

Bradford on Avon Town Council



Safeguarding Policy

Protection of children and vulnerable adults

Version Control

Action:	Who:	Date:	Comments:
Draft to Resources Committee	Town Clerk	17.12.19	As a 94-page agenda sent out, members were given more time to consider these policies and discuss them at the next Resources Committee on the 19 th February 2020. This meeting was subsequently cancelled.
Draft to Full Council	Town Clerk	04.02.20	Ask members for their comments by 9 th April 2020 then take to Full Council on the 5 th May 2020 for adoption.
Draft to Full Council	Town Clerk	27.07.20	With changes adopted at Virtual Extraordinary Full Council.
Draft to Resources Committee	Community Engagement & Development Officer	04.06.24	Changes to reflect BoA Youth delivery.

1. Introduction

Bradford on Avon Town Council recognises that safeguarding is a key responsibility for any organisation working with children and young people under the age of 18 and vulnerable adults, over the age of 18.

The purpose of this policy is to make clear to all members of staff, town councillors, volunteers and contractors, the importance of safeguarding children, young people and vulnerable adults and what is required of them in terms of their responsibilities for identifying and reporting actual or suspected abuse.

Children, young people and vulnerable adults have the right to participate, have fun and be safe in the services and activities provided for them.

This policy will help to maintain a safe and positive environment for children and vulnerable adults.

2. Policy Coverage

This policy applies to all councillors, employees, volunteers and contractors working in partnership with Bradford on Avon Town Council. Under the Children Act 2004, Bradford on Avon Town Council has a duty to co-operate with other agencies and authorities to promote the wellbeing of children and young people.

Wiltshire Council is the lead agency for the protection of vulnerable adults.

It is not the role of Bradford on Avon Town Council to investigate allegations of abuse. However, all councillors, employees, volunteers and contracted services providers have a responsibility to take action when they suspect or recognise that a child or vulnerable adult may be a victim of significant harm or abuse.

This policy is to be used in conjunction with the Bradford on Avon Town Council's:

- Risk Management Scheme
- Anti-Fraud & Corruption Policy
- Code of Conduct for members
- Health & Safety Policy
- Whistleblowing Policy
- Complaints Procedure
- Equality, Diversity & Inclusion Policy
- Disciplinary and Grievance Procedures.

2.1 Terminology

The phrase '**children, young people and vulnerable adults**' refers to:

- anyone under the age of 18 years;
- someone who is over the age of 18 who may be in need of community care services by reasons of mental health or other disability, age, infirmity or illness and is, or may be, unable to take care of themselves or unable to protect him or herself against significant harm or exploitation.

When the term 'parent' is used, it is used in the broadest sense to include parents, carers and guardians.

3. Policy Principles

Bradford on Avon Town Council recognises that all children and vulnerable adults have an equal right to protection from abuse. It is committed to safeguarding children and vulnerable adults and protecting them from abuse when they are engaged in services provided by, or on behalf of the council.

Referrals of suspicions of abuse cannot be anonymous and should be made in the knowledge that, during the course of enquiries, the agency that made that referral will be made clear.

Bradford on Avon Town Council will not tolerate the harassment of any councillor, employee, volunteer, contracted service provider or child/vulnerable adult who raises concerns of abuse.

4. Policy Statement

Bradford on Avon Town Council is committed to taking all reasonable precautions and working in partnership with others to safeguard children, young people and vulnerable adults.

This policy aims to ensure that employees, councillors, those delivering contracts on behalf of the council and volunteers have a clear understanding of their role and responsibilities for identifying and reporting actual or suspected abuse.

The town council will ensure that staff are trained to an appropriate level and encouraged to think of safeguarding as being their responsibility, understanding the need for them to play a full and active part in the delivery of the council's response to protect people from harm.

The following principles are those upon which this Safeguarding Policy is based:

- all people have the right to be safe from harm and must be able to live free from harm, abuse, neglect, and exploitation irrespective of their age, gender, race or ethnicity, religion, disability or sexual preference and to that end the town council adopts this policy that applies to, and must be followed, by all town councillors, employees and volunteers
- the welfare of a child, young person and a vulnerable adult will always be paramount
- to always act in the best interests of the child or vulnerable adult
- proactively seek to promote the welfare and protection of all children and vulnerable adults living in the local community
- the rights, wishes and feelings of children, young people and their families and vulnerable adults will be respected and listened to
- those people in positions of responsibility within the town council will work in accordance with the interests of those safeguarded and follow the policy outlined below
- endeavour to ensure that unsuitable people are prevented from working with children or vulnerable adults through safer recruitment procedures
- take any concern made by a councillor, employee, volunteer or contracted service provider, child or vulnerable adult seriously and treat it with sensitivity
- respond to suspicion of abuse promptly and appropriately

This document is written in accordance with the Working Together to Safeguard Children 2023 and the Care Act 2016.

5. Responsibilities

Safeguarding is the responsibility of all town councillors, employees, volunteers and contractors working in partnership with Bradford on Avon Town Council and they will be expected to support the Safeguarding Policy, with the overall responsibility falling to the Designated Safeguarding Lead (DSL).

The town council will follow the child protection procedures set out by the Wiltshire Safeguarding Vulnerable People Partnership (SVPP).

5.1 Responsible People

The Designated Safeguarding Lead (DSL) will take lead responsibility for:

- overseeing and monitoring the implementation of this policy and any resultant procedures on behalf of the town council
- the development of this safeguarding policy, issuing operational guidance and promoting best practice
- developing, maintaining and reviewing the organisational plan for safeguarding
- ensure safeguarding training is available to meet the requirements and needs of staff, councillors and volunteers
- advise the town council on any matters related to the safeguarding of children, young people, and vulnerable adults
- take the appropriate action when abuse is disclosed, discovered or suspected
- work in partnership with other agencies.

The Designated Safeguarding Lead (DSL) is:

Community Engagement & Development Officer - George Tomlinson

The Deputy Safeguarding Lead (DDSL) is:

BoA Youth Coordinator - David Lloyd

5.2 Individual Responsibility

Every staff member, councillor and volunteer should have a clear understanding of their responsibilities when working with children and vulnerable adults. This policy applies to all members of staff, councillors and volunteers regardless of whether they have direct contact with children, young people and vulnerable adults.

This policy seeks to ensure that all staff, councillors and volunteers have a clear understanding of:

- how to recognise signs of abuse and what appropriate course of action should be taken in such circumstances;
- the potential risk to themselves and ensure that good practice is always adhered to;

- recognising signs of improper behaviour from others and reporting it to the DSL at the earliest opportunity.

6. Definitions of Abuse

Abuse covers any form of physical, emotional, mental and sexual abuse including bullying and lack of care that leads to injury or harm. For vulnerable adults abuse may also be financial.

Main forms of abuse:

Neglect - the persistent failure to meet a child's or vulnerable person's basic physical / psychological needs which is likely to result in the serious impairment of their health or development. For example, the failure to provide adequate food, clothing, medical and social care and educational needs. It may also include simply being left alone or excluded.

Physical Abuse - where physical pain or injury is caused, for example hitting, shaking, biting and burning as well as the use of inappropriate restraint. Physical abuse can also be caused by an omission or failure to act to protect, for example, the giving of alcohol or inappropriate drugs.

Sexual Abuse – forcing or enticing a child or vulnerable adult to take part in sexual activities whether or not the child or vulnerable adult is aware of, or consents to what is happening. It can also include non-contact activities such as showing pornographic material, inappropriate photography or videoing or encouraging someone to behave in a sexually inappropriate way.

Emotional Abuse - persistent emotional ill treatment that causes severe and persistent adverse effects on the child's or vulnerable person's emotional status. This can include being verbally abused, threatened, ignored or taunted. Other forms of emotional abuse include excessive overprotection, unrealistic pressure to perform, intimidation, humiliation, bullying and cyberbullying.

Other forms of abuse include exploitation, trafficking, criminal exploitation and gangs, domestic abuse, female genital mutilation (FGM), grooming and online abuse.

Children and adults with Special Education Needs

People with additional needs face an increased risk of abuse and neglect and may have added difficulties in communicating what is happening to them. Additional care should be taken to correctly interpret apparent signs of abuse or neglect.

7. Responding to Concerns and Reporting Abuse

The Council is committed to maintaining an open culture where members, employees, volunteers, children, vulnerable persons, parents, guardians and carers feel able to express concerns both about child protection and issues of poor practice.

It is the duty of all to respond to concerns about the wellbeing of children, young people and vulnerable adults and to report any abuse disclosed, discovered or suspected.

The town council will treat any concern seriously and with sensitivity.

It is not the responsibility of staff, councillors or volunteers to decide whether or not abuse has taken place. However, they should act promptly if they have concerns or suspicions.

When there is a suspicion of abuse taking place, it should be reported to the DSL who in turn should report all incidents to the Town Clerk. If the DSL is unavailable, then the incident should be reported to the Deputy DSL.

There may be exceptional circumstances where it is necessary to restrain a child or vulnerable adult to prevent them from hurting or inflicting harm on themselves or others. Only the minimum reasonable force necessary may be used.

Any incident of physical restraint must be recorded on an incident form and submitted to the DSL, or if unavailable, to the Deputy DSL, as well as informing the parents and/or carer as soon as possible.

7.1 Responding to a disclosure

If a child, young person or vulnerable adults wishes to make a disclosure, the following '7Rs' guidance should be followed:

Receive – stay calm, be patient, find a quiet place, give them your full attention, allow them to speak at their own pace and without interruption, listen carefully, take it seriously.

Reassure – try to make them feel safe and secure; reassure them that their feelings are important and they've done the right thing in talking to you.

Respond – only ask questions for clarification; explain that the information will need to be shared.

Reflect – repeat back what they've said, using their language, to check your understanding.

Report – follow the town council's procedures for reporting an allegation; if the person is in immediate danger call 999.

Record – write down what you've been told as soon as possible; use the child/vulnerable person's words; record the date, time, your name and sign the record; give to DSL as soon as possible.

Remember – DO NOT:

- promise confidentiality
- ask leading questions
- look panicked, shocked or angry
- interrupt
- make them repeat the story
- give an opinion
- inform their parents until you've spoken to the DSL
- try to investigate
- make any comments about the abuser or try to guess who the abuser is

A disclosure should be reported to the DSL, or if unavailable to the Deputy DSL at the earliest opportunity.

If an employee, councillor or volunteer is implicated, allegations should be recorded and reported to both the DSL and Town Clerk immediately. If the Town Clerk is implicated, refer to the Town Mayor.

All allegations must be reported to the DSL, no matter how insignificant they seem to be, or when they occur.

The details of an allegation or an incident of abuse or mistreatment must be carefully recorded regardless of whether or not the concerns are later shared with a statutory agency. An accurate record should include:

- the date and time of the incident and/or the disclosure
- the parties who were involved
- what was said and done by whom
- the full name of the person making the allegation
- to whom the allegation was reported

And where appropriate:

- any action taken by the town council
- reasons why there was no referral to a statutory agency

7.2 Record keeping

The DSL should take the lead in making sure all concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing.

They should ensure that records are kept confidential and stored securely in separate child protection files in line with data protection legislation.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved, including any advice provided by the MASH
- a note of any decisions reached, any action taken and the outcome
- every effort should be made to ensure that confidentiality is maintained for all concerned.

7.3 Reporting allegations of abuse

If an allegation of abuse is disclosed, the DSL should contact Wiltshire's Multi Agency Safeguarding Hub (MASH) at the earliest opportunity.

They should ask for the duty officer and indicate that they wish to discuss a matter of a child/vulnerable person protection. They should ask for and record the name of the person with whom they are speaking. They should not filter out or withhold any information. They should ask if there is anyone else who should be informed.

The DSL should follow the advice from the MASH and take no other action unless advised to do so.

7.4 Responding to concerns when no specific disclosure or allegation has been made
All councillors, employees, volunteers and organisations contracted to provide services on behalf of the town council are encouraged to share concerns with the DSL.

The DSL will, if appropriate, make a referral to the MASH.

The town council will fully co-operate with any statutory investigation into any suspected abuse linked to the activity of the town council or council representatives.

7.5 Confidentiality

Councillors, employees, volunteers and contracted service providers must not discuss allegations of abuse, substantiated or not, with anyone other than in connection with the formal investigation.

Where it is necessary to put procedures in place to prevent continuing abuse, the matter should be shared with the Town Clerk so that the appropriate risk assessments may be undertaken.

Where an allegation has been made against a staff member, the council will seek to balance protecting children and vulnerable adults from harm whilst protecting its staff from the risk of unfounded allegations.

The Town Clerk will be responsible for dealing with all allegations and suspicions of abuse concerning a member of staff, in conjunction with any relevant authorities and agencies.

7.6 Key Contacts

If there is immediate danger, phone the police or emergency services on 999.

Otherwise contact:

Multi Agency Safeguarding Hub (MASH)

0300 456 0108 – 8.45am-5pm Monday-Thursday and 8.45am-4pm Friday

0300 456 0100 – out of hours

Or for less urgent enquiries, email mash@wilshire.gcsx.gov.uk

Wiltshire Council Monitoring Officer

0300 456 100 – 9am-5pm Monday to Friday

Email, governance@witshire.gov.uk

Wiltshire Police non-emergency telephone 101

NSPCC Child Protection Line

0808 800 5000 or text 0800 056 0566

Email help@nspcc.org.uk

8. Prevention

It is the duty of every representative of the town council, whether that representative be a councillor, employee, or volunteer, to prevent the physical, sexual or emotional abuse, neglect or exploitation of children, young people and vulnerable adults.

8.1 Safe Behaviour: Code of Conduct for Council Representatives

These guidelines have been devised to protect children and vulnerable adults from abuse, as well as to protect councillors, staff and volunteers from situations where false allegations may occur.

The guidelines apply to those working with children or vulnerable persons involved in activities organised by or on behalf of Bradford on Avon Town Council or at services provided by Bradford on Avon Town Council.

Safe working practice ensures that children, young people and vulnerable adults are safe and that all councillors, staff and volunteers:

- always operate within the council's policies and procedures
- treat everyone with respect, regardless of their age, ethnicity, social background, ability, sexual orientation, culture or religious beliefs
- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- work in an open and transparent manner
- when working in public spaces, be identifiable by wearing a Bradford on Avon Town Council ID card or clothing displaying the town council logo
- ensure that, when possible, there is more than one adult present during activities involving children and vulnerable people
- be aware that any physical contact with a child or vulnerable adult may be misinterpreted
- control the use of photographs and images of young people to prevent possible misuse - agreement will be sought from parents or guardians that images can be used as appropriate
- recognise that special caution is required when discussing sensitive issues with children or vulnerable adults
- discuss and/or take advice from management over any incident which may give rise to concern
- challenge unacceptable behaviour and report all allegations/suspicions of abuse

Employees who breach these guidelines will face investigation and may face disciplinary action, which could lead to dismissal.

Volunteers in breach of the above Code of Conduct will have their services terminated with immediate effect and their parent organisation (as appropriate) will be informed.

If a councillor does not adhere to the policy, there may be grounds for reporting their behavior to the Monitoring Officer who may require an investigation under the Member Code of Conduct.

Where there is evidence of illegal activity, the councillor, employee or volunteer will be reported to the relevant authorities and may face criminal investigation.

Complaints about a councillor, employee or volunteer and/or serious and/or persistent abuse of these safeguarding policies and procedures will not be tolerated and will be dealt with through Bradford on Avon Town Council's disciplinary process.

If a member of staff feels unable to raise a concern or is worried about how the organisation is dealing with a concern they have raised, they should seek support through the NSPCC Whistleblowing Advice Line (0800 028 0285).

8.2 Safer Recruitment

The Town Council will exercise proper care in the selection and appointment of those working with children, young people and vulnerable adults, whether paid or voluntary.

All staff involved in the recruitment of positions working with children and/or vulnerable adults will have undertaken safer recruitment training.

Prospective employees will be interviewed and previous, relevant experience will be noted.

Safeguarding questions will be asked at all interviews, where the position requires interaction and/or supervision of children or vulnerable adults.

At least two appropriate references will be taken up for all employees. All employees will undergo a probationary period.

All members, employees and volunteers who are required to carry out duties that involve working with children or vulnerable adults or whose roles mean they come directly into contact with children or vulnerable adults must be checked by the Government's Disclosure and Barring Service (DBS) and / or appropriate safeguarding agency.

In line with best practice, these checks will be repeated every three years.

8.3 Support and Supervision of Workers

The town council will ensure that representatives routinely working with children, young people or vulnerable adults will have effective policies and procedures in place and be provided with appropriate training, support and supervision to promote the safeguarding of those deemed to be at risk.

Anyone who has not been DBS checked must not support activities where there is a possibility of unsupervised contact with a child, young person or vulnerable adult.

All staff, councillors and volunteers will be shown this Safeguarding Policy at their induction.

The DSL, Deputy DSL and BoA Youth Team will undertake safeguarding training at least once every three years and keep up to date with national policy and guidance.

8.4 Procedure in Relation to Specific Services

Work Experience

Bradford on Avon Town Council may offer work experience placements through various schemes. The council will ensure that employees working with children or vulnerable adults are aware of the Safeguarding Policy.

Line managers are responsible for the health, safety and welfare of work experience students who are under law regarded as employees.

Leisure Services/Hall Hire

Independent sports clubs and private individuals who regularly use the facilities operated by Bradford on Avon Town Council should have appropriate child protection and vulnerable adult policies in place, in level with the contact they have.

Furthermore, their employees, or volunteers who have significant and regular unsupervised contact with children and vulnerable adults should have satisfactory DBS checks in conjunction with the council's Safeguarding Policy for Hirers.

Use of Contractors

Bradford on Avon Town Council will take responsible care that all contractors doing works on behalf of the council are monitored properly.

Any contractor, or sub-contractor, engaged by the council in areas where workers are likely to come into regular contact with children, young people or vulnerable adults, should have its own equivalent child protection and vulnerable adult policies, or failing this, must comply with the terms of this policy.

This requirement will be written into the contract. If this is not met, the contractor will be deemed to be in breach of their contract.

First Aid

Under ordinary circumstances a child or young person can be administered with first aid only if their parent or guardian expressly permits this course of action.

When administering first aid, whenever possible, employees should ensure that another adult is present, or is aware of the action being taken. Parents/carers should always be informed when first aid is administered.

In an emergency, councillors, employees, volunteers and contracted service providers may undertake first aid to minimise a child's, or vulnerable person's distress, notifying parents/carers as soon as possible.

Special Events- Photography

Anyone using cameras or film recorders for or on behalf of the council should obtain consent from the parents of the children being photographed or filmed before the activity commences.

When commissioning professional photographers or inviting the press to cover council services, events and activities the council's expectations must be made clear in terms of child protection by checking the credentials of any photographers, ensuring identification is worn and by not allowing unsupervised access to the children or one to one photographic sessions.

8.5 Policy and Procedures

Each representative of the Town Council working with children, young people, or vulnerable adults, whether paid or voluntary, will be given access to this policy and resultant procedures and will be required to follow them.

A full copy of this policy and resultant procedures will be made available on request to any member of the local community.

This policy will be reviewed at least every 3 years and will also be revised in light of changing needs, changes in legislation and guidance, or in the light of experience.