



North Norfolk District Council

Safeguarding Policy

for

Children, Young People

and

Adults with care and support needs

December 2016



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1. Introduction

Safeguarding is a term which is broader than child and adult protection. It relates to actions taken to promote the welfare and the protection from abuse, neglect and exploitation of all children, young people and adults with needs for care and support (vulnerable adults) irrespective of age, gender, religion or belief, race, class, culture, ethnicity or sexual orientation.

North Norfolk District Council (NNDC) is not a direct provider of social care services for children or adults with needs for care and support. However, the Council is committed to fulfilling its legal and moral duty to safeguard children, young people and adults with needs for care and support from harm and abuse.

NNDC's Head of Paid Service has overall accountability for ensuring that the Council fulfils its safeguarding duties responsibilities. Specific responsibility is for ensuring NNDC meets its legal and moral safeguarding duties is delegated to Designated Child Protection Officers however NNDC recognises that safeguarding is the corporate responsibility of every employee, elected Members, organisations and contractors who work for or provide services on behalf of NNDC.

2. Safeguarding Legislation

The requirement and generic safeguarding duties for NNDC as a local authority are identified within the following legislation:

- **The Children Act 2004** – Section 11: Provide Arrangements to safeguard and promote welfare. Further information can be found in the government document **Working Together to Safeguard Children 2015**
- **The Care Act 2014** – Promote that individual's wellbeing including Protection from abuse and neglect.
- **PREVENT** duty under **The Counter Terrorism and Security Act 2015** - Section 26: A specified authority must have due regard to the need to prevent people from being drawn into terrorism.
- **The Equality Act 2010 – Public Sector Equality Duty:** To have due regard to the need to:
 - 1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - 2. Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it
 - 3. Foster good relations between people who share and relevant protected characteristic and those who do not share it.The nine protected characteristics covered by the act are; Age, Disability, Gender reassignment, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation, Marriage and Civil Partnership.
- **The Modern Slavery Act 2015:** A local authority is required to notify the government where they have reasonable grounds to believe that a person may be a victim of slavery or human trafficking.
- **Mandatory reporting duty for Female Genital Mutilation (FGM) under The Serious Crime Act 2015:** The duty applies to healthcare, social work or teaching professionals but the legislation states that non-regulated practitioners also have a responsibility to take appropriate safeguarding action in relation to any identified or suspected case of FGM, in line with wider safeguarding frameworks.

To fulfil these generic duties NNDC works in partnership with other statutory and voluntary organisations involved in the protection of children and adults with needs for care and support to promote safeguarding and protect them against abuse, neglect and exploitation. NNDC officers attend multi organisational thematic and geographic Safeguarding Groups for both children and adults with needs for care and support. Safeguarding legislation and representation on these groups helps shape

and inform NNDC's response to Safeguarding. NNDC also works with the North Norfolk Early Help Hub based at the District Council offices in Cromer. It offers a venue and the opportunity for statutory and voluntary organisations that support people of all ages to work together and share knowledge, get advice and information or make referrals for support to other organisations.

3. Housing and Licencing Safeguarding Responsibilities

NNDC also has specific safeguarding duties in relation to:

3.1 Homelessness

North Norfolk District Council has a legal duty to provide temporary accommodation to individuals whose status and circumstances meet certain criteria as defined by statute. In addition to the responding to safeguarding concerns, allegations and disclosures identified in Section 7, NNDC officers may need to make a safeguarding referral in the following circumstances:

Homeless 16 – 17 year olds

A 16 or 17 year old may be referred to the MASH for assessment to determine if they are a child in need with a duty owed to them by Norfolk County Council.

Intentionally homeless household with children

If a household with children is found to be intentionally homeless, a referral will be sent to the MASH so they can ascertain whether a duty is owed under the Children Act 1989.

4. Licensing

North Norfolk District Council is responsible for carrying out a range of licencing functions. Protection from harm is a licensing objective that the Council is legally obliged to consider as part of its licensing function particularly when licensing premises under the licensing Act 2003 or the Gambling Act 2005.

5. Policy Statement

This overarching Safeguarding Policy which covers children, young people and adults with needs for care and support aims to ensure that a consistent approach to safeguarding, the implementation of safeguarding policies and procedures and the dissemination of learning from relevant external Domestic Homicide and Serious Case Reviews is embedded across NNDC. The processes and procedures identified within the policy apply to all staff, elected Members and organisations or contractors working for or on behalf of NNDC.

NNDC will achieve this by ensuring:

- The views of children, young people and adults with needs for care and support are respected and listened to.
- The implementation of "Safer Recruitment Procedures" such as the Norfolk Safeguarding Children's Board Recruitment Guidance 2013 to prevent unsuitable people from working with children, young people and adults with needs for care and support.
- Safeguarding forms part of the new officer and Member induction process.
- Employees in job roles which have been identified as having direct contact with children, young people and adults with needs for care and support will be subject to the appropriate level Disclosure and Barring Service (DBS) checks.
- Safeguarding training appropriate to the level of involvement with children, young people and adults with needs for care and support will be available to all employees.
- Officers and elected Members are aware of their responsibilities in relation to safeguarding and how to access the Safeguarding Policy.
- Implementation of effective procedures for recording, reporting and monitoring any safeguarding concerns, incidents or suspicions of abuse.

- Any safeguarding concerns raised by an employee, Member, contractor, member of the public, child, young person or adult with needs for care and support will be responded to and dealt with appropriately and sensitively.
- The promotion of a safe and healthy environment within all our services, avoiding situations where abuse or allegations of abuse may occur.
- Safeguarding allegations regarding officers, Members or contractors are dealt with appropriately and sensitively through the implementation of formal appropriate procedures and processes.
- Appropriate safeguarding governance arrangements including the identification of a designated safeguarding officer.
- Reporting mechanisms to disseminate safeguarding information appropriately throughout NNDC.
- Appropriate engagement with the Norfolk Safeguarding Children Board (NSCB), sub groups and relevant partner agencies.
- The Safeguarding Policy will be regularly reviewed to ensure it reflects changes in safeguarding legislation, duties and responsibilities.

6. Definitions

- The term children or young people is used to refer to anyone under the age of 18 years (including unborn babies).
- The term adult with needs for care and support is used to refer to anyone over the age of 18 years who by reason of disability, age or illness; is or may be unable to take care of or protect themselves against abuse, neglect, harm or exploitation.
- The term parent is used as a generic term to represent parents, carers and guardians.
- The term staff. Members and contractors is used to refer to employees, seasonal or temporary workers, Councillors, contractors and anyone working on behalf of and/or representing the Council.

7. Safeguarding Themes

There are many different types of abuse, neglect and exploitation which would give rise to a safeguarding concern for children, young people or adults with needs for care and support. These include:

•Abuse and Neglect

Abuse and neglect may occur when a person(s) intentionally or unintentionally inflicts harm or fails to prevent harm. Abuse and neglect can occur within a family or a community or institutional setting. Children, young people and adults with needs for care and support are more likely to be abused or neglected by someone known to them.

Main Forms of Abuse

There are seven main forms of abuse:

- Physical Abuse – physical harm or injury caused by hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or deliberately causing a person to become ill. Physical abuse can be a deliberate act or can be caused by omission or a failure to protect.
- Emotional Abuse – persistent, emotional ill treatment that causes severe and persistent adverse effects on emotional development. A person could feel frightened in case they did something perceived to be wrong or be made to believe that they are useless, worthless, unloved or inadequate. It may feature the imposition of age or developmentally inappropriate expectations.
- Sexual Abuse - involves forcing a person to take part in sexual activities, whether or not they are aware of, or consent to, what is happening. The activities may involve physical contact, such as fondling. Sexual abuse can also include non-contact activities, such as involving children or young

people in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children or young people to behave in sexually inappropriate ways.

- Neglect - persistent failure to meet a person's basic physical, psychological or emotional needs, likely to result in the serious impairment of their health or development.

Listed below are some physical signs and behavioural indicators that **may** be seen in people who are being physically, emotionally or sexually abused or neglected.

Some children, young people or adults with needs for care and support will exhibit some of these signs and indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring.

PHYSICAL ABUSE	
Physical Signs	Behavioural Indicators
<ul style="list-style-type: none"> • Unexplained bruising, marks or injuries on any part of the body where accidents are unlikely such as thighs, back, abdomen • Bruises which reflect hand marks, fingertips (from slapping or pinching) or from an object • Cigarette burns • Bite marks • Broken bones • Scalds and burns • Bald patches • Untreated or inadequately treated injuries • Retinal haemorrhages • Fractured ribs • Injuries on people from ethnic minorities whose skin colour can be darker may be less noticeable 	<ul style="list-style-type: none"> • Fear of suspected abuser being approached for an explanation • Aggressive behaviour or severe temper outbursts • Flinching when approached or touched • Reluctance to get changed, for example wearing long sleeves in hot weather • Depression • Withdrawn behaviour • Running away from home • Fear of medical help or examination • Self - destructive tendencies • Admitting that they are punished but the punishment is excessive • Trouble sleeping / over tired • Injuries which the person cannot explain or explains unconvincingly

EMOTIONAL ABUSE	
Physical signs	Behavioural Indicators
<ul style="list-style-type: none"> • Physical, mental and emotional development lags • Sudden speech disorders • Continual self – depreciation • Unusual physical behaviour (rocking, hair twisting, self - mutilation) • Extremes of passivity or aggression • Underweight or stunted growth • Failure to achieve milestones 	<ul style="list-style-type: none"> • Overreaction to mistakes • Extreme fear of any new situation • Inappropriate response to pain (I deserve this) • Person is withdrawn or emotionally flat • Attention seeking or over familiarity • Unable to play • Fear of other parent / care giver being approached regarding behaviour

• SEXUAL ABUSE	
• Physical Signs	• Behavioural Indicators
<ul style="list-style-type: none"> • Pain or itching in the genital/anal areas • Bruising or bleeding near genital/anal areas • Sexually transmitted disease • Vaginal discharge or infection • Stomach pains • Discomfort when walking or sitting down • Pregnancy • Sexual abuse may lead to secondary enuresis or faecal soiling and retention 	<ul style="list-style-type: none"> • Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn • Fear of being left with a specific person or group of people • Having nightmares • Running away from home • Sexual knowledge which is beyond their age or development age • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell

	anyone about <ul style="list-style-type: none"> • Self-harm or mutilation, sometimes leading to suicide attempts • Eating problems such as overeating or anorexia
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NEGLECT	
Physical Signs	Behavioural Indicators
<ul style="list-style-type: none"> • Constant hunger, sometimes stealing food from others • Poor personal hygiene • Constant tiredness • Loss of weight, or being constantly underweight • Untreated medical problems • Inappropriate dress for the conditions • Failure to thrive • Health problems associated with a lack of basic facilities such as heating • Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor health conditions • Neglect can also include failure to care for the individual needs of the person including any additional support the person may need as a result of any disability 	<ul style="list-style-type: none"> • Not requesting medical assistance and/or failing to attend appointments • Having few friends • Mentioning their being left alone or unsupervised • No social relationships • Compulsive scavenging • Destructive tendencies • Unexplained absence from school by child or young person • Inappropriate caring responsibilities • Craving attention • Difficult or challenging behaviour • Delayed development and for a child or young person failing at school

- Financial abuse – unauthorised or fraudulent obtaining or improper use of a person’s money, property, goods or resources.
- Discriminatory abuse – a person may be victimised, ridiculed or treated unfairly because something about them is different. This can include unreasonable or less favourable treatment due to a person’s race, gender, age, disability, religion, sexuality, appearance or cultural background, values, beliefs or culture.
- Institutional abuse – an organisation that supports children, young people or adults with needs for care and support imposing rigid and insensitive routines; poor practices embedded in systems, unskilled or untrained staff, intrusive or invasive interventions or an environment with inadequate privacy or physical comfort.

In addition to abuse and neglect, NNDC has a legal responsibility and duty to work individually and collectively with other organisations to safeguarding children, young people and adults with needs for care and support from other types of abuse including - Domestic Abuse and Violence, Honour Based Abuse, Female Genital Mutilation, Forced Marriage, Sexual Exploitation, Prevent (Government’s Counter terrorism Strategy), Modern Slavery, Self-Neglect and Hoarding.

- Domestic violence and abuse – defined as any incident or pattern of incidents or 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.
- Honour Based Abuse (HBA) - 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.

- Female Genital Mutilation (FGM) is a collective term for illegal procedures which include the removal of part/all external female genitalia for cultural or other non-therapeutic reasons. The practice is not required by any religion. It is painful, medically unnecessary and has serious health consequences at the time it is carried out and in later life. The procedure is typically performed on girls of any age, but is also performed on new born girls and on young women before marriage/pregnancy. FGM may be practised illegally by doctors or traditional health workers in the UK, or girls may be taken abroad for the operation.
- Forced Marriage (FM) “is a marriage conducted without the valid consent of both parties, where duress is a factor”
- Sexual Exploitation and Grooming – sexual exploitation is illegal activity by people who have some form of power and control over children, young people or adults with needs for care and support and use it to sexually abuse them. It involves forcing or enticing them to take part in sexual activities whether or not they are aware of what is happening, including exploitative situations, contexts and relationships where they (or a third person or persons) receive ‘something’ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of performing, and/or others performing on them, sexual activities. Sexual exploitation can be a form of organised or complex abuse, involving a number of abusers and/or a number of people. Sexual exploitation can occur through use of technology without the person’s immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting have power over those involved by virtue of their age, gender, intellect, and physical strength and/or economic or other resources.

Grooming for sexual exploitation occurs when someone builds an emotional connection and gains the trust of a child, young person or adult with needs for care and support for the purposes of sexual abuse or exploitation. Groomers then exploit the relationship by isolating them from friends or family and making the individual feel dependent on them. They will use power or control to make someone believe they have no choice but to do what they want. Groomers may introduce 'secrets' as a way to control or frighten the individual. Sometimes they will blackmail the person, or make them feel ashamed or guilty, to stop them telling anyone.

- Prevent – Section 26 of the Counter Terrorism and Security Act 2015 places a new duty of local authorities including district councils to have “due regard to the need to prevent people from being drawn into terrorism”.

The PREVENT Strategy has three objectives, to:

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

Grooming for Radicalisation is a process where a person, often from a vulnerable background begins to adopt extreme political, religious, or social view(s) and through these - engage in extremist activity. Their views will often be formed through misguidance, misunderstanding, jealousy, anger, a ‘sense of injustice’, resentment or fear.

- Modern Slavery (Human Trafficking) - involves the recruitment, transportation, transfer, harbouring or receipt of people who, with the threat or use of force, coercion, abduction, abuse of power or deception are exploited for the purposes of prostitution, forced labour, slavery or other similar practices. Victims are trafficked all over the world, including in and around the UK.
- Self-neglect and hoarding – self neglect can be described as the failure or refusal of a person to provide themselves with adequate food, water, clothing, shelter, hygiene, medication or ensure their own personal safety. Hoarding occurs when a person experiences distress and is unable to discard or part with things because of a perceived need to save them. Excessive accumulation of items

occurs. Commonly hoarded items include paper, plastic bags, food, clothing, household goods and supplies. Excessive hoarding can increase fire risk within a property and also if the hoarding involves putrescible material there is a risk of infestation.

Self – neglect and hoarding may be a safeguarding issue for children, young people and adults with needs for care and support if their health and wellbeing or safety is seriously compromised.

8. Responding to safeguarding concerns, allegations and disclosures

Staff, elected Members and contractors **must** report a safeguarding concern, alleged or suspected abuse when:

- They have or are made aware of a safeguarding concern about a child, young person or adult with needs for care and support
- A child, young person or adult with needs for care and support discloses a safeguarding concern or makes an allegation of abuse to them
- They have or are made aware of a safeguarding allegation or concern which involves an employee, elected Member or contractor
- They have or are made aware of a safeguarding allegation or concern which involves any other person

9. Specific Response Procedures

Staff, elected Members and contractors who have or are made aware of a safeguarding concern, alleged or suspected abuse should:

- If they believe a child, young person or adult with needs for care and support is at **immediate or imminent risk of harm** call 999 and ask for the Police. The Designated Safeguarding Officer should be advised of the situation as soon as possible. Contact Sonia Shuter – Tel: 01263 516173, email Sonia.Shuter@north-norfolk.gcsx.gov.uk or Lisa Grice – Tel: 01263 516164 email Lisa.Grice@north-norfolk.gcsx.gov.uk
- If they have or are made aware of any other safeguarding concerns in respect of a child, young persons or adult with needs for care and support including safeguarding allegations or concerns which involve an employee, elected Member, contractor or any other person, NNDC's Designated Officer(s) should be contacted for advice and support in making a Safeguarding Referral.
 - When the Designated Officer(s) are unavailable phone Norfolk County Council on 0344 800 8020 (24 hours) and ask for the Multi Agency Safeguarding Hub (MASH) stating that you have a safeguarding concern and would like to make a referral about a child, young person or adult with needs for care and support:
 - When a safeguarding concern relates to a child or young person an [NSCB1 Referral Form](#) should be completed and sent to the MASH within 24 hours of a telephone referral by email to mash@norfolk.gcsx.gov.uk.
 - When a safeguarding concern relates to an adult with needs for care and support a [Norfolk Safeguarding Adults Referral Checklist](#) should be used to help ensure that all of the information required by the MASH is collected.
 - When a safeguarding concern relates to PREVENT a [Person Vulnerable to Radicalisation Referral Form.docx](#) (VTR) should be completed and sent to the MASH mash@norfolk.gcsx.gov.uk

To comply with safeguarding guidance, and to enable effective coordination, monitoring and reporting all safeguarding referrals made to the police or MASH by phone, email or following completion of an NSCB1 or VTR must be reported to NNDC's Designated Safeguarding Officer.

9.1 Responding to a child, young person or adult with needs for care and support disclosing a safeguarding concern or making an allegation of abuse

Children, young people and adults with needs for care and support are more likely to disclose a safeguarding concern or making an allegation of abuse to people they trust and with whom they feel safe. By listening and taking seriously what the person is saying, you are already helping the situation. The following points are a guide to help you respond appropriately.

- Stay calm.
- Listen carefully to what is said.
- Find an appropriate early opportunity to explain that the information will need to be shared with other people and organisations – do not promise to keep secrets.
- Allow the person to continue at their own pace.
- Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.
- Reassure the person that they have done the right thing in telling you.
- Tell them what you will do next and with whom the information will be shared.
- Record all the details that you are aware of and what was said using the person's own words, as soon as possible. The record should include:
 - The date and time.
 - The person's name, address and date of birth.
 - The nature of the allegation.
 - A description of any visible injuries.
 - Your observations – e.g. a description of the person's behaviour, physical and emotional state.
 - Exactly what the person said and what you said. Record the person's account of what has happened as close as possible.
 - Any action you took as a result of your concerns e.g. who you spoke to and resulting actions. Include names, addresses and telephone numbers.
 - Sign and date what you have recorded.
- Follow the appropriate Specific Response Procedure

9.2 Responding to safeguarding allegations or concerns involving an employee, elected Member, contractor or any other person.

The previously identified Specific Response and disclosure Procedures must be followed if there is an allegation or concern that an employee, elected member or contractor in connection with their employment or elected capacity or any other person has within the context of the safeguarding themes previously identified in Section 5:

- Behaved in a way that has harmed a child, young person or adult with needs for care and support
- Possibly committed a criminal offence against or related to a child, young person or adult with needs for care and support
- Behaved towards child, young person or adult with needs for care and support in a way that indicates they may pose a safeguarding risk to them

In addition to those identified within the Specific Response Procedures, if a safeguarding allegation or concern relates to an employee, elected Member or contractor, a member of the Corporate Leadership Team Tel: 01263 516000 email CLT@north-norfolk.gov.uk and the HR Manager must be notified of the allegation or concern as soon as possible.

In addition to assisting with any external investigations, North Norfolk District Council will respond to the situation in accordance with relevant internal policies and procedures, this could include contacting the Local Authority Designated Officer.

9.3 Local Authority Designated Officer (LADO)

LADO's work in Children's Services, their role is to be involved in the management and oversight of allegations against people who work with children and young people. They are not responsible for undertaking investigations but they can provide advice and guidance to employers and voluntary organisations. The LADO will be contacted by NNDC in all situations where it is alleged that a person who works with children or young people has:

- Behaved in a way that has harmed or may have harmed a child or young person
- Possibly committed a criminal offence against children or related to a child or young person
- Behaved towards a child, children or young people in a way that indicates they are unsuitable to work with children

It can be difficult experience for staff if safeguarding allegations are made against them. The LADO can support staff whilst the allegations are investigated. They are able to:

- Manage and oversee individual cases
- Provide advice and guidance
- Liaise with the Police and other agencies
- Monitor progress
- Independently scrutinise

If you are concerned that the Council's response in relation to a reported safeguarding concern has not been taken in accordance with written procedures please contact a member of the Corporate Leadership Team.

10. Confidentiality

It is extremely important that:

- A child, young person or adult with needs for care and support who discloses a safeguarding concern or allegation of abuse is advised that a safeguarding referral has to be made and information shared with relevant people / organisations. Do not promise to keep the information secret or confidential.
- In the case of a safeguarding concern or allegation relating to a child or young person, the person with parental responsibility must be advised that NNDC has a legal duty to make a safeguarding referral unless this would increase the risk of harm to the child or young person.
- Safeguarding allegations or concerns must not be discussed with anyone other than identified officers or organisations. Any breach of confidentiality could be damaging to the child, young person or adult with needs for care and support, their families and any formal safeguarding investigations.

Any individual under suspicion has the right to be notified about the cause for concern. This is likely to be done by the Police or the MASH. It is important that the timing of this does not prejudice the investigation.

Employees and elected Members against whom a safeguarding allegation or concern is raised will be supported by the Council in accordance with relevant policies and procedures. They will have the right to consult with a trade union representative, solicitor or other recognised legal advisor.

All copies of NSCB1 forms and safeguarding referral information must be sent to the designated officer to be stored electronically in a secure location to ensure confidentiality.

Safeguarding documentation in relation to an employee or elected Member against whom a safeguarding concern or allegation has been made will be stored securely by HR in accordance with NNDC's Data protection Policy

If as a result of a safeguarding concern or allegation enquiries arise from the public or any branch of the media they must be directed to a relevant Council spokesperson. Staff and elected members must not make any comments regarding the situation and should be advised who the Council spokesperson will be.

11. Recruitment and employment of officers and contracted services

North Norfolk District Council will adhere to the [Norfolk Safer Recruitment Guidance](#) which sets out best practice to ensure that employees whose job role involves working with children, young people or adults with needs for care and support are safe and qualified to do so.

11.1 Use of contractors

The Council will adopt suitable procurement procedures to ensure that any contractor or sub-contractor (including consultants), engaged by the Council in areas where workers are likely to come into contact with children, should have its own equivalent Child Protection Policy or failing this, must comply with the terms of this policy:

- The Council will make reference to the policy in any invitation to contractors. Either a copy of the policy will be included in tender or negotiation documents or prospective contractors will be invited to view the policy before submission of their offer.
- If contractor has its own policy, the Council will obtain a copy and check that it is equivalent to its own. In the case of any ambiguities or differences the Council will require that the contractor gives its written agreement to comply with the Council's policy before acceptance of any offer or before entering into any agreement.

The Council will further adopt suitable procedures to ensure that any contractor or sub-contractor complies with the requirements of this policy:

- The contractor's failure to comply with the policy will be included as a breach of contract within contract or sub-contract terms and conditions.
- The contractor's compliance with the policy will be an agenda item at regular progress or performance meetings.
- Failure to comply with the policy will be a breach of contract and a default notice or an improvement notice will be served on the contractor.
- In the case of a serious failure or repeated failures to comply with the policy the Council will terminate its contract or agreement with the contractor.

12. Good practice for officers and elected Members

The following guidelines, whilst not exhaustive identifies good practice for officers, elected Members and contractors while working or engaging with children, young people and adults with needs for care and support. They also identify practical actions that officers, elected members and contractors should take to help protect themselves and reduce the likelihood of safeguarding allegations being made against them. They will be particularly relevant to officers who works involves regular contact with children, young people and adults with needs for care and support such as sports and countryside officers.

- A Parental Consent Form (Appendix C) should be completed before children and young people participate in activities and events organised by or on NNDC's behalf.

- Always work openly, avoid situations where an officer or elected member and an individual child, young person or adult with needs for care and support are alone or unobserved.
- Respect the child, young person or adult with needs for care and support and provide a safe and positive environment. If any form of physical contact is required it should be provided openly and according to appropriate guidelines, i.e. National Governing Body of Sport Guidelines
- If supervision in changing rooms or similar environments is required, officers should work in pairs and never enter opposite sex changing rooms.
- With mixed groups, supervision should be by a male and female officer where possible.
- Officers and elected Members must respect the rights, dignity and worth of every person and treat everyone equally within the context of the activity.
- Secure parental consent (Appendix C) in writing to act *in loco parentis*, if the need arises to give permission for the administration of emergency first aid and / or other medical treatment. This must only be carried out by a person qualified to do so.
- Service Managers and those with parental responsibility must be informed of any incident at the earliest opportunity.
- If a child, young person or adult with needs for care and support is accidentally injured as the result of an officers or elected members actions, seems distressed in any way, appears to be sexually aroused, misunderstands or misinterprets something that has been done or said, the incidents should be reported verbally as soon as possible to the relevant service manager and a written report / incident form completed.

Officers and elected members should not:

- Spend time with children, young people or adults with needs for care and support alone and away from others.
- Take children, young people or adults with needs for care and support alone on a car journey.
- Take children, young people or adults with needs for care and support to your home where they will be alone with you.
- Arrange to meet children, young people or adults with needs for care and support outside an organised activity or service.

If any of these situations are unavoidable, officers should ensure they only occur with the full prior knowledge and consent of the relevant service manager and the person with parental responsibility for the child, young person or adult with needs for care and support.

Officers and elected Members must **never**:

- Participate in rough physical or sexually provocative games.
- Allow or engage in inappropriate touching of any form.
- Allow children, young people or adults with needs for care and support to use inappropriate language unchallenged, or use it yourself.
- Make sexually suggestive comments about a child, young person or adult with needs for care and support, even in fun.
- Do things of a personal nature for children, young people or adults with needs for care and support that they can do for themselves, e.g. assist with changing.
- Enter areas designated only for the opposite sex.

13. Guidance of use of photographic and video equipment

Unfortunately, some people use activities and events for children, young people or adults with needs for care and support as an opportunity to take inappropriate photographs, mobile phone pictures or video footage. Officers and elected members should be vigilant at all times. If there are concerns about a person using cameras, videos or other image recording equipment such as a mobile phone or tablet at events or activities organised by North Norfolk District Council which involve children and young they

should be asked to complete a Consent Form for the use of Cameras and other Image Recorders, including mobile phones (see Appendix D).

When commissioning professional photographers or inviting the press to cover Council services, events and activities you must ensure that you make the Council's expectations clear in relation to child protection.

- Check credentials of any photographers and organisations present.
- Ensure identification is worn at all times, if they do not have their own – provide it.
- Do not allow unsupervised access by photographers or cameramen commissioned by the Council to children or young people or one to one photographic sessions.
- Do not allow photographic sessions outside of the activities or services
- Parents must be informed that photographs of their child or young person may be taken during Council services, activities or events, and parental consent forms need to be signed agreeing to this.(see Appendix D).
- The credentials of any other organisations who may ask to use photographs which have been commissioned by the Council will be checked. Parents will be contacted and permission sought prior to photographs being released.
- It is recommended that the names of children or young people should not be used in photographs or video footage, unless with the express permission of the child or young person's parent.

Legislation and Guidance

Legislation

- [Children Act 2004](#)
- [Working Together to Safeguard Children 2015](#)
- [The Care Act 2014](#)
- [The Counter Terrorism and Security Act 2015](#)
- [The Equality Act 2010](#)
- [The Modern Slavery Act 2015](#)
- [The Serious Crime Act 2015](#)

Guidance

- [Working Together to Safeguard Children 2015](#)
- [Norfolk Local Safeguarding Children Board \(NSCB\)](#)
- [The Norfolk Threshold Guidance 2016 \(NSCB\)](#)
- [Information Sharing - Advice for Practitioners](#)
- [Norfolk Safeguarding Adults Board \(NSAB\)](#)
- [Self-neglect-and-hoarding-Strategy \(NSAB\) 2016](#)
- [Norfolk Safer Recruitment Guidance 2013 \(NSCB\)](#)
- [LADO Consultation and Referral Guidance - Norfolk Safeguarding Children Board](#)

Useful Contacts

- [Norfolk Multi Agency Safeguarding Hub \(MASH\)](#)
Tel: Customer Service Team 0344 800 8020 or direct dial 01603 276151
Email: MASHSupervisors@norfolk.pnn.police.uk
- **Norfolk Constabulary (Police)**
In an emergency phone or text 999
Non emergency phone 101
- **Norfolk Local Safeguarding Children Board**
County Hall, Room 60, Martineau lane, Norwich, NR1 2DH
Tel: 01603 223409 Email: nscb@norfolk.gov.uk
- **Norfolk Local Safeguarding Adults Board**
County Hall, 8th Floor, Martineau lane, Norwich, NR1 2DH
Tel: 0344 800 8020 Email nsabchair@norfolk.gov.uk
- **Norfolk Local Authority Designated Officer**
Tel 01603 223473. Email LADO@norfolk.gov.uk
nscb@norfolk.gov.uk
- **North Norfolk Early Help Hub**
NNDC, Holt Road, Cromer NR27 9EN.
Tel: 01263 739004 Email NorthNorfolkHelpHub@north-norfolk.gov.uk

Consent Form

All information will be treated in strict confidence

Please use block capitals and print clearly

Event/Activity: _____ Date: _____

Name of Child: _____ Age: _____ Date of Birth: _____

Home Address: _____

_____ Postcode _____

Home Telephone Number: _____ Mobile Telephone Number: _____

Medical Conditions: (if any) e.g. asthma, diabetes, allergies: _____

I confirm that my son/daughter is in good health and I give consent for my son/daughter to participate in the above event/activity.

I consent to any emergency treatment required by my son/daughter during the course of the event/activity

I give consent for my son/daughter to be photographed during the course of the above event/activity and I consent to the photographs being used by North Norfolk District Council for bona fide promotional purposes. This also includes the use on the World Wide Web (internet). Images and caption details will be stored electronically and may be used for promotional purposes by the Council in the future.

The information you provide will be used in accordance with the Data Protection Act 1998, to ensure the safety of all participants and may be shared with other people/organisations involved in the delivery of the above event/activity, if appropriate. By signing this form you are consenting to the Council using the information, which you have supplied in the manner stated above.

Name of Parent/Guardian: _____

Signature: _____ Date: _____

Consent Form for the use of Cameras and other Image Recorders

Venue/Area:.....	Ref No:.....
Description of Equipment:.....	
Surname:.....Fornames:.....	
Address:.....Postcode:.....	
Telephone No:.....	Mobile Telephone No:.....
Fax No:.....	Email Address:.....
Name(s) of the subject(s)	
1.....	5.....
2.....	6.....
3.....	7.....
4.....	8.....
Relationship of the photographer and subject (s).....	
Reason for taking photographs and/or uses the images are being, or are intended to be put to (i.e. family record/advertising etc)	
I declare that the information provided is true and correct and that the images will only be used for the purposes stated.	
Signed:..... Date:.....	
Authorised by:..... Date:.....	
Position held:.....	

Under the Data Protection Act 1998 the information that you have provided will be used only for the purposes monitoring camera and image recorder use and will be destroyed at the end of a year.