



# Safeguarding Policy and Procedure

**A guide to safeguarding children and adults**

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**ALL SAFEGUARDING DISCUSSIONS AND CONCERNS MUST BE FORWARDED TO THE SAFEGUARDING EMAIL FOR THE COUNCILS CENTRAL RECORDS:**

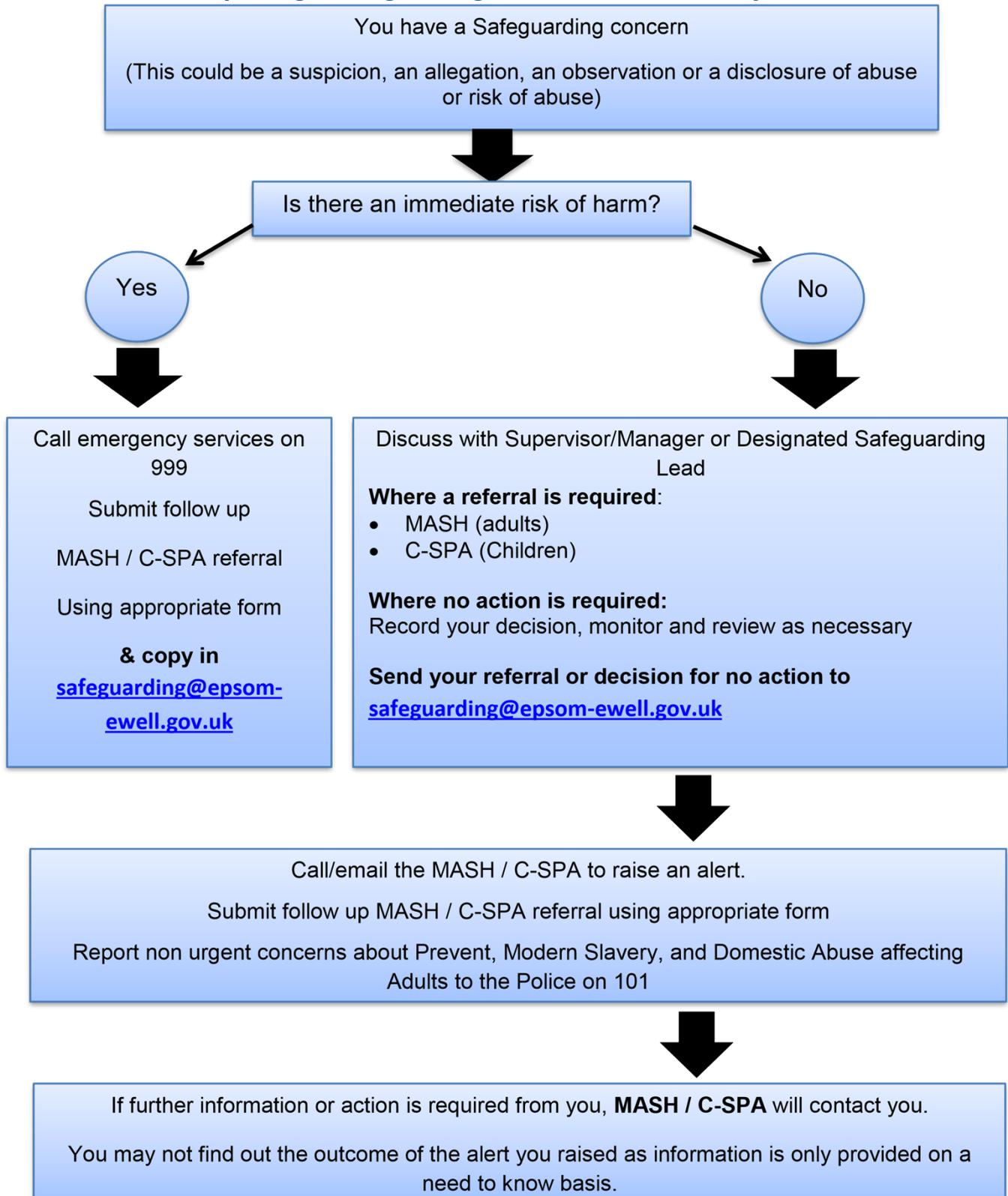
**[safeguarding@epsom-ewell.gov.uk](mailto:safeguarding@epsom-ewell.gov.uk)**

<b>Multi Agency Safeguarding Hub (MASH) &amp; Child – Single Point of Access (C-SPA)</b>	
<b>Phone Number</b> (MASH, C-SPA & LADO)	0300 470 9100 (Open Monday-Friday, 9am-5pm)
<b>Out of hours number</b> (MASH, C-SPA & LADO)	01483 517898 (Open Friday 5pm – Monday 9am and 24 hours at weekends)
<b>MASH email</b> Concerns for an Adult	<a href="mailto:ascmash@surreycc.gov.uk">ascmash@surreycc.gov.uk</a>
<b>C-SPA email</b> Concerns for a child	<a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a>
<b>LADO</b> (Local Authority Designated Officer)	<a href="mailto:LADO@surreycc.gov.uk">LADO@surreycc.gov.uk</a>

## How to respond to a safeguarding concern

The procedure outlined below should be followed in response to any concerns.

### Reporting a safeguarding concern: What should you do?



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## Introduction

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 adults and children from abuse or other types of exploitation and impairment of development, whilst supporting individuals to maintain control over their lives and enabling them to make informed decisions without coercion. While safeguarding is a 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 the Council will meet its obligations to safeguard vulnerable adults and children. 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 compliments and supports the Surrey Safeguarding Children Board (SSCB) and Surrey Safeguarding Adults Board (SSAB) agreed multi-agency procedures<sup>1 2</sup>. It is governed by a set of key principles 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. It is vital for successful safeguarding that the policy and procedures are understood and applied consistently at an individual, managerial, and organisation level.

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.
- 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:

1. Protect children from maltreatment;
2. Prevent impairment of children's health or development;
3. Ensure that children grow up in circumstances consistent with the provision of safe and effective care; and
4. Take action to enable all children to have the best outcomes.

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<sup>1</sup> In the event of any potential conflict between procedures; the multi-agency procedures and/or government guidance take precedence.

<sup>2</sup> See Appendix 2 for link.

# PART 1 - Policy

*Legal background, principles and values, definitions, and roles and responsibilities*

## 1. Legal Framework

This Safeguarding policy is underpinned by a range of legislation 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 2015*<sup>3</sup>, provide the current framework for safeguarding children.

This legislation places an overarching responsibility on Surrey County Council (SCC), as the lead authority for children, for safeguarding and promoting the welfare of all children in their area but makes clear that other agencies also have a role to play.

Section 11 of the Children Act 2004 places a statutory duty on various agencies, including districts and borough councils, to make arrangements to ensure that their functions are discharged taking account of the need to safeguard and promote the welfare of children. This includes any services or function they contract out.

This Act led to the establishment of the Surrey Safeguarding Children Board (SSCB)<sup>4</sup> and required SCC to secure the co-operation of partners in setting up arrangements to improve the well-being of children in the County.

*Working Together to Safeguard Children 2015*<sup>5</sup> sets out how organisations and individuals should work together relying on the following two key principles (expanded on in Section 2. below):

- Safeguarding is everyone's responsibility: for services to be effective each professional and organisation should play their full part.
- The approach must be child-centred: in order to be effective, there needs to be a clear understanding of the needs of the child.

### The Care Act 2014

*The Care Act 2014* sets out the legal framework for how local authorities and other statutory agencies, including district and borough councils, should protect adults with care and support needs who are at risk of abuse or neglect. It consolidates existing law and puts similar arrangements in place to those safeguarding children.

The Act required SCC, as the lead authority for vulnerable adults, to establish a Safeguarding Adults Board to bring together the key local partners to focus on safeguarding strategy and practice. The Act also places a duty on SCC to carry out safeguarding enquiries where it is suspected that someone is suffering or at risk of abuse or neglect and to conduct

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<sup>3</sup> See link in Appendix 2

<sup>4</sup> This replaced the Area Child Protection Committee

<sup>5</sup> This guidance is updated from time to time; therefore the most up to date guidance will apply in relation to the operation of this policy.

Safeguarding Adults Reviews (SARs) where there is a cause for concern about a particular case and how it has been handled so that lessons can be learned.

***The responsibilities of local authorities as identified in the Care Act 2014***

<b><i>What must be done by all Borough and District Councils</i></b>	Paragraph in Care Act 2014
To ensure effective safeguarding arrangements all organisations must have arrangements in place which set out clearly the processes and the principles for sharing information between each other, with other professionals and the Safeguarding Adults Board; this could be via an Information Sharing Agreement to formalise the arrangements.	Paragraph 14.43
In order to respond appropriately where abuse or neglect may be taking place, anyone in contact with the adult, whether in a volunteer or paid role, must understand their own role and responsibility and have access to practical and legal guidance, advice and support. This will include understanding local multi-agency policies and procedures.	Paragraph 14.51
Local authorities must cooperate with each of their relevant partners, as described in section 6(7) of the Care Act, and those partners must also cooperate with the local authority, in the exercise of their functions.	Paragraph 14.63
When an employer is aware of abuse or neglect in their organisation, then they are under a duty to correct this and protect the adult from harm as soon as possible and inform the local authority, Care Quality Commission (CQC) and Clinical Commissioning Groups (CCG) where the latter is the commissioner.	Paragraph 14.69
Everyone involved in a safeguarding adult's enquiry must focus on improving the adult's well-being and work together to that shared aim.	Paragraph 14.93
It is the responsibility of all staff and members of the public to act on any suspicion or evidence of abuse or neglect and to pass on their concerns to a responsible person or agency.	Paragraph 14.95
Employers must ensure that all staff, including volunteers, are trained in recognising the symptoms of abuse or neglect, how to respond and where to go for advice and assistance.	Paragraph 14.102
Employers must also ensure all staff keep accurate records, stating what the facts are and what are the known opinions of professionals and others and differentiating between fact and opinion. It is vital that the views of the adult are sought and recorded.	Paragraph 14.103

Employers who are also providers or commissioners of care and support not only have a duty to the adult, but also a responsibility to take action in relation to the employee when allegations of abuse are made against them.	Paragraph 14.116
When a person's conduct towards an adult may impact on their suitability to work with or continue to work with children, this must be referred to the local authority's designated officer (LADO)	Paragraph 14.124
Employers, student bodies and voluntary organisations should have clear procedures in place setting out the process, including timescales, for investigation and what support and advice will be available to individuals against whom allegations have been made.	Paragraph 14.126
If an organisation removes an individual (paid worker or unpaid volunteer) from work with an adult with care and support needs (or would have, had the person not left first) because the person poses a risk of harm to adults, the organisation must make a referral to the Disclosure and Barring Service.	Paragraph 14.127
Where an adult has refused to consent to information being disclosed for these purposes, then practitioners must consider whether there is an overriding public interest that would justify information sharing and wherever possible, the appropriate Caldicott Guardian* should be involved. (* a Caldicott Guardian is a senior person responsible for protecting the confidentiality of people's health and care information and making sure it is used properly.)	Paragraph 14.188
Operational front line staff are responsible for identifying and responding to allegations of abuse and substandard practice.	Paragraph 14.198
Concerns about abuse or neglect must be reported whatever the source of harm is. It is imperative that poor or neglectful care is brought to the immediate attention of managers and responded to swiftly, including ensuring immediate safety and well-being of the adult.	Paragraph 14.200
The Safeguarding Adults Board (SAB) should ensure that relevant partners provide training for staff and volunteers on the policy, procedures and professional practices that are in place locally, which reflects their roles and responsibilities in safeguarding adult arrangements. Employers, student bodies and voluntary organisations should also undertake this, recognising their critical role in preventing and detecting abuse.	Paragraph 14.225

<p>The Care Act 2014 requires that Safeguarding Adults Boards should establish and agree a framework and process for any organisation to respond to allegation against anyone who works (in either a paid or unpaid capacity) with adults with care and support needs. These people are known as People in a Position of Trust.</p> <p>Surrey Safeguarding Adults Board (SSAB) also requires partner agencies and the service providers they commission to identify a designated Person in a Position of Trust (PiPoT) lead or contact to oversee the delivery of responsibilities in their organisation.</p>	<p>Paragraph 14.120</p>
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## The Mental Capacity Act 2005

*The Mental Capacity Act 2005* provides a statutory framework for people who lack the capacity to make decisions themselves, or who have capacity and want to make preparations for a time when they may lack capacity in the future. The 2005 Act sets out who can make decisions, in which situations, and how they should go about doing so. The 2005 Act assumes that a person has full legal capacity to make decisions themselves unless it can be shown that they lack capacity.

Additional safeguards have been introduced in law in *Deprivation of Liberty Safeguards*, to protect the rights of individuals at risk who lack the capacity to consent to treatment/care in hospitals and care homes and to ensure the treatment or care is in their best interests.

## 2. Principles and Values

Safeguarding is supported by key principles and values that guide how we respond when alerts are raised.

### *The Key Principles of Safeguarding and Protecting the Welfare of Children*

Effective safeguarding of children is underpinned by two key principles:

#### ***Safeguarding is Everyone's Responsibility***

'Safeguarding is everyone's responsibility' is the founding principle of safeguarding children. It asserts that everybody has a role to play in protecting children from harm and keeping them safe. If a person comes into contact with a child whom they consequently have concerns about, they must take action to safeguard the child. It is unlikely that a single individual's insight into a child's situation will form a complete picture and by raising your concerns, however small, and sharing information, it will allow for more informed decision making and decisive action to be taken.

#### ***A Child Centred Approach***

In all cases, safeguarding should be child centred. This means prioritising the needs of the children, and their views. In order to do this, children's views must be sought, heard and

respected, and they must have consistent support that meets their needs. Children have clearly expressed what they want from the safeguarding process (see box below).

<b>Vigilance</b>	To have adults notice when things are troubling them.
<b>Understanding and action</b>	To understand what is happening; to be heard and understood; and to have that understanding acted upon.
<b>Stability</b>	To be able to develop an on-going stable relationship of trust with those helping them.
<b>Respect</b>	To be treated with the expectation that they are competent rather than not
<b>Information and engagement</b>	To be informed about and involved in procedures, decisions, concerns and plans.
<b>Explanation</b>	To be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response.
<b>Support</b>	To be provided with support in their own right as well as a member of their family.
<b>Advocacy</b>	To be provided with advocacy to assist them in putting forward their views.

## Adult safeguarding: principles and values

### *The key principles of adult safeguarding*

The Care Act 2014 introduced six principles of safeguarding.

<b>Empowerment</b>	Presumption of person led decision making and informed consent.
<b>Prevention</b>	Take action before harm occurs.
<b>Proportionality</b>	Take the least intrusive response appropriate to the risk presented.
<b>Protection</b>	Provide support and representation for those in the greatest need.
<b>Partnership</b>	Local solutions through services working with their communities.
<b>Accountability</b>	Ensure there is accountability and transparency in safeguarding practices.

### *Making Safeguarding Personal*

Making Safeguarding Personal is a shift in culture and practice in response to what we now know about what makes safeguarding more or less effective from the perspective of the person being safeguarded.

It is about having conversations with people, about how we might respond in safeguarding situations in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety. It is about seeing people as experts in their own lives and working alongside them. It is a shift from a process supported by conversations to a series of conversations supported by a process.

The key focus is on developing a real understanding of what people wish to achieve, agreeing, negotiating and recording their desired outcomes, working out with them (and their representatives or advocates if they lack capacity) how best those outcomes might be realised and then seeing, at the end, the extent to which desired outcomes have been realised.

### ***Wellbeing Principle***

The Care Act 2014 introduces a duty to promote wellbeing when carrying out any care and support functions in respect of a person. This is sometimes referred to as “*the wellbeing principle*” because it is a guiding principle that puts wellbeing at the heart of care and support.

The wellbeing principle applies in all cases where carrying out any care and support function, or making a decision, or safeguarding. When safeguarding adults, it applies equally to adults with care and support needs and their carers.

Promoting “wellbeing” means actively seeking improvements, at every stage in relation to the individual, and where applicable their carer. It is a shift from providing services to the concept of “meeting needs”. To promote “wellbeing” it should be assumed that individuals are best placed to judge their own wellbeing, their individual views, beliefs, feelings, wishes are paramount, and individuals should be empowered to participate as fully as possible.

## **3. Definitions**

### ***What is the definition of ‘child’ in this policy?***

The term ‘child’ is used to encapsulate 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 an 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**;
- 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 abuse/neglect?***

Defining abuse or neglect is complex and rests on many factors. The term “abuse” can be subject to wide interpretation. It may be physical, verbal or psychological, it may be an act of neglect, failing to prevent harm or occur where a person is persuaded to enter into a financial or sexual transaction to which they have not, or cannot consent.

Incidents of abuse may be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of poor care may be an indication of serious problems and of what we now describe as organisational abuse. In order to see these patterns, it is important that information is recorded and appropriately shared.

Abuse or neglect may be the result of deliberate intent, negligence or ignorance. Exploitation can be a common theme in the experience of abuse or neglect. Abuse or neglect can take many different forms and there are common types of abuse that affect adults and children, as set out in the tables below respectively.

<b>The categories of abuse used in relation to child safeguarding</b>	
<b>Physical Abuse</b>	A form of abuse, which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child
<b>Emotional Abuse (including Domestic Abuse)</b>	Persistent emotional maltreatment of a child, such as to cause effects on the child’s emotional development. Bullying (including cyber bullying) does not have its own category but may be considered to be emotional abuse by causing children to feel frightened or in danger’
<b>Sexual Abuse</b>	Forcing or enticing a child or young person to take part in sexual activities. Sexual abuse may involve physical or non-contact activities. Adult males do not solely perpetrate sexual abuse. Women can also commit acts of sexual abuse, as can other children.
<b>The categories of abuse used in relation to child safeguarding</b>	

<b>Child Sexual Exploitation (CSE)</b>	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
<b>Neglect</b>	Persistent failure to meet a child's basic physical &/or psychological needs likely to result in the serious impairment of the child's health or development.

The Care Act guidance identifies a wider range of common types of abuse or neglect, see table below. For further details and possible indicators of abuse, see Appendix 3.

<b>The types of abuse / neglect as set out in the Care Act</b>	
<b>Physical abuse</b>	Including assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions.
<b>Domestic violence</b>	Including psychological, physical, sexual, financial, emotional abuse and 'honour' based violence.
<b>Sexual abuse</b>	Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the person has not consented or was pressured into consenting.
<b>Psychological abuse</b>	Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

<b>Financial or material abuse</b>	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.
<b>Modern slavery</b>	Encompasses slavery, human trafficking, forced 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.
<b>Discriminatory abuse</b>	Including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
<b>Organisational abuse</b>	Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
<b>Neglect and acts of omission</b>	Including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
<b>Self-neglect</b>	This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

## 4. Roles and responsibilities

### The Council as an Organisation

The Council is committed to safeguarding children and adults at risk and complying with our responsibilities under the Care Act 2014, the Children Act 2004, and Working Together to Safeguard Children 2015. The Council upholds these responsibilities in a number of ways:

- Appointment of a Lead Councillor for Children and Adult Safeguarding.
- Appointment of Safeguarding Officers; to provide designated, professional leads.
- Supporting the Borough and District Representative(s) at the Surrey Safeguarding Children Board.
- Supporting the Borough and District Representative(s) at the Surrey Safeguarding Adults Board.
- Providing information as requested by the Boards, including the completion of standard returns.
- Sign up to protocols and policies.
- Training staff and volunteers involved in the delivery of our services.

## **The Council as an Employer**

The Council incorporates safeguarding measures in its recruitment procedure and provides mandatory safeguarding training for all employees.

### ***Recruitment Procedures***

The Council is committed to ensuring that it has recruitment procedures in place, which minimise the risk of employing or engaging individuals who pose a predictable risk to children, young people and vulnerable adults.

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.

Levels of criminal record check available include:

- Standard checks – to be eligible for a standard level DBS certificate, the position must be included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975.
- Enhanced checks – to be eligible for an enhanced level DBS certificate, the position must be included in both the ROA Exceptions Order and in the Police Act 1997 (Criminal Records) regulations.
- Enhanced checks with children’s and/or adults’ barred list check(s) – to be eligible to request a check of the children’s or adults’ barred lists, the position must be eligible for an enhanced level DBS certificate as above and be specifically included in the Police Act 1997 (Criminal Records) regulations as able to check the appropriate barred list(s).

Whilst a DBS check has no official expiry date, the Council undertake renewal checks every three years for both enhanced level and enhanced level with barred list checks.

Job descriptions ensure that all relevant employees are aware and committed to the Council’s statutory duty to safeguard and promote the welfare of children, young people and vulnerable adults, by outlining that safeguarding is a fundamental part of their role within the Council.

### ***Training***

The Council, as an employer, is responsible for ensuring that staff are competent and confident in carrying out their responsibilities for safeguarding and promoting the welfare of children and adults.

The Council recognises that in order for staff to fulfil their own duties in line with statutory safeguarding duties, they will have different training needs, which are dependent on their degree of contact with children, young people and adults, their level of responsibility and their independence with decision-making. This is reflected in the Council’s tiered approach to delivering the following safeguarding training:

**1. Corporate Induction Training**

This training forms part of the Corporate Induction, which all staff are required to complete within their first six months at the Council. The short session aims to give employees a basic level understanding of their responsibility to safeguarding children, young people and vulnerable adults. It also outlines the basic procedures for reporting and dealing with safeguarding concerns.

**2. Safeguarding Officer and Management Level – Child and Adult Safeguarding Training**

This training is for staff with a more specialised safeguarding role or for staff who have direct and regular intensive contact with children, adults and families. The Surrey Safeguarding Children’s Board and Surrey Safeguarding Adult Board provide training across a broad range of safeguarding subjects.

**Professional standards and boundaries**

All Council employees are required to participate in safeguarding training to a level appropriate to their role and to adhere to the Safeguarding Policy and Procedures. Employees must always maintain professional standards and personal boundaries and, in their dealings with the public, never:

- Engage in rough, physical or sexually provocative activities;
- Allow or engage in inappropriate touching of any form;
- Allow children to use inappropriate language unchallenged;
- Make sexually suggestive comments, even for fun;
- Let allegations a child or adult at risk makes go unchallenged, unrecorded or not acted upon;
- Do things of a personal nature for a person that they can do for themselves.
- Put themselves in a vulnerable position
- form intimate personal, social relationships or inappropriate relationships with vulnerable adults, children, their carers or families
- enter into a financial agreement with vulnerable adults
- use personal social media accounts to interact with vulnerable adults or children
- expose confidentiality
- abuse a position of power

Employees should exercise care when lone working or carrying out home visits and never place themselves in a vulnerable position either from being vulnerable to unfounded allegations or vulnerable to physical assault. Each service will have internal risk assessments to manage the potential for breaches in professional boundaries and procedures appropriate to their work area. Employees are responsible for managing boundaries with the public and colleagues.

**Whistleblowing**

Staff may find it difficult to raise safeguarding concerns about colleagues or managers. Employees are often the first to realise that there may be something seriously wrong within the Council. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Council. They may also fear harassment or

victimisation. In these circumstances, staff should be aware that it may seem easier to ignore the concerns and treat them as mere suspicions of misconduct rather than report them. The Council's whistleblowing policy encourages and supports staff when raising safeguarding issues

The Council is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, we encourage employees and others with serious concerns about any aspect of the Council's work to come forward and voice those concerns using the Whistle blowing policy. The policy does not just apply to concerns about the activities of employees of the Council. It also applies to concerns about the activities of councillors and external organisations in their dealings with the Council.

Safeguarding allegations against staff will be dealt with in accordance with this guidance, and the Council's disciplinary and grievance policies.

### **The Council as a Licensing Authority**

The Council is a licensing authority for services such as taxi drivers, public events, alcohol and entertainment, charity collections, gambling, animal licensing, boot fairs, Sunday and street trading and other licenses such as fireworks storage licences. The Council needs to 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, the Council's safeguarding policy and procedure must be followed.

#### **Taxi Licensing**

All drivers (existing and new applicants) must be "fit and proper" to hold a licence. Applicants for the grant and renewal of a licence are subject to an enhanced DBS check, and must sign up to the online DBS update service.

### **The Council as a Licensing Authority continued**

There is an exemption for drivers who undertake Home to School runs who will not be required to undertake a DBS from the Authority as they have already been checked through Surrey County Council. Drivers licensed by Transport for London (TfL) are also not required to undertake a DBS check as they are already checked through TfL.

All drivers new and current are required to undertake a CSE awareness course approved by the Authority.

The Council has a [Taxi Licensing Policy](#)

### **Council procurement, contracting, commissioning and grant funding**

The Council procures and commissions various services, which range from construction, building maintenance and cleaning contracts and direct delivery of services such as leisure centre management and outreach services for the homeless.

When the Council commissions or procures services, we must be satisfied that our procurement and contract management processes and procedures take account of our

safeguarding responsibilities. This includes checking that tenderers have appropriate safeguarding policies and practices and that our contracts include safeguarding clauses.

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

The Council 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 supplied used by the Council refer to safeguarding.

If the Council grant aid to voluntary and community organisation we will monitor this funding through service level agreements. Safeguarding policies and procedures are required from all grant funded organisations. In addition, satisfactory DBS checks may be required for individuals working with children and vulnerable adults.

As a minimum, any organisation receiving funding from the Council 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. This applies to all organisations the Council awards grants to, irrespective of how the grant has been awarded. Commissioned/contracted or grant-funded organisations with minimal contact with children, young people, or vulnerable adults may wish to adopt the Council's policy if deemed suitable.

### **Working in partnership and information sharing**

The Council has a duty to work in partnership and/or co-operate with Surrey County Council (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 **Surrey Children's Single Point of Access (C-SPA)** following reports of safeguarding concerns by the public or professionals. Concerns regarding vulnerable adults are managed by Surrey's **Multi Agency Safeguarding Hub (MASH)**. Further details about the C-SPA and MASH are provided in sections 7 and 8 of this policy.

As the Council provides services to children, vulnerable adults and their families, we may be asked to share information we hold to enable any safeguarding risks to be assessed and managed appropriately. The HM Government Guidance ['Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers'](#) has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being. All information sharing is governed by the data protection legislation. The [Surrey Multi Agency Information Sharing Protocol](#) (MAISP) is an agreed set of principles about sharing personal or confidential information.

We may also be requested to assist a child and their family or a vulnerable adult on safeguarding grounds if this is appropriate.

More information on advice on information sharing within the context of safeguarding can be accessed [here](#)

## **Community Safety and Safeguarding**

There is a clear link between the Council's safeguarding responsibilities and those in connection with Community Safety. Various County wide multi-agency strategies and procedures exist in response to Child Sexual Exploitation, Domestic Abuse, Prevent (counter terrorism) and Modern Slavery. The Council has developed operational guidance in these areas that are complimentary to this policy. In all instances, safeguarding principles equally apply.

## **Communications**

### ***Media and publications***

The Council must ensure that any publications or use of media takes account of our safeguarding responsibilities and promotes the welfare and well-being of children, young people and vulnerable adults. This includes the use of photographs, videos and general content both on and offline.

### ***Listening to the views of customers***

The Council delivers a wide range of public services with associated strategies, policies and business plans. It is good practice to listen to the views of customers and service users to improve the effectiveness and satisfaction with services. The Council should consider how to take account of the '**voice of the child**' – by listening to children, young people and families. The views of hard to reach groups, those with special characteristics under equalities legislation, and other vulnerable adults should also be considered.

## **5. Surrey Safeguarding Boards**

The Surrey Safeguarding Children Partnership (SSCP) and Surrey Safeguarding Adults Board (SSAB) are statutory boards, responsible for working to protect children, young people and vulnerable adults.

### ***Representation on Safeguarding Boards***

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 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)**

From September 2019 the Surrey Safeguarding Board was replaced by the new SSCP. The partnership is led jointly and equally by Surrey County Council, Surrey Police and Surrey Downs (Clinical Commissioning Group (CCG), with relevant agencies as partners.

The SSCP is the key statutory mechanism for agreeing how the relevant organisations in Surrey will cooperate to safeguard and promote the welfare of children and ensure the effectiveness of what they do and provide strategic oversight.

The latest information on the Surrey Safeguarding Children arrangements through the SSCP, the partnership priorities and the structure of the board are set out [here](#).

### ***Audits***

The SSCP also carries out regular audits of aspects of its work. This includes Section 11 Audits of partner agencies, including the borough and district councils every two years.

### **Surrey Safeguarding Adults Board (SSAB)**

The 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.

The SSAB makes sure that there are effective processes in place to prevent and respond to abuse and neglect. It 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 latest information on the Surrey Safeguarding Adults arrangements through the SSAB, the board's priorities and the structure of the board are set out [here](#).

## **6. Effective Family Resilience Surrey- meeting children and families' needs**

The Effective Family Resilience document explains the SSCP approach to safeguarding and promoting the welfare of children and their families as set out [here](#).

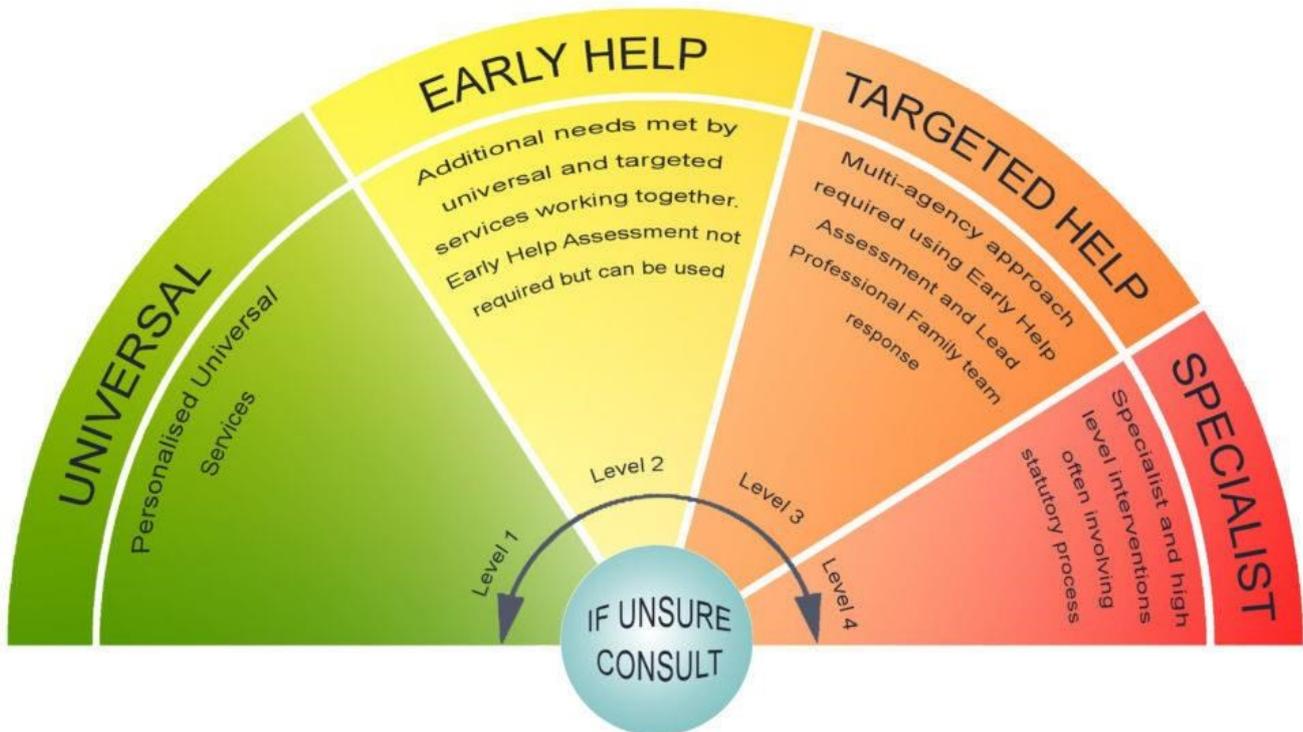
The Effective Family Resilience model and windscreen is a simple way of developing a shared understanding and explaining the Surrey approach across all services and partnerships, ensuring a consistent approach is applied by all.

The model illustrates how the SSCP will respond to the requirements of children and families across four levels of need (Universal, Early Help, Targeted Help and Specialist). The

windscreen is a visual tool to help us share a common language to describe risk and needs. The Surrey Early Help approach is called ‘**Family Resilience**’ and the Social Work practice model ‘**Family Safeguarding**’.

A summary of the model and levels are provided below with the Surrey Effective Support Windscreen to provide an illustration.

*The Surrey Effective Support Windscreen*



*Universal:* Children and young people who make good overall progress in most areas of development and receive appropriate universal services, such as health care and education. They may also use leisure and play facilities, housing or voluntary sector services.

*Early Help:* Children and young people whose needs require some extra support. A single universal or targeted service or two services are likely to be involved; these services should work together. A Team around the Family meeting to share information and agree an Early Help Plan to support the child and family is helpful. No need for specialist services.

*Targeted Help:* Vulnerable Children. Children and young people whose needs are more complex. This refers to the range, depth or significance of the needs. A number of these indicators would need to be present to indicate need at Level 3. More than one service is involved, using a Team around the Family approach, Early Help Plan and a Lead Practitioner to co-ordinate multi-agency support. Targeted Help can support at this level.

*Specialist:* Children and young people whose needs are complex and enduring and cross many domains. More than one service is normally involved, with a co-ordinated multi-agency approach and a Lead Professional, commonly in a non-statutory role. At times statutory intervention may be required.

## 7. Getting the right information, advice and support

### Surrey Children’s Single Point of Access (C-SPA)

The Children's Single Point of Access is the umbrella term used to describe the front door to Surrey County Council services for children. Residents and practitioners can phone in to access support, direct information and advice for families and those who work with children in Surrey.

Your contact will be answered by the Children's Request for Support Team. They may be able to answer your query directly, or when a response is required from a specific team, they will send the service request to the appropriate team to respond to you.

Requests for support up to Level 3 of Effective Family Resilience will be directed to the Early Help Hub. Families meeting the threshold for Level 4 of Effective Family Resilience will be sent straight to the Quadrant Assessment Teams (Children's Social Care).

If you are concerned about the safety of a child or young person you can contact the Surrey Children's Single Point of Access (SPA).

### Surrey Multi- Agency Safeguarding Hub (MASH)

The MASH is the front door to Surrey County Council service for adult social care. If you have an adult safeguarding concern, it should be referred to the MASH.

***Part 2 of this document sets out the procedures for making a referral and requesting support.***

## 8. Cross cutting safeguarding concerns

### *Prevent*

If you have concerns that a child or adult may be at risk of being drawn into terrorism due to their vulnerabilities, associations or ideology you should discuss this with your supervisor, manager, Council’s safeguarding, or community safety leads.

Professionals can make a referral by completing the [Prevent Referral Form](#) and returning it to the Surrey Police Prevent Team [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). This is a single “front

door” which will share the form with both the police and the MASH, to allow the safeguarding concerns to be assessed alongside any police risk.

A member of the public who is concerned that someone they know may be at risk of being drawn into terrorism, has several options:

Contact Surrey Police by dialling 101 If it's an emergency, always dial 999.

Report your concerns anonymously to CrimeStoppers 0800 555 111

Call the Anti-Terrorist Hotline on 0800 789 321

### ***Modern Slavery***

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.

Victims of modern slavery can be any age, gender, nationality and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.

Modern slavery is an unseen crime, it hides in takeaways, hotels, car washes, nail bars and private homes. There is no typical victim of slavery.

If you think you or someone you know is a victim of modern slavery, you can [report it online](#) or call Surrey Police on 101 (**always call 999 in an emergency**).

## **9. Governance of the Council’s safeguarding responsibilities**

### **Lead Officers**

The Chief Executive has overall accountability to ensure we comply with our safeguarding duties. They are supported by the Head of Housing and Community Safety who is the safeguarding lead and provides leadership and guidance.

There is a Community Safety Officer who is responsible for the majority of safeguarding enquiries and several experienced officers/managers providing further support as safeguarding leads. These officers are available to support front line staff, supervisors and managers in dealing with any safeguarding concerns.

As this is an operational policy, it will require updating and review in the light of changes in legislation, government policy and best practice. The Safeguarding Lead is therefore authorised to amend and update this guidance in consultation with the Lead Councillor to ensure it remains fit for purpose.

# PART 2 - Procedure

*A guide on how to respond if you have a concern*

The safeguarding procedures outlined below form a framework for raising an alert and taking action, however, it must be remembered that safeguarding is a dynamic process that must be undertaken with people and is not something that happens to people.

***Contact details for:***

The Council's Safeguarding Leads

The Multi Agency Safeguarding Hub (**MASH**),

The Children's Single Point of Access (**C-SPA**),

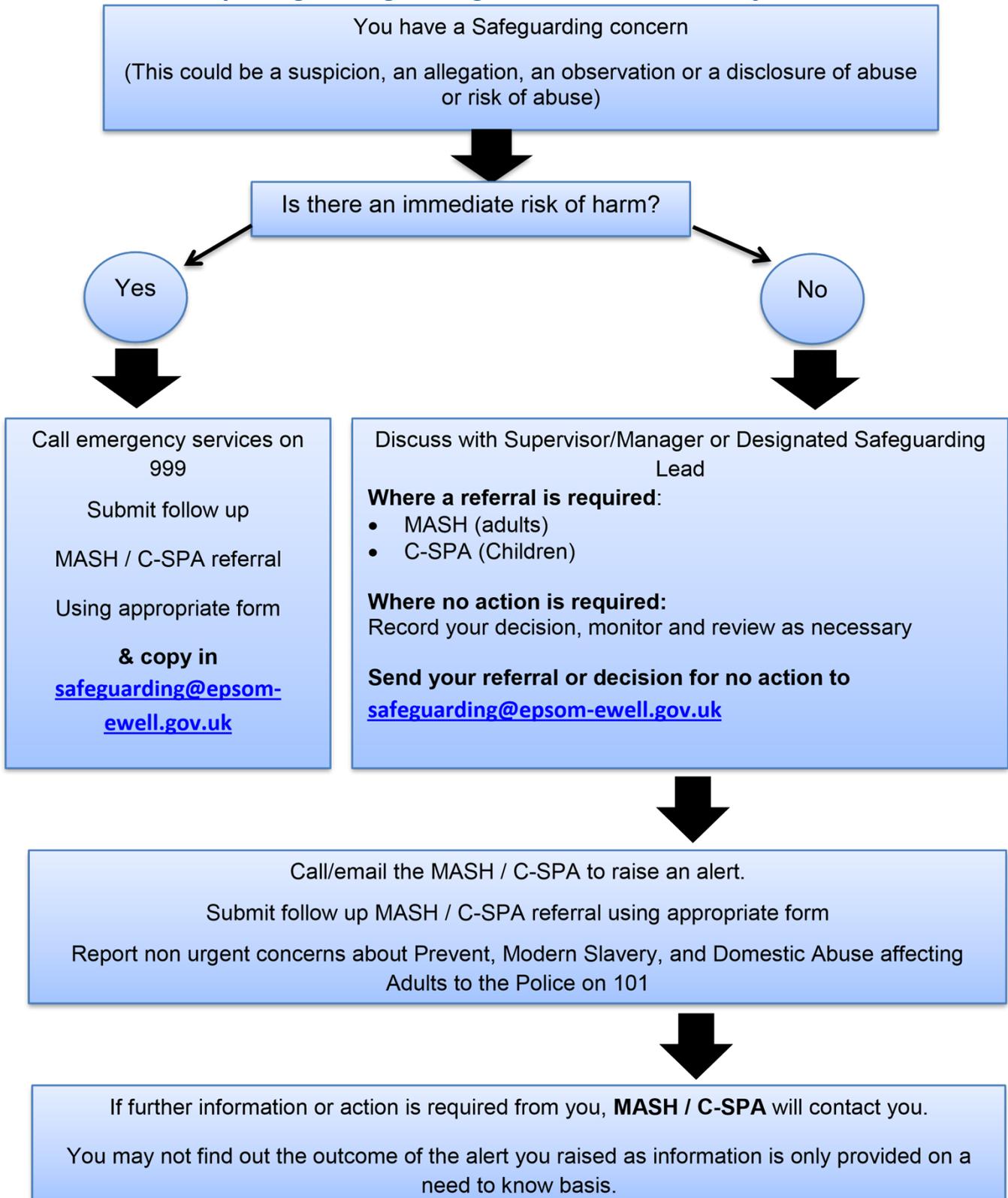
Surrey County Council's Children's Social Care and Adults Social Care

Are all set out in contact information - [Appendix 1](#).

## How to respond: Steps to take

The procedure outlined below should be followed in response to any concerns.

### Reporting a safeguarding concern: What should you do?



## Duty to refer

If a member of staff has a concern that a child or adult is being abused or at risk of abuse, they have a duty to report this. This should be raised with their supervisor or manager, or one of the safeguarding leads at the earliest opportunity.

**Our responsibility is not to investigate concerns, or make judgements, but to ensure that we share information with the right people, at the right time, in the right way.**

Where a child or adult is at **immediate risk of harm**, call **999** without delay. There is no requirement to speak to a supervisor or manager before doing so. This should be reported to their manager after the call and followed up with a referral.

## In the case of children

In the case of **children**, a referral to the C-SPA must be made if there is belief or suspicion that:

- A child is suffering or is likely to suffer **significant harm**; or
- A child's health or development may be impaired without the provision of services; or
- With the agreement of the person with **parental responsibility**, a child would be likely to benefit from family support services.

You should normally seek agreement from a person with parental responsibility, explaining why you have concerns. This should be either in writing or recorded as verbal consent with reference to a specific verbal conversation. This should only be done where such discussion and agreement-seeking will not place a child at increased risk of suffering significant harm.

A decision not to seek parental permission before making a referral to Surrey Children's Services must be recorded and the reasons given.

Surrey Children's Services must be told if the parent has withheld her/his permission

The parent must be contacted to inform her/him that after considering their wishes a referral has been made, unless to do so would place the child(ren) at increased risk of significant harm.

## In the case of Adults

In the case of adults, a referral to the MASH must be made if there is belief that an adult:

- has needs for care and support (whether or not these are currently being met);
- is experiencing, or are at risk of, abuse or neglect;
- as a result of those needs are unable to protect themselves against the abuse or neglect or the risk of it

The Care Act **does not** require consent for adult safeguarding work, so absence of consent is not a barrier to such work. However, where possible, the person should be informed before referring an adult safeguarding concern to the MASH, unless to do so would present further risk.

A written record of any incident, which gave rise to the concern should be made as soon as possible after the incident. Guidelines for record keeping are set out later in this section. If the concern relates to the behaviour of another council employee, this may be reported directly to HR. A designated HR advisor has been trained to deal with allegations of abuse.

The Council's whistle blowing policy may apply in such situations.

### ***Reporting a safeguarding concern: What should the Manager or Safeguarding Lead do?***

If a member of staff raises a concern about safeguarding with their supervisor or manager, depending upon the circumstances and their knowledge or experience the manager may seek advice from one of the safeguarding leads.

Following an assessment of the situation, either the manager or safeguarding lead will then decide whether a referral should be made, and if so to whom i.e. to the MASH, C-SPA, the allocated social worker or the Police. They will ensure the appropriate referral form or information is submitted and that referral is recorded on the relevant files. If a decision is made not to refer the concern, make a record of the reason for the decision.

**ALL safeguarding concerns raised, completed referrals and decisions MUST copy in the Council's Safeguarding Email for a central record to be held [safeguarding@epsomewell.gov.uk](mailto:safeguarding@epsomewell.gov.uk)**

### **Child – Single Point Access referral**

#### **How to make a C-SPA referral for children**

Referrals made by professionals should be made by contacting C-SPA by phone initially.

You should then complete a request for support form and email your completed form to the C-SPA.

The Child (C-SPA) referral form can be found in Appendix 2

#### **Contact Details**

**C-SPA phone:** 0300 470 9100 (Open Monday-Friday, 9am-5pm)

**C-SPA email for concerns and referrals about a child:** [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

**C-SPA out of hours phone:** 01483 517 898 (Friday 5pm – Monday 9am and 24 hrs at weekends)

If you have already been in touch with children’s social care services and you can contact your allocated social worker or family support worker directly:

**North East Surrey Children’s Services:** 0300 123 1610

#### **Emergencies**

**In situations where a child or adult is at immediate risk of harm, call the emergency services on 999.**

**Ensure you follow this up with a C-SPA referral and copy in [safeguarding@epsom-eweel.gov.uk](mailto:safeguarding@epsom-eweel.gov.uk)**

**ADULT - Multi Agency Safeguarding Hub referral**

**How to make a MASH referral for adults**

Referrals made by professionals should be made to the MASH

You should complete a MASH referral form and email your completed form to the MASH. You must also copy in [safeguarding@epsom-ewell.gov.uk](mailto:safeguarding@epsom-ewell.gov.uk)

**The Adult (MASH) referral form can be found in Appendix 2**

**Contact Details**

**MASH phone:** 0300 470 9100 (Open Monday-Friday, 9am-5pm)

**MASH email** for concerns and referrals about an adult: [ascmash@surreycc.gov.uk](mailto:ascmash@surreycc.gov.uk)

**MASH out of hours phone:** 01483 517898 (Open Friday 5pm – Monday 9am and 24 hrs at weekends)

If you have already been in touch with adult social care services and you can contact the allocated social worker

**Emergencies**

**In situations where an adult is at immediate risk of harm, call the emergency services on 999.**

**Ensure you follow this up with a MASH referral and copy in [safeguarding@epsom-ewell.gov.uk](mailto:safeguarding@epsom-ewell.gov.uk) .**

**How to respond to a safeguarding concern: Good practice guidelines**

<b>Responding to a person who discloses a concern of abuse:</b>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> In an emergency ring 999</li> <li><input type="checkbox"/> Do ensure the safety of the individual and others if in immediate danger, contact the relevant emergency service.</li> <li><input type="checkbox"/> Do <b>not</b> be judgemental or jump to conclusions.</li> <li><input type="checkbox"/> Do listen carefully.</li> <li><input type="checkbox"/> Do provide support and information to meet their specific communication needs.</li> <li><input type="checkbox"/> Do use open questions.</li> <li><input type="checkbox"/> Do tell them that they did a good/right thing in telling you.</li> <li><input type="checkbox"/> Do tell them you are treating the information seriously.</li> <li><input type="checkbox"/> Do tell them it was not their fault.</li> <li><input type="checkbox"/> Do ask them what they need to keep themselves safe.</li> <li><input type="checkbox"/> Do <b>not</b> make promises you cannot keep</li> <li><input type="checkbox"/> Do <b>not</b> promise to keep secrets</li> <li><input type="checkbox"/></li> </ul>	<ul style="list-style-type: none"> <li>• Do seek consent to share the information with your lead for safeguarding, however lack of consent should not prevent you from reporting your concerns.</li> <li>• Do explain that you have a duty to tell your lead for safeguarding.</li> <li>• Do <b>not</b> confront the person alleged to have caused the harm as this could place you at risk, or provide an opportunity to destroy evidence, or intimidate the person alleged to have been harmed or witnesses.</li> <li>• Do explain that you will try to take steps to protect them from further abuse or neglect.</li> <li>• Do support and reassure the person.</li> <li>• Do preserve any forensic or other evidence.</li> </ul>
<b>Action after the concern of abuse has been recognised: (to be taken as soon as possible or within 4 hours)</b>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Report concerns to a lead for safeguarding or another designated person.</li> <li><input type="checkbox"/> Record your concerns and how they came to light, any information given by the person, information about any witnesses, the individual’s wishes, actions taken, who was present at the time, dates and times of incident(s).</li> <li><input type="checkbox"/> Record details of the person alleged to have caused harm.</li> <li><input type="checkbox"/> Do record any concerns about the person’s capacity to make any decisions and the reasons for the concerns.</li> </ul>	<ul style="list-style-type: none"> <li>• Do record whether the person is aware that the concerns have been reported.</li> <li>• Do record their perspective.</li> <li>• Do record any previous concerns about the person.</li> <li>• Do <b>not</b> breach confidentiality for example by telling friends, other work colleagues.</li> <li>• Do use Whistleblowing Procedures if you feel that you will not be believed, taken seriously or believe that your manager or lead for safeguarding may be causing the risks of abuse to the adult or child.</li> </ul>

## **How to respond: Information sharing and record keeping**

Safeguarding relies on good practice in order to be effective. In order to gain an accurate view of a situation, it may require putting pieces of information together. Information sharing is crucial to delivering efficient services that are coordinated around the needs of the individual. It enables early intervention and preventative work and for wider public protection, improving outcomes for all. High standards of record keeping, and information sharing are therefore essential.

### ***Information sharing***

The Council recognises that people need to be confident their personal information is kept safe and secure and that practitioners maintain their privacy, while sharing appropriate information to deliver better services. All information sharing should be in line with the Council's data protection requirements and the principles about sharing personal or confidential information set out in the Surrey Multi-Agency Information Sharing Protocol (MAISP). Further information is set out in Part 3 of this policy.

Data protection laws require compliance to ensure people's personal data is handled and protected in certain ways. Data protection is not an obstacle for information sharing in relation to safeguarding.

### ***Record keeping***

Good record keeping is an essential part of the accountability of organisations to those who use their services. Maintaining proper records is vital to individuals' care and safety. If records are inaccurate, future decisions may be wrong and harm may be caused to the individual. Where an allegation of abuse is made, all agencies have a responsibility to keep clear and accurate records. It is fundamental to ensure that evidence is protected and to show what action has been taken, what decisions have been made and why.

As soon as possible on the same day, make a written record of what you have seen, been told or have concerns about. Ensure anyone else who saw or heard anything relating to the concern also makes a written report.

### *A guide to making a record*

- The written report will need to include:
- the date and time when the disclosure was made, or when you were told about / witnessed the incident/s,
  - who was involved, any other witnesses including service-users and other staff, ○ exactly what happened or what you were told, in the person's own words, keeping it factual and not interpreting what you saw or were told,
  - the views and wishes of the adult
  - the appearance and behaviour of any persons involved ○ any injuries observed,
  - any actions and decisions taken at this point,
  - any other relevant information, e.g. previous incidents that have caused you concern.

Remember to:

- Include as much detail as possible.
- Make sure the written report is legible, written or printed in black ink, and is of a quality that can be photocopied.
- Make sure you have printed your name on the report and that it is signed and dated.
- Keep the report factual as far as possible. However, if it contains your opinion or an assessment, it should be clearly stated as such and be backed up by factual evidence. Information from another person should be clearly attributed to them.
- Keep the report/s confidential, storing them in a safe place until needed

### *How to respond: Allegations against staff, carers and volunteers*

All allegations of abuse or maltreatment of children or vulnerable adults by a professional, staff member or volunteer must be taken seriously and investigated. Just because someone does not wish to make a complaint following an allegation of abuse, this does not mean the allegation should not be considered and investigated. The Council will investigate any allegations of abuse in accordance with the Disciplinary or Grievance procedures.

The SSCP has specific procedures for dealing with allegations of abuse against children by staff or volunteers. These may be found on the SSCP website.

Surrey County Council has a statutory responsibility to have a **local authority designated officer (LADO)**, who is responsible for coordinating the response to concerns that an adult who works with children may have caused them harm.

**The LADO's key role is to:**

- Provide advice/guidance to employers or voluntary organisations
- Liaise with the police and other agencies including OFSTED and professional bodies such as the General Medical Council, HCPC and the College for Teaching and Leadership
- Monitor the progress of referrals to ensure they are dealt with as quickly as possible, consistent with a thorough and fair process
- Seek to resolve any inter-agency issues
- Collect strategic data and maintain a confidential database in relation to allegations
- Disseminate learning from LADO enquiries throughout the children's workforce.

Regardless of the nature of allegation, or who receives it, the allegation must be reported to the LADO. This must include situations where the worker resigns. Compromise agreements are not acceptable in such circumstances and may put others at risk in the future.

The LADO's contact details are in Appendix 1

# **PART 3 - Other related strategies policies and guidance**

## **Surrey wide strategies, policies and guidance**

A County-wide strategic approach to a number of policy areas, largely in relation to community safety, has been developed many of which are complemented or supported by local strategies and action plans. Relevant links are set out in Appendix 3.

### ***10 Surrey Multi-Agency Information Sharing Protocol***

The MAISP is an agreed set of principles about sharing personal or confidential information. It enables each organisation signed up to the protocol to understand the circumstances in which it should share information and what its responsibilities are. The MAISP has been developed in partnership with SCC, all the borough and districts as well as the health services and Surrey Police. The MAISP provides the overarching information sharing protocol and it is supported by service specific information sharing protocols where necessary, for example in relation to the MASH.

### ***11 Domestic Abuse (DA)***

Domestic abuse can be any incident of threatening behaviour, violence or abuse between adults who are, or have been, intimate partners, family members or members of the same household regardless of gender or sexuality. Domestic abuse is not limited to violent abuse; it can be physical, psychological, sexual, emotional or financial. Children's health and wellbeing can be seriously affected by living in households where there is any form of domestic abuse.

The county-wide Domestic Abuse Management Board has overall responsibility for the development and implementation of the [Surrey Against Domestic Abuse Strategy](#). The Community Safety partnership has Domestic Abuse reduction as one of its priorities.

### ***12 Child Criminal Exploitation (CCE)***

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Examples include; Gangs, County Lines, grooming and sexual exploitation (including Online), child trafficking, radicalisation and peer on peer abuse.

### **13. County lines**

A form of CCE where gangs and organised crime networks groom and exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs.

### **14. Child Sexual Exploitation (CSE)**

CSE is a form of Criminal Exploitation, it is the sexual abuse of a child or young person under 18 by an adult who involves them in inappropriate sexual activities with themselves or another person. The activity often takes place in exchange for money, alcohol, drugs, food, accommodation or presents. Online grooming is a type of CSE that affects both boys and girls across Surrey. Specialist police officers that work closely with partners such as, social care, youth services, including the borough and district councils, housing providers and the voluntary sector lead this area of work.

There is a County CSE strategy supported by local community safety partnership action plans.

### **15. Modern slavery and human trafficking**

The Modern Slavery Act 2015 imposed new duties on Councils to notify the Secretary of State of any individual who they believe is a suspected victim of slavery or human trafficking. There is a National Referral Mechanism (NRM) for victims of modern slavery and trafficking to ensure they receive appropriate help and support. The Council is working in partnership with the police and other agencies to address this and support the national strategy.

The Surrey Safeguarding Children's Partnership (SSCP) and Surrey Safeguarding Adults Board (SSAB) have developed guidance for professionals in relation to Modern Slavery and human trafficking, which are available on their websites.

The SSAB guidance highlights that trafficked adults are at increased risk of significant harm because they are largely invisible to the professionals and volunteers who would be in a position to assist them. The adults who traffic them take trouble to ensure that the adults do not come to the attention of the authorities, and either have no contact or disappear from contact with statutory services soon after arrival in the United Kingdom (UK), or in a new area within the UK.

The Council has developed advice and guidance on how to recognise victims of Modern Day Slavery and what to do if staff become concerned or aware (Appendix 4 page 55).

### **16. Missing Persons Protocol**

This is in place to ensure that there is a coordinated response from agencies when a vulnerable adult goes missing. This includes Surrey Police, Surrey & Borders Partnership Trust, and Surrey Care Association, SCC Adult social Care Services and Surrey Care providers and associated agencies. It provides guidelines to all parties as to what actions should be taken when a person receiving care goes missing. More information can be found on the Surrey Safeguarding Adults Board website.

### **17. People in a Position of Trust Protocol**

The Care Act 2014 requires that Safeguarding Adults Boards establish and agree a framework and process for any organisation to respond to allegation against anyone who works (in either a paid or unpaid capacity) with adults with care and support needs. SSAB have established a “Protocol” that applies to all their partner agencies and the organisations commissioned to provide services by them, so they can respond appropriately to allegations against people who, whether an employee, volunteer or student, paid or unpaid, works with or cares for adults with care and support needs. These individuals are known as **People in a Position of Trust (PiPoT)**. The protocol also requires partner agencies and the service providers they commission to identify a designated PiPoT lead or contact to oversee the delivery of responsibilities in their organisation.

### **18 Prevent Strategy**

The purpose of the Prevent strategy (2011) is to stop people becoming terrorists or supporting terrorism. Whilst the percentage of people willing to support violent extremism in the UK is small evidence identifies that terrorist and violent extremist organisations exploit vulnerabilities to spread their rhetoric and gain support. The UK government has identified factors that may lead to individuals supporting and/ or engaging in terrorist related activity. Understanding and targeting these factors is crucial to prevent radicalisation and minimise the risks it poses to the national security.

The government’s counter terrorism strategy is known as CONTEST (2011). There are four strands to CONTEST of which Prevent is one. The strands of the strategy are as follows:

**Pursue:** is concerned with the apprehension and arrest of any persons suspected of being engaged in the planning, preparation or commission of a terrorist act.

**Prevent:** is concerned with working with partners to reduce support for terrorism of all kinds, challenging and isolating extremists whose views are shared by terrorist organisations and challenging and isolating extremists operating on the internet.

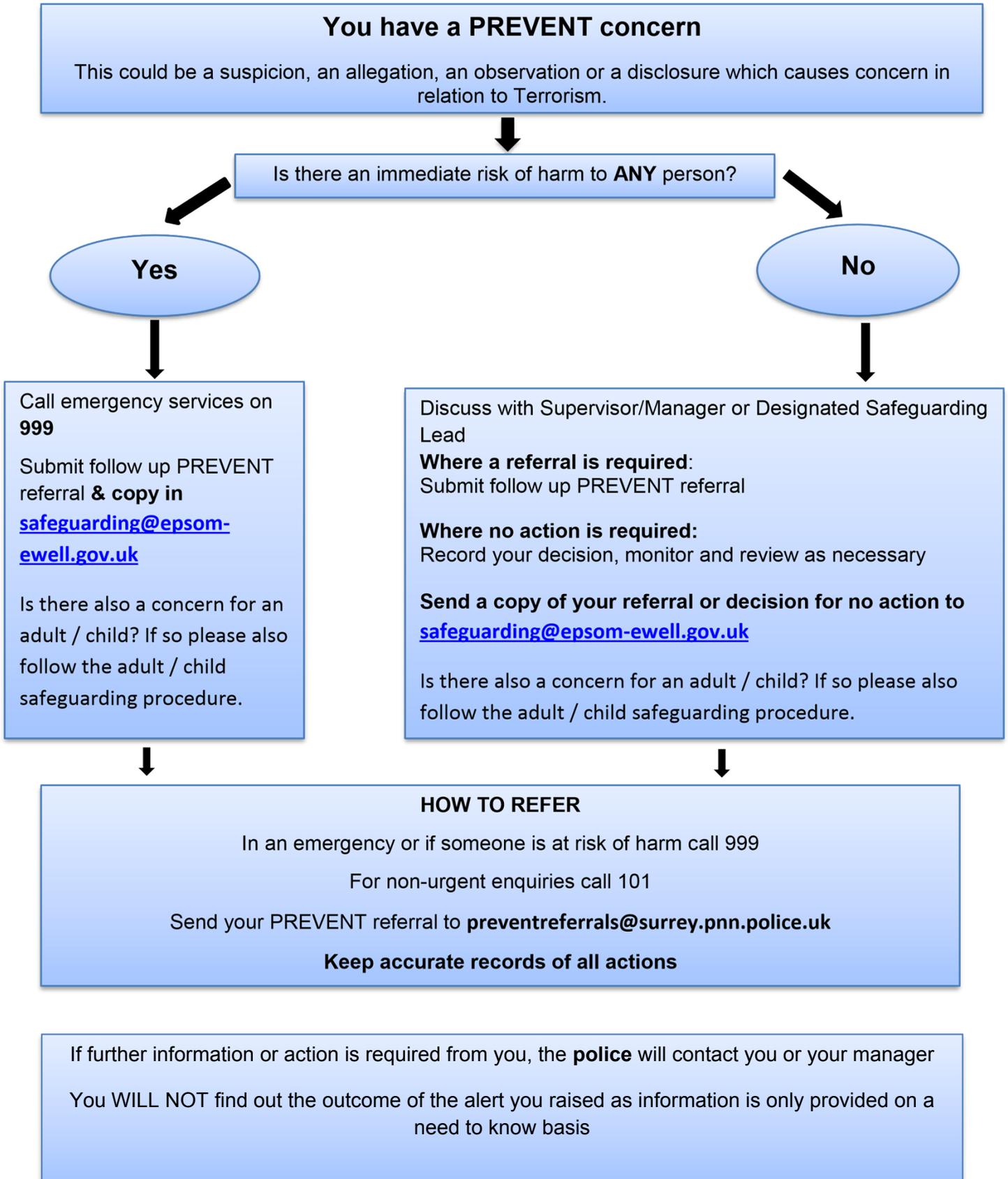
**Protect:** aims to strengthen our protection against a terrorist attack and reduce our vulnerability to such attacks. This involves managing the risks to crowded places and the safeguarding of hazardous materials.

**Prepare:** seeks to mitigate the impact of a terrorist attack where that attack cannot be stopped. This included work to bring a terrorist attack to an end and to increase our resilience so we can recover from its aftermath.

In Surrey the Surrey Prevent Executive Group (PEG) aims to have oversight of and coordinate Prevent work across the county by providing a strategic and coordinated approach. More information can be found for Surrey using [PREVENT strategy information](#) or the [Government PREVENT guidance](#).

The Epsom and Ewell Community Safety Partnerships have identified Prevent as a priority for the borough. A quick reference guide has been created for PREVENT referrals.

## Reporting a Terrorism / Extremism concern also known as a PREVENT referral: what should you do?



**Appendix 1: Safeguarding Leads and Other Useful Contacts****Epsom and Ewell Borough Council Safeguarding Leads**

<b>Head of Safeguarding</b>		
Rod Brown	Head of Housing & Community Safety	01372 732546

<b>Designated Safeguarding Lead &amp; Safeguarding Referrals (Safeguarding inbox and central records)</b>		
Francesca Hyde	Community Safety & Enforcement Officer	01372 732133
Oliver Nelson	Environmental Health Manager	01372 732406

**ALL SAFEGUARDING DISCUSSIONS AND CONCERNS MUST BE FORWARDED TO THE SAFEGUARDING EMAIL FOR THE COUNCILS CENTRAL RECORDS:**

**[safeguarding@epsom-ewell.gov.uk](mailto:safeguarding@epsom-ewell.gov.uk)**

<b>Multi Agency Safeguarding Hub (MASH) &amp; Child – Single Point of Access (C-SPA)</b>	
<b>Phone Number</b> (MASH, C-SPA & LADO)	0300 470 9100 (Open Monday-Friday, 9am-5pm)
<b>Out of hours number</b> (MASH, C-SPA & LADO)	01483 517898 (Open Friday 5pm – Monday 9am and 24 hours at weekends)
<b>MASH email</b> Concerns for an Adult	<a href="mailto:ascmash@surreycc.gov.uk">ascmash@surreycc.gov.uk</a>
<b>C-SPA email</b> Concerns for a child	<a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a>
<b>LADO</b> (Local Authority Designated Officer)	<a href="mailto:LADO@surreycc.gov.uk">LADO@surreycc.gov.uk</a>

## Appendix 2: Safeguarding Referral Forms



### Child Single Point of Access (C-SPA) Safeguarding Reporting Form

Referrer Details	
Date of Contact:	Time of contact:
Name of person making request:	
Job Title:	
Agency: Epsom and Ewell Borough Council	
Address:	Telephone:
	Email:

Consent
Requests for support from Children’s Services should be made with the knowledge and agreement of the family members being referred. The only exception to not seeking consent is: When there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, and/or when sharing information would undermine the prevention, detection or prosecution of a serious crime.
Does the parent/young person give consent for this support request? YES / NO
If not then why?

Details of the person involved in the safeguarding referral	
First Name:	Surname:
Date of Birth:	Gender:
Ethnicity:	Telephone:
Address:	

Household Details					
First Name	Surname	Date of Birth	Gender	Ethnicity	Relationship to the person

Other professionals involved (Include details of GP and school if known)			
Name	Job Title	Address	Telephone



## Child Single Point of Access (C-SPA) Safeguarding Reporting Form

Early Help Hub	
Have the Early Help Hub been contacted?	YES /NO
If an Early Help Assessment has been completed please attach it when sending the email.	
Advice given:	

Reason for the referral
Please provide details of the concern:
What are these concerns based on? (What information have you gathered?)
What services have been offered by the Council and/or other agencies and what were the outcomes?

Other Partners and Agencies involved			
Who have you discussed this with at the Council?			
Please state if you have made a referral to any of the following agencies			
Children’s Services	Yes/No	Adult Social Care	Yes/No
Mental Health Service	Yes/No	Police	Yes/No
Other (Please specify)			

Once this form has been completed please forward it to

[cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) and  
[safeguarding@epsom-ewell.gov.uk](mailto:safeguarding@epsom-ewell.gov.uk)



## Adult Multi Agency Safeguarding Hub (MASH) Safeguarding Reporting Form

Referrer Details	
Date of Contact:	Time of contact:
Name of person making request:	
Job Title:	
Agency: Epsom and Ewell Borough Council	
Address:	Telephone:
	Email:

Information for the referral
<p>If you have, a concern that an adult who has care and support needs is experiencing or at risk of experiencing abuse or neglect, please contact the Multi-Agency Safeguarding Hub (MASH) for advice and support.</p> <p><b>In an emergency, always dial 999 for the police.</b></p> <p>Multi Agency Safeguarding Hub (MASH)</p> <ul style="list-style-type: none"> <li>Contact the Multi Agency Safeguarding Hub (MASH): 0300 470 9100</li> <li>Email: <a href="mailto:ascmash@surreycc.gov.uk">ascmash@surreycc.gov.uk</a></li> <li>Out of hours Emergency Duty Team: 01483 517898</li> </ul> <p>Please use this form to notify Adult Social Care that you have a concern an adult is at risk of abuse or neglect (including self-neglect).</p> <p style="text-align: center;">CONSENT IS NOT REQUIRED TO SHARE YOUR CONCERNS REGARDING AN ADULT</p>

Details of the person involved in the safeguarding referral	
First Name:	Surname:
Date of Birth:	Gender:
Ethnicity:	Telephone:
Address:	

Household Details					
First Name	Surname	Date of Birth	Gender	Ethnicity	Relationship to the person



**Adult Multi Agency Safeguarding Hub (MASH) Safeguarding Reporting Form**

Other professionals involved (Include details of GP and school if known)			
Name	Job Title	Address	Telephone

Reason for the referral
Please provide details of the concern:
What are these concerns based on? (What information have you gathered?)
What services have been offered by the Council and/or other agencies and what were the outcomes?

Other Partners and Agencies involved			
Who have you discussed this with at the Council?			
Please state if you have made a referral to any of the following agencies			
Children’s Services	Yes/No	Adult Social Care	Yes/No
Mental Health Service	Yes/No	Police	Yes/No
Other (Please specify)			

**Once this form has been completed please forward it to**  
[ascmash@surreycc.gov.uk](mailto:ascmash@surreycc.gov.uk) and  
[safeguarding@epsom-ewell.gov.uk](mailto:safeguarding@epsom-ewell.gov.uk)

### Appendix 3: Useful Links

<b><i>Surrey Safeguarding Children Board</i></b>	
Surrey Safeguarding Children Partnership	<a href="https://www.surreyscp.org.uk/">https://www.surreyscp.org.uk/</a>
SSCP Procedures Manual	<a href="http://surreyscb.procedures.org.uk/">http://surreyscb.procedures.org.uk/</a>
Children Act 1989 and 2004 Statutory Guidance Working together to Safeguard Children 2018	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722307/Working_Together_to_Safeguard_Children_Statutory_framework_k.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722307/Working_Together_to_Safeguard_Children_Statutory_framework_k.pdf</a>
Effective Family Resilience Surrey Guidance for professionals on levels of need when working together with children and families to provide early help, targeted help and specialist help	<a href="https://www.surreyscp.org.uk/wp-content/uploads/2019/10/Effective-family-resilienceSSCB-Final-March-2019-1.pdf">https://www.surreyscp.org.uk/wp-content/uploads/2019/10/Effective-family-resilienceSSCB-Final-March-2019-1.pdf</a>
Dealing with Allegations against people who work with Children	<a href="https://www.surreyscp.org.uk/professionals/dealing-withallegations-against-people-who-work-with-children/">https://www.surreyscp.org.uk/professionals/dealing-withallegations-against-people-who-work-with-children/</a>
<b><i>Surrey Safeguarding Adults Board</i></b>	
Surrey Safeguarding Adults Board	<a href="https://www.surreysab.org.uk/">https://www.surreysab.org.uk/</a>
SSAB Safeguarding Adults policy and procedures	<a href="https://www.surreysab.org.uk/wp-content/uploads/2019/12/SSAB-Policy-and-Procedure2018-FINAL-v4.0-agreed-on-240518-updated04.12.19.pdf">https://www.surreysab.org.uk/wp-content/uploads/2019/12/SSAB-Policy-and-Procedure2018-FINAL-v4.0-agreed-on-240518-updated04.12.19.pdf</a>
Care Act 2014 Statutory Guidance	<a href="https://www.gov.uk/government/publications/care-actstatutory-guidance/care-and-support-statutory-guidance">https://www.gov.uk/government/publications/care-actstatutory-guidance/care-and-support-statutory-guidance</a>
<b><i>Community Safety</i></b>	
Surrey Community Safety (Health and Wellbeing Board)	<a href="https://www.healthysurrey.org.uk/community-safety">https://www.healthysurrey.org.uk/community-safety</a>
Epsom & Ewell Community Safety Partnership	<a href="https://www.epsom-ewell.gov.uk/residents/communities-healthand-wellbeing/epsom-and-ewell-community-safety">https://www.epsom-ewell.gov.uk/residents/communities-healthand-wellbeing/epsom-and-ewell-community-safety</a>
<b><i>Information sharing</i></b>	

HM Government Guidance on Information Sharing in Safeguarding	<a href="https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice">https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice</a>
Surrey Multi-Agency Information Sharing Protocol (MAISP)	<a href="https://www.surreycc.gov.uk/_data/assets/pdf_file/0006/23748/MAISP-Compliance-Template.pdf">https://www.surreycc.gov.uk/_data/assets/pdf_file/0006/23748/MAISP-Compliance-Template.pdf</a>
<b>Prevent Strategy</b>	
Prevent Duty- Government Guidance	<a href="https://www.gov.uk/government/publications/prevent-dutyguidance">https://www.gov.uk/government/publications/prevent-dutyguidance</a>
Surrey Prevent Strategy	<a href="https://www.healthysurrey.org.uk/communitysafety/prevent">https://www.healthysurrey.org.uk/communitysafety/prevent</a>
<b>Domestic Abuse</b>	
Surrey Domestic Abuse Strategy	<a href="https://www.healthysurrey.org.uk/domesticabuse/professionals/surrey-against-domestic-abusestrategy">https://www.healthysurrey.org.uk/domesticabuse/professionals/surrey-against-domestic-abusestrategy</a>
<b>Child Sexual Exploitation</b>	
SSCP CSE information	<a href="https://www.surreyscp.org.uk/resources-category/cse/">https://www.surreyscp.org.uk/resources-category/cse/</a>
SSCP CSE procedure Guide	<a href="http://surreyscb.procedures.org.uk/hkpzs/procedures-for-specific-circumstances/safeguarding-children-and-young-people-from-sexual-exploitation">http://surreyscb.procedures.org.uk/hkpzs/procedures-for-specific-circumstances/safeguarding-children-and-young-people-from-sexual-exploitation</a>
<b>Modern Slavery</b>	
Government Guidance and documents including referral forms	<p><i>Guidance for Specified Public Authorities Version 2.0 published 18 March 2016</i></p> <p><a href="https://www.gov.uk/government/collections/modernslavery-bill">https://www.gov.uk/government/collections/modernslavery-bill</a></p> <p>Duty to notify further information available via the links below:</p> <p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/560826/6.2286_HO_LL_factsheet_duty_to_notify_copy_V3.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/560826/6.2286_HO_LL_factsheet_duty_to_notify_copy_V3.pdf</a></p> <p>The Independent Anti-Slavery Commissioner <a href="http://antislaverycommissioner.co.uk">antislaverycommissioner.co.uk</a></p>

Government Guidance and documents including referral forms	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/560813/6.2286_HO_LL_Duty_of_notice_poster_2_v2.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/560813/6.2286_HO_LL_Duty_of_notice_poster_2_v2.pdf</a> <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/560821/6.2286_HO_LL_Duty_of_notice_poster_v2.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/560821/6.2286_HO_LL_Duty_of_notice_poster_v2.pdf</a>  Links to referrals form <a href="https://www.gov.uk/government/publications/humantrafficking-victims-referral-and-assessment-forms">https://www.gov.uk/government/publications/humantrafficking-victims-referral-and-assessment-forms</a>
SSCP Guidance on Modern Slavery	<a href="https://www.surreyscp.org.uk/?s=modern+slavery">https://www.surreyscp.org.uk/?s=modern+slavery</a>
<b><i>Council Policies and Procedures</i></b>	
<b><i>Employment and Recruitment</i></b>	
EEBC Recruitment and Selection Handbook	<a href="https://www.epsom-ewell.gov.uk/sites/default/files/images/careers/Recruitment-Brochure.pdf#search=recruitment">https://www.epsom-ewell.gov.uk/sites/default/files/images/careers/Recruitment-Brochure.pdf#search=recruitment</a>
Disclosure and Barring - Government Guidance	<a href="https://www.gov.uk/government/organisations/disclosureand-barring-service">https://www.gov.uk/government/organisations/disclosureand-barring-service</a>
<b><i>Training</i></b>	
SLP Learning Pool	<a href="https://slp.learningpool.com/login/index.php">https://slp.learningpool.com/login/index.php</a>
Surrey Safeguarding Childrens Board training	<a href="https://www.surreyscp.org.uk/sscb-multi-agency-trainingprogramme/">https://www.surreyscp.org.uk/sscb-multi-agency-trainingprogramme/</a>
Surrey Safeguarding Adults Board training	<a href="https://www.surreysab.org.uk/training/ssab-training-programme/">https://www.surreysab.org.uk/training/ssab-training-programme/</a>
<b><i>Whistleblowing</i></b>	<a href="https://www.epsom-ewell.gov.uk/council/about-council/antifraud-and-corruption-strategy">https://www.epsom-ewell.gov.uk/council/about-council/antifraud-and-corruption-strategy</a>
<b><i>Taxi Licensing</i></b>	<a href="https://www.epsom-ewell.gov.uk/taxis">https://www.epsom-ewell.gov.uk/taxis</a>

## Appendix 4: Forms of and indicators of abuse

### Physical abuse

Physical abuse includes 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*

1. Unexplained or inappropriately explained injuries;
2. Exhibiting untypical self-harm;
3. Unexplained cuts or scratches to mouth, lips, gums, eyes or external genitalia;
4. Unexplained bruising to the face, torso, arms, back, buttocks, thighs, in various stages of healing. Collections of bruises that form regular patterns which correspond to the shape of an object or which appear on several areas of the body;
5. Unexplained burns on unlikely areas of the body (e.g. soles of the feet, palms of the hands, back), immersion burns (from scalding in hot water/liquid), rope burns, burns from an electrical appliance;
6. Unexplained or inappropriately explained fractures at various stages of healing to any part of the body;
7. Medical problems that go unattended;
8. Sudden and unexplained urinary and/or faecal incontinence. Evidence of over/undermedication;
9. Flinches at physical contact;
10. Appears frightened or subdued in the presence of particular people;
11. Asks not to be hurt;
12. May repeat what the person causing harm has said (e.g. 'Shut up or I'll hit you');
13. Reluctance to undress or uncover parts of the body;
14. Wears clothes that cover all parts of their body or specific parts of their body;
15. An adult with capacity<sup>6</sup> not being allowed to go out of a care home when they ask to;
16. An adult without capacity not being allowed to be discharged at the request of an unpaid carer/family member.

### Domestic abuse

Domestic abuse includes psychological, physical, sexual, financial, emotional abuse, and 'honour' based violence.

In 2013, the Home Office announced changes to the definition of domestic abuse:

- Incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse... by someone who is or has been an intimate partner or family member regardless of gender or sexuality

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<sup>6</sup> The NHS defines capacity as "the ability to use and understand information to make a decision, and communicate any decision made. A person lacks capacity if their mind is impaired or disturbed in some way and this means the person is unable to make a decision at that time. <http://www.nhs.uk/Conditions/Consent-to-treatment/Pages/Capacity.aspx>

- Includes: psychological, physical, sexual, financial, emotional abuse, so called ‘honour’ based violence, Female Genital Mutilation, forced marriage.
- Age range extended down to 16.

Many people think that domestic abuse is about intimate partners, but it is clear that other family members are included and that much safeguarding work that occurs at home is, in fact is concerned with domestic abuse. This confirms that domestic abuse approaches and legislation can be considered safeguarding responses in appropriate cases.

Family members are defined as mother, father, son, daughter, brother, sister and grandparents, whether directly related, in-laws or stepfamily.

Forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties’ consent to the assistance of their parents or a third party in identifying a spouse.

In a situation where there is concern that an adult with care and support needs is being forced into a marriage they do not or cannot consent to, there will be an overlap between action taken under the forced marriage provisions and the adult safeguarding process. In this case action will be co-ordinated with the police and other relevant organisations. The police must always be contacted in such cases as urgent action may need to be taken.

The Anti-social Behaviour, Crime and Policing Act 2014 means it is now a criminal offence to force someone to marry. In addition, the Forced Marriage (Civil Protection) Act 2007 may be used to obtain a Forced Marriage Protection Order as a civil remedy.

Honour-based violence is a crime and referring to the police must always be considered. It has or may have been committed when families feel that dishonour has been brought to them. Women are predominantly (but not exclusively) the victims and the violence is often committed with a degree of collusion from family members and/or the community. Many of these victims will contact the police or other organisations. However, many others are so isolated and controlled that they are unable to seek help.

Safeguarding concerns that may indicate honour-based violence include domestic violence, concerns about forced marriage, enforced house arrest and missing person’s reports. If a safeguarding concern is raised, and there is a suspicion that the adult is the victim of honourbased violence, referring to the police must always be considered as they have the necessary expertise to manage the risk.

Female genital mutilation (FGM) involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act (FGMA) was introduced in 2003 and came into effect in March 2004. The Act makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is

lawful in another country. It also makes it illegal to aid, abet, counsel or procure the carrying out of FGM abroad.

### **Sexual abuse**

Sexual abuse including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault 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 etc.) may also constitute sexual abuse (see section on position of trust).

### **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 with care and support needs involves exploitative situations, contexts and relationships where adults with care and support needs (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.

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***

1. Untypical ambivalence, deference, passivity, resignation;
2. Appears anxious or withdrawn, especially in the presence of the alleged abuser;
3. Exhibits low self-esteem;
4. Untypical changes in behaviour (e.g. continence problems, sleep disturbance);
5. Not allowed visitors/phone calls;
6. Locked in a room/in their home;
7. Denied access to aids or equipment, (e.g. glasses, dentures, hearing aid, crutches, etc.);
8. Access to personal hygiene and toilet is restricted;
9. Movement is restricted by use of furniture or other equipment;
10. 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***

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

## 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.

Someone is in slavery if they are:

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

Contemporary slavery takes various forms and affects people of all ages, gender and races. 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 them.

If an identified victim of human trafficking is also an adult with care and support needs, the response will be co-ordinated under the adult safeguarding process. The police are the lead agency in managing responses to the victims of human trafficking. There is a national framework to assist in the formal identification and help to coordinate the referral of victims to appropriate services, known as the National Referral Mechanism.

### ***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. Whilst by no means exhaustive, this is a list of some common signs:

1. Not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else;
2. Has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred.
3. Looks malnourished, unkempt, or appears withdrawn
4. Have few personal possessions and often wear the same clothes
5. What clothes they do wear may not be suitable for their work.
6. Withdrawn or appears 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

7. They 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
8. Fear of authorities
9. Perceives themselves to be in debt to someone else or in a situation of dependence.

### ***Environmental indicators***

1. 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 tacked on from neighbouring properties or directly from power lines?
2. 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". The plan is available via: [www.gov.uk/government/publications](http://www.gov.uk/government/publications)

### ***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.
- May reject their own cultural background and/or racial origin or other personal beliefs, sexual practices or lifestyle choices
- Making complaints about the service not meeting their needs.

### ***Organisational abuse***

Including 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 their 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.

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 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 it 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 their community.

### ***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;
- hoarding large numbers of pets;
- neglecting household maintenance;
- portraying eccentric behaviour/lifestyles;
- NOTE: Poor environments and personal hygiene may be a matter of 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 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 with care and support needs. A wide range of people may harm others.

These include:

- a spouse/partner; other family members
- an adult with care and support needs;
- neighbours; friends; local residents;
- people who deliberately exploit adults they perceive as vulnerable to abuse; □ paid staff or professionals: and volunteers and strangers.

## Appendix 5: Glossary of Acronyms

CCE	Child Criminal Exploitation
CCG	Clinical Commissioning Groups
CONTEST	Counter-terrorism Strategy
CQC	Care Quality Commission
CSE	Child Sexual Exploitation
CSP	Community Safety Partnership
C-SPA	Children’s Single Point of Access
DA	Domestic Abuse
DBS	Disclosure and Barring Service
EEBC	Epsom and Ewell Borough Council
FGM	Female Genital Mutilation
FGMA	Female Genital Mutilation Act
HCPC	The Health and Care Professionals Council
HR	Human Resources
LADO	Local Authority’s Designated Officer
MASH	Multi Agency Safeguarding Hub
MAISP	Multi-Agency Information Sharing Protocol
MSP	Making Safeguarding Personal
NRM	National Referral Mechanism
OFSTED	Office for Standards in Education
PiPoT	Person in a Position of Trust
PEG	Prevent Executive Group
ROA	Rehabilitation of Offenders Act
SARs	Safeguarding Adults Reviews
SAB	Safeguarding Adults Board
SCC	Surrey County Council
SSAB	Surrey Safeguarding Adults Board
SSCB	Surrey Safeguarding Children Board
SSCP	Surrey Safeguarding Children’s Partnership
TfL	Transport for London
UK	United Kingdom