

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)



Guildford Borough Council – Safeguarding Policy and Procedure Part 1- Safeguarding Policy

1. Document Information

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3. Document Statement

A life that is free from harm, abuse, and neglect is a basic right of every person. The objective of safeguarding is to prevent and reduce the risk of harm to adults¹ and children from abuse or other types of exploitation and impairment of development, while supporting individuals to maintain control over their lives and enabling them to make informed decisions without coercion. Although safeguarding is recognised as a key responsibility of local authorities, safeguarding is still everybody's business, and as neighbours, citizens, and community members we need to be alert to neglect and abuse and be committed to reporting our concerns.

This policy sets out how Guildford will meet their obligations to safeguard children and adults at risk. It applies to staff, agency workers, volunteers and contractors employed by the Council. It is also applicable to councillors undertaking official duties on behalf of the Council.

The policy complements and supports the agreed multi-agency procedures set down by the [Surrey Safeguarding Children Partnership](#) and [Surrey Safeguarding Adults Board](#). (See **Appendix 1**: Surrey Safeguarding Partners).

It is vital for successful safeguarding that this policy and the related safeguarding procedures are understood and applied consistently at an individual, managerial, and organisational level. Accompanying this policy is the individual Process and training framework.

This policy sets out the responsibilities of the organisations, our staff, and our managers to meet training requirements, undertake safer recruitment practices and take action to safeguard children and young people up to the age of 18, including unborn babies and all adults aged 18 or over, inclusive of those without assessed with care and support needs. *From this point onwards in this policy the term 'adults' refers to **all adults** (see footnote) who have a safeguarding need.*

This policy is governed by a set of key principles and themes, designed to ensure that people who are at risk experience the process in such a way that it is sensitive to individual circumstances, is person-centred and is outcome focused.

The aims of safeguarding are to:

- prevent harm and reduce the risk of abuse or neglect
- stop abuse or neglect wherever possible
- prevent impairment of development and enable individuals to have the best outcomes
- safeguard individuals in such a way that supports them in making choices and having control over how they want to live
- promote an approach that concentrates on improving life for the individual
- raise public awareness so that communities, alongside professionals, play their part in preventing, identifying, and responding to abuse and neglect

¹ When the policy refers to Adults it is referencing **all adults** (aged 18 or over), inclusive of those who do not have care and support needs and meet the criteria for Surrey Councils Adult Social Care intervention.

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- provide accessible information and support to help people understand what constitutes abuse and neglect, and how to respond
- address what has caused the abuse or neglect

Safeguarding and promoting the welfare of children

specifically aims to:

- protect children from maltreatment
- prevent impairment of children's health or development
- ensure that children grow up in circumstances consistent with the provision of safe and effective care
- take action to enable all children to have the best outcomes

Safeguarding adults

specifically aims to address where there is an impact on an adult in:

- managing and maintaining nutrition
- maintaining personal hygiene
- managing toilet needs
- being appropriately clothed
- being able to make use of the home safely
- maintaining a habitable home environment
- developing and maintaining family or other personal relationships
- accessing and engaging in work, training, education, or volunteering
- making use of necessary facilities or services in the local community including
- public transport and recreational facilities or services
- carrying out any caring responsibilities the adult has for a child

Safeguarding of children and adults at risk are governed by separate Government legislation and separate Surrey County Council safeguarding boards. Therefore, the policy will consider the safeguarding of children and adults at risk independently, before addressing where there is overlap between the two safeguarding areas.

4. Scope & Purpose

This policy is defined by its purpose and context, including the statutory duties set out in legislation. (See section 3, **Policy Context**).

What is the definition of 'child' in this policy?

The term 'child' is used to capture all children and young people up to the age of 18 years of age, including unborn babies.

Who is an adult at risk of abuse and neglect who may require safeguarding?

The safeguarding duties apply to any adult (someone aged 18 or over) who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and

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- is experiencing, or at risk of, abuse or neglect and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

What is the definition of child abuse?

Child abuse is when a child is intentionally harmed by an adult or another child – it can be over a period of time but can also be a one-off action. It can be physical, sexual or emotional and it can happen in person, online or contextual. It can also be a lack of love, care and attention – this is neglect. Exploitation can be a common theme in the experience of abuse or neglect.

NSPCC – 30 January 2024

What is the definition of adult abuse?

Adult abuse refers to any action, or failure to act, that causes harm, distress, or violates the rights of an adult who is unable to protect themselves. Adults at risk of abuse often include older adults, adults with disabilities, or individuals with mental or physical health challenges that make them more vulnerable.

Abuse or neglect can take many different forms and there are common types of abuse that affect adults and children, as set out in **Appendices 2 & 3**.

Where does abuse take place?

Abuse and neglect can happen anywhere including but not limited to:

- Domestic settings: including in own homes, or another person's
- Institutional settings: including nurseries, play schemes, day centres, residential care, nursing homes and hospitals
- Public settings: including in the street, any public area or social or work environment

Safeguarding – the wider context

Safeguarding is part of the wider context of integrated services for children and adults inclusive of those with care and support needs. Safeguarding is everybody's business, but there are several functions delivered by the Council where safeguarding is closely linked. These functions are highlighted through section 5 of this policy.

5. Policy Context

We recognise our statutory responsibilities for safeguarding and our role to safeguard and promote the welfare of all children, and adults with or without care and support needs, that we support, provide services for, and interact with. This includes a timely and appropriate response where there is a concern that a child, or adult is at risk of or is experiencing abuse or neglect.

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Legislation

This Safeguarding Policy is underpinned by a range of legislation and statutory guidance including, but not limited to the following:

The Children Acts 1989 and 2004

The Children Act 1989 and Children Act 2004 along with the statutory guidance, [Working Together to Safeguard Children 2023](#) provide the current framework for safeguarding children.

Statutory responsibility in Surrey for the effective implementation of local safeguarding children arrangements is fulfilled by the [Surrey Safeguarding Children Partnership](#) (SSCP). We work with the SSCP to ensure we meet our statutory duties to safeguard and promote the welfare of children when discharging all our functions. This includes any services or function we procure, contract, commission and grant fund.

The Care Act 2014

The Care Act 2014 along with the statutory guidance, [Care and Support Statutory Guidance 2022](#), sets out the legal framework for how local authorities and other statutory agencies, including district and borough councils, should protect adults who are at risk of abuse or neglect.

This legislation places a duty on Surrey County Council (SCC) as the lead authority for adults to:

- make enquiries where there is reasonable cause to suspect that an adult in its area:
 - has needs for care and support (whether or not the authority is meeting any of those needs),
 - is experiencing, or is at risk of, abuse or neglect, and
 - as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
- conduct Safeguarding Adult Reviews (SARs)
- establish a safeguarding adults board

[The Surrey Safeguarding Adults Board \(SSAB\)](#) is responsible for the effectiveness of adult safeguarding work across the county, co-ordinating activities to ensure adults are protected. We work with SSAB, to ensure we meet our statutory duties to safeguarding and promote the welfare of adults in delivering our services or function which includes those we procure, contract, commission and grant fund.

This policy and procedure have been written under the guidance of the [SSCP Procedures Manual](#) and [SSAB Policy and Procedures Document 2018](#)

The Mental Capacity Act 2005

The primary purpose of the [Mental Capacity Act](#) (MCA) is to promote and safeguard decision-making within a legal framework.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

The Act assumes that a person has full legal capacity to make decisions themselves unless it can be shown that they lack capacity.

Professionals and other staff need to understand and always work in line with the Mental Capacity Act 2005 (MCA).

The MCA and the Care Act work together to promote the empowerment, safety, and wellbeing of adults. In all safeguarding activity, due regard must be given to the Mental Capacity Act 2005.

6. Policy Approach

Safeguarding is everybody's business

It is everyone's responsibility to work together to promote the welfare and to protect children, and adults including those with care and support needs. For categories of abuse in relation to child safeguarding and adult safeguarding see **appendices 2 & 3**.

If a Safeguarding Lead advises you to make a safeguarding referral to an external agency, such as MASH, C-SPA, or a Local Borough Council Partner, it is the responsibility of the officer or staff member to complete the referral, regardless of personal opinions or views. As a Council, it is our duty to raise safeguarding concerns and inform the relevant departments. Managers are responsible for ensuring that safeguarding advice is followed, supporting Safeguarding Leads, and ensuring the referral is completed.

A child centred approach to safeguarding

A child centred approach is fundamental to safeguarding and promoting the welfare of every child. A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families. All practitioners should follow the principles of the Children Acts 1989 and 2004 - that state that the welfare of children is paramount. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take.

Continuum of Support for children and families living in Surrey

In Surrey the approach for helping families early is embedded within the Early Help Strategy [Families First](#). The Strategy guidance sets out the '[Continuum of Support](#)' offered to children and families in Surrey, it offers clarity and guidance to partners working with them and considers who is best to be leading on early support to meet the child and family's needs. It recognises the contribution partners make to children and family's outcomes across the Continuum of Support and is intended to provide clarity to practitioners of the type of support available below the threshold for statutory children's safeguarding services. The Continuum of needs aligns with [The Thrive Framework for System Change](#) needs-based groupings:

Families First Framework	Thrive Framework
Universal or Community Support	Thriving
Emerging Needs	Getting Advice and Signposting

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Target Support	Getting Help
Intensive Support	Getting More Help
Statutory Services	Getting Risk Support

The Continuum of Support indicators are a framework for practitioners to support children and families and the detailed framework can be found here [Continuum of support indicators](#)

The Six Principles of Adult Safeguarding

The six principles of adult safeguarding are embedded in the Care Act and apply to all health and care settings. In applying good practice, we will adopt these principles in our safeguarding when working with adults.

1. Empowerment- people being supported and encouraged to make their own decisions and informed consent
2. Prevention- it is better to take action before harm occurs.
3. Proportionality- the least intrusive response appropriate to the risk presented.
4. Protection- support and representation for those in greatest need.
5. Partnership- local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
6. Accountability- accountability and transparency in safeguarding practice.

Making Safeguarding Personal- Adults

The Care Act promotes 'Making Safeguarding Personal' which means that the adult at risk should be at the centre of all enquiries and decisions being made throughout the safeguarding process. The Local Government Association (LGA) and Association of Directors of Adult Social Care (ADASS) have developed a [support offer](#) to help councils and their partners embed the Making Safeguarding Personal (MSP) approach.

Making Safeguarding Personal is relevant to everyone who works in services that support adults.

Professional curiosity

Professional curiosity means exploring every possible indicator of abuse or neglect and trying to understand what the life of that child or adult is like on a day-to-day basis – their routines, thoughts, feelings, and relationships with family members. A professional may have the opportunity to identify abuse and neglect even if they come into contact with a family for an unrelated reason.

To effectively apply the principles of professional curiosity it is crucial that practitioners maintain an open mind – this includes being willing to think the unthinkable. People who abuse or neglect others do not fit any particular profile. They are not always aggressive and obstructive, may be charismatic, well-educated, and sociable. It is natural for a practitioner to want to believe the best of those that provide care and support to children or adults and thinking the unthinkable does not mean assuming the worst. It means keeping an open mind and being able to think objectively about the evidence presented.

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7. Roles and responsibilities in safeguarding children and adults at risk

We believe that the safety and well-being of children and adults that are at risk, have a fundamental and equal right to be protected from harm regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

As an Organisation

Guildford are committed at senior officer and member level to safeguarding children and adults at risk. The Council recognises its responsibilities under the Care Act 2014, The Children Act 2004 and Working Together to Safeguard Children 2023. Safeguarding is a Council priority, and we will deliver our statutory responsibilities by:

- being clear about the expectations and responsibilities of our staff, agency workers, volunteers, contractors and councillors through our policy and procedure
- appointment of a Lead Councillor for Children and Adult Safeguarding
- establishment of internal strategic and operational safeguarding groups
- appointment of lead safeguarding officers across the organisation to provide designated, professional support and advice to the organisation
- being represented at local and countywide safeguarding groups and boards
- providing information as requested by the Safeguarding Partnerships and Boards, including the completion of statutory returns
- discharging our duties across all our functions
- embedding safeguarding practices in our recruitment of staff and volunteers involved in the delivery of our services
- ensuring our staff, volunteers and councillors access appropriate safeguarding training
- embedding safeguarding practices in our procurement practices

Safeguarding Leads

Our internal safeguarding leads are responsible for supporting both our strategic and operational safeguarding practices and are identified in our Part 2: Safeguarding Procedure. The safeguarding leads are available to provide advice and guidance for all **internal** staff and councillors who have a safeguarding concern. Advice for external customers should be directed to contact SCC through the [Children's Single Point of Contact \(C-SPA\)](#) or the [Multi Agency Safeguarding Hub \(MASH\)](#).

Our staff

All staff, agency workers, volunteers, and contractors employed by the Council, and councillors undertaking official duties are responsible for:

- being aware of our safeguarding policy and procedures
- implementing this policy and our safeguarding procedures where they have a concern about a child or an adult.
- keeping their knowledge and skills up to date by meeting the training requirements expected of their role as outlined in Part 3 Training Framework

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- taking all reasonable actions in line with the expectations set out in this policy and our safeguarding procedures.
- taking all reasonable actions to prevent children and adults from experiencing abuse and neglect.

In addition, all **managers** have a responsibility to:

- ensuring the people, they manage are made aware of the expectations on them regarding this policy and our safeguarding procedures.
- undertake safer recruitment practices.
- ensure the mandatory corporate induction process is followed by all staff, volunteers and agency staff under their supervision including identifying and accessing appropriate policies and training.
- monitoring, reviewing, and recording training and development needs of staff, volunteers and agency staff under their supervision including refresher training.
- ensuring the appropriate level of safeguarding supervision is provided to all staff, volunteers, and agency staff under their supervision through one-to-one meetings and team meetings.

We will work in accordance with guidance and good practice from the [Surrey Safeguarding Children Partnership](#) and [Surrey Safeguarding Adults Board](#). All staff and councillors are encouraged to familiarise themselves with and regularly review the information on their websites.

Procurement, contracting, commissioning and grant funding

Where the Council's procures services, contracts out services, commissions or grant-funds other organisations which come into contact with those groups covered by this policy, they will be required to have safeguarding arrangements in place or subscribe to the policies and procedures set out in this policy.

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

The Council must be satisfied that our procurement and contract management processes and procedures take account of our safeguarding responsibilities. This includes checking, where required, that tenderers have appropriate safeguarding policies and practices and that our contracts include safeguarding clauses. Safeguarding clauses are drafted with consideration for the nature of the contract and include reference to written procedures being in place. They also state any relevant requirements for contractors and sub-contractors to ensure that all personnel are Disclosure and Barring Service (DBS) checked to the level required by the Council. We will request evidence of DBS references from suppliers.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Any contractor or sub-contractor engaged by us in areas where workers are likely to come into regular contact with children or adults should have its own safeguarding policies, process and procedures for their staff to follow.

We should also ensure that our contract management is robust, and that safeguarding is addressed in regular contract management meetings with service providers. In addition, any contract monitoring reports refer to safeguarding.

It is the responsibility of the contractor to train their staff and subcontracts on safeguarding and how to identify a safeguarding concern. It is the responsibility of any frontline contractor or subcontract who encounters or discovers a safeguarding concern to report it to the appropriate external agency, whether that is to 999, Adult Social Care or Child Services. The contractor must then inform their Council contract manager.

We also grant aid voluntary and community organisations through grant schemes and service level agreements. Where appropriate, provision is made for safeguarding policies and procedures to be provided from all grant-funded organisations working with children and adults.

As a minimum, any organisation receiving funding from us that works with children and young people or adults will be expected to have a statement of policy and procedure regarding safeguarding in place and understood by employees and volunteers, that is also available to service users.

Commissioned/contracted or grant-funded organisations with minimal contact with children, young people, or vulnerable adults have the option to adopt our policy if deemed suitable.

The Council as a Licensing Authority

The Council is the licensing authority for a range of services with distinct responsibilities legislated under the Licensing Act 2003, the Gambling Act 2005 and the public protection and economic growth aspects of licensing:

- setting the local framework through a statement of licensing policy
- considering applications with a view to promoting the licensing objectives
- undertaking inspection and enforcement activities to ensure conditions of licences are being met, and to ensure that any operator who requires a licence has one
- maintaining the required statutory registers

We must ensure we take the steps necessary to prevent crime, protect public safety, protect children from harm and prevent public nuisance through the licensing process.

Our licensing responsibilities include taxi and private hire vehicles and drivers, alcohol and entertainment, charitable collections, gambling, animal licensing, cosmetic procedures, external seating, and street trading.

We must ensure that all relevant checks are carried out prior to issuing licenses and, if a safeguarding concern is raised at any time during the process, our safeguarding policy and procedure must be followed.

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Taxi licensing

We recognise the important role that Hackney Carriages and Private Hire vehicles play in enabling people to travel around. Most licence holders operate to a good standard and want to provide the best possible service to their customers. There is however evidence to support the view that taxis and private hire vehicles are a high-risk environment. In terms of risks to passengers, this can be seen in abuse and exploitation of children and vulnerable adults facilitated and, in some cases, perpetrated by the trade and the number of sexual crimes reported which involve taxi and private hire vehicle.

Our policies and practices set our standards to both protect the public and build public confidence in the licensed trade. It is designed to promote improved professional behaviour amongst licence holders, to increase their awareness of safeguarding issues, and to allow those that share our commitment to a high standard of service to thrive. Both policies require several measures, including driver training (including safeguarding awareness) and enhanced DBS checks. These measures support our commitment to safeguarding in taxi licensing.

The Council as a Landowner / Events Organiser

Martyn's Law is focused on improving public venue security against terrorism and complements safeguarding by enhancing protections for vulnerable individuals. Both emphasise creating safe environments, conducting risk assessments, training staff, and collaborating with agencies. While safeguarding addresses risks like abuse and neglect, Martyn's Law extends this by addressing broader public safety concerns, ensuring a comprehensive approach to protecting individuals. Martyn's Law was introduced to Parliament on 12 September 2024 and is currently undergoing Parliamentary scrutiny.

The Council as landlord

Council landlords play an essential role in identifying and addressing safeguarding concerns within council-owned properties and among tenants. By embedding safeguarding into housing services, council landlords help ensure that vulnerable tenants have access to safe housing and a supportive environment. This approach upholds both legal responsibilities and the council's commitment to tenant welfare.

When safeguarding concerns are identified, officers will escalate these concerns to the appropriate statutory or voluntary safeguarding agencies. Tenants may also be signposted to relevant partners for further assessment, ensuring they can access the support and services they need.

Officers use their professional judgment on a case-by-case basis to address safeguarding risks. If an applicant appears to lack the capacity to make informed decisions or is acting in a way that jeopardises their safety or that of their household, safeguarding concerns will be raised with the appropriate agencies. This ensures that the welfare of vulnerable individuals remains a priority.

Homelessness Prevention

The Council's Housing Options and Homechoice teams support customers who are homeless, at risk of homelessness, or seeking to register for social housing.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

As part of their work, officers conduct detailed assessments to determine what housing duties the Council owes to applicants. These assessments include questions designed to identify medical and support needs, as well as potential risks to the applicant or members of their household.

When safeguarding concerns are identified, either through these assessments or during interactions with applicants, officers will escalate these concerns to the appropriate statutory or voluntary safeguarding agencies. Applicants may also be signposted to relevant partners for further assessment, ensuring they can access the support and services they need.

While not all customers are eligible for housing assistance, officers ensure applicants understand the implications of refusing an offer of accommodation, including the potential impact on their housing rights. Applicants are also informed of their legal rights to review decisions, whether related to the Council's refusal to provide accommodation or the suitability of an offered property.

Officers use their professional judgment on a case-by-case basis to address safeguarding risks. If an applicant appears to lack the capacity to make informed decisions or is acting in a way that jeopardises their safety or that of their household, safeguarding concerns will be raised with the appropriate agencies. This ensures that the welfare of vulnerable individuals remains a priority.

Independent Living Scheme

The council's Independent Living Scheme provide homes that ensure our tenants can live safely and independently whilst being in a community environment that helps combat any feelings of social isolation and loneliness. All our schemes deliver excellent customer service that puts tenants at the heart of what we do. Safeguarding Independent Living tenants is paramount to our commitment to be an excellent landlord and staff will work alongside housing colleagues and appropriate agencies to safeguard our most vulnerable.

Partnership information sharing

We have a duty to work in partnership and co-operate with SCC and the police to safeguard children and vulnerable adults when it is legal and necessary to do so. Initial safeguarding enquires in relation to children are managed by the C-SPA following reports of safeguarding concerns by the public or professionals. Concerns regarding adults are managed by the MASH.

As we provide services to children, adults, and their families, we may be asked to share information we hold to enable any safeguarding risks to be assessed and managed appropriately. Some of this information may be of a sensitive nature.

All sharing of personal information is governed by data protection legislation mainly the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018. The Surrey Multi Agency Information Sharing Protocol (MAISP) is an agreed set of principles about sharing personal or confidential information in Surrey. All staff should have regard to the MAISP when sharing information. We are signed up to tiers 1 [Surrey Multi-Agency](#)

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[Information Sharing Protocol - Surrey County Council](#) and tier 2 [Information sharing protocols \(ISP\) Tier 2 - Surrey County Council](#) of the MAISP.

Media and publications

We must ensure that any publications and our use of media channels takes account of our safeguarding responsibilities and promotes the welfare and well-being of children, and adults.

We may have contact with the public through our marketing and communications where our safeguarding responsibilities must be applied, including:

- conversations on social media accounts
- content online
- discussion groups or comment boxes on our website
- events delivered by the Council

This includes the use of images and [consent for the use of photographs and videos](#).

Community Safety and Safeguarding

Safeguarding is a cross cutting theme with implications for practice and delivery across our community safety work. This can include children and adults who need safeguarding. Our safeguarding principles and procedures apply when we are planning for and responding to community safety interventions.

Our safeguarding procedures (Part 2) set out how to raise concerns in the following areas.

Domestic Abuse

All adults and children experiencing domestic abuse need to be seen, safe and heard, and free from the harm caused by perpetrator behaviour. This can include children and adults who need safeguarding. Effective safeguarding practices draw on specialist expert support to work with survivors, children and perpetrators in a way that achieves safety.

Serious organised crime

Serious and organised crime (SOC) is planned and conducted by people working together on an ongoing basis. SOC almost always involves the exploitation of vulnerable people:

- modern slavery
- county lines and cuckooing
- child exploitation

This can include all children and adults who need safeguarding.

Anti-Social behaviour

Anti-Social Behaviour (ASB) covers a wide range of incidents and is dealt with by several different agencies. Victims and perpetrators of anti-social behaviour can include all children and adults who need safeguarding including through:

- Housing issues
- Complaints

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- Regulatory and environmental issues
- Community wellbeing
- ASB Case Reviews

Prevent

The prevent programme aims to stop people being drawn into terrorism and ensure that they are given appropriate advice and support. This can include all children and adults who need safeguarding.

Guildford Community Safety Partnership [Safer Guildford Partnership](#) work with Surrey's Prevent Executive Group (PEG) and the Surrey Channel Panel to ensure individuals who are vulnerable and susceptible to radicalisation and extremism are supported at an early stage.

8. Safer recruitment and training

Safer Recruitment

We are committed to ensuring that we have recruitment procedures in place, which help deter, reject, or identify people who might abuse children or adults, or who are otherwise unsuited to work with them.

We understand that effective safer recruitment practices are promoted through all aspects of recruitment and do not rely on one single method of checks (for example a DBS or references).

All existing and new posts are assessed to determine if they are eligible for any form of [Disclosure and Barring Service](#) (DBS) checks within the legal framework. The type of check available is determined by the role:

- a basic check, which shows unspent convictions and conditional cautions
- a standard check, which shows spent and unspent convictions and cautions
- an enhanced check, which shows the same as a standard check plus any information held by local police that's considered relevant to the role
- an enhanced check with barred lists, which shows the same as an enhanced check plus whether the applicant is on the list of people barred from doing the role

A DBS check has no official expiry date. Any information included will be accurate at the time the check was carried out. Our policy is to review the status of the role and undertake DBS checks every 3 years where applicable. A renewal list is produced by HR for review by managers.

All vacancy adverts include a standardised commitment statement to safeguarding. The standard terms in our job profile template includes the expectation for all employees to commit to our safeguarding policies.

All recruiting managers and any other staff responsible for the induction of new starters must ensure the corporate induction process is followed.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

All recruiting managers for roles that work with children or adults must complete the Safer Recruitment online training provided by Surrey Children's Services Academy. Making safeguarding an integral part of our recruitment and culture.

Training and professional development

We recognise that for staff to fulfil their own duties in line with our statutory safeguarding duties, they will have different training needs, which are dependent on their degree of contact with children and adults, their level of responsibility and their independence with decision-making.

Managers are responsible for:

- ensuring staff complete mandatory safeguarding training as part of their induction
- using the training framework documents to identifying additional training needs above level 1 (Part 3)
- ensuring their staff access the appropriate level of training freely available through the relevant safeguarding board/partnership
- reviewing and monitoring safeguarding training including refreshers through the Performance Development Framework
- ensuring safeguarding training is recorded at an individual or team level
- Reviewing DBS renewal list provided by HR to ensure their staff have a relevant and valid check.

Training pathways

The Care Act statutory guidance states employers must ensure that staff including volunteers are trained in recognising the symptoms of abuse or neglect, how to respond and where to go to for advice and assistance. Further details can be found in the training framework document in Part 3.

9. Governance, performance, and policy review

Strategic and operational safeguarding groups

The Council's Strategic Safeguarding Group (SSG) is the key mechanism for driving forward the strategic priorities for safeguarding across the Council and for agreeing how each service will co-operate to safeguard and promote the welfare of children, and adults.

The group is responsible for ensuring the Council is meeting its statutory duties across both adult and children's safeguarding.

The Council's Operational Safeguarding Delivery Group (OSDG) is the key mechanism for communication between specialist service delivery staff. It also supports the dissemination of information from the Strategic Safeguarding Group (SSG) to service delivery areas.

The overall aim of the group is to ensure that staff with responsibility for delivering services, can safeguard and promote the welfare of children, and adults. The group provides a forum for sharing best practice and learning from thematic reviews, highlighting barriers in service delivery and escalating issues to the SSG.

Terms of reference for these groups are provided in **APPENDIX 4**.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

If approved at the Community Safety Partnership Executive meeting, our proposal is to adapt the current CHARMM (Community Harm and Risk Management Meeting) framework. This would allow not only the discussion of CHARMM referrals but also cases involving individuals with safeguarding concerns who lack engagement or do not have a lead agency supporting them. This adjustment would help us establish a unified multi-agency approach to safeguarding individuals who may be elusive, evasive, or disengaged, ensuring they are not overlooked during the process.

Performance and Quality Assurance

We are represented on the SSCP and SSAB by a nominated district and borough officer. We are responsible for ensuring that we provide any data that is required by the boards for their respective Performance and Quality Assurance Frameworks. We are also expected to complete any returns and comply with any audit requirements including the statutory Section 11 audit for children's safeguarding. Action plans are monitored by the boards to ensure that partners are fulfilling statutory obligations.

Safeguarding audits can also be undertaken by our internal auditors as part of the annual audit work programme.

The Strategic Safeguarding Group (SSG) is responsible for developing, monitoring, delivering, and reporting on an annual safeguarding action plan. It reflects the recommendations made in the latest Section 11 and SSAB quality assurance audits (our statutory responsibilities) as well as the outstanding actions from the internal audits (non statutory). Progress against the action plan is presented to Corporate Management Board (CMB) twice a year and to Corporate Governance and Standards Committee annually.

Policy monitoring and review

Our Safeguarding Policy and Procedures will be monitored and reviewed by the SSG to ensure our approach takes account of changing legislation, learning from reviews, best practice, and experience across the organisation.

A full review will be undertaken every 2 years to ensure the policy and procedures are relevant and up to date.

Approval of minor changes is delegated to the Joint Executive Head, Community Services in consultation with the SSG and the relevant Lead Councillor. More fundamental changes will be escalated to the Executive in line with the Council's strategy and policy review processes.

10. Other Documents

Further guidance, advice, and best practice

The following policies and procedures from our statutory partners provide more detailed guidance, advice, and support for specific safeguarding related issues.

[Surrey Safeguarding Partnership Procedures Manual](#) - reflects current legislation, government statutory guidance and expectations, and accepted best practice. The manual also includes procedures for specific circumstances. It covers all boroughs and districts served by the Surrey Safeguarding Children Partnership.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

[Surrey Safeguarding Adults Board Adult Safeguarding Policy and Procedures](#)- sets out how Surrey Safeguarding Adults Board will co-ordinate and ensure the effectiveness of what each of its members does to help and protect adults in Surrey.

[Surrey multi agency information sharing protocol](#) (MAISP) -is an overarching framework that identifies the commitments that are required by each partner organisation to enable the responsible sharing of personal information to take place.

It provides guidance for practitioners on best practice when sharing information between organisations. It outlines the principles, standards, lawful and justifiable basis for using and sharing information about people. It also links to sources of further advice and support.

We are signed up to tier 1 of the MAISP and tier 2 in relation to the Surrey Crime and Disorder Information Sharing Protocol.

[Healthy Surrey](#) provides more information on community safety issues such as domestic abuse, anti-social behaviour, prevent (counter terrorism), serious and organised crime and child exploitation.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

11. Appendix 1

SURREY SAFEGUARDING PARTNERS

In Surrey, the statutory Safeguarding Children Partnership and Safeguarding Adults Board are responsible for providing local agencies with guidance and holding agencies to account for their actions.

Representation on Safeguarding Partnerships

The Children Act 2004 and Care Act 2014 together with associated statutory guidance sets out which organisations are required to sit on both boards and comprises all relevant statutory and key voluntary agencies.

The 11 Surrey Borough and District Councils have a single representative nominated by the Surrey Chief Executives Group to represent them on each board. Other borough and district council officers may attend the boards or the various subgroups that deal with the operational arrangements and ensure effective practice throughout the County.

Performance and Quality Assurance

Organisations on the boards are responsible for ensuring that they provide any data that is required by the boards for their respective Performance and Quality Assurance Frameworks. Likewise, they are expected to complete any returns and comply with any audit requirements.

Surrey Safeguarding Children Partnership (SSCP)

The overall role of the SSCP is to coordinate local work to safeguard and promote the welfare of children and to ensure the effectiveness of what the member organisations do individually and together by developing interagency policies and procedures for safeguarding and promoting the welfare of children, including:

- the action to be taken where there are concerns about a child's safety or welfare
- training of those working with children and/or families or in services affecting the safety and welfare of children
- investigation of allegations concerning persons working with children

It is very important that local safeguarding arrangements are strongly led and promoted at a local level, specifically by:

- a strong lead from local authority members, and the commitment of chief officers in all agencies, in particular the Director of Children's Services and Lead Member for Children's Services at Surrey County Council; and
- effective local coordination and challenge by the Local Safeguarding Children's Partnership.

Borough and District Councils have a crucial role to play in the safeguarding of children in their areas. The Surrey Safeguarding Partnership Procedures Manual specifically refers to the duty of housing authorities to share information that is relevant to safeguarding. They should promote the welfare of children and the duties of leisure services departments and leisure contractors to ensure that their leisure facilities safeguard children. All casual and temporary members of staff must be aware of safeguarding children issues and know how to report concerns.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

Each Surrey Borough and District Council completes Section 11 forms to be returned to the Surrey Safeguarding Children Partnership by the Lead Safeguarding Officer.

The Surrey Safeguarding Children Partnership has identified [three targeted priorities for 2024-2026](#):

1. Deliver a consistent and effective multi-agency response to all forms of neglect.
2. Ensuring that children and young people receive the right support from the right agencies at the right time.
3. Safeguarding adolescents

Surrey Safeguarding Adults Board (SSAB)

The Surrey Safeguarding Adults Board (SSAB) helps and protects adults in Surrey who have care and support needs and who are experiencing, or are at risk of, abuse or neglect.

Representatives from carers' groups, disability groups and older people's groups are members of the board.

The Partnership ensures the voices of adults at risk, their families and their carers are heard and guarantees there are effective processes in place to prevent and respond to abuse and neglect. The board also raises awareness of the importance of safeguarding through publicity campaigns and has a multi-agency training programme in place to give staff the right skills to safeguard adults.

The SSAP has three core duties:

- to publish a strategic plan that sets out how it will meet its main objective and what the members will do to achieve this
- to publish an annual report detailing what the SSAP has done during the year to achieve its main objective and implement its strategic plan
- to conduct any safeguarding adults reviews in accordance with the Care Act 2014

The SSAB developed a new 3-year [Strategic Plan](#) at the start of 2022.

The priorities identified in the three-year strategic plan (2022-25) for the Surrey SAB are:

1. Prevention and Awareness - Delivering a preventative approach and raising awareness of safeguarding adults across partners and communities.
2. Communication and Engagement - Engaging and learning from organisations, including voluntary sector agencies.
3. Quality and Improvement - Seeking assurance from agencies and using that information to strengthen safeguarding adults work.
4. Reflection and Learning - Reflecting upon learning from statutory reviews and good practice using the information to inform new ways of working.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

12. Appendix 2 Categories of Abuse

CHILDREN AT RISK: forms of abuse and indicators of abuse

Physical abuse

This is a form of significant harm 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.

The following are often regarded as indications of concern;

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Reluctance to give information or mention previous injuries.

Emotional Abuse

Emotional abuse is 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 children that they are worthless or unloved, inadequate or valued. 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 also feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capabilities, 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, serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Staff must also be aware to raise concerns relating to a child witnessing or are a potential victim of domestic abuse. In 2013, the Home Office announced changes to the definition of domestic abuse with age range extended down from 18 to 16. The [Domestic Abuse Act 2021](#) updated the statutory guidance and definition of domestic abuse to include the definition of personally connected and children as victims of domestic abuse. See definition below:

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Section 1: Definition of “domestic abuse”

- (1) This section defines “domestic abuse” for the purposes of this Act.
- (2) Behaviour of a person (“A”) towards another person (“B”) is “domestic abuse” if—
- (a) A and B are each aged 16 or over and are “personally connected” to each other, and
 - (b) the behaviour is abusive.
- (3) Behaviour is “abusive” if it consists of any of the following—
- (a) physical or sexual abuse;
 - (b) violent or threatening behaviour;
 - (c) controlling or coercive behaviour;
 - (d) economic abuse (see subsection (4));
 - (e) psychological, emotional or other abuse; and it does not matter whether the behaviour consists of a single incident or a course of conduct.
- (4) “Economic abuse” means any behaviour that has a substantial adverse effect on B’s ability to —
- (a) acquire, use or maintain money or other property, or
 - (b) obtain goods or services.
- (5) For the purposes of this Act, A’s behaviour may be behaviour “towards” B despite the fact that it consists of conduct directed at another person (for example, B’s child).
- (6) References in this Act to being abusive towards another person are to be read in accordance with this section.
- (7) For the meaning of “personally connected”, see section 2

Section 2: Definition of “personally connected”

- (1) Two people are “personally connected” to each other if any of the following applies —
- (a) they are, or have been, married to each other;
 - (b) they are, or have been, civil partners of each other;
 - (c) they have agreed to marry one another (whether or not the agreement has been terminated); Domestic Abuse Act 2021 Statutory Guidance 22
 - (d) they have entered into a civil partnership agreement (whether or not the agreement has been terminated);
 - (e) they are, or have been, in an intimate personal relationship with each other;
 - (f) they each have, or there has been a time when they each have had, a parental relationship in relation to the same child (see subsection (2));
 - (g) they are relatives.
- (2) For the purposes of subsection (1)(f) a person has a parental relationship in relation to a child if —
- (a) the person is a parent of the child, or;
 - (b) the person has parental responsibility for the child.
- (3) In this section —
- “child” means a person under the age of 18 years;
 - “civil partnership agreement” has the meaning given by section 73 of the Civil Partnership Act 2004;

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

“parental responsibility” has the same meaning as in the Children Act 1989;
“relative” has the meaning given by section 63(1) of the Family Law Act 1996.

Section 3: Children as victims of domestic abuse

(1) This section applies where behaviour of a person (“A”) towards another person (“B”) is domestic abuse.

(2) Any reference in this Act to a victim of domestic abuse includes a reference to a child who –

(a) sees or hears, or experiences the effect of, the abuse, and
(b) is related to A or B.

(3) A child is related to a person for the purposes of subsection (2) if –

(a) the person is a parent of, or has parental responsibility for, the child, or
(b) the child and the person are relatives.

(4) In this section –

“child” means person under the age of 18 years;

“parental responsibility” has the same meaning as in the Children Act 1989 (see section 3 of that Act);

“relative” has the meaning given by section 63(1) of the Family Law Act 1996.

Sexual Abuse

Sexual abuse is 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 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 activities, encouraging children to behave in a 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.

Staff must also be aware of **Child Sexual Exploitation** as an emerging, high priority concern.

Child Sexual Exploitation is defined as:

...involving 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 their performing, and/or another or others performing on them, sexual activities. It can occur through the use of technology without the child’s immediate recognition, e.g. being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child 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,

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

involvement in exploitative relationships being characterised in the main by the child's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Sexual exploitation can have a serious long-term impact upon every aspect of a child or young person's life, health and education. It also damages the lives of families and carers and can lead to families breaking up.

It is a multi-agency responsibility of partner agencies to identify those children and young people at risk of exploitation, to protect them and safeguard them from further risk of harm and to prevent children from becoming victims of this form of abuse.

County Lines

County Lines refers to urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or *deal lines*. This criminal activity often involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money.

New guidance has been developed by the Home Office to support frontline staff – particularly those who work with children, young people and potentially vulnerable adults – in identifying potential victims of this type of criminal exploitation. It sets out the signs to look for in potential victims, and what action staff should take so that potential victims get the support and help they need. The document supplements an organisation's existing safeguarding policies.

Any practitioner working with a vulnerable person who they think may be at risk of county lines exploitation should follow their local safeguarding guidance and share this information with local authority social care services.

If you believe a person is in immediate risk of harm, you should contact the police.

Guidance: [Criminal exploitation of children and vulnerable adults: county lines](#)

Neglect

Neglect is a form of significant harm which involves 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 because 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-givers)
- Ensure access to appropriate medical care or treatment

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

If physical, emotional, sexual or neglect significant harm is suspected, or you have any other concerns regarding significant harm, discuss your concern with a safeguarding Lead / Champion and if appropriate or make a referral immediately using the referral method in Part 2 Safeguarding Procedures.

A piece of information, no matter how small, could mean that a child at risk is identified. Several small pieces of information from different agencies have in the past identified horrific cases of abuse that would not have been identified by one single agency.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

13. Appendix 3

ADULTS AT RISK: forms of abuse and indicators of abuse

Physical abuse

Physical abuse is a form of significant harm which may involve assault, hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate sanctions or force-feeding, inappropriate methods of restraint, and unlawfully depriving a person of their liberty.

Possible indicators

- Unexplained or inappropriately explained injuries including cuts, scratches, bruising and burns (from scalding in hot water/liquid or appliance)
- Exhibiting untypical self-harm
- Collections of bruises that form regular patterns which correspond to the shape of an object or which appear on several areas of the body
- Medical problems that go unattended
- Sudden and unexplained urinary and/or faecal incontinence. Evidence of over/under-medication
- Flinches at physical contact
- Appears frightened or subdued in the presence of particular people
- Asks not to be hurt
- May repeat what the person causing harm has said (e.g. 'Shut up or I'll hit you')
- Reluctance to undress or uncover parts of the body
- Wears clothes that cover all parts of their body or specific parts of their body

Domestic violence or abuse

Domestic violence or abuse can be characterised by any indicators of abuse including psychological, physical, sexual, financial, emotional abuse. Domestic violence or abuse can also include threats and intimidation, harassment, and stalking, online or digital abuse and coercive control.

Many people think that domestic abuse relates to intimate partners, but it is clear that other family members are included and that much safeguarding work that occurs at home is, in fact connected with domestic abuse.

Possible Indicators:

- Low self-esteem.
- Feeling that the abuse is their fault when it is not.
- Physical evidence of violence such as bruising, cuts, broken bones.
- Verbal abuse and humiliation in front of others.
- Fear of outside intervention.
- Damage to home or property.
- Isolation – not seeing friends and family.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Sexual abuse

Sexual abuse can include rape, attempted rape or sexual assault, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, or sexual acts to which the adult has not consented or was pressured into consenting.

It includes penetration of any sort, incest and situations where the person causing harm touches the abused person's body (e.g. breasts, buttocks, genital area), exposes his or her genitals (possibly encouraging the abused person to touch them) or coerces the abused person into participating in or looking at pornographic videos or photographs.

Denial of a sexual life to consenting adults is also considered abusive practice.

Any sexual relationship that develops where one person is in a position of trust, power or authority in relation to the other (e.g. day centre worker/social worker/residential worker/health worker) may also constitute sexual abuse.

Possible indicators

- Urinary tract infections, vaginal infections or sexually transmitted diseases that are not otherwise explained
- Appears unusually subdued, withdrawn or has poor concentration
- Exhibits significant changes in sexual behaviour or outlook
- Experiences pain, itching or bleeding in the genital/anal area
- Underclothing is torn, stained or bloody
- A child or a woman who lacks the mental capacity to consent to sexual intercourse becomes pregnant

Sexual exploitation

The sexual exploitation of adults involves exploitative situations, contexts and relationships where adults (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of performing sexual activities, and/or others performing sexual activities on them.

Sexual exploitation can occur through the use of technology without the person's immediate recognition. This can include being persuaded to post sexual images or videos on the internet or a mobile phone with no immediate payment or gain or being sent such an image by the person alleged to be causing harm. In all cases those exploiting the individual have power over them by virtue of their age, gender, intellect, physical strength, and/or economic or other resources.

Psychological abuse

Psychological abuse includes 'emotional abuse' and takes the form of threats of harm or abandonment, deprivation of contact, humiliation, rejection, blaming, controlling, intimidation, coercion, indifference, harassment, verbal abuse (including shouting or swearing), cyber bullying, isolation or withdrawal from services or support networks.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Psychological abuse is the denial of a person's human and civil rights including choice and opinion, privacy and dignity and being able to follow one's own spiritual and cultural beliefs or sexual orientation.

It includes preventing a person from using services that would otherwise support them and enhance their lives. It also includes the intentional and/or unintentional withholding of information (e.g. information not being available in different formats/languages etc).

Possible indicators

- Untypical ambivalence, deference, passivity, resignation
- Appears anxious or withdrawn, especially in the presence of the alleged abuser
- Exhibits low self-esteem
- Untypical changes in behaviour (e.g. continence problems, sleep disturbance)
- Not allowed visitors/phone calls
- Locked in a room/in their home
- Denied access to aids or equipment (e.g. glasses, dentures, hearing aid, crutches etc.)
- Access to personal hygiene and toilet is restricted
- Movement is restricted by use of furniture or other equipment
- Bullying via social networking internet sites and persistent texting

Financial or material abuse

This includes 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.

Possible indicators

- Lack of heating, clothing or food
- Inability to pay bills/unexplained shortage of money
- Lack of money, especially after collecting benefits
- Inadequately explained withdrawals from accounts
- Unexplained loss/misplacement of financial documents
- The recent addition of authorised signatories on accounts or cards
- Disparity between assets/income and living conditions
- Power of attorney obtained when the adult lacks the capacity to make this decision
- Recent changes of deeds/title of house or will
- Recent acquaintances expressing sudden or disproportionate interest in the person and their money
- Service user not in control of their direct payment or individualised budget
- Miss-selling/selling by door-to-door traders/cold calling
- Illegal money-lending.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Modern slavery

Modern Slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude and inhumane treatment.

A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators.

There are many different characteristics that distinguish slavery from other human rights violations – however, only one needs to be present for slavery to exist.

Contemporary slavery takes various forms and affects people of all ages, gender and races. Someone is in slavery if they are:

- forced to work by mental or physical threat
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- dehumanised, treated as a commodity or bought and sold as 'property'
- physically constrained or has restrictions placed on his/her freedom of movement

Human trafficking involves an act of recruiting, transporting, transferring, harbouring or receiving a person through a use of force, coercion or other means, for the purpose of exploiting that person.

Possible Indicators

Signs of various types of slavery and exploitation are often hidden, making it hard to recognise potential victims. Victims can be any age, gender or ethnicity or nationality.

Although by no means exhaustive, persons may:

- not be in possession of legal documents (passport, identification and bank account details) and they are being held by someone else
- have old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred
- look malnourished, unkempt, or appears withdrawn
- have few personal possessions and often wear the same clothes
- what clothes they wear may not be suitable for their work
- be withdrawn or appear frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are inconsistent in the information they provide, including basic facts such as the address where they live
- appear under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. Many victims will not be able to speak English
- exhibit fear of the authorities
- perceive themselves to be in debt to someone else or in a situation of dependence

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Environmental indicators

Outside the property: there are bars covering the windows of the property or they are permanently covered on the inside. Curtains are always drawn. Windows have reflective film or coatings applied to them. The entrance to the property has CCTV cameras installed. The letterbox is sealed to prevent use. There are signs the electricity may have been connected from neighbouring properties or directly from power lines.

Inside the property: access to the back rooms of the property is restricted or doors are locked. The property is overcrowded and in poor repair.

Discriminatory abuse

This includes discrimination on the grounds of race, faith or religion, age, disability, gender, sexual orientation, and political views, along with racist, sexist, homophobic or ageist comments or jokes, or comments and jokes based on a person's disability or any other form of harassment, slur or similar treatment.

Hate crime can be viewed as a form of discriminatory abuse, although will often involve other types of abuse as well. It also includes not responding to dietary needs and not providing appropriate spiritual support. Excluding a person from activities on the basis they are 'not liked' is also discriminatory abuse.

The government has recently published a four-year plan for tackling hate crime: *Action Against Hate*. Guidance: [Action against hate: the UK government's plan for tackling hate crime](#)

Possible Indicators

Indicators for discriminatory abuse may not always be obvious and may also be linked to acts of physical abuse and assault, sexual abuse and assault, financial abuse, neglect, psychological abuse and harassment, so all the indicators listed above may apply to discriminatory abuse.

A person may reject his or her own cultural background and/or racial origin or other personal beliefs, sexual practices or lifestyle choices, or make complaints about the service not meeting his or her needs.

Organisational abuse

Organisational abuse is the mistreatment, abuse or neglect of person by a regime or individuals in a setting or service where the person lives or that they use. Such abuse violates the person's dignity and represents a lack of respect for their human rights.

Organisational abuse occurs when the routines, systems and regimes of an institution result in poor or inadequate standards of care and poor practice which affect the whole setting and deny, restrict or curtail the dignity, privacy, choice, independence or fulfilment of the individuals.

It can include neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or where care is provided within a person's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Organisational abuse can occur in any setting providing health or social care. A number of inquiries into care in residential settings have highlighted that organisational abuse is most likely to occur when staff:

- receive little support from management
- are inadequately trained
- are poorly supervised and poorly supported in their work
- receive inadequate guidance or where there is:
 - unnecessary or inappropriate rules and regulations
 - lack of stimulation or the development of individual interests
- inappropriate staff behaviour, such as the development of factions, misuse of drugs or alcohol, failure to respond to leadership
- restriction of external contacts or opportunities to socialise

Neglect and acts of omission

These include ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating. Neglect also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk for themselves.

Neglect and poor professional practice may take the form of isolated incidents or pervasive ill treatment and gross misconduct. Neglect of this type may happen within a person's own home or in an institution. Repeated instances of poor care may be an indication of more serious problems. Neglect can be intentional or unintentional.

Possible indicators

- Inadequate heating and/or lighting
- Physical condition/appearance is poor (e.g. ulcers, pressure sores, soiled or wet clothing)
- Malnourished, has sudden or continuous weight loss and/or is dehydrated
- Cannot access appropriate medication or medical care
- Not afforded appropriate privacy or dignity
- Has inconsistent or reluctant contact with health and social services
- Callers/visitors are refused access to the person
- Person is exposed to unacceptable risk

Self-neglect

Self-neglect covers a wide range of behaviour, neglecting to care for one's personal hygiene, health or surroundings including behaviour such as hoarding. Self-neglect is also defined as the inability (intentional or non-intentional) to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and well-being of the individual and sometimes to his or her community.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Possible indicators

- Living in very unclean, sometimes verminous, circumstances
- Poor self-care leading to a decline in personal hygiene
- Poor nutrition
- Poor healing/sores
- Poorly maintained clothing
- Long toenails
- Isolation
- Failure to take medication
- Keeping large numbers of pets
- Neglecting household maintenance
- Portraying eccentric behaviour/lifestyles

NOTE: Poor environments and personal hygiene may be due to personal or lifestyle choice or other issues such as insufficient income.

Where does abuse take place?

Abuse can take place anywhere. For example:

- The person's own home, whether living alone, with relatives or others
- Day or residential centres
- Supported housing
- Work settings
- Educational establishments
- Care homes
- Clinics and hospitals
- Prisons
- Other places in the community

Who might abuse?

Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the child or adult. A wide range of people may harm others. These include:

- a spouse/partner
- an adult
- other family members
- neighbours
- friends
- local residents
- people who deliberately exploit adults they perceive as vulnerable to abuse
- paid staff or professionals
- volunteers
- strangers
- gangs - small groups of people known to each other

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Additional vulnerabilities

Vulnerability factors in the context of safeguarding, are factors that are known to increase the risk of abuse or neglect. These are the situations, behaviours or underlying characteristics of children, adults with care and support needs, their parents or carers, their families, or their social environment, that increase their vulnerability to abuse or neglect.

Having one or more of these characteristics does not automatically mean a child or adult with care and support needs will experience abuse or neglect. And not having any of them does not mean that abuse or neglect will not occur.

The following are factors that can increase vulnerability to child abuse and neglect:

- exposure to domestic abuse
- disabilities
- looked after children
- age and gender of child impacting their ability to recognise abuse or neglect
- parental experience of child abuse or neglect
- parental substance misuse
- parental mental health problems

The following are factors that can increase vulnerability to abuse and neglect of **adults** with care and support needs

- lack of mental capacity
- disabilities
- previous experience of abuse
- physical dependency
- isolation and social exclusion
- lack of access to information and support
- discrimination
- lack of or difficulty communicating

It is important for professionals to understand risk and vulnerability factors so they can identify which families or individuals need extra support to help keep them safe.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

14. Appendix 4

Terms of Reference for Strategic Safeguarding Group and Operational Safeguarding Group

Strategic Safeguarding Group (SSG)

Overview of group:

The Council's Strategic Safeguarding Group (SSG) is the key mechanism for driving forward the strategic priorities for safeguarding across both Council's and for agreeing how each service will co-operate to safeguard and promote the welfare of children, and adults with care and support needs.

The group is responsible for ensuring the Council is meeting its statutory duties across both adult and children's safeguarding by:

- responding to the legislation within the Children's Acts (1989 and 2004) and the statutory guidance 'Working Together to Safeguard Children' (2018).
- responding to the legislation within the Care Act 2014 and the Mental Capacity Act 2005 and the statutory guidance 'Care and Support Statutory Guidance' (updated 2020)
- coordinating the effective implementation of policies and procedures
- promoting a culture of effective safeguarding practice across the organisation
- communicating the need to safeguard and promote welfare to all staff, volunteers, councillors, and contractors

The objectives of the SSG are:

- To promote the welfare of children, and adults, consistent with statutory guidance and best practice.
- To develop and agree corporate policies and procedures for safeguarding including the action to be taken where there are concerns about the safety or welfare of a child or of an adult.
- To influence and develop the Council's response to safeguarding within corporate policies and procedures relating to:
staff recruitment, vetting and barring, induction, training, development, supervision, discipline, and conduct
- information sharing and management of data
- To ensure representation of the Council within the Surrey Safeguarding Partnership groups for adults and children
- To monitor, report on and challenge the effectiveness of what is done to safeguard and promote the welfare of children and of adults with care and support needs, across the Council.

Membership

Members must commit to their responsibilities to ensure the Council is meeting its statutory duties to safeguard and promote the welfare of children and of adults:

Lead Councillor for Community both Guildford & Waverley

Joint Strategic Director Housing, Communities & Environment - Joint Leadership Team

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

lead for safeguarding

Joint Assistant Director - Community Services- JLT Safeguarding Lead

Joint Assistant Director - Organisational Development

Joint Assistant Director - Communications and Customer Service

Joint Assistant Director - Regulatory Services

Joint Assistant Director - Housing Services

Joint Assistant Director - Commercial Services

Joint Assistant Director - Legal and Democratic Services

Specialist – HR - Training

Frequency of meetings:

Quarterly

The Council's internal audit programme includes safeguarding every 2 years. The outcome of the audit is an action plan for improvement which is reflected in the SSG action plan. A biannual progress report is presented to CLB. An annual progress report is required by Corporate Governance and Standards Committee.

SSG Strategic Action Plan

The SSG will develop, coordinate, and ensure delivery of an annual strategic action plan. The action plan will primarily respond to any gaps in compliance with the Council's statutory duties and audit recommendations but will also support best practice across the Council. The action plan will set the work programme for the SSG and relevant subgroups. The plan will be reviewed at each meeting to ensure it is continuing to respond to current legislation and best practice.

The SSG will provide an update on the strategic action plan to Corporate Leadership Board twice a year.

Quality assurance

The Council has a statutory duty to complete the Surrey Safeguarding Children's Partnership self-assessment section 11 audit and Surrey Safeguarding Adults Board audits. Each of these have associated action plans for improvement that are reflected in the SSG action plan.

The Council's internal audit programme includes safeguarding every 2 years. The outcome of the audit is an action plan for improvement which is reflected in the SSG action plan. A biannual progress report is presented to CLB. An annual progress report is required by Corporate Governance and Standards Committee.

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Operational Safeguarding Group (OSG)

Overview of group:

The Council's Operational Safeguarding Group (OSG) is the key mechanism for communication between specialist service delivery staff. It also supports the dissemination of information from the Strategic Safeguarding Group (SSG) to service delivery areas.

The overall aim of the group is to ensure that staff with responsibility for delivering services, can safeguard and promote the welfare of children, and adults. The group provides a forum for sharing best practice and learning from thematic reviews, highlighting barriers in service delivery and escalating issues to the SSG. The group also provides a review and monitoring function for safeguarding referrals and concerns raised through the C-SPA and MASH.

The group is responsible for supporting the Council in meeting its statutory duties across both adult and children's safeguarding by:

- contributing to shared learning and best practice sharing
- identifying issues and barriers in delivering safeguarding within their service area and developing problem solving solutions
- escalating strategic issues to the SSG
- supporting the dissemination of information and implementation of policy and procedure
- communicating the need to safeguard and promote welfare to all staff, volunteers, and contractors within their service area
- promoting a culture of effective safeguarding practice across the organisation
- monitoring and reviewing referrals made to C-SPA and the MASH

The objectives of the OSG are:

- To promote the welfare of children, and adults, consistent with statutory guidance and best practice.
- To share best practice between services
- To implement learning from thematic reviews through service delivery
- To implement corporate and service based policies and procedures for safeguarding including; the action to be taken where there are concerns about the safety or welfare of a child or of an adult.
- To identify training needs across service delivery
- To challenge the effectiveness of what is done to safeguard and promote the welfare of children and of adults through service delivery
- To ensure effective record keeping and information sharing within service delivery

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

Membership

Members must commit to safeguarding their responsibilities as set out in our Safeguarding Policy, to ensure the Council is meeting its statutory and moral duties to safeguard and promote the welfare of children and of adults.

Joint Assistant Director Community Services - Chair
Customer Service Team Leader
Customer Case Services Team Leader
Specialist Occupational Therapy
Specialist Licensing
Specialists Housing
Homelessness Advice and Allocations Lead
Neighbourhood Housing Lead
Sheltered and Supported Tenants
Family Support Team Lead
Community Wellbeing Team Leader
Day Care Team Leader
Home Improvement Lead
Community Transport and Meals on Wheels Lead
Access Education and Engagement Officer
Operational - waste and parks
Community Services Business Support – action tracker recording
Contracts Manager
Specialist Housing Options Manager
Senior housing Officer x 2
Senior living and Careline Service Manager
Housing Options Manager
Community Safety Manager
Customer Services Centre Manager
Environmental Health Manager
Housing Manager
Specialist Grants and Adaptations Surveyor
Operational Safeguarding Coordinator
Home choice Manager
Officers who have submitted a referral to C-SPA or MASH where the referral remains 'live'

Frequency of meetings:

Every 6 weeks

This policy must be read alongside the Safeguarding Procedures (Part 2) and the safeguarding training framework (Part 3)

15. Strategic Safeguarding Structure

Key:

Blue – GBC/WBC Safeguarding accountability

Yellow – Relationship with SCC / NHS Partnerships/Boards

Green – Relationship with GBC/WBC Partnerships/Boards

