



Safeguarding Policy

DATE OF MEETING AGREED	Full Council 19.07.2022
DATE OF REVIEW	July 2023
SIGNED	

Introduction

Downham Market Town Council supports the ethos of 'making safeguarding personal'.

Safeguarding is an umbrella term for what we do to ensure all children and adults are safe from harm.

Safeguarding, in its broadest sense, is defined as 'To protect from harm'. The Council has a duty to ensure safeguarding is embedded within all services areas throughout the council.

We have a duty to children and vulnerable adults to include domestic abuse, exploitation, radicalisation, forced marriage, trafficking, modern slavery and female genital mutilation.

Policy statement

Downham Market Town Council provides a wide range of services and facilities.

This Policy aims to ensure the Council protects the welfare of all children, young people and vulnerable adults by:

- Raising awareness of safeguarding responsibilities, amongst officers, Elected Members, volunteers and contractors.
- Ensuring that everyone within the Council understands their roles and responsibilities with regards to safeguarding
- Considering the rights and viewpoints of children, young people and vulnerable adults in the council's decision making
- Establishing and embedding robust processes and procedures as a clear mechanism to report concerns
- Identifying and responding appropriately to any safeguarding concerns, incidents or allegations raised
- Establishing and facilitating regular awareness and training, to employees, Elected Members, contractors and volunteers that is appropriate to their role and level of involvement with children, young people and vulnerable adults
- Maintaining and undertaking recognised vetting procedures (DBS) appropriate to the roles held by staff and volunteers
- Ensuring that organisations the Council contracts with or receives services from have appropriate safeguarding processes and protocols in place to undertake suitable vetting procedures
- Taking all responsible steps to ensure individuals who are disbarred, are prevented from working with children, young people and vulnerable adults
- Reviewing this policy and any associated procedures on a regular basis

Scope

This policy applies to all Downham Market Town Council employees, Elected Members, and volunteers working directly on behalf of DMTC.

All contracted and or grant funded organisations delivering services on behalf of DMTC, must adhere to the core principles of this policy, when carrying out core functions on behalf of DMTC.

In addition, any such organisation is required to have their own agreed internal Safeguarding processes and procedures in place.

All the above are required to comply with this policy and any associated procedures.

It is the dual responsibility of any signatories to such contracts, service level or grant agreements to ensure the compliance with, and reporting of, any discrepancies or concerns, to the Town Clerk within the Council.

It may be necessary on occasions that some functions and service areas require additional policies, processes and training. It is the responsibility of the Town Clerk, in consultation with the Norfolk County Council to assess any additional needs.

Safeguarding Definitions

Abuse – “an act or omission of an individual’s human and civil rights by any other person. Abuse may consist of a single or repeated act, it may be physical, verbal or psychological, or an act of neglect or omission to do something.

Adverse Childhood Experiences (ACEs) – are a stressful events occurring in childhood; including, domestic violence, parental separation or divorce, a parent with a mental health condition, being the victim of abuse or neglect, a member of the household being in prison, a member of the household experiencing alcohol and drug problems. ACEs have been found to have lifelong impacts on health and behaviour.

Children and young people – refer to anyone under the age of 18 It may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction which he or she has not consented or cannot consent to. Abuse can occur in any relationship and may result in significant harm to, or exploitation or, the person subjected to it. ” (No Secrets Guidance 2000)

Coercive behaviour - Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used by the abuser to harm, punish, or frighten their victim.

Contextual Safeguarding – assessing contexts in which abuse occurs, including peer groups, schools and public spaces. Speaking with young people about their feelings of safety in public and private spaces and how their behaviour changes in those different contexts.

Controlling behaviour – is a range of actions designed to make a person dependant by isolating them from sources of support, depriving and exploiting them for personal gain. Controlling behaviour is a range of acts performed by the abuser and designed to make their victim subordinate and/or dependent. These acts include but are not limited to:

- isolating the victim from sources of support
- exploiting the victim's resources and capacities for personal gain
- depriving the victim of the means needed for independence, resistance and escape
- regulating the victim's everyday behaviour

Domestic abuse - any incident or pattern of incidents of controlling coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of gender or sexuality.

Domestic abuse can also impact on other people within a household where it is experienced. For example, violence, fear and intimidation may have an indirect impact on other people such as children or vulnerable adults who could suffer due to witnessing or hearing incidents. Domestic abuse is categorised by any incident or pattern of incidents of

controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- physical
- emotional
- psychological
- sexual
- financial

This definition includes honour-based abuse and forced marriage and is clear that victims are not confined to one gender or ethnic group. The frequency and severity of domestic violence can vary dramatically, just one encounter counts as abuse, and it can be an ongoing pattern of behaviour. However, the one constant element of domestic abuse is the abuser's consistent efforts to maintain power and control over the victim.

Emotional Abuse or Psychological Abuse and Mental Abuse

Emotional, psychological and mental abuse are often closely linked terms that can be used interchangeably. The aim of the perpetrator of emotional abuse in relationships is to reduce confidence and esteem in order to make their victim increasingly reliant on them. They use tactics such as intimidation, bullying, constant criticism and keeping someone isolated from family and friends in order to exert control. Emotional abuse in relationships is often a means of controlling the victim by having a strong mental hold over them.

Exploitation – can be summarised as treating someone unfairly for your own advantage. It is often referred to in terms of child/criminal or sexual exploitation (CSE) but is not exclusive to young people.

Female Genital Mutilation (FGM) - is a term used to describe procedures that include the partial or total removal of the external genital organs, such as excision or infibulation. This collective term also covers injury to the genitalia for a cultural or non-medical reason.

Female Genital Mutilation (FGM)

A collective term used for illegal procedures, such as female circumcision, which include the partial or total removal of the external female genital organs, breast ironing or injury to the female genital organs for a cultural or non-therapeutic reason.

Honour Based Abuse Honour Based Abuse (HBA)

HBA is violence and abuse in the name of honour, covering a variety of behaviours (including crimes), mainly but not exclusively against females, where the person is being punished by their family and/or community for a perceived transgression against the 'honour' of the family or community, or is required to undergo certain activities or procedures in 'honour' of the family. It is a form of domestic abuse which relates to a victim who does not abide by the 'rules' of an honour code. This will have been set at the

discretion of relatives or community; the victims are punished for bringing shame on the family or community.

Honour-Based Violence and Forced Marriage - 'Honour based' violence is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. Forced Marriage is the act of pressuring someone to marry against their will. Forced marriages can occur in this country or abroad, and differs significantly from an arranged marriage, which is entered into freely by both people, despite their families taking a leading role in the choice of partner. Chapter 12 part 10 of The Anti-Social Behaviour, Crime and Policing Act 2014 made, from 16 June 2014, parents who force their children to marry liable to be punished by up to seven years in prison. The new law also applies to UK nationals overseas who are at risk of becoming the victim of a forced marriage. Forced Marriage (FM) In a forced marriage, victims are coerced into marrying someone against their will. They may be physically threatened or emotionally blackmailed to do so. It is an abuse of human rights and cannot be justified on any religious or cultural basis. It's not the same as an arranged marriage where people have a choice as to whether to accept the arrangement or not. The tradition of arranged marriages has operated successfully within many communities and countries for a very long time.

Human Trafficking – also known as 'Modern Slavery' – involves the recruitment, transfer, harbouring or receipt of people, with the threat or use of force, coercion, abuse of power or deception are exploited for the purposes of prostitution, forced labour, slavery or similar practices. Slavery, servitude and forced or compulsory labour. A person commits an offence if:

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

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:

- Forced to work – through mental or physical threat
- Owned or controlled by an "employer", usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as property
- Physically constrained or has restrictions placed on his/her freedom of movement
- Subject to human trafficking Most common forms of Human Trafficking and Modern Slavery Sexual - when someone is deceived, coerced or forced to take part in sexual activity.

Labour - This refers to situations where people are coerced to work for little or no remuneration, often under threat of punishment. There are a number of means through which a person can be coerced.

Domestic Servitude- A domestic worker or helper is a person who works within their employer's home, performing a variety of tasks. This arrangement becomes exploitative when there are restrictions on the domestic worker's movement, and they are forced to work long hours for little pay.

Forced Marriage - This is when a person is put under pressure to marry someone. They may be threatened with physical or sexual violence or placed under emotional or psychological distress to achieve these aims.

Forced Criminality - This is when somebody is forced to carry out criminal activity through coercion or deception.

Contemporary slavery takes various forms and affects people of all ages, gender and race. Adults who are enslaved are not always subject to human trafficking. Recent court cases have found homeless adults promised paid work opportunities enslaved and forced to work and live in dehumanising conditions, and adults with a learning difficulty restricted in their movements and threatened to hand over their finances and work for no gains.

From 1 November 2015, specified public authorities have a duty to notify the Secretary of State of any person identified in England and Wales as a suspected victim of slavery or human trafficking, under Section 52 Modern Slavery Act 2015.

Physical abuse and sexual abuse

Physical abuse is the use of physical force against someone in a way that injures or endangers that person. The police have the power and authority to protect you from physical attack.

Sexual abuse is a form of physical abuse. Forced sex, even by a spouse or intimate partner with whom you also have consensual sex, is an act of aggression and violence.

Prevent – relates to the National Counter Terrorism agenda, where 'Prevent' is one of four delivery strands, aimed at raising awareness and training around safeguarding someone from becoming involved in terrorism, or being persuaded to be involved due to being vulnerable.

CONTEST is the national counter terrorism strategy. The aim of CONTEST is to reduce the risk to the United Kingdom and its interests overseas from international terrorism, so that people can go about their lives freely and with confidence. The Office for Security and Counter Terrorism (OSCT) is responsible for providing strategic direction and governance on CONTEST.

The strategy has four work streams:

1 Prevent: to stop people becoming terrorists or supporting terrorism

2 Pursue: to stop terrorist attacks

3 Protect: to strengthen our protection against terrorist attack

4 Prepare: where an attack cannot be stopped, to mitigate its impact

The objectives of the Prevent work stream are to:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation which we need to address.

In relation to Local Authorities, the CONTEST document says'

Delivery of Prevent is locally led and driven by analysis of the threat in communities. Local authorities are among the most vital partners in our network. The Prevent duty requires local authorities to establish or make use of existing multi-agency groups to assess the local picture, coordinate activity and to put in place arrangements to monitor the impact of safeguarding work. In priority areas where the risk of radicalisation is assessed as being highest, Prevent coordinators employed by local authorities build partnerships in communities, oversee the delivery of local action plans to respond to the risk of radicalisation, and work with partners to embed safeguarding activity in statutory services including social care, health and education.

The Channel programme was developed as a key part of the Prevent strategy. Channel is a Home Office funded programme to utilise the existing partnership working and expertise between the police, local authority, other partner agencies and the local community in the form of a professionals panel to identify those at risk of being drawn into terrorism or violent extremism and to provide them with community-based safeguarding strategies and interventions. Prevent will address all forms of terrorism but continue to prioritise according to the threat posed to our national security.

Safeguarding – includes all forms of activity that aims to protect or promote the welfare of a group of people or an individual.

Vulnerable adult – refers to anyone over the age of 18, and could be considered 'vulnerable' when (for reasons of mental health, learning, physical disability, age, illness or another personal characteristic) requires a form of intervention or community care to take care of themselves, or are unable to protect themselves from harm or exploitation. This may also include having money stolen or taken under duress.

Roles and Responsibilities of the Council

Downham Market Town Council sees safeguarding in the broadest sense as 'To protect from harm'.

We have several duties to support the safeguarding of children and vulnerable adults. This extends to domestic abuse, modern slavery, trafficking and exploitation.

External organisations, contractors and volunteers providing services to, or on behalf of, Downham Market Town Council, are also required to comply with this policy and ensure any discrepancies or concerns are reported to the designated safeguarding officers within the council.

Requirements for specific circumstances

The council funds and assists others to undertake functions on Council property or land. It is important that any individuals or organisations that the Council liaises with have an awareness of safeguarding and that council property and open spaces are wherever possible designed to promote safety and wellbeing.

Facility Hire and Events

The Council is responsible for managing the Market, Town Hall, Jubilee Community Centre and Jubilee Sports Centre. Any club, charity, community group or business who regularly hires out Council facilities, should have appropriate child, young person and vulnerable adult procedures in place. They should also ensure any volunteer or employee that has unsupervised contact with children, young people or vulnerable adults undertakes a DBS check.

Any Safeguarding concerns on Council land or facilities should be reported to the Town Clerk at Downham Market Town Council. (Not negating a need to call Police in a safeguarding emergency)

The Town Clerk can provide further advice and support to groups or organisations.

Protecting children from harm is a licensing objective under the premises licence that the Council is legally obliged to meet. All hirers must operate within current legislation including the Licensing Act 2003 or Gambling Act 2005.

Grant applications

Safeguarding policies and procedures are required from all grant funded organisations.

Satisfactory DBS checks for employees and volunteers are also requested of any organisation or group, working with children, young people and vulnerable adults who seek funding from Downham Market Town Council.

As a minimum, an organisation will be expected to have a policy statement or procedure relating to safeguarding.

Recognising abuse

Any Council employee, member, volunteer or contracted service provider, who has contact with people or who works where people may have access, could potentially meet someone who experiences a form of abuse and they may be required to make a safeguarding report.

Responsibilities under this policy are to report concerns to the Town Clerk. It is not the responsibility of the person who suspects or has witnessed abuse, to make a judgement or to investigate. This will be the responsibility of the Police and / or Norfolk County Council Safeguarding team.

Safeguarding concerns will usually fall into one or more of these categories: and could happen to any child, young person or vulnerable adult.

Several different types of abuse may be being committed at the same time.

Type of abuse	Description	Possible indicator(s)
<p><u>Emotional or psychological</u> Emotional acts or behaviour resulting in distress or trauma.</p>	<ul style="list-style-type: none"> ● Bullying, intimidation, manipulation ● Humiliation, shaming and ridicule ● Control or coercion ● Deliberate isolation ● Deprivation ● Threats of harm or abandonment 	<ul style="list-style-type: none"> ● Disturbed sleep and tendency to withdraw ● Loss of confidence ● Loss of appetite, loss of weight ● Anxiety, confusion ● Extreme submissiveness ● Changes in behaviour ● Excessive craving for attention ● Self-abusing behaviour, self-harming
<p><u>Sexual</u> Direct or indirect involvement with sexual activity, under duress or without consent / ability to consent.</p>	<ul style="list-style-type: none"> ● Rape ● Indecent assault ● Indecent exposure ● Exposure to inappropriate material 	<ul style="list-style-type: none"> ● Unexplained changes in behaviour ● New tendency to withdraw ● Recent development of overly sexual behaviour ● Deliberate self-harm ● Incontinence / bed wetting ● Disturbed sleep patterns ● Discomfort in walking ● Unexplained bruising, injuries in personal areas ● Excessive washing ● Stained or torn clothes ● Sexually transmitted or urinary tract infections ● Pregnancy
<p><u>Physical</u> Non accidental infliction of force resulting in injury or impairment</p>	<ul style="list-style-type: none"> ● Inflicted physical injury not satisfactorily explained ● Injury where it is known or suspected that it was inflicted 	<ul style="list-style-type: none"> ● Injury that is inconsistent with explanation given ● Cowering and flinching ● Bruises/ marks

	<p>intentionally or through lack of care</p> <ul style="list-style-type: none"> ● Assaults, hitting, slapping, pushing, kicking, burns, abrasions, fractures, welts, mutilation, wounds or marks of physical restraint ● Misuse of medication or medical processes ● Inappropriate restraint 	<ul style="list-style-type: none"> ● Abrasions, especially to wrists and / or ankles ● Unexplained burns, scalds or fractures ● Hair loss in one area ● Frequent minor incidents without seeking help ● Unusually sleepy or docile ● Frequently moving GP or care providers ● Emotional distress, low self esteem
<p><u>Neglect or acts of omission</u> Ignoring or withholding physical or medical care to the detriment of wellbeing</p>	<ul style="list-style-type: none"> ● Failure of a person who has responsibility, care or custody to provide access to health, social or educational care services (unintentional or deliberate) ● Withholding necessities of life, including nutrition, medication, heating, shelter ● Failure to intervene 	<ul style="list-style-type: none"> ● Poor hygiene or cleanliness ● Unkempt or unsuitable clothing for the weather conditions/ environment ● Untreated illness ● Dehydration, weight loss, malnutrition, hunger ● Repeated infections ● Unexplained trips/ falls ● Incontinence issues not addressed ● Inconsistent or reluctant contact with health or social care agencies ● Withholding needed items such as hearing aids, glasses, medication etc
<p><u>Financial</u> Unauthorised or fraudulent obtaining and improper use of funds, property or resources</p>	<ul style="list-style-type: none"> ● Misuse or misappropriation of property, possessions or benefits ● Theft, fraud, exploitation ● Pressure in connection with wills, property or inheritance ● Extortion of money, property or possessions by threat, coercion or fraudulent means ● Refusal to let the vulnerable person have access to their own money, property or possessions 	<ul style="list-style-type: none"> ● Unexplained or sudden inability to pay bills ● Unexplained or sudden withdrawal of money from accounts ● Personal possessions of value go missing without explanation ● Contrast between known income and actual living conditions ● Someone responsible for paying bills is not doing so ● Unusual interest by a relative, friend or neighbour in financial assets ● Where services are refused under pressure from potential beneficiaries ● Unusual purchases unrelated to the known interests of vulnerable person

<p><u>Discriminatory</u> When values, beliefs or culture result in a misuse of power that denies opportunities</p>	<ul style="list-style-type: none"> ● Unequal treatment ● Inappropriate use of language ● Exclusion ● Harassment 	<ul style="list-style-type: none"> ● The vulnerable person is subject to racist, sexist, gender or homophobic abuse or relating to their age, illness or disability ● Not meeting cultural or religious needs ● Imposing unwanted political, cultural or religious beliefs ● Acts or comments motivated to harm or intimidate ● Inciting others to commit abuse ● Lack of effective interpreter provision
<p><u>Institutional</u> When the culture of the organisation, such as a care or medical facility, doesn't prioritise care</p>	<ul style="list-style-type: none"> ● Abuse due to imposing rigid and insensitive regimes or routines ● Poor practices embedded in systems ● Unskilled or untrained staff ● Intrusive or evasive interventions ● Environment allowing inadequate privacy or comfort 	<ul style="list-style-type: none"> ● Lack of or inappropriate care plans ● Contact with the outside world not encouraged ● Restricting visitors ● Not accounting for individual preferences ● Lack of choice or consultation ● Lack of privacy ● Subdued behaviour ● Lack of personal clothing/ belongings ● Strong smell of urine, linen not changed regularly ● Furniture positioned to restrict movement
<p><u>Digital exploitation</u> Dissemination or transmission in non-analogue form of personal data</p>	<ul style="list-style-type: none"> ● Increased exposure to online activities due to World Pandemic ● Negative influences ● Promotion of hateful views, for example through conspiracy theories 	<ul style="list-style-type: none"> ● Exploring new and unusual websites, chat forums and platforms. Harmful influences may push individuals towards platforms with a greater degree of anonymity. ● Joining new or secret groups since isolation. ● Speaking with new friends or being secretive about chats during online gaming or in forums. ● A strong desire to seek new meaning, identity and purpose. ● Using language, you wouldn't expect them to know.

		<ul style="list-style-type: none">● Watching, sharing or creating films online linked to religious, political or racial hate.● Becoming increasingly argumentative or refusing to listen to different points of view.
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Reporting process

The process for reporting safeguarding concerns needs to be simple and streamlined.

The same process applies to an employee, member, contractor or volunteer undertaking any services for Downham Market Town Council to report ANY safeguarding concern, whether it is about a child, young person or vulnerable adult.

Having one simple process ensures that all safeguarding concerns are discussed and reported in the same way to the appropriate specialist service to investigate further. When the person reporting the concern does, they may only have one piece of the bigger picture.

It is always advised, where possible, to try and obtain consent of the person who the concern is about, and notify them of any referral, although this is not always possible and may put someone at further risk. Each situation needs to be considered individually and carefully.

All employees, members, contractors and volunteers are trained and advised to report their concerns to the Town Clerk in the first instance and then the safeguarding officer at Norfolk County Council for recording purposes or guidance.

The Downham Market Town Council is NOT a 24 hour service and safeguarding concerns do not always happen during office hours. If it is suspected a person is or could be in significant and immediate harm, then then information should be passed on immediately to the Police by calling 999. The Town Clerk can be notified after. Social services out of hours for both Children and Adults can be contacted on:

0344 800 8020

Child - [Report concerns - Norfolk County Council](#)

Adult - [Report a concern - Safeguarding - Norfolk County Council](#)

Police – 999

Recruitment and employment

Downham Market Town Council has a duty to ensure that all, employees, members, volunteers and contracted service providers have the relevant level of safeguarding checks because they may have contact with children, young people and vulnerable adults.

A DBS check helps DMTC as employers make safer recruitment decisions, and prevents unsuitable candidates working with potentially vulnerable people. Each job has been discussed and agreed with our HR department and assigned a level of DBS check to take place during the early stages of the employment process.

Confirmation of employment for all new employees is subject to satisfactory checks and references in line with Downham Market Town Council's Recruitment and Selection Policy and Procedure, and the Disclosure and Barring Service (DBS) Policy.

Each role within the organisation, including that of members, volunteers and service contractors will be categorised depending on level of contact. A level of vetting and assessment is then required for roles where there is likely or regular unsupervised contact with children, young people and vulnerable adults.

This list is maintained and reviewed annually by the Town Clerk or as required following any changes to roles and responsibilities.

There is no Government guidance regarding how often these checks should be completed however DMTC will ensure that all DBS checks are reviewed as best practise every 3 years.

What information is disclosed on a basic DBS certificate?

A basic check will contain details of convictions and conditional cautions considered to be 'unspent' under the terms of the Rehabilitation of Offenders Act 1974.

The Rehabilitation of Offenders Act 1974 aims to give those with convictions or cautions the chance - in certain circumstances - to wipe the slate clean and start afresh.

Under the Act, eligible convictions or cautions become 'spent' after a specified period of time known as the 'rehabilitation period', the length of which varies depending on how the individual was dealt with.

A table of rehabilitation periods for the most common sentences and disposals can be found here:

[Rehabilitation Periods - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/rehabilitation-periods)

Training and Supervision

The Council has a responsibility to ensure that all employees, members, contractors or volunteers have an awareness of what safeguarding is, appropriate to their role and level of contact with children, young people and vulnerable adults.

The Council will provide biennial training to employees, members and volunteers.

Induction of new starters

All new starters are expected to familiarise themselves with the Safeguarding Policy.

This is included in the induction and forms part of the initial discussions with the Town Clerk.