices/decisions. Anyone can experience suicidal thoughts, this includes colleagues. If you feel that someone you work with is struggling, remember that simply talking and listening to somebody can be powerful enough to help someone in distress. The most important thing is to get the person the right support.
Honour-based abuse	Honour-based abuse (HBA) is an incident or crime involving violence, threats of violence, intimidation, coercion or abuse (including psychological, physical, sexual, financial or emotional abuse), which has or may have been committed to protect or defend the honour of	Signs could include: • Going missing (from home/school) to keep themselves safe.

	an induvial, family and or community for alleged or perceived breaches of the family and/or community's code of behaviour. (Safeguarding Network). It is mostly carried out against women, who are killed for perceived immoral behaviour, deemed to have breached the honour code of a family or community, causing shame.	• Being withdrawn, upset, self-harm, appearing depressed, angry and/or desperate. • Being restricted in their movements and overly supervised. • Expressing concerns regarding a forthcoming holiday abroad, talk about marriage, being forced to marry, or forced to live elsewhere. • Not having access to the internet or mobile phones, their passport or family members. • Having physical injuries. • Witnessing or experiencing family disputes or domestic violence. Children who witness HBA may be threatened with or are at significant risk of neglect and/or physical and/or emotional harm
Stalking and Harassment	Stalking involves fear of violence or serious alarm or distress. Harassment involves putting people in fear of violence. Stalking and Harassment is when someone repeatedly behaves in a way that makes you feel scared, distressed or threatened. Anyone can be a victim. It's harassment if the unwanted behaviour has happened more than once. Stalking is like harassment, but it's more aggressive. The stalker will have an obsession with the person they're targeting.	Harassment may include: • Bullying at school or in the workplace. • Cyber stalking. • Anti-social behaviour. • Sending abusive text messages. • Sending unwanted gifts. • Unwanted phone calls, letters, emails or visits (any contact). It's sexual harassment if the unwanted behaviour: • Violates your dignity. • Creates an intimidating, hostile, degrading, humiliating or offensive

		environment (including online). Stalking may include: • Regularly following somone. • Repeatedly going uninvited to their address. • Checking someone's internet history or other electronic communication. • Frequenting somwhere they know the person often visits. • Interfering with the person's property. • Watching or spying on someone. • Identity theft.

E-based abuse
The growth of the Internet has brought with it a mass of opportunities and also complex and diverse risks to safeguarding; for example, exploitation of vulnerable residents for the purposes of radicalisation, countered by the council's commitment to the PREVENT agenda. The council has an obligation to help keep children and adults at risk safe online by being adequately equipped to understand, identify, and mitigate the risks of new technology outlined below wherever possible.

Financial	• Phishing scams, designed to obtain personal and/or financial information and possibly steal your identity. • Gifts of expensive smart phones which can be used in exchange for gang membership, sexual favours and abuse.
Fraud	• Fake shopping, banking, charity, dating, social networking, gaming, gambling and other websites.
Psychological	• Exposure to inappropriate content; sexually explicit, racist, violent, extremist, or other harmful material, either through choice or in error. • Naming of rape victims online.
Inappropriate contact	• People who may wish to abuse, exploit, or bully. • Digital stalking.
Inappropriate conduct	• Due to their own and others' online behaviour, such as the personal information they make public, for example on social networking sites.
Sexual	• Exposure to sexually explicit content. • "Sexting" (exchange of sexual messages or images). • Grooming in web forums and chat rooms and online gaming.

	• Online predators, cyber-stalking and risk of abuse.
Physical	• Access to legal highs and illegal drugs. • Online predators, cyber-stalking, and risk of abuse.

Appendix 3 – Legislative Framework

Appendix 3 outlines specific statutory legislation and associated duties relevant to Gravesham Borough Council's corporate safeguarding responsibilities.

Operationally the Council has in place a framework of policies that set out how the Council's activities are delivered in consideration of the wider Safeguarding agenda and other specific duties e.g. Housing Allocations Policy, and these are available via the Council's website.

Act	Section	Duty/Explanation
Children Act 1989	s17(1)	***Duty to promote and safeguard the welfare of children*** It shall be the general duty of every local authority: *(a) to safeguard and promote the welfare of children within their area who are in need; and,* *(b) so far as is consistent with that duty, to promote the upbringing of such children by their families,* by providing a range and level of services appropriate to those children's needs.
	s27	***Duty to co-operate (Help with children in need)*** A duty on other local authorities, local authority housing services and health bodies to cooperate with a local authority in the exercise of that authority's duties under Part 3 of the Act which relate to local authority support for children and families (Kent County Council).
	s47	***Duty to investigate (Help with significant harm enquiries)*** Where a local authority: *(a) are informed that a child who lives, or is found, in their area (i) is the subject of an emergency protection order, or (ii) is in police protection; or* *(b) have reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm:* the authority must make, or cause to be made, such enquires as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare.
Housing Act 1996	s177(1)	***Whether it is reasonable to continue to occupy accommodation*** It is not reasonable for a person to continue to occupy accommodation if it is probable that this will lead to domestic violence against him, or against: a person who normally resides with him as a member of his family, or any other person who might reasonably be expected to reside with him.
	s213A	***Co-operation in certain cases involving children*** Requires housing authorities to refer to adult social care services persons with whom children normally reside or might reasonably be expected to reside, who they believe may be ineligible for assistance, or who may be homeless and may have become so

		intentionally or who may be threatened with intentional homelessness, as long as the person consents.
Children Act 2004	s10	***Duty to co-operate to improve children's wellbeing*** Requires each Local Authority with responsibility for education and children's services (Kent County Council) to plan to promote co-operation between the Authority, each of the Authority's relevant partners and such other persons or bodies working with children in the Local Authority's area as the Authority considers appropriate. The arrangements are to be made with a view to improving the wellbeing of children in the authority's area, which includes protection from harm or neglect.
	s11	***Duty to safeguard and promote the welfare of children*** Requires a range of organisations (including District Councils) to plan for ensuring that their functions, and services provided on their behalf, are discharged regarding the need to safeguard, and promote the welfare of children. This Safeguarding Policy outlines how Gravesham Borough Council practically delivers on its responsibilities under this duty.
	s13	***Establishment of LSCBs*** Requires each local authority to establish a Local Safeguarding Children Board (LSCB) for their area and specifies the organisations and individuals that must be represented on the Board. Within Kent, these responsibilities are discharged through the Kent Safeguarding Children's Board of which Gravesham Borough Council is a member.
Housing Act 2004	s9	***Housing Conditions*** Part 1 of the Housing Act (2004) gives local authorities powers and duties to act against bad housing conditions and introduces a new Housing Health and Safety Rating System under which environmental health professionals will assess the impact of health and safety hazards in the light of the occupants most vulnerable.
Care Act 2014	s42	***Enquiry by Local Authority*** *(1) Where a Local Authority has reasonable cause to suspect that an adult in its area (whether ordinarily resident there or not):* *(a) has needs for care and support (whether the Authority is meeting any of those needs or not),* *(b) is experiencing, or is at risk of, abuse or neglect, and,* *(c) because of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it* *(2) The Local Authority must make (or cause to be made) whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case (whether under this Part or*

		otherwise) and, if so, what and by whom.
Care Act 2014 cont.	s43	***Establishment of SABs*** Each local authority must establish a Safeguarding Adults Board (SAB) for its area. Within Kent, responsibilities are discharged through the Kent and Medway Safeguarding Adults Board of which Gravesham is a member.
	s44	A SAB must arrange for there to be a review of a case involving an adult in its area with needs for care and support (whether the local authority has been meeting any of those needs or not) if: *(a) there is reasonable cause for concern about how the SAB, members of it or other persons with relevant functions worked together to safeguard the adult and,* *(b) condition 1 or 2 (see s44(2) and s44(3) is met.* Each member of the SAB must cooperate in and contribute to the carrying out of the review.
	s45	***Supply of information*** This section outlines the conditions whereby Council officers are to supply relevant case information about vulnerable residents to SABs when undertaking a SAR.
Modern Slavery Act 2015	s52	*Duty to notify* *If a public authority to which this section applies has reasonable grounds to believe that a person may be a victim of slavery or human trafficking it must notify—* *(a) the Secretary of State, or* *(b) if regulations made by the Secretary of State* *require it to notify a public authority other than the Secretary of State.*
Counter Terrorism and Security Act 2015	s26	***General duty on specified authorities*** *A specified authority (which includes Local Authorities) 'must, in the exercise of its functions, have due regard to the need to prevent people from being drawn into terrorism'.*
Domestic Abuse Act 2021	s57	***Accommodation Duty*** *Places a duty on Local Authorities in England to provide accommodation-based support to victims of domestic abuse and their children in refuges and other safe accommodation* *Duty of Local Authority to establish DA Local Partnership Board.*

Gravesham Borough Council: Policy framework

This Safeguarding Policy and the associated procedures should be interpreted in consideration of the council's corporate policy framework and specifically:

- Accessibility for All Policy.
- Code of Conduct for Employees to include PIPOT Policy,
- Corporate Complaints Procedure.
- Dignity at Work Procedure.
- Disciplinary and Grievance Procedures.
- Equality Policy.
- Health and Safety Policy.
- Information Security Policy.
- Internet Acceptable Use Policy.
- Recruitment and Selection Policy and Procedures.
- Records Retention Schedule; and
- Whistleblowing Policy
- Domestic Abuse Staff Policy
- Domestic Abuse Customer Policy
- Did not attend/was not brought Policy.
- Making Safeguarding Personal.

Core Safeguarding guidance documents

Document title	Purpose	Source
Care and Support Statutory Guidance Department of Health	A guide to the Local Authority responsibilities under the Care Act (2014).	https://www.gov.uk/guidance/care-and-support-statutory-guidance/safeguarding
Working Together to Safeguard Children Department for Education	Advice for practitioners providing safeguarding services to children, young people, parents and carers.	https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
What to do if you're worried a child is being abused Department for Education	Guidance to help practitioners identify the signs of child abuse and neglect and understand what to do.	https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2
Criminal Exploitation of children and vulnerable adults: County Lines guidance Home Office	Guidance for professionals on dealing with county lines, part of the government's approach to ending gang violence and exploitation.	https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines
Guidance for Professionals Kent Safeguarding Children Multi-Agency Partnership and Kent and Medway Safeguarding Adults Board	Practical guidance for local professionals on making referrals and other key material covering. • Sexual exploitation • Self-neglect • Human trafficking • Mental capacity	http://www.kscmp.org.uk/guidance Kent and Medway SAB - Report Abuse (kmsab.org.uk) Adult safeguarding for professionals - Kent County Council Mental Capacity Act - Kent County

	• Domestic abuse • Modern slavery • Financial abuse • Religious exploitation	Council
Kent Family Support Framework: KELSI	A framework used by Early Help and Preventative Services to support families with needs defined as intensive.	Support for children and young people - KELSI

Appendix 4 – Service Responsibilities

The duty to safeguard and promote the welfare of children and adults at risk is applicable corporately across the authority. Through their activities, some services are likely to play a more prominent role in safeguarding and promoting the welfare of children and adults at risk as part of their day-to-day work – recognising welfare issues, sharing information, making referrals and subsequently managing or reducing risks. Appendix 4 sets out some of those areas and services with likely interaction in the Safeguarding agenda.

Human Resources

- Working to maintain a corporate record of those posts requiring a DBS disclosure together with the level of disclosure required.
- Ensuring that recruitment procedures are robust and that information pertinent to working with vulnerable groups is obtained during the recruitment procedure.
- Ensuring that DBS Disclosures are carried out in compliance with legislation and DBS guidance.
- Referring information to the DBS about employees who have been dismissed or removed from working with vulnerable groups (or would have been had they not left/ resigned) as a result of a relevant caution/conviction, conduct that has harmed or put a child/adult at risk of harm, or satisfied the 'Harm Test' in relation to vulnerable groups.

Communications and Digital Team

- Officers should be aware of safeguarding and be mindful of how images of children and adults at risk are used in Council publications, including Social Media, with due consideration of data protection regulations.

Revenues and Benefits

- Visiting officers may be become aware of conditions that impact adversely on a child or adult at risk.
- Officers may be alerted to adverse situations by telephone/processing Benefit applications.
- Investigations may reveal safeguarding issues particularly in concern of customers with financial difficulties.
- Housing Benefits officers will need to have regard to the council's duty to safeguard children and adults at risk, particularly where direct claims are made by 16 and 17 year old's, victims of domestic abuse etc.

Customer Services/Reception

- Adults at risk, some with complex needs, may visit the Civic Centre/Gateway with service requests or seeking help.
- Procedures should be in place to deal with people with special or specific needs such as mental health issues which impact on their ability to communicate effectively.
- Often Customer Services/Reception officers will be required to escort from the Civic Centre adults at risk or families who have made service requests but where it has been identified that no council service provision is to be made. Officers are to use this policy to recognise and report broader safeguarding issues as they are identified than perhaps the original service request (i.e. a resident's needs may require a number of different services and therefore before requiring someone to leave consider other relevant/potential needs).

Planning Regeneration & Development Management

- Planning and enforcement employees, in their day-to-day site visits may become aware of needs or welfare issues.

- Specifically, officers should ensure that all contracts and grants to organisations are required to demonstrate that they have in place an appropriate Safeguarding Policy as a condition of financial support.

Leisure/public health activities

- Staff, volunteers and contractors who provide or administer the following services will have various degrees of contact with children and adults at risk:
- Leisure Centre's.
- Public health programmes via the Gr@nd.
- Healthy living activities and programmes in the community.
- Community events and attractions.
- Play facilities.
- Parks and gardens.

The Council's Leisure Centre management contractors and the Gr@nd's officers are key partners in identifying potential abuse to children and adults at risk and this policy should be advertised accordingly to provide a direct link to their individual Safeguarding duties and policies.

Housing

All Housing employees (and partners delivering aspects of the Council's housing services) are well placed to observe situations that may warrant referral:

- Day-to-day contact with families and tenants, may become aware of needs or welfare issues that they can either tackle directly (for instance, by making repairs or adaptations to homes) or by assisting the family in accessing help through other organisations.
- Homelessness officers play a front line emergency role managing re-housing or repossession when adults and children become homeless or at risk of homelessness including formal reporting procedures when homelessness as a result of abuse.
- Housing Officers who interact with tenants, often in their homes, have a direct line of potential intelligence into safeguarding concerns.
- Complaints received from tenants in the Private Rented Sector may uncover safeguarding issues, e.g. Houses of Multiple Occupation, that require investigation.

Environmental Health/Licensing

- Environmental Health officers may become aware of conditions that impact adversely on a child or adult at risk – particularly through investigations / response to complaints.
- Under Part 1 of the Housing Act (2004), authorities will take account of the impact of health and safety hazards in housing on vulnerable occupants, including children, when deciding on the action to be taken by landlords to improve conditions.
- Employees need to be especially aware of the risk of neglect, emotional abuse and domestic abuse.
- Licensing officers have a duty to consider the welfare and protection of children and adults at risk when making licensing decisions and report any safeguarding breaches (suspected or otherwise) of owners and officers of licensed premises and for taxi licensing functions (Hackney/Private Hire).

- The Council's waste and recycling service is a key service in identifying potential areas of concern to children and adults at risk.

Community Safety

- Through Police intelligence received at the bi-weekly briefing with the Police, Probation, CCTV, Housing and other partner agencies. Will help the council fulfil a multi-agency approach in response to suspicions of abuse to children or adults at risk.
- Officers working to reduce anti-social behaviour should liaise with other organisations to reduce unacceptable activities and be particularly mindful that children and adults at risk can be the target of serious anti-social behaviour, physical and sexual abuse.

Procurement

- In overseeing the tender process for council contracts, the Procurement service will work with officers seeking to procure a service that potentially has a direct impact on children or adults at risk. There is a commitment for the lead officer (commissioner) to outline in the appropriate specification the requirement for details of relevant safeguarding arrangements and polices for review in the determining of the tender application.

- Procurement processes should also include steps to mitigate against the risk of certain forms of abuse e.g. modern slavery, being present within its supply chains.

Appendix 5 – Photography and Filming Consent Form

Project:

For the purposes of Gravesham Borough Council's marketing and publicity material, I give permission for a photograph of:

Name 1: …… Age: ……
PRINT NAME

Name 2: …… Age: ……
PRINT NAME

Name 3: …… Age: ……
PRINT NAME

Name 4: …… Age: ……
PRINT NAME

Signed…….. **Date:** .....

Print Name: …….

Address……
…….

(A parent or guardian must give authorisation for children under the age of 18)

***NOTE:* Names and ages of children will only be printed with your consent. Addresses and other personal details will remain confidential.**

***NOTE:* All images and details will be maintained in line with data protection regulations. All participants have the right to withdraw consent for the use of their image at a later point.**

Appendix 6 – Reporting Procedure for Safeguarding Children and Vulnerable Adults

Recognise it and report it!

Is the child or adult at IMMEDIATE risk of harm?

If yes, call Kent Police on 999.

If no but you have general concerns about the welfare of a child or adult, contact your Manager IMMEDIATELY and follow the GBC Safeguarding Reporting Procedure below.

GBC's Safeguarding Reporting Procedure

Stage 1 Do you suspect someone is/you are being abused OR has someone told you of an incident of abuse?

- After consulting with your Manager, email the Safeguarding Champions with the case details at: safeguarding@gravesham.gov.uk
- The Safeguarding Champions will consider the case and provide any supporting intelligence with a recommended course of action.

Stage 2 When to make a referral

- Following consultation with the Safeguarding Champions, to make a referral you should immediately complete the Inter-Agency Referral Form (for a child) or the Adult Safeguarding Alert Form.
- If you would like further advice before submitting a referral you have the option to consult the KCC Central Duty Team. All forms emailed to KCC should also be emailed to the Safeguarding Champions.

Stage 3 Follow-up actions

- Check – have you heard back from KCC within 72 hours of your referral?
- If yes, contact the Safeguarding Champions and advise on the case outcome.
- If no, contact the KCC Central Duty Team for an update and advise the Safeguarding Champions on the eventual case outcome.

REMEMBER: It is YOUR responsibility, as the referring officer, to ensure Gravesham Borough Council fulfils its statutory obligation to receive confirmation that KCC has considered your referral.

Contact details for individual Safeguarding Champions can be found in Appendix 8.

Contact the KCC Central Duty Team on:

Child: 03000 411111

Adult: 03000 416161

Out of Hours: 03000 419191

Email: social.services@kent.gov.uk

Appendix 7 – Notification and Referral Forms

Appendix 7 sets out the key considerations (e.g. disclosures from the public, intervention thresholds) and forms required for completion (e.g. notifications) as part of any safeguarding referrals that are to be made.

Stage 1: Initial notification and considerations

- **Guidance notes for officers when dealing with a 'disclosure'**: These guidance notes provide some considerations for dealing both with someone disclosing information relating to safeguarding and also when seeking to report an incident of abuse or safeguarding concern.

  Do:

  - Stay calm.
  - Provide a listening ear and an open mind.
  - Be reassuring, particularly that the individual is doing the right thing by telling you.

  - Record the information you are provided with and report as quickly as possible to your line manager and the Safeguarding Champions. This information will potentially be passed to an external agency and should include a record of the time, date and persons present.

  - If you are the reporting officer and you call anyone for advice/support it is your responsibility to record all relevant information, make appropriate referrals, raise a Safeguarding concern internally on QES Case Review and update the customers file/notes accordingly.

Don't:

- Promise to keep the information secret. Make it clear that you have a duty to refer the matter on.
- Stop the individual who is freely recalling significant events.
- Make the individual tell anyone else. S/he may have to be formally interviewed later and it is important to minimise the number of times information is repeated.
- Make any suggestions to the individual about how the incident may have happened.
- Question the individual, except to clarify what they are saying.
- Discuss the information with anyone other than your line manager, a Safeguarding Champion, or an appropriate external agency.

Threshold criteria

Abuse of children can take many forms. Kent support levels guidance includes illustrative examples about how need may present itself for formal intervention. It can help to decide whether to refer a child and whether the child will meet either the 'child in need' or 'child protection' thresholds:

- **Child in need:** the child is unlikely to achieve or maintain a reasonable standard of health or development, or development is likely to be significantly impaired (section 17 of the 1989 Children Act).

- **Child protection:** where a child has suffered or is likely to suffer significant

harm, through neglect, physical, emotional, or sexual abuse (section 47 of the 1989 Children Act).

- The Multi-agency Safeguarding Arrangements Guidance has been developed to set out the statutory duties as applied to individual organisations to promote the welfare of children and ensure they are protected from harm.

Stage 2: Further investigation and/or making a referral

- Kent Child Safeguarding Referral Form Once you/your line manager have decided to make a formal referral, following consultation with the Safeguarding Champions and, potentially, the Kent County Council Central Duty Team, the Child Protection Form must then be completed and forwarded to the Kent County Council Central Duty Team within two working days.

- Kent Adult Safeguarding Alert Form: Once you/your line manager have decided to make a referral following consultation with the Safeguarding Champions and, potentially, the Kent County Council Central Duty Team, raise a safeguarding concern using the relevant form.

- Care Needs Assessment: Once you/your line manager have decided to make a request for a needs assessment following consultation with the Safeguarding Champions and, potentially, the Kent County Council Central Duty Team, raise a safeguarding concern using the relevant form.

NOTE: The more information received at the first point of contact, the more likely it is that appropriate services will be delivered at the earliest opportunity to help children and adults at risk.

NOTE: If you need to contact social services outside of normal office hours, for example during the night, call **03000 419191.**

NOTE: There are separate procedures in place for referrals relating to the Modern Slavery, PREVENT and Domestic Abuse agendas, and for young people caring for adult family members. Please consult Appendix 2 or contact the Safeguarding Champions for further details.

Gravesham Borough Council

Appendix 8 – Accountability Framework – Key Contacts

Appendix 8 provides a list of key points of contact that will be of use in fulfilling the reporting procedure set out in this Safeguarding Policy.

Safeguarding Role	Service	Name	Contact
Chief Executive	Chief Executive	Stuart Bobby	01474 337431 stuart.bobbygravesham.gov.uk
Local Authority Designated Officer	Communities and Inclusive Growth, (Director)	Jamie Izzard	01474 337324 jamie.izzard@gravesham.gov.uk
Lead Safeguarding Officer	Community Safety Unit (Lead Safeguarding Officer)	Carly Theis	01474 337328/M: 07901 994031 carly.theis@gravesham.gov.uk
Safeguarding Champions	Community Safety Officer	Dorota Trapl	01474 337328/M: 07707 293261 Dorota.trapl@gravesham.gov.uk
	Strategic Manager (Community Safety Unit)	Kath Donald	01474 337809/M: 07395 850178 Kath.donald@gravesham.gov.uk
	Health and Wellbeing Officer	Diljeet Nota	01474 330123 diljeet.nota@gravesham.gov.uk
	Domestic Abuse and Safeguarding Officer	Sooz Randall	01474 337369 Sooz.randall@gravesham.gov.uk
	Sports & Recreation Manager	Danielle Lock	01474 337806 Danielle.lock@gravesham.gov.uk
	Senior Customer Service Officer	Alice Chapman	01474 337725 Alice.chapman@gravesham.gov.uk
	Resident Liaison Officer	Jordan Vilday	01474 337388 Jordan.vilday@gravesham.gov.uk
	Independent Living	Kudu Omogbei	01474 337175 Kudu.omogbei@gravesham.gov.uk
	Assistant Licensing Manager	Emily Lane-Blackwell	01474 337451 Emily.lane-blackwell@gravesham.gov.uk
	Senior Parking Officer	Ann Rankin	01474 337167 Ann.rankin@gravesham.gov.uk
	Communications Manager	Andy Rayfield	01474 337304 Andy.rayfield@gravesham.gov.uk

	Neighbourhoods Services	Louise Rayner	01474 337861 Louise.rayner@gravesham.gov.uk
	Neighbourhoods Service	Mohamed.Jamal	01474 337861 Mohamed.jamal@gravesham.gov.uk
	Anti-Social Behaviour Officer	Kathleen Irwin	01474 337418 Kathleen.irwin@gravesham.gov.uk
	Committee & Electoral Services	Zoe Slater	01474 337151 Zoe.slater@gravesham.gov.uk
	Healthy Homes Team	Marie-Claire Hatton	01474 337647 Marie-claire.hatton@gravesham.gov.uk
	Chief Executives Department	Ben Turner	01474 337378 Ben.turner@gravesham.gov.uk
	Homeless Prevention Team	Joanne Thorpe	01474 337707 Joanne.thorpe@gravesham.gov.uk
	Parks and Open Spaces Manager	James Young	01474 337663 James.young@gravesham.gov.uk
	Park Ranger	Stuart Ballantyne	01474 337614 Stuart.ballantyne@gravesham.gov.uk
	Counter Fraud Officer	Louise Carpenter	01474 332325 Louise.Carpenter@medway.gov.uk
	Revenues Team Leader	Sharon Temme-Powell	01474 337192 Sharon.temme-powell@gravesham.gov.uk
	Revenues & Benefits	Sharon Anderson	01474 337416 Sharon.anderson@gravesham.gov.uk
	HR Officer	Charlotte Collins	01474 337374 Charlotte.collins@gravesham.gov.uk
	Head of Planning	Shazad Ghani	01474 337483 Shazad.ghani@gravesham.gov.uk
	Waste Management Support Officer	Karen Cordingley	01474 337449 Karen.cordingley@gravesham.gov.uk
	Digital Content Designer	Emma Mulcrow	01474 337915 Emma.mulcrow@gravesham.gov.uk
	Art & Culture Officer	Gemma Dand	01474 337389 gemma.dand@gravesham.gov.uk

	Print & Mail Supervisor	John Durling	01474 337263 john.durling@gravesham.gov.uk
	Corporate Debt Recovery Officer	Georgia Roche	01474 337166 georgia.roche@gravesham.gov.uk
	Senior Environmental Health Technician	Keith Moorhouse	014740 337308 Keith.moorhouse@gravesham.gov.uk
	Customer Services	Lara Chilvers	01474 337725 Lara.chilvers@gravesham.gov.uk
Data Protection Officer	Information Governance Manager	Preeti Lalli	Preeti.lalli@gravesham.gov.uk