

Safeguarding Children Young People and Adults At Risk Policy



Version Control

Version 3.3 Reviewed: Dec 2019 Next review due 2023

**Version 3.2 Agreed by Policy & Resources Committee on 18 July 2016
Re-written - July 2016 – with comments from consulted officers and Management Board**

1. Introduction

1.1 Three Rivers District Council takes the safeguarding of children, young people and adults at risk seriously. Within the course of providing our services, or having contact with local residents, we have the opportunity to make positive impacts on the lives of children and adults at risk, by protecting them from injury and abuse and helping them to access early help.

1.2 This revised policy outlines:

- The overarching commitments of the Council to safeguarding
- The aims of the Council's safeguarding and early help work
- How the policy relates to legislation and local safeguarding procedures
- The roles of different staff, members, contractors and volunteers in relation to safeguarding
- The categories of abuse for children, young people and adults at risk
- The commitments to maintaining up to date reporting and referral procedures for safeguarding concerns
- How information sharing, data protection and confidentiality will be addressed when using the policy
- The commitment to investigating allegations against staff, volunteers and members
- The commitments to safer recruitment, and undertaking criminal record checks
- The commitment to staff training on safeguarding
- The commitment to safeguarding within contracting and grant giving.

1.3 The policy applies to all staff, volunteers, agency staff, work placements, contractors and members of the Council.

1.4 The definition of a child for the purpose of the policy is anyone under the age of 18 years, including an unborn child.

1.5 The definition of an adult at risk for the purpose of the policy is:

A person 18 years or over who

- Has needs for care and support (whether or not any of those needs are being met by an authority); and
- Is experiencing, or is at risk of, abuse or neglect; and
- As a result of those needs is unable to protect him/herself against the abuse or neglect or the risk of it.

2. The Council's Commitments To Safeguarding

2.1 The Council:

- is committed to protecting and safeguarding children and adults at risk against potential and actual harm.
- fully accepts and promotes the principle enshrined in the Children Act 1989 that the welfare of the child is paramount.
- is committed to supporting adults and providing a service to adults at risk who are experiencing abuse, neglect and exploitation.
- will take all allegations of abuse seriously, valuing the individual affected, listening to them and respecting them.
- is committed to working with statutory and voluntary organisations to promote the safety and welfare of children and adults at risk, to protect them from abuse, and prevent abuse.
- is committed to empowering and supporting adults at risk to make their own choices.
- will act promptly whenever a concern is raised about a child or an adult at risk, or the behaviour of someone towards them, sharing information about concerns with agencies who need to know, involving children, parents and adults at risk as required.

- will co-operate with statutory partners in the investigation of any cases of suspected child abuse, or abuse of adults at risk.
- will maintain procedures and training for the identification of abuse, and appropriate investigation of such abuse.
- will recruit staff and volunteers safely ensuring all necessary checks are made.
- will safeguard children and adults at risk we come into contact with by following the procedures developed for the purposes of enacting this policy.

3. The aims of the Council's safeguarding and early help work

3.1 This policy aims to:

- Promote the welfare of children and young people accessing the Council's services and living in the District;
- Ensure the needs and interests of adults at risk are always respected and upheld;
- Assure children, young people, adults at risk and their families and carers, that the Council takes their welfare seriously and assure them that we deliver our services in a safe and secure environment;
- Help adults at risk maintain choice and control, safety, health, quality of life, dignity and respect;
- Ensure that all staff, volunteers, members and contractors understand the reporting procedures for any concerns that a child, young person or adult at risk may be at risk of abuse or neglect;
- Ensure that the Council maintains safer recruitment practices;
- Uphold the human rights of children and adults at risk.

4. How the policy relates to legislation and local safeguarding procedures

4.1 This policy and its associated procedures will ensure that the Council is compliant with the responsibilities and expectations laid out in the following legislation, guidance and local procedures:

- The Children Act 1989 – setting out that the welfare of the child is paramount and the priority of safeguarding and promoting the welfare of the child;
- The Children Act 2004 – setting out the duty to work closely with those agencies providing services to children and young people;
- 'Working Together to Safeguard Children 2018' – which sets out how organisations should work together to safeguard and promote the welfare of the child;
- The Care Act 2014 – which requires local authorities to make enquiries where we reasonably suspect an adult with care and support needs is at risk of abuse or neglect;
- Care and Support Statutory Guidance – which outlines the expected inter-agency procedures, responsibilities and definitions of abuse;
- Better Care, Higher Standards charter – which lays out the core quality standards for community care services to adults;
- Making Safeguarding Personal – which sets out the principles with which we will engage with adults at risk to ensure that adult safeguarding is person-led and focused on the outcomes that the adult wants to achieve;
- The United Nations Convention on the Rights of the Child;
- The Human Rights Act;
- Mental Capacity Act 2005 – which provides a framework to empower and protect people who may lack capacity to make decision for themselves;
- Deprivation of Liberty Safeguards 2008 - which provides protection to people who need to be cared for in a restrictive way;
- Female Genital Mutilation Act 2003 – which extended legislation criminalising FGM by making it an offence for UK nationals or residents to take a girl abroad or help others to do so to carry out FGM;
- Forced Marriage (Civil Protection) Act 2007 which requires the Council's Strategic Lead on Safeguarding to lead on forced marriage, to share information on the risks of forced marriage and so-called "honour"-based violence;

- The Domestic Violence, Crime and Victims Act 2004;
- **The Modern Slavery Act 2015;**
- The National Prevent Strategy – which requires the Council to share concerns about the risks of children and adults being radicalised;
- **Criminal Exploitation of Children and Vulnerable Adults: County Lines (September 2018) – which sets out guidance on responses to County Lines and related criminal exploitation.**
- Multi-Agency Public Protection Arrangements (MAPPA);
- Safeguarding Adults At Risk – The multi-agency policy, procedure and practice for working with adults at risk of abuse or neglect in Hertfordshire (Hertfordshire Safeguarding Adults Board);
- Hertfordshire Safeguarding Children **Partnership** Procedures Manual.

5. The roles of different staff, members, contractors and volunteers in relation to safeguarding

5.1 All staff, members, contractors and volunteers are to:

- Understand and apply the policy and its related procedures to their activities within the Council;
- Undertake appropriate training to support them in their safeguarding role;
- Act appropriately at all times and to challenge inappropriate behaviour in others and report it;
- Be able to recognise abuse and neglect; and
- Know how to report concerns to a designated safeguarding lead within the Council in a timely and appropriate manner.

5.2 Managers in the Council are to:

- Encourage all staff, volunteers and contractors to understand this policy and related procedures;
- Offer opportunities to undertake appropriate safeguarding training and refresher training;
- Ensure that the policy and its procedures are adhered to and that staff, volunteers and contractors know to whom they should report any concerns about a child or adult at risk;
- Ensure that staff, volunteers and contractors are aware of the Council's Whistle-Blowing Policy;
- Act on any breach of the policy and its procedures as appropriate;
- To refer any concern about the conduct of a member of staff, volunteer or contractor to a designated safeguarding lead and Human Resources for appropriate investigation and referral.

5.3 Designated Safeguarding Leads are to:

- Ensure that any concern about a child or adult at risk is acted on, clearly recorded, referred on to another agency where necessary, and followed up to ensure that issues are addressed;
- Identify options for early help for concerns about children or adults at risk that do not meet the thresholds of safeguarding referrals, to record and communicate these options and make any consented referrals;
- To work with Human Resources to respond to any reports of concern about the conduct of a member of staff, volunteer, member or contractor following the required reporting procedures;
- To undertake training and refresher training as required;
- Maintain their understanding of Hertfordshire Safeguarding Children **Partnership** and Hertfordshire Safeguarding Adults Board procedures.

5.4 Human Resources are to:

- Maintain and implement policy and procedures for the checks of staff recruited to the Council through Disclosure Scotland and the Disclosure and Barring Service, keeping records of all such checks and outcomes. This will include the maintenance of a register of posts requiring different levels of Disclosure and Barring checks according to responsibility above the level of Disclosure Scotland;

- Maintain safer recruitment practices for designated posts that work with children and adults at risk;
- To maintain a register of staff training requirements for safeguarding, and monitor and audit uptake of that training;
- To provide the training programme for safeguarding across the organisation.

5.5 The Strategic Lead For Safeguarding will be the Head of Community Partnerships who will:

- Take strategic responsibility for maintaining and updating this policy and associated procedures;
- Take strategic responsibility for ensuring that the policy and procedures are implemented and audited;
- Take strategic responsibility for engaging with the Hertfordshire Safeguarding Children **Partnership**, Hertfordshire Safeguarding Adults Board and statutory partner agencies across Hertfordshire, and enacting their joint procedures for the safeguarding of children and adults at risk, and for helping families and adults at risk access early help;
- To review with the Human Resources section, the posts identified for different levels of disclosure and barring checks, the posts identified for different levels of safeguarding training, and the training programme for safeguarding, early help and specialist topics;
- Act as the strategic lead for the specialist issues of Child Sexual Exploitation, **Child Criminal Exploitation and County Lines**, Female Genital Mutilation, Forced Marriage, so called "Honour"-Based Violence, **Modern Day Slavery** and Radicalisation, ensuring appropriate procedures and training are put in place to address these issues and that these procedures are audited.

5.6 Regulatory Services will:

- Ensure that all taxi licence applicants are Disclosure and Baring Service checked and Police intelligence checked to ensure they are 'fit and proper' and that the Licensing Policy is maintained in line with best practice for safeguarding children, and adults at risk.
- **Ensure that all licensed premises and licenced taxi drivers and operators receive information on Child Sexual Exploitation and Safeguarding.**
- **Ensure that new taxi drivers are required to undertake an enhanced driving test which covers safeguarding. Safeguarding questions will be included in the knowledge test which all new drivers are required to pass before being considered for a licence.**

6. The categories of abuse for children, young people and adults at risk

6.1 Child Abuse and Neglect

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those know to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

An abused child is any boy or girl, under 18 years of age, who has suffered from, or is believed likely to be at significant risk of, physical injury, neglect, emotional abuse or sexual abuse.

The Council is committed to maintaining staff, volunteer, member and contractor awareness of these four types of child abuse:

- 6.1.1 **Physical abuse** – 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 or deliberately induces illness in a child.
- 6.1.2 **Emotional abuse** – a form of significant harm which involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are

worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a child.

This may include interactions that are beyond the child's development capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

6.1.3 **Sexual abuse** – a form of significant harm which involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

6.1.4 **Neglect** – the persistent failure to meet a child's basic physical and or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-giver)
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

6.2 The Council is also committed to maintaining its staff volunteer, member and contractor awareness of bullying which includes:

- people being called names;
- making things up to get another person into trouble;
- hitting, punching, biting, pushing and shoving;
- taking things away from someone;
- damaging another person's belongings;
- stealing someone's money;
- taking someone's friends away from them;
- cyberbullying;
- spreading rumours;
- threats and intimidation;
- making silent or abusive phone calls;
- a bully frightening the victim so that they do not want to go to school or take part in other activities. The victim may pretend to be ill to avoid the bully.

6.3 Adult abuse

The Council is committed to maintaining staff, volunteer, member and contractor

awareness of the main forms of abuse set out in the Statutory Guidance of The Care Act 2014 which is not an exhaustive list but an illustration as to the sort of behaviour that could give rise to a safeguarding concern for an adult at risk:

- 6.3.1 **Physical abuse** - including assault, hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- 6.3.2 **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; so called “honour”- based violence.
- 6.3.3 **Sexual abuse** – including rape and sexual assault or sexual acts to which the adult at risk has not consented, or could not consent, or was pressured into consenting, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography, witnessing sexual acts or indecent exposure.
- 6.3.4 **Psychological/emotional abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- 6.3.5 **Financial or material abuse** – including theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- 6.3.6 **Modern slavery** - encompasses slavery, human trafficking, forced labour and domestic servitude.
- 6.3.7 **Discriminatory abuse** - including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.
- 6.3.8 **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in one’s own home.
- 6.3.9 **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or education services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- 6.3.10 **Self-neglect** – a wide range of behaviour neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding.

6.4 Child Sexual Exploitation (CSE)

The sexual exploitation of children and young people (CSE) under-18 is defined as that which:

- ‘involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive ‘something’ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.
- Child sexual exploitation can occur through the use of technology without the child’s immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common, involvement in exploitative relationships

being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability'

6.4.1 The Council is committed to maintaining staff, volunteer, member and contractor awareness of CSE. The Strategic Lead for Safeguarding will maintain specific procedures for referrals regarding CSE and commission specialists training for staff on this matter. The Strategic Lead will also provide guidance for all staff on this matter.

6.4.2 The Licensing Team will ensure that guidance is provided to all licensed premises, licensed taxi drivers and licensed taxi operators regarding Child Sexual Exploitation.

6.5 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is defined by the World Health Organisation as 'all procedures (not operations) which involve partial or total removal of the external female genitalia or injury to the female genital organs whether for cultural or other non-therapeutic reasons'. The Council recognises that FGM is illegal and that it is an offence for a UK resident or national to take a girl abroad or to help others to do so to carry out FGM.

6.5.1 The Council is committed to maintaining staff, volunteer, member and contractor awareness of FGM. The Strategic Lead for Safeguarding will maintain specific procedures for referrals regarding FGM and commission specialist training for staff on this matter. The Strategic Lead will also provide guidance for all staff on the matter.

6.6 "Honour"-based violence and forced marriage

In a forced marriage, one or both spouses do not consent to the arrangement of the marriage and some elements of duress are involved. Duress can include both physical and psychological pressure. Forced marriage is distinct from an arranged marriage – where both parties can choose whether or not to accept the arrangement usual made by the families of both spouses.

So-called "Honour"-Based Violence is a crime or incident that may have been committed to protect or defend the "honour" of a family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, "honour"-based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

6.6.1 The Council is committed to maintaining staff, volunteer, member and contractor awareness of "honour"-based violence and forced marriage. The Council recognises its responsibilities to protect children and adults from such violence and forced marriage. The Strategic Lead for Safeguarding will be responsible for producing specific procedures for referring concerns of this specialist type and commissioning training for staff on the subject. The Strategic Lead for Safeguarding will provide and maintain guidance for all staff on the specific risks of this violence and forced marriage and promote awareness of best practice in response to any concerns.

6.7 Modern Day Slavery

Modern Slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact can be devastating for the victims. Modern slavery comprises slavery, servitude, forced and compulsory labour and human trafficking. The common factors are that a victim is, or is intended to be, used or exploited for someone else's (usually financial) gain, without respect for their human rights. The perpetrators seeking to take

advantage of them could be private individuals, running small businesses or part of a wider organised crime network. For adult victims, there will be some element of coercion involved, such as threats, use of force, deception, or abuse of power

Victims may appear to give consent, but in reality they have little ability to choose leave the exploitative situation and the perpetrators have still committed a crime. Child victims and vulnerable adults are not able to give informed consent and therefore exploitation even without any element of coercion could constitute modern slavery.

6.7.1 The Council is committed to maintain staff, volunteer, member and contractor awareness of the risks of modern slavery and the processes for reporting concerns about potential victims. It recognises its duty under the Modern Slavery Act 2015 and will co-operate with national and local arrangements to meet these duties. The Strategic Lead for Safeguarding will provide and maintain procedures and guidance for staff on the referral process for concerns of modern slavery and will ensure that appropriate training is delivered in conjunction with Human Resources.

6.7.2 The Licensing Team will ensure that guidance is provided to all licensed premises, licensed taxi drivers and licensed taxi operators regarding Modern Slavery.

6.8 Radicalisation

The Counter-Terrorism and Security Act 2015 sets out the duty on local authorities and partners of local panels to provide support for people vulnerable to being drawn into terrorism. Hertfordshire's Prevent Strategy aims to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The Channel Panel is part of the local Prevent Strategy and is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism. Radicalisation of children and adults at risk can be compared to grooming for sexual exploitation. The Home Office states in the Prevent Strategy that 'Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm'.

6.8.1 The Council is committed to maintain staff, volunteer, member and contractor awareness of the risks of radicalisation and the processes for reporting concerns about potential radicalisation of children, young people and adults at risk. The Council recognises its duties under the Prevent Strategy and will co-operate with Hertfordshire-based arrangements to meet these duties including participation in the Channel Panel. The Strategic Lead for Safeguarding will provide and maintain procedures and guidance for staff on the referral process for concerns about radicalisation and will ensure that appropriate training is delivered to staff in conjunction with Human Resources.

6.9 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

6.9.1 The Council is committed to maintain staff, volunteer, member and contractor awareness of the risks of County Lines and the processes for reporting concerns about the potential exploitation of children, young people and adults at risk. The Council will work within the arrangements of the Community Safety Partnership and safeguarding boards arrangements to safeguard those affected. The Strategic Lead for Safeguarding will provide and maintain procedures and guidance for staff on the referral process for concerns about County lines and will ensure that appropriate training is delivered to staff in conjunction with Human Resources.

7. Our commitments to maintaining up to date reporting and referral procedures for safeguarding concerns

- 7.1 The Council recognises that it has a duty to act on reports or suspicions of abuse and believes that the safety of a child or adult at risk should override any doubts, hesitations, or other considerations (such as the potential to have a negative impact on professional relationship with a child, family or adult at risk).
- 7.2 The Council will maintain clear reporting procedures for all staff, volunteers, members and contractors to follow when they receive information that highlights a concern about a child or adult at risk.
- 7.3 The Strategic Lead for Safeguarding will ensure that these procedures are kept up to date and that Designated Safeguarding Leads are updated and briefed on any changes to reporting and referral procedures. He will also ensure that the reporting procedure is publicised to all staff, volunteers, members and contractors in conjunction with heads of service.
- 7.4 All staff, volunteers, members and contractors must follow the reporting procedures, keeping clear written records of their concerns about a child or adult at risk, and pass these concerns to a Designated Safeguarding Lead at the earliest opportunity for assessment and onward referral if necessary.
- 7.5 Where there is immediate risk to a child, or an adult at risk, or where there is an urgent medical requirement, the member of staff should immediately contact the emergency services on 999.

8. How information sharing, data protection and confidentiality will be addressed when using the policy

- 8.1 Information sharing between organisations is essential to safeguard children and adults at risk. Information about a child or adult at risk must be shared on a need to know basis in line with the Council's Information Sharing Protocols for safeguarding. The Council recognises that the duty to share personal confidential data can be as important as the duty to respect a service user's confidentiality. The Council also recognises that the Data Protection Act is not a barrier to sharing information.
- 8.2 The Strategic Lead for Safeguarding will be responsible for maintaining and updating the information sharing protocols for children, young people and adults at risk. These will be available on the Council's intranet.
- 8.3 The Council will share information with other agencies which comply with the requirements of the Hertfordshire Safeguarding Adults Board procedures and the Hertfordshire Safeguarding Children **Partnership** procedures when it has a concern about a child or adult at risk. Where appropriate it will seek consent to share this information, but there will be circumstances where it needs to share information without the informed consent of the data subject(s). The Council will follow the information sharing protocols in place, and will keep records of its decisions to share information.
- 8.4 Information about any concerns for a child or adult at risk will be stored securely, in a manner that all Designated Safeguarding Leads can access so that advice is available on all cases from any Designated Safeguarding Lead. All staff, volunteers, members and contractors will be bound by normal confidentiality arrangements in restricting access to this personal information.

9. Our commitments to investigating allegations against staff, volunteers and members

- 9.1 The Council will maintain specific procedures in line with the requirements of Hertfordshire Safeguarding Children **Partnership** and Hertfordshire Safeguarding Adults Board for reporting any concerns about the conduct of any staff, volunteer, member or contractor towards a child, young person or adult at risk. The Strategic Lead for Safeguarding will be responsible for maintaining and updating these reporting procedures.
- 9.2 The procedure will apply to any situation where any staff, volunteer, member or contractor has in any activity connected with their role:
- Behaved in a way that has, or may have harmed a child;
 - Possibly committed a criminal offence against/related to a child;
 - Behaved toward a child in a way which indicates they are unsuitable to work with children;
 - Or it is discovered that an individual known to have been involved previously in child abuse is, or has been, working with children;
 - Behaved in a way that has harmed, or may have harmed, an adult at risk;
 - Possibly committed a criminal offence against, or related to, an adult at risk;
 - Behaved towards any adult at risk in a way that indicates they are unsuitable to work with adults at risk – including having a sexual relationship with an adult at risk if in a position of trust, even if the relationship appears consensual; sending inappropriate text/email messages or images; or the possession of indecent images of adults at risk;
 - Or it is discovered that an individual known to have been involved previously in adult abuse is working with adults at risk.
- 9.3 Before starting any disciplinary investigation into such allegations, the Council will always seek the advice of partner agencies in Hertfordshire Safeguarding Children **Partnership** or Hertfordshire Safeguarding Adults Board.
- 9.4 The Strategic Lead for Safeguarding will also ensure that clear guidance is provided to all staff on appropriate conduct with children, young people and adults at risk.

10. Our commitments to safer recruitment, and undertaking criminal record checks

- 10.1 The Council is committed to recruiting appropriate staff to work safely with children, young people and adults at risk. The Human Resources Team will maintain appropriate policies, procedures and guidance to:
- Undertake Disclosure Scotland
 - checks for all staff and Disclosure and Barring checks, and Enhanced Disclosure and Barring checks for relevant staff and volunteers who have regular contact with children, young people and adults at risk;
 - To keep records and update checks of staff in line with recommended practice by Hertfordshire Safeguarding Children **Partnership** and Hertfordshire Safeguarding Adults Board;
 - To keep and maintain a register of all posts requiring different levels of Disclosure and Barring checks.
 - To identify posts that require an enhanced level of safer recruitment due to their role with children, young people and/or adults at risk, and to maintain training and guidance for staff involved in recruitment to such posts;
 - To apply the above policy to volunteers, and work placements, and consider safeguarding issues when offering work placements to young people and adults at risk.

11. Our commitments to staff training on safeguarding

- 11.1 The Council is committed to training all staff, volunteers, members and contractors on their responsibilities under this Safeguarding Policy. The Human Resources Team will be responsible for maintaining a register of training requirements for all roles within the Council in relation to safeguarding children and adults. The Human Resources Team will review this register with the Strategic Lead for Safeguarding on a regular basis and will consult with the Strategic Lead for Safeguarding on the content of all commissioned safeguarding training including that on specialist subjects.
- 11.2 Human Resources will also be responsible for alerting managers to when their staff are required to attend training, and refresher training in line with the requirements of Hertfordshire Safeguarding Children **Partnership** and Hertfordshire Safeguarding Adults Board. Managers will ensure that staff access their required level of training including induction training, e-learning courses and formal safeguarding and specialist courses.

12. Our commitments to safeguarding within contracting and grant-giving

- 12.1 When contracting with suppliers or providing grants to external organisations the relevant Council Officer involved in the contracting or grant-giving will:
- Ensure that the agencies are aware of the Council's commitment to safeguarding children and adults at risk.
 - Request to see a copy of the agency's Safeguarding Policy and ensure it is compliant with the requirements of Hertfordshire Safeguarding Children **Partnership** and Hertfordshire Safeguarding Adult Board. Where the agency does not have a safeguarding policy they will be required to adopt the Council's Safeguarding Policy before receiving funds or commencing work.
 - Request to see evidence of the safer recruitment and disclosure and barring processes used by the agency and of the training provided to its staff on safeguarding.
 - Provide the agency with copies of the Council's Safeguarding Contractor Cards.
 - Keep a record of the above and stipulate the safeguarding requirements in the contract or grant agreement.