

## REPORT TO CABINET

<b>Open/Exempt</b> Open		Would any decisions proposed :			
<b>Any especially affected Wards</b> Borough-wide (all wards)	Operational	Be entirely within Cabinet's powers to decide YES/NO Need to be recommendations to Council YES/NO Is it a Key Decision YES/NO			
		Other Cabinet Members consulted: Portfolio Holder for People and Communities Other Members consulted: Environment & Community Panel (25 November 2025)			
Lead Member: Cllr Jo Rust E-mail: <a href="mailto:cllr.jo.rust@west-norfolk.gov.uk">cllr.jo.rust@west-norfolk.gov.uk</a>  Lead Officer: Charlotte Marriott E-mail: <a href="mailto:charlotte.marriott@west-norfolk.gov.uk">charlotte.marriott@west-norfolk.gov.uk</a> Direct Dial: 01553 616642		Other Officers consulted: Deputy Chief Executive, Corporate Leadership Team, Internal Safeguarding Group.			
Financial Implications YES/NO	Policy/ Personnel Implications YES/NO	Statutory Implications YES/NO	Equality Impact Assessment YES/NO  If YES: Pre-screening/ Full Assessment	Risk Management Implications YES/NO	Environmental Considerations YES/NO

Date of meeting: 20 January 2026

### **TITLE: SAFEGUARDING POLICY REVIEW 2025**

#### **Summary**

This report seeks Cabinet approval to adopt the revised corporate Safeguarding Policy 2025.

The policy has undergone its first substantive review since 2019, prompted by legislative updates, partner feedback, and internal review. The revised policy has been streamlined, modernised, and refocused on practical guidance, ensuring compliance with statutory duties while improving usability.

#### **Recommendation**

Cabinet is recommended to resolve that:

1. Cabinet endorses and adopts the revised Safeguarding Policy.
2. Cabinet delegates authority to amend/update this policy to ensure it remains compliant with legislation to a member of the Executive Leadership Team in consultation with the relevant portfolio holder.

Cabinet recommends to Full Council that:

3. Cabinet recommends that Full Council agree changes to the Members' Code of Conduct to include explicit safeguarding responsibilities.

#### **Reason for Decision**

- To ensure the Council continues to meet its statutory safeguarding duties under the Children Act 2004 and the Care Act 2014, reflects

current guidance (Working Together 2023, Care and Support Statutory Guidance 2024), and is prepared for anticipated duties in the forthcoming Crime and Policing Bill 2025.

- The updated policy improves clarity and accountability, reflects new safeguarding priorities (including domestic abuse, modern slavery, cuckooing, self-neglect and hoarding), and provides stronger support for staff wellbeing.

## 1 Background

- 1.1 The council first adopted its Safeguarding Policy in 2017, with minor updates in 2018, 2019 and 2022. The policy outlines the council's approach to safeguarding and details how we comply with the requirements of the relevant legislation, including:
  - Children Act 2004
  - Care Act 2014
  - Modern Slavery Act 2015
  - Working together to Safeguard Children 2023
  - Domestic Abuse Act 2021
- 1.2 The statutory inquiry into the death of Victoria Climbié highlighted the lack of priority status given to safeguarding. The Government's responses to these findings included the 'Every Child Matters' green paper and the 2004 Children Act. Section 11 of this act places a duty on organisations and individuals (including this authority) to ensure their functions are discharged with regard to the need to safeguard and promote the welfare of children, in particular highlighting the need for multi-agency approaches.
- 1.3 The current review is the first comprehensive refresh since 2019. Over time the policy had grown to more than sixty pages, becoming lengthy and repetitive. While detailed, it was not easy to use, particularly for staff or volunteers who needed to act quickly when a safeguarding concern arose.
- 1.4 Alongside this, the wider safeguarding environment has evolved. New legislation and guidance - including Working Together to Safeguard Children 2023, the updated Care and Support Statutory Guidance 2024, and the Domestic Abuse Act 2021 - has introduced fresh duties and expectations. The forthcoming Crime and Policing Bill 2025 is also expected to place a statutory duty on councils to tackle "cuckooing". These changes, together with local priorities around issues such as modern slavery, self-neglect and hoarding, have underlined the need for the council to modernise our policy and approach.
- 1.5 Feedback from partners and from the council's Internal Safeguarding Group supported this view, emphasising that the policy needed to be extensively updated to ensure compliance and clarity. The revised draft responds to that challenge, balancing clarity with compliance, and ensuring that all those connected with the council, including staff, councillors, contractors and volunteers, can understand their safeguarding duties.

## **Proposal**

- 1.6 The revised policy has been streamlined to around 20 pages, supported by appendices and intranet resources. It focuses on clear definitions, straightforward processes and accessible guidance, removing duplication while strengthening emphasis on partnership working.
- 1.7 A key change is the introduction of a tiered training framework, which establishes mandatory learning at three levels: universal e-learning for all (Tier 1), enhanced face-to-face training for customer-facing roles (Tier 2), and specialist CPD for safeguarding leads and managers (Tier 3). This ensures a consistent baseline of knowledge while targeting more intensive training where risk and contact is highest.
- 1.8 The policy also gives greater attention to emerging safeguarding issues. Domestic abuse is covered more explicitly, with reference to the Council's White Ribbon and Domestic Abuse Housing Alliance (DAHA) accreditation work; modern slavery and human trafficking are integrated with the council's Modern Slavery Statement; self-neglect and hoarding are highlighted in line with Norfolk-wide priorities; and cuckooing is recognised in anticipation of new national duties.
- 1.9 The policy places more emphasis on supporting staff who may themselves be affected by safeguarding issues and recognises the impact a disclosure may have on people. It sets out the role of our Trauma Risk Management (TRiM) practitioners, directs to support resources available through Vivup, and recognises the importance of creating a safe, supportive culture within the organisation itself.

## **2 Options Considered**

- 2.1 Do nothing - retain outdated policy, offering limited compliance and assurance. This option is not recommended, as it would present significant risk to the council.
- 2.2 Minor revision only – this would be insufficient to meet statutory requirements or address new safeguarding risks.
- 2.3 Comprehensive review, as presented at Appendix 1 - adoption of revised policy - ensures compliance, usability, and proactive response to safeguarding duties. This is the recommended option.

## **3 Policy Implications**

- 3.1 The proposed Safeguarding Policy is an update to/rewrite of the council's existing Safeguarding Policy. It embeds a clear, corporate approach across all council functions.
- 3.2 Implementation of the revised policy, if adopted, will be led by the Corporate Governance Team, supported by the council's Safeguarding Leads and Internal Safeguarding Group.

3.3 If the policy is adopted and cabinet resolves to amend the Members' Code of Conduct, then this will require updating in line with relevant processes. Suggested wording to be included in the Members Code of Conduct:

*(Insert a new section 3).*

**Safeguarding**

*As a Councillor:*

*I have due regard to the need to safeguard and promote the welfare of children, young people and adults at risk when carrying out my role as a Councillor.*

*If I become aware of, or am given information about, a safeguarding concern or allegation, I report it promptly through appropriate safeguarding routes and do not attempt to investigate or resolve the matter myself.*

3.4 There is a need to review and fully embed the safeguarding risk assessment within our procurement processes.

#### **4 Financial Implications**

4.1 The revised training framework will require a financial commitment, although this is yet to be determined and will be led by staff need. Financial budgeting for 2025/26 (and subsequent years) should consider this within the allocated training budget.

4.2 There are no other costs associated with the adoption of this policy. Any work undertaken to update and implement the new policy will be contained within existing staff and resource budgets.

#### **5 Personnel Implications**

5.1 All staff will be required to familiarise themselves with the revised policy and undertake a certain level of training. It is proposed that all staff will be required to undertake e-learning training, regardless of their role within the council – '*Safeguarding is everyone's business*'.

5.2 The HR team will be required to support the rollout of the new tiered training framework.

5.3 The Communications team will be required to support the launch of the revised policy.

5.4 The Procurement team will need to ensure the safeguarding risk assessment is fully embedded within procurement practices and processes.

5.5 Overall responsibility for the policy sits with the Corporate Governance Team.

#### **6 Environmental Considerations**

6.1 None

## **7 Statutory Considerations**

7.1 The council has a statutory duty to comply with the following key pieces of safeguarding legislation and guidance:

- Children Act 2004 (s.11 duty).
- Care Act 2014 (s.42 duty).
- Domestic Abuse Act 2021.
- Counter Terrorism & Security Act 2015 (Prevent duty).
- Equality Act 2010.
- Modern Slavery Act 2015.
- Serious Crime Act 2015 (mandatory reporting duty for Female Genital Mutilation).
- Working Together to Safeguard Children 2023.
- Care and Support Statutory Guidance 2024.
- Anticipated Crime and Policing Bill (2025).

## **8 Equality Impact Assessment (EIA)**

8.1 EIA attached - no adverse impacts identified.

- **Age** - The policy demonstrates the council's commitment to safeguarding all children, young people and adults with care and support needs from harm.
- **Disability** – The Care Act 2014 specifically relates to adults that have care and support needs, and this policy demonstrates how we meet our responsibilities as defined in Section 42 of this act.
- **Sex** – The policy considered the duties defined within the Domestic Abuse Act. Whilst both men and women are victims and survivors of domestic abuse, it is known that it disproportionately effects women and girls. The policy references our work to tackle violence against women and girls through our White Ribbon Accreditation work.
- **Race** – The safeguarding policy covers issues that typically (although not exclusively) are experienced in certain cultures, including forced marriage and Female Genital Mutilation (FGM).

## **9 Risk Management Implications**

9.1 All Local Authorities have statutory safeguarding duties, as outlined in the extensive body of legislation. The Deputy Chief Executive has taken on the statutory role of 'Designated Safeguarding Coordinator' for the Council. The lack of an up-to-date, clear and concise policy would leave the council open to risk and legal action if safeguarding practices were not being followed and a child, young person, or adult with care and support needs suffers serious harm or loses their life.

## **10 Declarations of Interest / Dispensations Granted**

None

## **10 Background Papers**

- 10.1 Draft Safeguarding Policy 2025 (Appendix 1)
- 10.2 Grid of Policy Changes (Appendix 2)

## Stage 1 - Pre-Screening Equality Impact Assessment

For equalities profile information please visit [Norfolk Insight - Demographics and Statistics - Data Observatory](#)

Name of policy/service/function	Safeguarding Policy				
Is this a new or existing policy/service/function? (tick as appropriate)	New		Existing	<input checked="" type="checkbox"/> X	
Brief summary/description of the main aims of the policy/service/function being screened.  Please state if this policy/service is rigidly constrained by statutory obligations, and identify relevant legislation.	<p>The Safeguarding Policy explains how the Borough Council of King's Lynn and West Norfolk ("the Council") prevents harm, identifies concerns and acts swiftly to protect children, young people and adults at risk.</p> <p>The Policy is mandated by the Council's duties under section 11 of the Children Act 2004 and section 42 of The Care Act 2014 to ensure that it considers the need to safeguard and promote the welfare of children and safeguard adults.</p>				
Who has been consulted as part of the development of the policy/service/function? – new only (identify stakeholders consulted with)	<p>Internal stakeholders:</p> <ul style="list-style-type: none"> <li>• Housing</li> <li>• HR</li> <li>• The Internal Safeguarding Board</li> <li>• Senior Management Team</li> <li>• Alive West Norfolk</li> </ul>				
<b>Question</b>	<b>Answer</b>				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p> <p><b><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></b></p>		Positive	Negative	Neutral	Unsure
	Age	✓			
	Disability	✓			
	Sex	✓			
	Gender Re-assignment			✓	
	Marriage/civil partnership			✓	
	Pregnancy & maternity			✓	
	Race	✓			
	Religion or belief			✓	
	Sexual orientation			✓	
	Armed forces community			✓	
	Care leavers			✓	
Health inequalities*			✓		

*For more information on health inequalities please visit <a href="#">The King's Fund</a>	Other (eg low income, caring responsibilities)			✓	
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**Please provide a brief explanation of the answers above:**

**Age** - The policy demonstrates the council's commitment to safeguarding all children, young people and adults with care and support needs from harm.

**Disability** – The Care Act 2014 specifically relates to adults that have care and support needs, and this policy demonstrates how we meet our responsibilities as defined in Section 42 of this act.

**Sex** – The policy considered the duties defined within the Domestic Abuse Act. Whilst both men and women are victims and survivors of domestic abuse, it is known that it disproportionately affects women and girls. The policy references our work to tackle violence against women and girls through our White Ribbon Accreditation work.

**Race** – The safeguarding policy covers issues that typically (although not exclusively) are experienced in certain cultures, including forced marriage and Female Genital Mutilation (FGM).

Impact on other groups has been identified as neutral, however this policy applies to all children, young people and adults, regardless of any protected characteristic they may hold.

Question	Answer	Comments
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	No	
3. Could this policy/service be perceived as impacting on communities differently?	No	
4. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	No	<p><b>Actions:</b> N/A – no adverse impacts identified.</p> <p><b>Actions agreed by EWG member:</b></p> <p>.....</p>

If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:

Decision agreed by EWG member: .....

5. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	Yes	<b>Please provide brief summary:</b> The Policy is established to meet the council's safeguarding duties. While this will inevitably benefit individuals who are disadvantaged, the Policy does not seek to tackle disadvantage or discrimination specifically.			
<b>Assessment completed by:</b> <b>Name</b>	Charlotte Marriott				
<b>Job title</b>	Interim Corporate Governance Manager				
<b>Date completed</b>	03.10.2025				
<b>Reviewed by EWG member</b>	Alison Demonty	<b>Date</b>	17.10.25		

✓ Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy  
[corporate.policy@west-norfolk.gov.uk](mailto:corporate.policy@west-norfolk.gov.uk)



# Corporate Safeguarding Policy

<b>Owner</b>		Deputy Chief Executive		
<b>Responsible Person</b>		Interim Corporate Governance Manager		
<b>Review Cycle</b>		3 years	<b>Next Review Date</b>	Jan 2029
<b>Equality Impact Assessment (EIA) Date</b>		03.10.2025	<b>Date approved by the CEWG</b>	17.10.2025
<b>List any other impact assessments that have been completed</b>		N/A		
<b>Date initially approved by Cabinet/Full Council</b>		TBC		
<b>Published to</b>		Intranet and BCKL&WN website		
<b>Stakeholders consulted</b>		Internal Safeguarding Group Corporate Leadership Team Portfolio Holder for People & Communities		
<b>Revision Record</b>				
<b>Rev. No.</b>	<b>Date of Issue</b>	<b>Reason for Revision</b>		
05	XX/XX/XX	Substantive review – policy refreshed throughout		
04	December 2022	Scheduled review – revisions throughout to ensure compliance with legislation and practice. Updates to terminology, legislation (Working Together 2018, Domestic Abuse Act 2021), inclusion of new referral forms, guidance, and processes. Inclusion of roles and responsibilities section. Inclusion of Terms of Reference (ToRs) for Internal Safeguarding Group.		
03	August 2019	Revised to reflect new working arrangements in leisure		
02	July 2018	Revised to reflect Alive Leisure charity status		
01	October 2017	Revised to reflect new reporting arrangements in leisure		

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The Designated Safeguarding Coordinator for the Borough Council of King's Lynn & West Norfolk is **Michelle Drewery, Deputy Chief Executive**

Michelle Drewery Deputy Chief Executive 01553 616432  
[Michelle.drewery@west-norfolk.gov.uk](mailto:Michelle.drewery@west-norfolk.gov.uk)  
King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX

The Council's Deputy safeguarding co-ordinator, who should be contacted in Michelle's absence, is **Charlotte Marriott**, who can be contacted on 01553 616642, [Charlotte.marriott@west-norfolk.gov.uk](mailto:Charlotte.marriott@west-norfolk.gov.uk), address as above

## Safeguarding — Policy Summary for Officers

<b>What is safeguarding?</b>	Protecting children, young people and adults at risk from abuse or neglect – and acting early so they can live safe, healthy lives.
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### Your duty – three simple steps

1. **RECOGNISE** – Know the signs (physical, emotional, neglect, domestic abuse, modern slavery, self-neglect/hoarding, etc.).
2. **RECORD** – Write down the facts **immediately** (time, date, exact words).
3. **REPORT** – Follow the flow-chart on the intranet:
  - o **Emergency = 999.**
  - o Otherwise, speak to your **Safeguarding Lead** the **same day** and [submit the online referral form](#).
  - o If you have a concern that relates to the action or behaviours of a colleague, call the Designated Safeguarding Coordinator (DSC) or Deputy DSC first.

**Never promise total confidentiality.** Reassure the person their information will be treated sensitively but explain you may have to share it with relevant colleagues (i.e. your Safeguarding Lead or the DSC) and/or external organisations (e.g. Social Care, Police) to keep them (or others) safe.

### Information sharing

- “Need-to-know” only – but do share if someone is at risk.
- Use the [NSAB 7 Golden Rules](#) as your quick guide.

### Training you must complete

Tier	Who	Core learning	Renewal
<b>T1 – Awareness</b>	<b>All staff</b> , councillors and volunteers with incidental contact	E-learning: basic signs, how to report	Every 3 years
<b>T2 – Enhanced</b>	Housing, Customer-Facing, Licensing, Enforcement, Community Safety	Spotting self-neglect/hoarding, domestic abuse, modern slavery; case studies	Every 3 years
<b>T3 – Specialist / Decision makers</b>	Safeguarding Leads, Designated Officers, relevant councillors (such as portfolio holders) Alive West Norfolk leads	Bespoke and specialist training	Annual CPD & peer supervision

### Partnership contacts at a glance

- Social Services - Children (CADS) 0344 800 8021
- Social Services - Adults - 0344 800 8020 or for non-urgent referrals, use the [online form](#)
- Police MASH Duty DS 01603 276 151
- Modern-Slavery 24 / 7 Helpline 0800 0121 700

*Further external contacts can be found at XXXX*

### Looking after yourself

Dealing with Safeguarding concerns or disclosures can be upsetting. It is important that you take time to look after yourself and get help if you need it:

- Speak to your Line Manager
- Speak to a Trauma Risk Management (TRiM) Practitioner for peer support – access via HR
- Access free counselling via Vivup (Employee Assistance Programme).

**Remember:** Safeguarding is everybody's business – your swift action could save a life.

## Executive Summary

**Safeguarding is everyone's business.** This policy explains how the Borough Council of King's Lynn and West Norfolk ("the council") prevents harm, identifies concerns and acts swiftly to protect children, young people and adults at risk.

Safeguarding and promoting welfare is defined for the purposes of this policy as:

- protecting children, young people and adults experiencing or at risk from abuse or neglect from maltreatment.
- preventing the impairment of the health or development of children, young people and adults experiencing or at risk from abuse or neglect.
- ensuring that children, young people and adults experiencing or at risk from abuse or neglect grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children, young people and adults experiencing or at risk from abuse or neglect have the best outcomes.
- A commitment to working in multi-disciplinary partnerships, sharing information lawfully and proactively to secure the best outcomes for children and adults at risk.

The council, together with local agencies including the police and health services, have a duty under section 11 of the Children Act 2004 to ensure that it considers the need to safeguard and promote the welfare of children when carrying out its functions. This duty extends to contractors who deliver services on behalf of the council.

Under section 42 of The Care Act 2014 the Council has a duty to safeguard adults who have care and support needs. Professionals working in agencies with these duties are responsible for ensuring that they fulfil their role and responsibilities in a manner consistent with the statutory duties of their employer.

## 1. Introduction

1.1 Safeguarding is everyone's business – this is central to our approach and applies to the public, volunteers and professionals.

1.2 The council believes that all residents have the right to:

- live their lives to their fullest potential
- be protected
- have the opportunity to participate in and enjoy any activity
- be treated with dignity and respect.

1.3 This Policy is designed to ensure the council meets its safeguarding responsibilities. This applies to:

- Children (including unborn babies), young people and adults experiencing or at risk from abuse or neglect
- The Council itself and its staff, elected members, volunteers and contractors.

1.4 The council is committed to safeguarding and will establish policies, procedures and guidance to support the effective delivery of this policy across all its services and functions.

## 2. Definitions

Term	Meaning	Abbreviation used (if any)
Safeguarding	<p>Safeguarding is protecting children, young people and adults experiencing or at risk from abuse or neglect.</p> <p>This includes:</p> <ul style="list-style-type: none"><li>• Preventing abuse and maltreatment</li><li>• Preventing harm to health or development</li><li>• Ensuring all those at risk have safe and effective care</li><li>• Ensuring all those at risk have the best outcomes</li><li>• Providing specialist services where needed.</li></ul>	
Children and young people <sup>1</sup>	The term children or young person is used to refer to anyone under 18 years of age, including unborn babies.	CYP
Adults experiencing or at risk from abuse or neglect <sup>2</sup>	<p>Under the Care Act 2014, a person who is 18 years of age or older is considered to be an adult at risk if they:</p> <ul style="list-style-type: none"><li>• Have needs for care and support (whether or not the Local Authority is meeting any of those needs) and;</li><li>• Are experiencing, <b>or</b> at risk of, abuse or neglect; and;</li><li>• 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.<sup>1</sup></li></ul>	AAR
Parent	The term parent is used as a generic term to represent parents, carers and guardians	

<sup>1</sup> Note: Where someone over 18 is still receiving children's services, for example in an education setting until the age of 25, and a safeguarding issue is raised the matter should be dealt with through adult safeguarding arrangements. Children's safeguarding and other

<b>Staff</b>	All employees, agency workers, apprentices or volunteers (including those undertaking work experience placements) working on behalf of the Council	
<b>Contractor / Third Party</b>	Any individual or organisation delivering Council-commissioned services or using Council premises / licences.	
<b>Disclosure and Barring Service</b>	The UK agency that helps employers make safer recruitment decisions. A DBS check is a background check for criminal convictions and other information, required for individuals working in roles with children or adults at risk. Certain serious convictions will result in a person being barred from working with those groups.	DBS
<b>Abuse (or Neglect)</b>	Causing harm to a child or adult at risk. This can be a single act or repeated acts. It can take many forms – physical, emotional, sexual, financial, discriminatory, organisational, neglect (failure to meet basic needs), or exploitation. Abuse can be deliberate or result from negligence or lack of knowledge.	
<b>Hoarding</b>	Persistent accumulation of possessions and living spaces rendered unsafe, which may require joint response from Housing, Environmental Health and Adult Social Care.	
<b>Multi-Agency Safeguarding Hub</b>	The team of local agencies (such as Children's Services, Police, health etc.) that share information and coordinate responses to safeguarding referrals.	MASH
<b>Local Authority Designated Officer</b>	An officer at the County Council who is notified when there are allegations of abuse against people who work or volunteer with children. The LADO oversees and advises on such cases to ensure they are handled properly.	LADO
<b>Norfolk Safeguarding Children Partnership and Norfolk Safeguarding Adults Board</b>	Norfolk Safeguarding Children Partnership (NSCP) and Norfolk Safeguarding Adults Board (NSAB). These are the county-level multi-agency bodies that set policy and oversee safeguarding practice across Norfolk.	NSCP / NSAB

## 2. Policy Statement

2.1 The council believes that all children, young people and adults have the right to protection from harm. We have a duty to promote the welfare of and safeguard all CYP and AAR as far as is reasonably practicable. We will do this by:

- Raising awareness of safeguarding across the organisation so that all staff are aware of their responsibilities
- Ensuring our recruitment procedures are robust, with proper checks and procedures followed

relevant partners should be involved as appropriate. The level of needs is not relevant and the young adult does not need to have eligible needs for care and support under the Care Act.

- Where appropriate, ensuring contractors and funded organisations and other relevant third parties have safeguarding policies and procedures in place.

2.2 This policy is written in accordance with:

- the Children Act 2004,
- the Care Act 2014,
- the Counter Terrorism and Security Act 2015
- and associated guidance, council policies and procedures.

2.3 The council works in partnership with a range of agencies to safeguard children and adults at risk of or experiencing abuse or neglect. This includes the Norfolk Safeguarding Children Partnership and the Norfolk Safeguarding Adults Board. This policy aligns with the Norfolk Multi-Agency Safeguarding Arrangements.

2.4 This policy will be made available to all employees, Councillors, volunteers, contractors, those we fund and other relevant third parties. Training will be provided commensurate with roles and responsibilities.

2.5 Authority to amend/update this policy to ensure it remains compliant with legislation has been delegated to a member of the Executive Leadership Team in consultation with the relevant portfolio holder. The policy will be fully reviewed on a rolling three-year basis or updated as required between formal reviews.

**The Council accepts the moral and legal responsibility to implement procedures, to provide a duty of care for children, young people and adults experiencing or at risk from abuse or neglect, safeguard their wellbeing and protect them from harm when they are engaged in services organised and provided by the Council.**

### **3. Scope**

3.1 This policy applies to all council activity, including that of our wholly owned companies, West Norfolk Housing Company Limited and West Norfolk Property Limited) whether functions are directly provided or commissioned from a third party.

3.2 This policy applies to staff who are currently experiencing or at risk of experiencing abuse. We will ensure all managers received training on how to appropriately respond in these situations and ensure staff are supported.

3.3 It sets out the corporate arrangements made by the council to meet its responsibilities. It remains the responsibility of each service area to make appropriate arrangements to comply with these responsibilities. These arrangements will reflect local circumstances, and the nature of the service provided.

- 3.4 Safeguarding will also apply to procured services. Where appropriate, for higher value tender exercises, the council's safeguarding policy will be included in the tender pack. Bidders will be asked to confirm they have read this and will abide by it in their work for the council.
- 3.5 Certain services, such as Housing and Community Safety, have specific operational safeguarding guidance and procedures which should always be adhered to.

## 4. Aims

- 4.1 With this Policy, the council aims to:

- Raise awareness of the duty of care responsibilities relating to children, young people and adults experiencing or at risk from abuse or neglect.
- Create a safe and healthy environment within all our services
- Recruit, train, supervise and support staff to adopt best practice to safeguard and protect children, young people and adults. All staff will abide by this Policy, appropriate procedures and the [Officer Code of Conduct](#). Staff who work with CYP and AAR will be subject to the appropriate level of Disclosure and Barring Services (DBS) check. Any allegations or concerns against staff will be responded to appropriately.
- Require elected members to adopt and abide by the Policy and the [Members Code of Conduct](#).

## 5. How we will achieve this

- 5.1 The council will:

- Provide appropriate training for staff and Elected Members
- Aid staff to respond sensitively and seriously to someone who discloses information about abuse and be confident and able to take appropriate action swiftly
- Always maintain a level of good working practice
- Promote the general welfare and wellbeing of CYP and AAR while using council services
- Develop and implement effective procedures for recording and responding to incidents, of actual or suspected abuse.

## 6. Roles and Responsibilities

- 6.1 Safeguarding is everyone's responsibility. Therefore, **responsibility for the implementation of this policy lies at all levels of the council.**

- 6.2 Key roles include:

Role	Responsibility
Designated Safeguarding Co-Ordinator (DSC)	The senior officer responsible for leading and coordinating the Council's response to safeguarding concerns.

	Michelle Drewery, Deputy Chief Executive, <a href="mailto:Michelle.drewery@west-norfolk.gov.uk">Michelle.drewery@west-norfolk.gov.uk</a> , 01553 616432
Deputy Designated Safeguarding Co-Ordinator (DDSC)	Key responsible officer/deputy senior responsible officer, maintains policy, liaise with partners: Charlotte Marriott, Interim Corporate Governance Manager, <a href="mailto:Charlotte.marriot@west-norfolk.gov.uk">Charlotte.marriot@west-norfolk.gov.uk</a> , 01553 616642
Members of our Internal Safeguarding Group	Provides strategic oversight for all aspects of safeguarding across the council, identifies priorities, suggests improvements to procedures and oversees policy delivery. The group also serves to monitor progress against key safeguarding actions and the dissemination of relevant information to staff.
Assistant Directors	Monitor compliance, oversee policy implementation and resources, manage contractor risk assessments
Line Managers	Ensure staff complete training and are supported to carry out their duties
Every employee and volunteer	Be able recognise, record and report. Attend training to ensure up to date knowledge is maintained
Elected Members	Champion safeguarding; attend mandatory briefings
Corporate Governance Team	Co-ordinating the council's day to day safeguarding activities, policies and procedures and providing advice and guidance on safeguarding matters

## 7. Legislation and Guidance

7.1 Everyone who works with or around children and adults at risk needs to be aware of the laws and guidance that aim to protect those individuals from harm.

7.2 There is a considerable body of legislation, government guidance and standards designed to ensure that children and adults are safeguarded from harm. These include:

- Children Act 1989 and 2004
- Protection of Children Act 1999
- Human Rights Act 1998
- Sexual Offences Act 2003
- Care Act 2014 – Section 42 highlights need to escalate concerns that meet the S42 threshold.
- Counter Terrorism and Security Act 2015 (Prevent)
- Equality Act 2010
- Mental Capacity Act 2005

- Modern Slavery Act 2015
- Serious Crime Act 2015
- Domestic Abuse Act 2021
- Working Together to Safeguard Children 2023 and Care and Support Statutory Guidance 2024.
- Crime and Policing Bill (expected 2025) - expected to create a duty to tackle 'cuckooing'.

## 8. Oversight and Assurance of Policy

8.1 The Council's governance and assurance procedures ensure that the Policy remain robust and up to date.

<b>Body / Role</b>	<b>Frequency</b>	<b>Purpose</b>
Environment and Communities Panel and Cabinet	Three-year policy approval;	Democratic oversight.
Portfolio Holder for People and Communities	Regularly	Elected Member oversight.
Internal Safeguarding Group (ISG)	Quarterly	Cross-service learning, data review and action plan tracking. More information about the ISG can be found <a href="#">here</a> .
Designated Safeguarding Coordinator (DSC)	Ongoing	The lead officer for safeguarding within the council, the DSC can escalate complex cases and authorise policy updates.
Deputy DSC	Ongoing	Lead on actions, provide advice, promote training update and quality check.
Section 11 self-assessment	Annual	The Council participates in an annual Section 11 self-assessment process, led by the Norfolk Safeguarding Children Partnership (NSCP). This assesses practice against the standards set out in Section 11 of the Children Act 2004 and NSCP priorities.

## 9. Partnerships and Networks

9.1 The council participates in several groups as part of its commitment to meeting its responsibilities with regards to safeguarding, including:

- The Norfolk Safeguarding Children Partnership (NSCP), which works to ensure that all children and young people in Norfolk can expect to stay safe and that the appropriate action will be taken by relevant organisation. For further information about the NSCP, please visit their website: <https://www.norfolkscb.org/>
- The West Norfolk Local Safeguarding Children Group, which considers matters relating specifically to children in West Norfolk.

- The District Councils Safeguarding Group (DCSG), which considers broader safeguarding issues affecting district councils across Norfolk.
- The Norfolk Safeguarding Adults Board (NSAB), which brings together organisations to actively promote effective working relationships that address the issue of abuse and harm relating to adults. For further information about NSAB, please visit their website: <https://www.norfolksafeguardingadultsboard.info/>
- The Western Locality Safeguarding Adult Partnership, which communicates and delivers key adult safeguarding objectives at a local level from the Norfolk Safeguarding Adults Board.
- The council is a member of the Norfolk Anti-Slavery Network and utilise the county Exploitation website for up-to-date pathways: [Child and adult exploitation | Norfolk Safeguarding Adults Board](#)
- Council Officers attend a number of Domestic Abuse subgroups

## 10. Allegations of Previous Abuse among Council Staff

10.1 The Protection of Children Act 1999 states that it is an offence for an individual with a history of abusing children or vulnerable adults to apply for a role or be employed working with CYP and vulnerable adults. A Disclosure and Barring Service (DBS) check is required for staff who will have contact with CYP or adults at risk, which is rechecked every three years. DBS checks are carried out by the council's Human Resources (HR) team, in line with relevant legislation and guidance.

## 11. What You Should do if you have a Concern – Safeguarding Procedures

11.1 The following procedures are intended to inform all staff and volunteers of what actions they should take if they have concerns or encounter a case of alleged or suspected abuse.

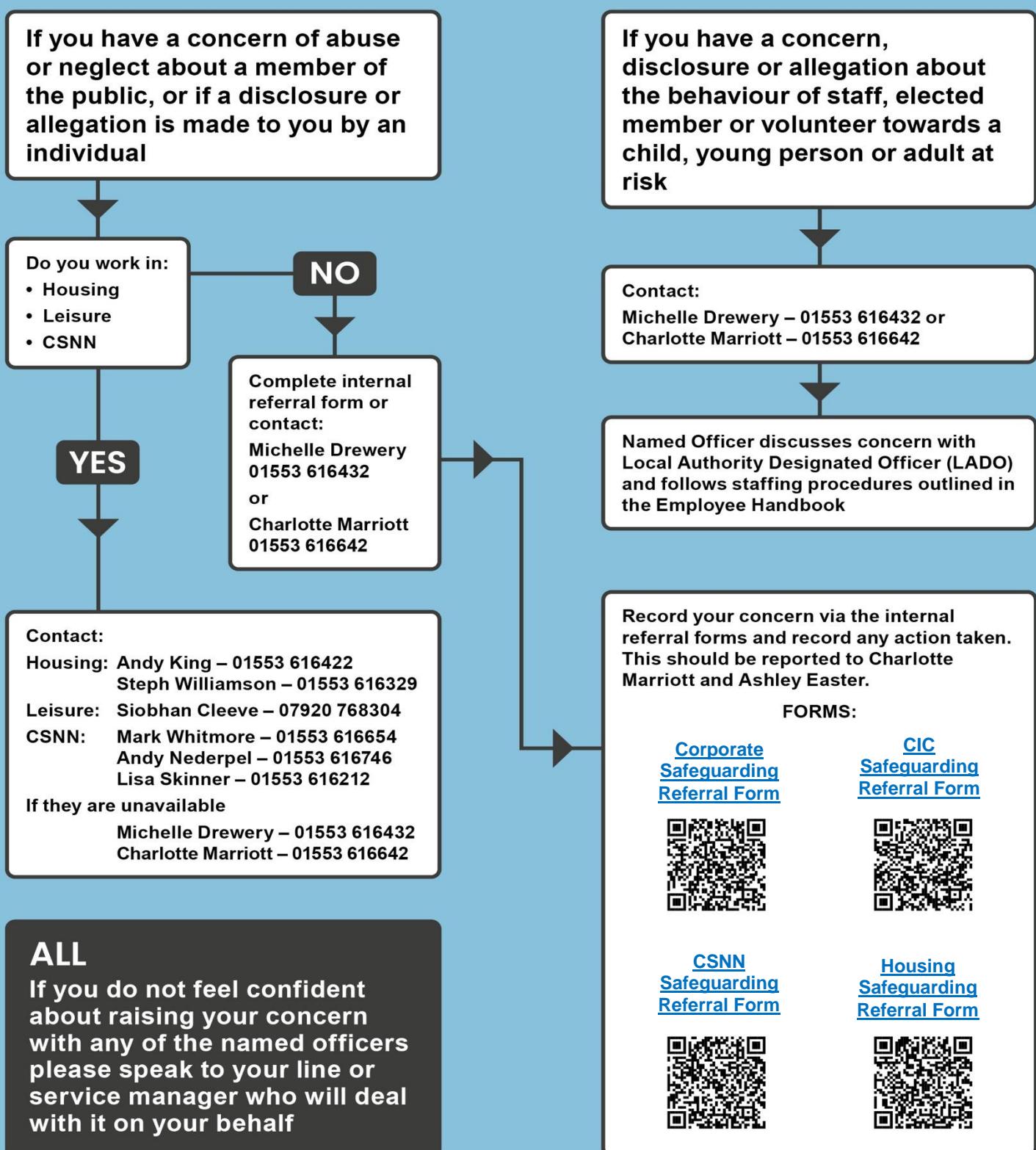
11.2 Safeguarding Procedure Flowchart:

# SAFEGUARDING REPORTING PROCEDURE FLOWCHART

Borough Council of  
King's Lynn &  
West Norfolk



If you have immediate concerns for the safety of a child/young person/adult experiencing or at risk from abuse or neglect call 999 for an emergency response



11.3 Always speak to your Safeguarding Lead if you are unsure and always record your concerns and the action you took via our internal reporting process, even if you have not made a referral to an external agency.

For concerns related to a <b>child or adult</b> at risk	<b>Child</b>	<b>Children Social Services via Children's Advice and Duty Service (CADS)</b> <b>- Norfolk County Council</b> - provide advice, support and signposting, identifying the correct services and support for children and young person	If you are a professional: <b>0344 800 8021</b> .  If you are a member of the public: <b>0344 800 8020</b> .
	<b>Adult</b>	<b>Adult Social Services – Norfolk County Council –</b> provide help and support for adults experiencing abuse and neglect.  <u><a href="#">Raising a Safeguarding Adults Concern: Checklist</a></u>	<b>0344 800 8020</b>  For non-urgent concerns regarding an adult, you can raise a concern using the online portal <a href="#">here</a> .
Duty Detective Sergeant within the MASH	For specialist Police advice	Email: <a href="mailto:MASHSupervisors@norfolk.pnn.police.uk">MASHSupervisors@norfolk.pnn.police.uk</a> Call: 01603 27(6151)	
Emergency services		If you have a concern: 101  If there is an immediate danger: 999	
Other contact details for advice	Norfolk Local Authority Designated Officer (LADO) Team <b><u>You must consult the DSC or Deputy DSC before contacting the LADO.</u></b>	<b>01603 223473</b> Email: <a href="mailto:lado@norfolk.gov.uk">lado@norfolk.gov.uk</a>  If you have concerns about the behaviour or actions of an adult working with a child under the age of 18 that you would like to report, please see the LADO Guidance and consultation documents below. <a href="#">LADO consultation and referral guidance</a> <a href="#">LADO referral/consultation form</a>	

## **12. Responding to Concerns, Disclosures and Allegations**

12.1 Any allegations or disclosures should be taken seriously. There is a duty on us all to report concerns about children, young people and adults where they may be at risk of harm or abuse. It is appropriate to gather and record facts about the concern, but care must be taken not to prejudice formal investigations. There are a range of situations that staff, Elected Members and volunteers may need to respond where there is a concern or case of alleged or suspected harm. For example:

- responding to a CYP or AAR disclosing abuse
- responding to allegations or concerns about a member of staff or volunteer
- responding to allegations or concerns about any other person.

12.2 All staff should:

- Stay calm and listen carefully to what is said
- If a vulnerable person is reported missing, notify Police immediately
- Take the disclosure or concern seriously
- Consider any allegation or concern to be potentially dangerous to the individual
- Remember that it is not your job to judge or investigate BUT to report.
- Remember not to promise confidentiality – offer reassurance that their information will be treated sensitively but be clear that you may have to share it with appropriate safeguarding professionals (such as your Safeguarding Lead, the DSC or external organisations), if it is necessary to protect them or others from harm.

**If there is an immediate risk to a child, young person or adult, call 999**

## **13. Staff Wellbeing**

13.1 The wellbeing of staff is important. Dealing with safeguarding concerns, particularly when someone discloses abuse or harm to you, can be upsetting or even potentially traumatic. Staff are not expected to manage these feelings alone, and support is available. If you find an incident difficult or distressing, you can ask for a TRiM referral to be made. TRiM Practitioners are trained to talk with you, assess how you're coping, and refer you to further help if needed.

13.2 You can also contact the Vivup 24/7 confidential freephone helpline at any time and this will give you access to free, qualified counselling.

Please contact the Personnel Officer, Welfare (01553 616368) for more information and guidance.

#### **14. Support to staff experiencing abuse or at risk of harm**

14.1 Employees who are experiencing abuse (inside or outside the workplace) or are at risk of harm can seek confidential advice. Where staff feel comfortable, they are encouraged to discuss concerns with their line manager, a trusted colleague, a Safeguarding Lead or a member of the HR team so that appropriate safety planning and reasonable adjustments can be put in place. Where the alleged perpetrator is a Council employee, the matter will be managed under HR procedures; where the perpetrator is a member of the public, concerns should be raised through the safeguarding route.

#### **15. Confidentiality and Information Sharing**

15.1 Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated among appropriate officer when necessary. Any breach of confidentiality could be damaging to the child, young person or adult experiencing or at risk from abuse or neglect, their family, the person whom the allegation is being made against and any safeguarding investigations that may follow.

15.2 The Norfolk Safeguarding Adults Board sets out the 'Seven Golden Rules' for information sharing, which represents good practice for staff: <7-golden-rules-for-info-sharing.pdf>

15.3 Remember: Sharing early with the appropriate partners is central to effective safeguarding.

15.4 Guidance for Photography and Filming:  
Staff are advised to speak to the Communications team if involved in any external communications or marketing activity, particularly those that could involve CYP or AAR. It is important that staff remember to ensure that any photographs of residents, especially CYP and AAR, are covered by photo consent using the form available here: <Photography and Videos Consent Form 2025.docx>.  
If you are allowing third party filming and photography at a council event, reasonable precautions should be taken to ensure attendees are aware of this (such as signage notifying for potential filming or flash photography).

#### **16. Good practice conduct – the “golden rules”**

15.1 Detailed advice on staff conduct can be seen on the intranet (<Officer Code of Conduct>). However, always remember the golden rules:

- **Respect** – Treat every child or adult at risk with dignity; be mindful of culture, age, disability and language
- **Empower** – Listen, ask open questions, offer choice wherever possible, and involve people in decisions that affect them
- **Maintain boundaries** – Meet in appropriate settings, do not give personal contact details or accept friend requests
- **Record and report** – Write facts (time, date, quote) immediately; pass the concern on the same day and record via the online form (details can be found here [LINK](#)) – do not investigate yourself
- **Confidentiality** – Share on a “need to know” basis only and never promise secrecy
- **Whistleblowing** – If you suspect malpractice, follow the Council’s [Whistleblowing policy](#). You are protected.

## 17. Work with Third Parties and Contracted Services

17.1 Children, young people and vulnerable adults can be subjected to abuse by those who work with them in any setting. It is important that all reasonable steps are taken by the council to ensure that unsuitable people are prevented from gaining access to them.

17.2 The council recognises that:

- some services are undertaken on its behalf by third party organisations, who may have contact with CYP and AAR
- it has property that may be used by third parties that involve contact with CYP and AAR
- it provides funding to some groups and organisations who provide services to or on behalf of CYP and AAR.

17.3 The Council has therefore developed a ‘safeguarding risk assessment’ (which forms part of our Procurement Handbook) to enable members of the Corporate Leadership Team and Service Managers to assess the level of appropriate action to take in respect of safeguarding in circumstances where the Council is:

- letting contracts, including preferred contractors
- providing grants or funding to third parties
- leasing Council owned property
- issuing licences for concessionary activities (outside the statutory licence process)
- undertaking event management
- undertaking general licensing functions

17.4 The risk assessment recognises the need to differentiate between the different levels of contact with CYP and AAR to apply the most appropriate level of action.

## 18. Recruitment

17.1 The Council follows robust recruitment, selection and appointment procedures for all vacancies. The fundamental stages of the procedure for recruiting and selecting staff are illustrated in the following table:

Pre-recruitment	It is essential that the need to work with children or vulnerable adults is clearly identified from the outset of the recruitment process for any post.
Pre-application	Information on all Council job opportunities are published on the recruitment pages of the Council's website.
Application	If the job advert highlights the need for a Disclosure and Barring Service (DBS) check, the Council is fulfilling its obligation to make applicants aware of the need for such a check, should they be successful in their application. All DBS checks are undertaken by our HR team and are conducted in line with relevant legislation and guidance.
Interview	The applicant is interviewed on the basis of suitability for the advertised role.
Checks and references	In cases where a DBS is required, a pre-employment check must be made. A provisional job offer will not be made formal until satisfactory DBS and references have been received. DBS certificates are rechecked every three years.
Induction and training	See section 16.

18.1 You can find more detailed information on each recruitment stage in the recruitment policy available on Ciphr.

## 19. Domestic abuse and Modern-Day Slavery

### Domestic abuse

19.1 The Council adheres to the Norfolk-wide [Safer Norfolk Plan](#), 2025-2028, set out by the Norfolk Community Safety Partnership. The Council has gained White Ribbon accreditation. White Ribbon encourages people, especially men and boys, to take action and change behaviour individually or collectively to end male violence against women and girls.

19.2 For more information on Domestic Abuse, please see Appendix A.

### Modern Slavery

19.3 The Council's approach to Modern Slavery and Human Trafficking are set out in the [Modern Slavery and Human Trafficking Policy Statement \(LINK\)](#)

## 20. Induction and Training

20.1 It is important that the recruitment and selection process is followed by relevant induction and training in order to further protect CYP and AAR. To make sure every individual linked to the Council receives the right depth of safeguarding knowledge, we use a three-tiered system.

20.2 Tier 1 – Awareness - This baseline training level is mandatory for all employees, including councillors, regardless of their level of contact with CYP or AAR.

- Format: an e-learning package available on the Learning Hub.
- Frequency: at induction and every three years.

19.3 Tier 2 – Enhanced contact - An in-person interactive workshop for staff who have regular and/or unsupervised contact with CYP and AAR.

- Format: One day, in-person workshop, covering recognising the signs of safeguarding issues, threshold and consent decisions, accurate recording.
- Frequency: Every three years.

19.4 Tier 3 – Specialist - This is more bespoke or specialist training, commissioned specifically for these groups and individuals. This level is required for:

- Appropriate elected members, such as portfolio holders
- Leisure and culture staff
- The council's Safeguarding Leads and other selected officers (such as members of the Internal Safeguarding Group).
- Frequency: Every three years or as necessary.

19.5 An annual safeguarding training plan is developed to ensure that staff are kept up to date on changes in legislation, recommended practice and new legislation or developments. This training plan is overseen by the Corporate Leadership Team.

## 20 Useful Links and Further Information

Organisation	Contact
Children's Services	<b>For reporting concerns about a child.</b> <ul style="list-style-type: none"><li>• Phone: 0344 800 8020 (8am-8pm Mon-Fri)</li><li>• Out of Hours Emergency Duty: 0344 800 8020 (same number – will divert)</li><li>• If immediate danger to a child, call police 999 as well.</li></ul>
Children's Advice and Duty Service (CADS)	
Norfolk Safeguarding Children Partnership (NSCP)	<b>For information on local protocols, threshold guide, referral form, training opportunities, and latest news on safeguarding children in Norfolk:</b>

	Website: <a href="http://www.norfolkscb.org">www.norfolkscb.org</a>
Adult Social Care – Safeguarding Adults Team (Norfolk County Council)	<p><b>To report concerns about an adult at risk.</b></p> <ul style="list-style-type: none"> <li>• Phone: 0344 800 8020 (Customer Service Centre, 24/7)</li> <li>• Safeguarding Adults concern form (for professionals) on NCC website <a href="#">secure portal</a>.</li> <li>• If immediate danger to adult, call police 999 as well.</li> </ul>
Norfolk Safeguarding Adults Board (NSAB)	<p><b>For policy documents like self-neglect strategy, referral guidance, and training info:</b></p> <p>Website: <a href="http://www.norfolksafeguardingadultsboard.info">www.norfolksafeguardingadultsboard.info</a></p>
Norfolk Constabulary (Police)	<p>Emergency: 999 (if a crime is in progress, life is in immediate danger or someone is at immediate risk of serious harm)</p> <ul style="list-style-type: none"> <li>• Non-emergency: 101 (to discuss or report a safeguarding concern that isn't immediate; they have dedicated Safeguarding units – for example, ask for the Child Abuse Investigation Unit or Adult Protection Team as needed.)</li> <li>• Prevent (Counter-Terrorism) Team: <a href="mailto:prevent@norfolk.pnn.police.uk">prevent@norfolk.pnn.police.uk</a> or call 101 and ask for Prevent Lead (to report radicalisation concerns).</li> </ul>
Childline (for children & young people direct)	<ul style="list-style-type: none"> <li>• Phone: 0800 1111 (Free, confidential, 24/7)</li> </ul>
National Domestic Abuse Helpline (for anyone experiencing domestic abuse)	<ul style="list-style-type: none"> <li>• Phone: 0808 2000 247 (Free, 24/7, run by Refuge)</li> </ul>
Modern Slavery Modern Slavery Helpline	<p><b>For advice or reporting suspected modern slavery or trafficking, besides police:</b></p> <ul style="list-style-type: none"> <li>• Phone: 08000 121 700 (24/7)</li> </ul>
Crimestoppers	<p><b>Public or staff can use this if they want to report something criminal but remain anonymous:</b></p> <ul style="list-style-type: none"> <li>• Phone: 0800 555 111 (Anonymous reporting of crime)</li> </ul>

## 21 Types and the potential signs of abuse

- 21.1 All staff are responsible for ensuring they are aware of the different types of abuse and any potential signs that may indicate someone is experiencing abuse or neglect.
- 21.2 Children and adults can be subject to different types of abuse, in different contexts, and therefore the signs will be different. For further information on the different categories and potential signs of abuse, please visit our [safeguarding intranet page](#) or visit the [NSCP](#) or [NSAB](#) website.
- 21.2 It is highly unlikely that an individual, especially a child, will ever directly say that they are being abused – it is up to you to remain alert and know the signs.

## Appendix A – Domestic Abuse Policy Statement

### 1. Purpose and scope

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening or violent behaviour between those aged 16 or over who are or have been intimate partners or family members. Children who witness such behaviour are victims.

This statement sets out how the Borough Council of King's Lynn and West Norfolk ("the Council") prevents, identifies and responds to domestic abuse affecting:

- residents, customers and visitors
- employees, agency workers, volunteers and Elected Members
- contractors and partner organisations delivering Council services.

It complements the main Safeguarding Policy, aligns with the Domestic Abuse Act 2021 and reflects current best practice drawn from Domestic Abuse Housing Alliance (DAHA), Local Government Association and district-council exemplars. Please note: a separate Domestic Abuse policy covering housing services can be found here ([link](#)).

### 2. Our commitment

We adopt a zero-tolerance stance towards domestic abuse and will:

- **Prevent** – raise awareness, encourage behaviour change and design out opportunities for abuse wherever the Council has influence.
- **Protect** – provide a trauma-informed response that puts the safety and voice of victim-survivors, including children, first.
- **Support** – ensure swift access to housing options, welfare advice, specialist advocacy and workplace help.
- **Pursue** – co-operate with police and other agencies to hold perpetrators to account, using tenancy, licensing and safeguarding powers when necessary.
- **Progress** – monitor data, listen to lived experience and improve policies and training continuously.

### 3. Guiding principles

Principle	What it means in practice
<b>Safety first</b>	Every disclosure or indicator of abuse is treated as urgent, and risk assessed the same working day.
<b>Believe and validate</b>	Staff will respond calmly, avoid judgement and believe what they are told.
<b>Child-centred</b>	Whenever children are involved, they are treated as victims.

<b>Equality and inclusion</b>	Services (both in-house and commissioned) are accessible regardless of sex, gender identity, disability, ethnicity, religion, immigration status or socio-economic position.
<b>Confidentiality</b>	Information is shared only on a “need-to-know” basis, except where risk of harm overrides consent.
<b>Partnership</b>	We follow the MARAC (Multi Agency Risk Assessment Co-ordination), CADS and MAPPA (Multi-Agency Public Protection Arrangements) arrangements agreed in Norfolk.

#### 4. Roles and responsibilities

<b>Role</b>	<b>Key duties</b>
<b>Designated Safeguarding Coordinator</b>	Strategic oversight; partnership liaison;
<b>Deputy Coordinator</b>	Day-to-day advice; maintain referral pathways; case advice and guidance.
<b>Managers</b>	Ensure staff complete mandatory training; implement workplace adjustments and support. Ensure staff have access to the right support if they have experienced or are experiencing domestic abuse.  Available from Ciphr: Domestic Abuse Procedure to Safeguarding Employees.
<b>DA Champions</b>	Network of officers to promote guiding principles and signpost staff and customers to relevant support.
<b>All staff, volunteers and Members</b>	Recognise, record and report concerns promptly; maintain professional curiosity.

#### 5. Support for victims and staff

- Residents and customers – 24/7 Norfolk Helpline 0300 561 0555, Live-Chat link and quick-exit button on the Council [website](#); [Sanctuary Scheme](#); flexible rent or council-tax arrangements; priority transfers where risk is confirmed.
- Employees – free, confidential support via VIVUP Employee Assistance (0800 023 9857); time-off and workplace safety planning; TRiM peer-support after traumatic disclosures.
- Perpetrators in the workforce –referral to behaviour-change programmes where available, and support organisations. Managed through the Domestic Abuse Procedure to Safeguard Employees, available from Ciphr.

#### 6. Procedures and referral routes

- Immediate danger: Dial 999.
- A DASH - Domestic Abuse, Stalking, Harassment and Honour Based Violence – Risk Assessment will be conducted by an appropriately trained member of staff. This tool is used to identify risk and will determine referral routes for the individual. For more information visit the [MARAC](#) webpage or speak to a Safeguarding Lead or a Domestic Abuse Champion.

## 7. Document control

Version 1.0

- Approved by Cabinet **DD/MM/2025**
- Review due December 2028

## Appendix 2 - Grid of Policy Changes

Section / Heading	Changes Made	Explanation / Rationale
<b>NEW: Safeguarding – Policy Summary for Officers</b>	<b>One page summary:</b> New section added as a clear one-page summary for all officers.	Enhances usability, offering accessible, concise guidance on essential safeguarding duties.
<b>Executive Summary</b>	<p><b>Rewritten for clarity:</b> The opening was changed from a formal description of authorities' duties (e.g. "Local authorities have overarching responsibility...") to a direct statement ("Safeguarding is everyone's business... explains how the Council prevents harm...").</p> <p>Key definitions of safeguarding remain, but minor phrasing fixes were made (e.g. correcting grammar in "preventing the impairment of...health or development").</p> <p>Added explicit commitment to multi-disciplinary partnership and information sharing.</p>	<p><b>Improve engagement and clarity:</b> The introduction is now more concise, and reader focused.</p> <p>The new opening emphasises collective responsibility in plain language, making the summary more accessible. Minor edits (grammar, wording) ensure accuracy and readability. These changes make the policy's purpose clearer from the outset.</p> <p>Also demonstrates a strengthened approach to collaboration and sharing responsibilities, reflecting best practice advice from LSAP.</p>
<b>Introduction</b>	<p>The intro's content – affirming everyone's right to live safely and the Council's commitment to safeguarding – is retained but shortened slightly and edited to avoid repetition with the Policy Statement. For example, sentences about residents' rights "to live their lives to their fullest potential... and be treated with dignity and respect" now appear without a separate heading.</p>	<p><b>Avoid redundancy:</b> The introduction's content overlapped with the Policy Statement.</p> <p>The important principles are still included but folding them into the Policy Statement eliminates duplication and keeps the policy focused.</p>
<b>Definitions (formerly "Overarching Definitions")</b>	<p><b>Renamed and reformatted:</b> The section title "Overarching Definitions" (old Section 2) is now just "Definitions." The content was transformed from narrative paragraphs into a glossary-style table of key terms and meanings.</p> <p>Terms like Safeguarding, Children and young people, Adults at risk, Parent, Staff, Contractor/Third Party, DBS, Abuse (Neglect), MASH, LADO, and NSCP/NSAB are listed with concise definitions and any abbreviations.</p>	<p><b>Clarity and quick reference:</b> Converting definitions into a table creates a convenient glossary. This format makes it easier for readers to find definitions and ensures consistency (including commonly used abbreviations). It also declutters the main text – detailed and unnecessary legal text was removed for brevity. The term "Overarching" was dropped from the title to keep it simple.</p>

	<p>Definitions that were previously prose are now in table rows (e.g. “Children and young people – anyone under 18”, with abbreviation CYP). The detailed statutory wording for child and adult definitions was moved out of the main body. Footnotes reference official sources. The old sub-headings “Safeguarding,” “Child,” “Adults...,” “Other Terms” are eliminated – all terms are integrated into the single glossary table.</p>	<p>Overall, these changes improve readability and keep definitions up to date by referencing external sources rather than embedding lengthy statutory text.</p>
<b>Policy Statement</b>	<p><b>Minor content edits:</b> The Policy Statement retains its core message but has slight wording updates for inclusivity and accuracy.</p> <p>For example, it still affirms the right of all children, young people and adults “irrespective of...age, class, religion, culture, disability, gender, ethnicity or sexual preference” to be protected, same as before.</p> <p>The list of how the Council will do this remains, but one bullet about contractor obligations was trimmed for conciseness (e.g. “Where appropriate, ensuring contractors...and other relevant third parties have safeguarding policies in place”). A new closing paragraph was added to affirm the policy’s alignment with laws and multi-agency arrangements.</p>	<p><b>Clarity and currency:</b> Minor rewording makes the statement more succinct without changing its meaning. The added note that the policy is written in accordance with specific Acts and “aligns with Norfolk Multi-Agency Safeguarding Arrangements” ties the statement to current law and local frameworks, reinforcing accuracy. These edits improve the statement’s precision and ensure it reflects the latest partnerships and terminology.</p>
<b>Scope</b>	<p>The Scope still specifies that the policy applies to all Council services and its wholly owned companies and includes procured services, essentially unchanged from before.</p> <p>Clarified that the policy also applies to staff who are currently experiencing or at risk of experiencing abuse</p>	<p><b>Maintaining clarity:</b> The scope remains comprehensive.</p>
<b>Aims</b>	<p><b>Reworded for focus:</b> The aims are still listed, but phrased as outcomes the Council seeks. For example, an aim in the old version, “Raise awareness of the duty of care responsibilities...” is retained in substance. However, some aim statements were consolidated or tightened. One combined aim now covers safe environments, proper recruitment, training, and response to</p>	<p><b>Improved coherence:</b> The aims were refined to avoid repetition and group related ideas. By tightening the language and combining closely related points (e.g. staff recruitment/training and adherence to codes of conduct), the policy’s goals are clearer. This makes the aims easier to read</p>

	<p>allegations all in one bullet (whereas previously these points were scattered).</p>	<p>and aligns them directly with the Council's duties (training, safe environment, compliance with conduct codes).</p>
<b>“Objectives” - renamed “How we will achieve this”</b>	<p><b>Section renamed and phrasing changed:</b> The old Objectives section (3.3) is now titled “How we will achieve this.” Instead of descriptive text (“The Council will do this by:...”) followed by gerund phrases, the new version uses a directive tone with the Council as subject (“The Council will: Provide... Aid... Maintain... Promote... Develop...”).</p> <p>The content of the five bullet points is very similar but slightly streamlined. For example, “Maintaining a level of good working practice at all times and therefore reducing risk...” is shortened to “Always maintain a level of good working practice”.</p> <p>All five original objectives (training, sensitive response, good practice, promoting welfare, effective procedures) remain, just phrased more succinctly.</p>	<p><b>Greater clarity and active voice:</b> Renaming to “How we will achieve this” makes the section’s purpose obvious (it describes implementation of the aims). The shift to active voice (“The Council will...”) and eliminating unnecessary words (like “at all times” or explanatory clauses) makes each commitment sharper. These edits improve readability and ensure staff quickly grasp the actionable steps the Council will take to meet its safeguarding aims.</p>
<b>Roles and Responsibilities</b>	<p><b>Major rewrite &amp; format change:</b> This section was overhauled from a long narrative list of duties for various roles to a concise table of key roles and their responsibilities.</p> <p>The old version enumerated roles with sub-paragraphs 3.4.1 through 3.4.9 (Safeguarding Coordinator, Management Team, Assistant Directors, all employees, specific teams like Personnel, etc.).</p> <p>In the new policy, it opens with a brief statement “Safeguarding is everyone’s responsibility... responsibility lies at all levels” and then presents a table of six role categories: Designated Safeguarding Coordinator (DSC), Deputy Coordinators &amp; Service Champions, Assistant Directors, Line managers, Every employee/volunteer, and Elected Members.</p> <p>Each is paired with a one-line summary of their duty (e.g. “Line managers – ensure staff complete training; safe staffing”). Roles that were previously listed in detail (e.g. Management Team,</p>	<p><b>Brevity and usability:</b> The original list was lengthy and risked making readers get lost. The new table format is intended to make it easy to scan who is responsible for what.</p> <p>By focusing on key roles, the policy highlights accountability without minor repetition. Less critical sub-roles (e.g. specific teams or management layers) were omitted because their duties overlap with the broader categories listed and will be documented in internal guidance.</p> <p>The table format improves clarity and serves as a quick reference “who does what” guide for staff, aligning with best practice for clarity in role definition.</p>

	Personnel Services, Corporate Policy Team) are no longer individually detailed; only the key positions are highlighted.	
<b>Legislation and Guidance</b>	<p><b>Updated and externalised:</b> The list of relevant laws and guidance was updated to include the latest references – for example, “Working Together to Safeguard Children 2023” (replacing the 2018 version) and “Care and Support Statutory Guidance 2024” were added.</p> <p>All the previous Acts (Children Act, Care Act, etc.) remain listed. In addition, it includes a reference to the anticipated “Crime and Policing Bill”, expected later in 2025, referring a new duty on cuckooing. However, instead of reproducing summaries of each law in the appendix, Appendix A’s detailed statute summaries were removed from the document (no longer printed in full). The new section still briefly explains the importance of being aware of laws but pushes the detailed content to the intranet. The policy now sets out an intranet link for more information.</p>	<p><b>Ensure currency and reduce bulk:</b> Listing the most up-to-date legislation makes the policy accurate as of 2025. The changes update policy to include forthcoming legislative requirements, ensuring compliance and preparedness. At the same time, the detailed descriptions of each law are likely to become outdated. By moving detailed legal synopses to the intranet (with a hyperlink in the policy), the Council can update legislative guidance in one place without re-issuing the policy each time a law changes. This approach also shortens the policy document while still providing readers access to necessary details if needed. It balances completeness with maintainability.</p>
<b>Oversight and Assurance</b>	<p><b>Restructured:</b> The narrative paragraphs describing audit processes and governance were replaced by a structured table. The old text explained the annual Section 11 audit, internal audits, and Cabinet approval in a descriptive way.</p> <p>The new version condenses these into a table of oversight “Body/Role – Frequency – Purpose”. For example, it lists: “Cabinet and Council – Three-year policy approval; annual update – (Purpose) Democratic oversight”, “Audit Committee – twice-yearly – monitors internal audit findings and risk register”, “Internal Safeguarding Group (ISG) – quarterly – cross-service learning, data review, action plan tracking”, and “Section 11 Self-Audit – every March – assesses practice against Children Act 2004 standards”.</p> <p>The full Terms of Reference for the ISG are no longer appended.</p>	<p><b>Clarity and accountability:</b> The change provides a snapshot of how the policy is monitored and kept up to date. Presenting the oversight mechanisms in a table makes it clear which body is responsible for what oversight activity and how often.</p> <p>The rationale is to improve transparency about governance in a concise format. Additionally, removing the ISG’s Terms of Reference from the main document keeps the policy focused; those detailed TOR are an internal governance matter and can be maintained elsewhere.</p> <p>Overall, these edits make the policy’s assurance framework easier to understand at a glance and ensure that lengthy procedural details (like TOR) don’t clutter the public policy document.</p>

	Added reference to annual Section 11 audit process, with submission to NSCP.	The update on Section 11 ensures that the policy reflects statutory requirements for annual audit, clarifies accountability, and demonstrates the Council's participation in external safeguarding assurance.
<b>Partnerships and Networks</b>	<p><b>Streamlined and updated:</b> The section still lists the multi-agency groups the Council engages with, but in a much shorter form. Previously, this part included an “Active participation in...” bullet list and then lengthy sub-sections describing the Norfolk Safeguarding Children Partnership (NSCP) and Norfolk Safeguarding Adults Board (NSAB) – their history, legal basis, structure, functions, etc. – spanning several paragraphs.</p> <p>In the new draft, all that detail is removed. The policy now simply states that “The Council participates in a number of groups... including:” and then bullet-points or brief lines for: District Councils Safeguarding Group (DCSG) to the NSCP, the local Safeguarding Children Group, the NSAB, and the Western Locality Safeguarding Adult Partnership.</p> <p>Each is described in one sentence and, where appropriate, points the reader to the external website for more information (e.g. “For further information about NSCP, please visit their website.”). The detailed explanation of NSCP’s internal structure, the Children and Social Work Act changes, etc., is no longer in the policy.</p> <p>There is, however, added confirmation of membership of the “Norfolk Anti-Slavery Network” and reference to the county’s exploitation website.</p>	<p><b>Focus and currency:</b> The detailed descriptions of NSCP and NSAB are more suited to training or guidance documents rather than the policy itself. Removing them cuts out several pages of text that were effectively paraphrasing external documents (which could become outdated).</p> <p>The new approach ensures the policy names all key partnerships to show compliance with duties but directs readers to the official sources for details. This makes the policy more succinct and prevents it from becoming stale or lengthy by duplicating information available on partner agencies’ websites. It also highlights only the necessary information (that the Council is involved in these groups), which is clearer for readers who just need to know the fact of participation and where to learn more.</p>
<b>Definitions of Abuse and Neglect</b>	<b>Content moved from main body to Appendix:</b> The old policy included a full section defining types of abuse and neglect (with over 20 sub-definitions like physical, sexual, emotional abuse, neglect, domestic abuse, modern slavery, etc.) in the main body.	<p><b>Streamlining and relying on up-to-date guidance:</b> This change removes about 12 pages of detailed content from the body of the policy, which overwhelmed the policy.</p> <p>Front-line staff now typically refer to live guidance from NSCP/NSAB for detailed indicators of abuse. By moving these details to an internal resource and keeping only a summary in policy, the document stays concise and avoids potential</p>

	<p>The long ‘indicators of Abuse’ appendix is removed. The policy now carries a brief main-body section ‘Types and the potential signs of abuse’ and directs staff to the intranet for full indicators.</p> <p>The separate short Section 8 on “Definition of Grooming” was also removed as a standalone section – grooming is now included as one of the entries in the consolidated abuse definitions table (labelled “Grooming”).</p>	<p>inconsistencies with external definitions. It also ensures that as definitions evolve (e.g. new forms of abuse, updated descriptions), the policy doesn’t require a full rewrite – staff will be directed to current resources. In short, the policy now highlights that all these abuse categories exist and are recognised but trusts dynamic sources (intranet or partner websites) for exhaustive descriptions, thereby maintaining accuracy over time.</p>
<b>Allegations of Previous Abuse (among Council Staff)</b>	<p><b>Repositioned and condensed:</b> What was Section 11 in the old policy (“Allegations of Previous Abuse”) is now brought forward as Section 7, retitled “Allegations of Previous Abuse among Council Staff.”</p> <p>Content-wise, it is significantly shortened. The original section described scenarios of historic abuse allegations coming to light (e.g. an adult reporting past abuse by a staff member) and instructed that standard procedures should be followed and authorities informed; it also mentioned that anyone with a prior conviction for abuse is barred from such work by law (Protection of Children Act 1999) and outlined the need for DBS checks and re-checks every 3 years.</p> <p>The revised section omits the scenario-based discussion and simply states the legal and policy bottom line: Under the Protection of Children Act 1999, it is an offence for an individual with a history of abusing children or vulnerable adults to seek or hold a role working with those groups, and that staff in contact with children/vulnerable adults require a DBS check rechecked every 3 years. This captures the key points from the old text (the legal prohibition and the DBS requirement) and leaves out the earlier narrative about reporting procedure (which is covered elsewhere).</p>	<p><b>Clarity and avoiding duplication:</b> By moving this topic earlier in the document (from 11 to 7), it now sits alongside other policy framework content (like oversight and HR practices) rather than after procedures. This is intended to improve logical flow.</p> <p>The heavy edit in content focuses on the essential preventative policy: do not employ past abusers (legal compliance) and conduct regular DBS checks. The rationale is that the procedural response to allegations (even historic ones) is already covered under the general “what to do if you have a concern” procedures. In this way, the new text avoids repeating those instructions and instead emphasises compliance and prevention. It’s more succinct and ensures the policy statement remains forward-looking (preventing unsuitable individuals in the workforce) rather than case-handling, which is addressed later.</p>

<p><b>“What to do if you have a Concern” – Safeguarding Procedures</b></p>	<p><b>Procedures section retained, minor tweaks:</b> This section remains a step-by-step guidance for staff, members, and volunteers on how to respond to concerns or allegations.</p> <p>The overall content is similar, but some improvements were made for clarity and ease of use. For example, the safeguarding contact information was reorganised into a clear table/chart.</p> <p>In the old policy, after the narrative, there were lists of whom to contact (e.g. specific coordinators or external numbers) within the text. In the new version, key contacts are presented in a table format for quick reference.</p> <p>For example, there is a table under “Who to talk to if you have a concern” that lists types of issues and the correct organisation/contact. This is a new addition that makes the procedure more actionable.</p> <p>This new sub-section adds specific contact guidance for concerns. In addition, there are details for missing persons/</p>	<p><b>User-friendly guidance:</b> The minor modifications aim to make the procedure section more user centric. By adding a contact table, the policy ensures that anyone with a concern can quickly find the correct reporting route without wading through paragraphs. This change was made for clarity – it turns what was prose into an easy-to-scan reference.</p> <p>These updates refine the section so that in a moment of need, the reader can easily follow the steps and reach out to the right resources, thereby enhancing the effectiveness of the policy’s guidance.</p>
<p><b>Safeguarding Procedure Flowchart</b></p>	<p>Updated to remove legacy named contacts and to point users to online referral forms.</p>	<p><b>Clarity and consistency:</b> The update of the flowchart underscores its importance as a quick guide. Updating the content ensures it is up to date, but with no loss of information – the focus is on making the flowchart as clear and accessible as possible, since it’s a critical tool for staff in an urgent situation.</p>
<p><b>Responding to Concerns, Disclosures and Allegations</b></p>	<p><b>Reference to guidance added:</b> This section remains in place to guide how to respond once a concern is reported (e.g. duties to refer and general actions).</p> <p>The structure is kept similar, but the main change is to explicitly tell the reader that a detailed breakdown of actions is available elsewhere and then provide a short list of key things all staff should do.</p>	<p><b>Avoiding duplication and emphasising key actions:</b> Since Appendix C contains a comprehensive “how-to” for recording and responding to concerns, the main policy doesn’t need to duplicate all that.</p> <p>By referencing Appendix C, the policy ensures staff know where to find the detailed checklist. Meanwhile, highlighting that “all staff should:” followed by a few critical bullet points ensures the most important messages (like refer immediately,</p>

	<p>In other words, rather than listing all action steps in the main text, it now summarises and points to the appendix for full details. The content itself (e.g. remind staff not to investigate, to report in writing promptly, etc.) has not materially changed – it's just been offloaded to the guidance notes to avoid repetition.</p> <p>Also includes explicit guidance on not promising confidentiality, with clear reasoning.</p> <p>The text also explicitly reminds that if there is immediate risk, call 999 (reiterated for emphasis).</p>	<p>don't delay, etc.) are front and centre. This approach provides a layered detail – simple instructions in policy with detailed guidance in an appendix – which keeps the policy concise while still covering all bases.</p> <p>Provides clarity on managing disclosures sensitively while fulfilling safeguarding obligations.</p> <p>Reiterating urgent guidance (dial 999 if immediate danger) in bold doubles down on critical advice.</p>
<b>Confidentiality and Information Sharing</b>	<p><b>Largely unchanged:</b> This section still emphasises maintaining confidentiality and only sharing information on a need-to-know basis to protect those involved.</p> <p>The content in the new draft remains very similar in meaning and wording, reiterating government guidance that data protection is not a barrier to sharing information in safeguarding cases, etc.</p> <p>One structural change is that the subsection on “Guidance for use of Photographic/Filming Equipment” was moved under this section (see next row). The confidentiality section’s primary text stayed stable, continuing to stress proper handling of sensitive info and the principle that safeguarding concerns override typical confidentiality where necessary.</p>	<p><b>Consistency with best practice:</b> The existing content did not require much alteration.</p>
<b>Guidance on Photographic/Filming Equipment</b>	<p><b>Relocated under Confidentiality section:</b> This guidance was originally a sub-heading under “Good Practice” (Section 13.03 in old policy). In the new draft, it appears as subsection 11.03 under Confidentiality and Information Sharing.</p> <p>The changes add explicit reference and link to NSAB’s “Seven Golden Rules” for information sharing.</p>	<p><b>Thematic reorganisation:</b> Moved here because the use of images and recordings has as much to do with data protection and consent as it does with general “good practice.”</p> <p>Situating it under Confidentiality makes it clear that photo/video usage is considered in the context of information governance and privacy. It also slimmed down the Good Practice section to focus on behaviour “golden rules,” while all technical guidance (like photography rules) now sits elsewhere.</p>

		More broadly, this section now reinforces the importance of proactive information sharing.
<b>Good Practice Guidelines</b>	<p><b>Reframed and reduced:</b> The old policy's Section 13 introduced general good practice principles and then pointed to Appendix E for a detailed "Always/Never" list of dos and don'ts.</p> <p>Essentially, the exhaustive list of do's and don'ts was condensed into a concise half-page summary of best practices, with a reference to where the full guidelines can be found if needed. In the updated draft, Appendix E is removed (see Appendix E row), and a new "Good practice conduct – the 'golden rules'" section is included in the main body.</p> <p>This new section distils the guidance into a short, memorable list of key principles (described as "golden rules"), each with a brief explanation (e.g. "Respect – treat every child or adult at risk with dignity...").</p> <p>It explicitly states that detailed advice on staff conduct is available on the intranet and then focuses on the core rules to always remember.</p>	<p><b>Avoiding duplication &amp; emphasizing core behaviour:</b> The full 2-page checklist in Appendix E was too lengthy for the policy. By removing it, the policy avoids replicating information that is elsewhere in corporate policies.</p> <p>Introducing "golden rules" serves to highlight the spirit of those guidelines in a digestible way. This change was made to keep the policy document lean and focused on key messages – staff and volunteers get the high-level principles up front, while still being directed to more detailed guidance when needed. It improves recall (people are more likely to remember a handful of golden rules) and ensures consistency with the Codes of Conduct (since the detailed list can be maintained on the intranet and updated in sync with any code of conduct changes).</p>
<b>Work with Third Parties and Contracted Services</b>	<p><b>Minor clarification:</b> This section's title and position remain the same. The content continues to outline the Council's expectations that third-party service providers and contractors also adhere to safeguarding responsibilities.</p> <p>There were no major content overhauls; however, references were adjusted to link with the new risk assessment process. For instance, the policy still insists on ensuring contractors have appropriate safeguarding policies, but now explicitly mentions using the Council's safeguarding risk assessment process for contractors, which ties into Appendix G. However, Appendix G has been removed, as considered unnecessary by Procurement.</p>	<p><b>Maintaining policy, integrating new tools:</b> The slight tweak referencing the risk assessment aligns this section with former Appendix G, reinforcing that the Council has a mechanism to vet third parties.</p> <p>The original content was sound, and only a small update was needed to ensure readers know to apply the formal risk assessment for contractors, grants, or licensees as part of safeguarding due diligence.</p>

	<p>Any duplication with Appendix F (which was removed) was cleaned up.</p>	
<b>Recruitment</b>	<p><b>Section shorted, linked to intranet:</b> The Recruitment section was shortened in narrative and the table (based on the diagram previously in the Appendix moved to the policy section). More details on the intranet – to be added.</p> <p>Details on the recruitment procedure for posts where 'Disclosure' (formally police checks) are signposted to intranet.</p>	<p><b>Ensuring safer recruitment and avoiding redundancy:</b> The old appendix on recruitment duplicated standard HR procedures and contained details that could change (like DBS eligibility criteria).</p> <p>The new approach is to host the detailed recruitment guidance on the HR intranet and include a simplified overview in the policy. By doing so, the policy still underscores that safe recruitment is essential (and shows the critical steps in an easy-to-follow format), but it doesn't repeat entire HR policies. The inserted table (taken and summarised from the original appendix) makes the process clear at a glance which is practical for managers.</p> <p>The reason for this change is both to improve clarity (visual timeline of actions) and to prevent outdated info: as DBS rules or HR practices update, the intranet can be updated accordingly without changing the policy document.</p>
<b>Current Employees and Safeguarding</b>	<p><b>No substantive change:</b> This section addresses safeguarding considerations for existing employees (e.g. how to handle concerns about staff, ongoing responsibilities, etc.). The content was largely retained.</p> <p>It continues to emphasise that safeguarding obligations extend to all staff and even those under 18 or on work experience, and that internal mechanisms (like support and training) are in place.</p>	<p><b>Already fit for purpose:</b> Keeping it unchanged maintains continuity – the expectations of their conduct and the support they receive (like welfare support or TRIM for traumatic incidents) remain steady.</p>
<b>Induction and Training</b>	<p><b>Revised training approach:</b> Clearly sets out a tiered approach to safeguarding training. This sets out the different levels and expectations, with additional emphasis on modern slavery, domestic abuse and self-neglect/hoarding.</p>	<p>This incorporates best practice around targeted training for specific teams – while guaranteeing that the entire council has a strong baseline of understanding, it also ensures teams understand mandatory training requirements clearly.</p>

<b>Support for Staff</b>	<p><b>Enhanced emphasis on staff welfare:</b> This subsection continues to recognise that staff may themselves be affected by safeguarding issues (like domestic abuse) and outlines support. The content was updated slightly to strengthen this message. The new draft explicitly commits to a “zero tolerance for abuse” in the workplace and encourages a supportive culture. It reiterates that any employee suffering domestic abuse can confidentially seek help (line manager or HR welfare officer) and will receive support. It then covers how the Council will treat any allegations or convictions of domestic abuse by employees on a case-by-case basis using appropriate HR policies – this remained as before. The Trauma Risk Management (TRiM) programme is still included. The support offered (Vivup, TRiM) are explicitly set out in simplified, plain-English to ensure support is accessible.</p>	<p><b>Caring for the carers:</b> The updates here serve to underline the Council’s dedication to its employees’ welfare. By adding “zero tolerance” and clearly inviting those experiencing domestic abuse to seek support, the policy sends a strong message that staff safety is also a priority.</p>
<b>Useful Links and Further Information</b>	<p><b>Expanded and formatted as reference list:</b> In the old policy, this was a brief section listing a few key contacts or resources in text form. The updated draft greatly expands this into a comprehensive contact directory in table format. It now provides a list of relevant agencies and helplines with descriptions and up-to-date contact information, making it much more practical. This means the policy now serves as a handy reference for anyone needing to quickly find where to report or seek advice on a safeguarding issue.</p>	<p><b>Improved utility and comprehensiveness:</b> The change here was to turn a simple list into a robust (but accessible) resource. The rationale is to ensure that no matter the situation (child concern, adult concern, concern about staff, general advice), the reader can find the right contact easily. Presenting it in a table ensures readability and quick access.</p>
<b>Appendix A: Legislation and Guidance</b>	<p><b>Retained in name, content pared down:</b> Appendix A in the old policy contained “A summary of the key legal requirements” – multiple paragraphs describing various Acts (Children Act, Care Act, etc.). In the new version, the appendix is removed, and the</p>	<p><b>Up-to-date and slimmed down:</b> The reasoning for this change is that while it’s important to cite relevant legislation, maintaining lengthy descriptions in the policy is impractical. Laws can change and the summaries can become obsolete. By keeping a brief list of statutes (in the main text) and moving detailed descriptions to an intranet page, the Council can</p>

	<p>policy instructs readers to consult the intranet for the summaries instead of including them.</p>	<p>update legal references more nimbly. This also prevents the policy from becoming too long.</p>
<b>Appendix B: Indicators of Abuse</b>	<p><b>Removed from policy:</b> Appendix B was drastically overhauled. The original appendix spanned around 12 pages of detailed signs and indicators for each type of abuse (physical, emotional, sexual, domestic, etc.).</p> <p>In the revised policy, Appendix B is now operationalised via the intranet.</p>	<p><b>Making the policy digestible and current:</b> The full indicator tables are more suitable for training reference than for a policy document – they were very lengthy and could quickly go out-of-date as guidance evolves.</p> <p>The new Appendix B approach gives all readers a common understanding of each abuse category (so terminology is clear) while directing those who need in-depth indicators to external resources (which are kept updated by expert bodies). This reduces the policy by approximately 12 pages, hugely improving readability.</p> <p>The reason for keeping short definitions is to ensure the policy still defines its scope – it lists what constitutes abuse in general terms – fulfilling a glossary function. The intranet link ensures no loss of information, merely a relocation. This strikes a balance between comprehensiveness and practicality.</p>
<b>Appendix C: Guidance Notes (Recording Concerns &amp; Allegations)</b>	<p><b>Removed from policy:</b> Appendix C, which provides step-by-step guidance on how to document safeguarding concerns and allegations, has been removed.</p>	<p><b>Moved to intranet for practical usage:</b> These guidance notes may be a useful tool for staff to handle disclosures correctly but is not practical within the policy itself.</p>
<b>Appendix D: Internal Safeguarding Referral Form</b>	<p><b>Removed from policy:</b> Appendix D in the old policy contained both the internal form for reporting a concern (a blank template) and guidance for filling it out.</p> <p>In the new draft, the blank template is no longer included. The text in the policy now guides users to complete the live form on the intranet instead of providing a static form.</p>	<p><b>Moved to intranet for practical usage:</b> If the idea was to complete the copy found on the policy, then it is an overcomplicated and unusual approach. Better to have a downloadable version that can be filled out using guidance from the policy, which is retained.</p> <p>The approach now is to ensure everyone uses the form available on the intranet (if it isn't there already, it should be added).</p>

<b>Appendix E: Good Practice for Staff/Members (Guidelines)</b>	<p><b>Removed from policy:</b> Appendix E, which contained the detailed guidelines (“Always do this, Never do that”) for staff and volunteers, was removed in its entirety.</p> <p>The content (two pages of bullet-pointed best practices) is no longer printed in the policy. Instead, the key points have been summarised into the “golden rules” section in the main body.</p>	<p><b>Overlong and impractical:</b> The rationale was that Appendix E’s content, while useful, was much too overlong to be useful. It also made the policy lengthy. The solution is to collate it into a brief in-policy summary. This way, employees still have access to guidance (which can be updated in one place), but the policy document remains concise.</p>
<b>Appendix F: Recruitment and Selection of Staff</b>	<p><b>Removed from policy (intranet and table replacement):</b> Appendix F, which gave specific instructions on safe recruitment (including annual DBS eligibility updates, procedural steps, etc.), has been removed. Its content is now intended to reside on the HR intranet, and the policy body itself was supplemented with a simplified table of the recruitment process (as described in the Recruitment section above).</p>	<p><b>Preventing outdated HR info and focusing on process:</b> The recruitment guidelines can change (especially DBS rules or best practices), so having them in an appendix posed a maintenance issue.</p> <p>Moreover, much of Appendix F reiterated standard HR policy. In place of the appendix, the policy now gives a visual summary that is unlikely to change (the need for DBS, reference checks, etc. in sequence). This keeps the policy lean and ensures alignment with HR’s official procedures. If HR updates the recruitment process or legal requirements shift, those can be addressed in the intranet guidance without touching the Council’s Safeguarding Policy text.</p>
<b>Appendix G: Safeguarding Risk Assessment (for contracts/grants/licenses)</b>	<p><b>Removed from policy:</b> Appendix G has been removed from the policy. The assessment will be used by procurement, but the team consider its use to be rare.</p>	<p><b>Irrelevant:</b> Appendix G has been removed as the risk assessment will only be used for certain procurement processes.</p>
<b>Appendix H: Internal Safeguarding Group Terms of Reference (ToR)</b>	<p><b>Removed from policy:</b> Appendix H contained the Terms of Reference for the Council’s Internal Safeguarding Group. This content has been removed from the policy.</p>	<p><b>Internal detail moved out:</b> The Terms of Reference are procedural/administrative details about an internal committee – not essential for the general policy reader.</p>
<b>NEW Appendix</b>	<p><b>Domestic Abuse Policy Statement:</b> Comprehensive standalone appendix developed, aligning clearly with the Domestic Abuse Act 2021, the Norfolk Domestic Abuse Strategy, best practice and the councils own prospective DAHA status.</p>	<p>Provides focused guidance and meets statutory requirements. It offers clear accessible information for staff handling DA concerns, without over committing the council in the short term. This is set out on the acknowledgment that a more in-depth</p>

		review of domestic abuse policy may be required in coming years.
<b>Section / Heading</b>	<b>Changes Made</b>	<b>Explanation / Rationale</b>
<b>NEW: Key Take-away Sheet</b>	<b>One page summary:</b> New section added as a clear one-page summary for all officers.	Enhances usability, offering accessible, concise guidance on essential safeguarding duties.
<b>Executive Summary</b>	<p><b>Rewritten for clarity:</b> The opening was changed from a formal description of authorities' duties (e.g. "Local authorities have overarching responsibility...") to a direct statement ("Safeguarding is everyone's business... explains how the Council prevents harm...").</p> <p>Key definitions of safeguarding remain, but minor phrasing fixes were made (e.g. correcting grammar in "preventing the impairment of...health or development").</p> <p>Added explicit commitment to multi-disciplinary partnership and information sharing.</p>	<p><b>Improve engagement and clarity:</b> The introduction is now more concise, and reader focused.</p> <p>The new opening emphasises collective responsibility in plain language, making the summary more accessible. Minor edits (grammar, wording) ensure accuracy and readability. These changes make the policy's purpose clearer from the outset.</p> <p>Also demonstrates a strengthened approach to collaboration and sharing responsibilities, reflecting best practice advice from LSAP.</p>
<b>Introduction</b>	The intro's content – affirming everyone's right to live safely and the Council's commitment to safeguarding – is retained but shortened slightly and edited to avoid repetition with the Policy Statement. For example, sentences about residents' rights "to live their lives to their fullest potential... and be treated with dignity and respect" now appear without a separate heading.	<p><b>Avoid repetition:</b> The introduction's content overlapped with the Policy Statement.</p> <p>The important principles are still included but folding them into the Policy Statement eliminates duplication and keeps the policy focused.</p>
<b>Definitions</b> (formerly "Overarching Definitions")	<p><b>Renamed and reformatted:</b> The section title "Overarching Definitions" (old Section 2) is now just "Definitions." The content was transformed from narrative paragraphs into a glossary-style table of key terms and meanings.</p> <p>Terms like Safeguarding, Children and young people, Adults at risk, Parent, Staff, Contractor/Third Party, DBS,</p>	<p><b>Clarity and quick reference:</b> Converting definitions into a table creates a convenient glossary. This format makes it easier for readers to find definitions and ensures consistency (including commonly used abbreviations). It also declutters the main text – detailed and unnecessary legal text was removed for</p>

	<p>Abuse (Neglect), MASH, LADO, and NSCP/NSAB are listed with concise definitions and any abbreviations.</p> <p>Definitions that were previously prose are now in table rows (e.g. "Children and young people – anyone under 18", with abbreviation CYP). The detailed statutory wording for child and adult definitions was moved out of the main body. Footnotes reference official sources. The old sub-headings "Safeguarding," "Child," "Adults...," "Other Terms" are eliminated – all terms are integrated into the single glossary table.</p>	<p>brevity. The term "Overarching" was dropped from the title to keep it simple.</p> <p>Overall, these changes improve readability and keep definitions up to date by referencing external sources rather than embedding lengthy statutory text.</p>
<b>Policy Statement</b>	<p><b>Minor content edits:</b> The Policy Statement retains its core message but has slight wording updates for inclusivity and accuracy.</p> <p>For example, it still affirms the right of all children, young people and adults "irrespective of...age, class, religion, culture, disability, gender, ethnicity or sexual preference" to be protected, same as before.</p> <p>The list of how the Council will do this remains, but one bullet about contractor obligations was trimmed for conciseness (e.g. "Where appropriate, ensuring contractors...and other relevant third parties have safeguarding policies in place"). A new closing paragraph was added to affirm the policy's alignment with laws and multi-agency arrangements.</p>	<p><b>Clarity and currency:</b> Minor rewording makes the statement more succinct without changing its meaning. The added note that the policy is written in accordance with specific Acts and "aligns with Norfolk Multi-Agency Safeguarding Arrangements" ties the statement to current law and local frameworks, reinforcing accuracy. These edits improve the statement's precision and ensure it reflects the latest partnerships and terminology.</p>
<b>Scope</b>	<p><b>No major changes:</b> The Scope still specifies that the policy applies to all Council services and its wholly owned companies, and includes commissioned services, essentially unchanged from before.</p>	<p><b>Maintaining clarity:</b> The scope remains comprehensive.</p>

	Through research and conversation it was discovered that <b>Alive West Norfolk</b> do not follow our policy and have their own.	
<b>Aims</b>	<p><b>Reworded for focus:</b> The aims are still listed, but phrased as outcomes the Council seeks. For example, an aim in the old version, "Raise awareness of the duty of care responsibilities..." is retained in substance. However, some aim statements were consolidated or tightened. One combined aim now covers safe environments, proper recruitment, training, and response to allegations all in one bullet (whereas previously these points were scattered).</p>	<p><b>Improved coherence:</b> The aims were refined to avoid repetition and group related ideas. By tightening the language and combining closely related points (e.g. staff recruitment/training and adherence to codes of conduct), the policy's goals are clearer. This makes the aims easier to read and aligns them directly with the Council's duties (training, safe environment, compliance with conduct codes).</p>
<b>"Objectives" - renamed "How we will achieve this"</b>	<p><b>Section renamed and phrasing changed:</b> The old Objectives section (3.3) is now titled "How we will achieve this." Instead of descriptive text ("The Council will do this by:...") followed by gerund phrases, the new version uses a directive tone with the Council as subject ("The Council will: Provide... Aid... Maintain... Promote... Develop...").</p> <p>The content of the five bullet points is very similar but slightly streamlined. For example, "Maintaining a level of good working practice at all times and therefore reducing risk..." is shortened to "Always maintain a level of good working practice".</p> <p>All five original objectives (training, sensitive response, good practice, promoting welfare, effective procedures) remain, just phrased more succinctly.</p>	<p><b>Greater clarity and active voice:</b> Renaming to "How we will achieve this" makes the section's purpose obvious (it describes implementation of the aims). The shift to active voice ("The Council will...") and eliminating unnecessary words (like "at all times" or explanatory clauses) makes each commitment sharper. These edits improve readability and ensure staff quickly grasp the actionable steps the Council will take to meet its safeguarding aims.</p>
<b>Roles and Responsibilities</b>	<b>Major rewrite &amp; format change:</b> This section was overhauled from a long narrative list of duties for various	<b>Brevity and usability:</b> The original list was lengthy and risked making readers get lost. The new table

	<p>roles to a concise table of key roles and their responsibilities.</p> <p>The old version enumerated roles with sub-paragraphs 3.4.1 through 3.4.9 (Safeguarding Coordinator, Management Team, Assistant Directors, all employees, specific teams like Personnel, etc.).</p> <p>In the new policy, it opens with a brief statement "Safeguarding is everyone's responsibility... responsibility lies at all levels" and then presents a table of six role categories: Designated Safeguarding Coordinator (DSC), Deputy Coordinators &amp; Service Champions, Assistant Directors, Line managers, Every employee/volunteer, and Elected Members.</p> <p>Each is paired with a one-line summary of their duty (e.g. "Line managers – ensure staff complete training; safe staffing"). Roles that were previously listed in detail (e.g. Management Team, Personnel Services, Corporate Policy Team) are no longer individually detailed; only the key positions are highlighted.</p>	<p>format is intended to make it easy to scan who is responsible for what.</p> <p>By focusing on key roles, the policy highlights accountability without minor repetition. Less critical sub-roles (e.g. specific teams or management layers) were omitted because their duties overlap with the broader categories listed and will be documented in internal guidance.</p> <p>The table format improves clarity and serves as a quick reference "who does what" guide for staff, aligning with best practice for clarity in role definition.</p>
<b>Legislation and Guidance</b>	<p><b>Updated and externalised:</b> The list of relevant laws and guidance was updated to include the latest references – for example, "Working Together to Safeguard Children 2023" (replacing the 2018 version) and "Care and Support Statutory Guidance 2024" were added.</p> <p>All the previous Acts (Children Act, Care Act, etc.) remain listed. In addition, it includes a reference to the anticipated "Crime and Policing Bill", expected later in 2025, referring a new duty on cuckooing. However, instead of reproducing summaries of each law in the appendix, Appendix A's detailed statute summaries were removed from the document (no longer printed in full).</p>	<p><b>Ensure currency and reduce bulk:</b> Listing the most up-to-date legislation makes the policy accurate as of 2025. The changes update policy to include forthcoming legislative requirements, ensuring compliance and preparedness. At the same time, the detailed descriptions of each law are likely to become outdated. By moving detailed legal synopses to the intranet (with a hyperlink in the policy), the Council can update legislative guidance in one place without re-issuing the policy each time a law changes. This approach also shortens the policy document while still</p>

	<p>The new section still briefly explains the importance of being aware of laws but pushes the detailed content to the intranet. The policy now sets out an intranet link for more information.</p>	<p>providing readers access to necessary details if needed. It balances completeness with maintainability.</p>
<b>Oversight and Assurance</b>	<p><b>Restructured:</b> The narrative paragraphs describing audit processes and governance were replaced by a structured table.</p> <p>The old text explained the annual Section 11 audit, internal audits, and Cabinet approval in a descriptive way.</p> <p>The new version condenses these into a table of oversight "Body/Role – Frequency – Purpose". For example, it lists: "Cabinet and Council – Three-year policy approval; annual update – (Purpose) Democratic oversight", "Audit Committee – twice-yearly – monitors internal audit findings and risk register", "Internal Safeguarding Group (ISG) – quarterly – cross-service learning, data review, action plan tracking", and "Section 11 Self-Audit – every March – assesses practice against Children Act 2004 standards".</p> <p>The full Terms of Reference for the ISG are no longer appended.</p> <p>Added reference to annual Section 11 audit process, with submission to NSAB.</p>	<p><b>Clarity and accountability:</b> The change provides a snapshot of how the policy is monitored and kept up to date. Presenting the oversight mechanisms in a table makes it clear which body is responsible for what oversight activity and how often.</p> <p>The rationale is to improve transparency about governance in a concise format. Additionally, removing the ISG's Terms of Reference from the main document keeps the policy focused; those detailed TOR are an internal governance matter and can be maintained elsewhere.</p> <p>Overall, these edits make the policy's assurance framework easier to understand at a glance and ensure that lengthy procedural details (like TOR) don't clutter the public policy document.</p> <p>The update on Section 11 ensures that the policy reflects statutory requirements for annual audit, clarifies accountability, and demonstrates the Council's participation in external safeguarding assurance.</p>
<b>Partnerships and Networks</b>	<p><b>Streamlined and updated:</b> The section still lists the multi-agency groups the Council engages with, but in a much shorter form. Previously, this part included an "Active participation in..." bullet list and then lengthy sub-</p>	<p><b>Focus and currency:</b> The detailed descriptions of NSCP and NSAB are more suited to training or guidance documents rather than the policy itself. Removing them cuts out several pages of text that</p>

	<p>sections describing the Norfolk Safeguarding Children Partnership (NSCP) and Norfolk Safeguarding Adults Board (NSAB) – their history, legal basis, structure, functions, etc. – spanning several paragraphs.</p> <p>In the new draft, all that detail is removed. The policy now simply states that “The Council participates in a number of groups... including:” and then bullet-points or brief lines for: Norfolk District Council Advisory Group to the NSCP, the local Safeguarding Children Group, the NSAB, and the Western Locality Safeguarding Adult Partnership.</p> <p>Each is described in one sentence and, where appropriate, points the reader to the external website for more information (e.g. “For further information about NSCP, please visit their website.”). The detailed explanation of NSCP’s internal structure, the Children and Social Work Act changes, etc., is no longer in the policy.</p> <p>There is, however, added confirmation of membership of the “Norfolk Anti-Slavery Network” and reference to the county’s exploitation website.</p>	<p>were effectively paraphrasing external documents (which could become outdated).</p> <p>The new approach ensures the policy names all key partnerships to show compliance with duties but directs readers to the official sources for details. This makes the policy more succinct and prevents it from becoming stale or lengthy by duplicating information available on partner agencies’ websites. It also highlights only the necessary information (that the Council is involved in these groups), which is clearer for readers who just need to know the fact of participation and where to learn more.</p>
<b>Definitions of Abuse and Neglect</b>	<p><b>Content moved from main body to Appendix:</b> The old policy included a full section defining types of abuse and neglect (with over 20 sub-definitions like physical, sexual, emotional abuse, neglect, domestic abuse, modern slavery, etc.) in the main body.</p> <p>In the new draft, this section was removed from the main text. Instead, the policy provides a summarised Appendix B (see Appendix B changes below) and indicates in the Definitions section that “different kinds of safeguarding issues are defined in Appendix B”.</p>	<p><b>Streamlining and relying on up-to-date guidance:</b> This change removes about 12 pages of detailed content from the body of the policy, which overwhelmed the policy.</p> <p>Front-line staff now typically refer to live guidance from NSCP/NSAB for detailed indicators of abuse. By moving these details to an internal resource and keeping only a summary in policy, the document stays concise and avoids potential inconsistencies with external definitions. It also ensures that as definitions evolve (e.g. new forms of abuse, updated</p>

	<p>The detailed indicators and lengthy explanations for each abuse type are no longer printed in the policy; only concise one-line definitions for each abuse type are given (in the new Appendix B table). More detailed guidance than this should be put on the intranet and linked.</p> <p>The separate short Section 8 on "Definition of Grooming" was also removed as a standalone section – grooming is now included as one of the entries in the consolidated abuse definitions table (labelled "Grooming").</p>	<p>descriptions), the policy doesn't require a full rewrite – staff will be directed to current resources. In short, the policy now highlights that all these abuse categories exist and are recognised but trusts dynamic sources (intranet or partner websites) for exhaustive descriptions, thereby maintaining accuracy over time.</p>
<b>Allegations of Previous Abuse (among Council Staff)</b>	<p><b>Repositioned and condensed:</b> What was Section 11 in the old policy ("Allegations of Previous Abuse") is now brought forward as Section 7, retitled "Allegations of Previous Abuse among Council Staff."</p> <p>Content-wise, it is significantly shortened. The original section described scenarios of historic abuse allegations coming to light (e.g. an adult reporting past abuse by a staff member) and instructed that standard procedures should be followed and authorities informed; it also mentioned that anyone with a prior conviction for abuse is barred from such work by law (Protection of Children Act 1999) and outlined the need for DBS checks and re-checks every 3 years.</p> <p>The revised section omits the scenario-based discussion and simply states the legal and policy bottom line: Under the Protection of Children Act 1999, it is an offence for an individual with a history of abusing children or vulnerable adults to seek or hold a role working with those groups, and that staff in contact with children/vulnerable adults require a DBS check rechecked every 3 years. This captures the key points from the old text (the legal prohibition and the DBS requirement) and leaves out the</p>	<p><b>Clarity and avoiding duplication:</b> By moving this topic earlier in the document (from 11 to 7), it now sits alongside other policy framework content (like oversight and HR practices) rather than after procedures. This is intended to improve logical flow.</p> <p>The heavy edit in content focuses on the essential preventative policy: do not employ past abusers (legal compliance) and conduct regular DBS checks. The rationale is that the procedural response to allegations (even historic ones) is already covered under the general "what to do if you have a concern" procedures. In this way, the new text avoids repeating those instructions and instead emphasises compliance and prevention. It's more succinct and ensures the policy statement remains forward-looking (preventing unsuitable individuals in the workforce) rather than case-handling, which is addressed later.</p>

	earlier narrative about reporting procedure (which is covered elsewhere).	
<b>"What to do if you have a Concern" – Safeguarding Procedures</b>	<p><b>Procedures section retained, minor tweaks:</b> This section remains a step-by-step guidance for staff, members, and volunteers on how to respond to concerns or allegations.</p> <p>The overall content is similar, but some improvements were made for clarity and ease of use. For example, the safeguarding contact information was reorganised into a clear table/chart.</p> <p>In the old policy, after the narrative, there were lists of whom to contact (e.g. specific coordinators or external numbers) within the text. In the new version, key contacts are presented in a table format for quick reference.</p> <p>For example, there is a table under "Who to talk to if you have a concern" that lists types of issues and the correct organisation/contact. This is a new addition that makes the procedure more actionable.</p> <p>This new sub-section adds specific contact guidance for concerns. In addition, there are details for missing persons/</p>	<p><b>User-friendly guidance:</b> The minor modifications aim to make the procedure section more user centric. By adding a contact table, the policy ensures that anyone with a concern can quickly find the correct reporting route without wading through paragraphs. This change was made for clarity – it turns what was prose into an easy-to-scan reference.</p> <p>These updates refine the section so that in a moment of need, the reader can easily follow the steps and reach out to the right resources, thereby enhancing the effectiveness of the policy's guidance.</p>
<b>Safeguarding Procedure Flowchart</b>	<b>No changes:</b> Needs to be checked and updated for accuracy.	<b>Clarity and consistency:</b> The retention of the flowchart underscores its importance as a quick guide. Keeping the content the same ensures no loss of information – the focus was on making the flowchart as clear and accessible as possible, since it's a critical tool for staff in an urgent situation.

<b>Responding to Concerns, Disclosures and Allegations</b>	<p><b>Reference to guidance added:</b> This section remains in place to guide how to respond once a concern is reported (e.g. duties to refer and general actions).</p> <p>The structure is kept similar, but the main change is to explicitly tell the reader that a detailed breakdown of actions is available in Appendix C (the guidance notes) and then provide a short list of key things all staff should do.</p> <p>In other words, rather than listing all action steps in the main text, it now summarises and points to the appendix for full details. The content itself (e.g. remind staff not to investigate, to report in writing promptly, etc.) has not materially changed – it's just been offloaded to the guidance notes to avoid repetition.</p> <p>Also includes explicit guidance on not promising confidentiality, with clear reasoning.</p> <p>The text also explicitly reminds that if there is immediate risk, call 999 (reiterated for emphasis).</p>	<p><b>Avoiding duplication and emphasising key actions:</b> Since Appendix C contains a comprehensive "how-to" for recording and responding to concerns, the main policy doesn't need to duplicate all that.</p> <p>By referencing Appendix C, the policy ensures staff know where to find the detailed checklist. Meanwhile, highlighting that "all staff should:" followed by a few critical bullet points ensures the most important messages (like refer immediately, don't delay, etc.) are front and centre. This approach provides a layered detail – simple instructions in policy with detailed guidance in an appendix – which keeps the policy concise while still covering all bases.</p> <p>Provides clarity on managing disclosures sensitively while fulfilling safeguarding obligations.</p> <p>Reiterating urgent guidance (dial 999 if immediate danger) in bold doubles down on critical advice.</p>
<b>Confidentiality and Information Sharing</b>	<p><b>Largely unchanged:</b> This section still emphasises maintaining confidentiality and only sharing information on a need-to-know basis to protect those involved.</p> <p>The content in the new draft remains very similar in meaning and wording, reiterating government guidance that data protection is not a barrier to sharing information in safeguarding cases, etc.</p> <p>One structural change is that the subsection on "Guidance for use of Photographic/Filming Equipment" was moved under this section (see next row). The confidentiality section's primary text stayed stable, continuing to stress proper handling of sensitive info and the principle that</p>	<p><b>Consistency with best practice:</b> The existing content did not require much alteration.</p>

	<p>safeguarding concerns override typical confidentiality where necessary.</p>	
<b>Guidance on Photographic/Filming Equipment</b>	<p><b>Relocated under Confidentiality section:</b> This guidance was originally a sub-heading under "Good Practice" (Section 13.03 in old policy). In the new draft, it appears as subsection 11.03 under Confidentiality and Information Sharing.</p> <p>The changes add explicit reference and link to NSAB's "Seven Golden Rules" for information sharing.</p>	<p><b>Thematic reorganisation:</b> Moved here because the use of images and recordings has as much to do with data protection and consent as it does with general "good practice."</p> <p>Situating it under Confidentiality makes it clear that photo/video usage is considered in the context of information governance and privacy. It also slimmed down the Good Practice section to focus on behaviour "golden rules," while all technical guidance (like photography rules) now sits elsewhere.</p> <p>More broadly, this section now reinforces the importance of proactive information sharing.</p>
<b>Good Practice Guidelines</b>	<p><b>Reframed and reduced:</b> The old policy's Section 13 introduced general good practice principles and then pointed to Appendix E for a detailed "Always/Never" list of dos and don'ts.</p> <p>Essentially, the exhaustive list of do's and don'ts was condensed into a concise half-page summary of best practices, with a reference to where the full guidelines can be found if needed. In the updated draft, Appendix E is removed (see Appendix E row), and a new "Good practice conduct – the 'golden rules'" section is included in the main body.</p> <p>This new section distils the guidance into a short, memorable list of key principles (described as "golden</p>	<p><b>Avoiding duplication &amp; emphasizing core behaviour:</b> The full 2-page checklist in Appendix E was too lengthy for the policy. By removing it, the policy avoids replicating information that is elsewhere in corporate policies.</p> <p>Introducing "golden rules" serves to highlight the spirit of those guidelines in a digestible way. This change was made to keep the policy document lean and focused on key messages – staff and volunteers get the high-level principles up front, while still being directed to more detailed guidance when needed. It improves recall (people are more likely to remember a handful of golden rules) and ensures consistency with the Codes of Conduct (since the detailed list can be</p>

	<p>rules”), each with a brief explanation (e.g. “Respect – treat every child or adult at risk with dignity...”).</p> <p>It explicitly states that detailed advice on staff conduct is available on the intranet and then focuses on the core rules to always remember.</p>	<p>maintained on the intranet and updated in sync with any code of conduct changes).</p>
<b>Work with Third Parties and Contracted Services</b>	<p><b>Minor clarification:</b> This section’s title and position remain the same. The content continues to outline the Council’s expectations that third-party service providers and contractors also adhere to safeguarding responsibilities.</p> <p>There were no major content overhauls; however, references were adjusted to link with the new risk assessment process. For instance, the policy still insists on ensuring contractors have appropriate safeguarding policies, but now explicitly mentions using the Council’s safeguarding risk assessment process for contractors, which ties into Appendix G. However, Appendix G has been removed, as considered unnecessary by Procurement.</p> <p>Any duplication with Appendix F (which was removed) was cleaned up.</p>	<p><b>Maintaining policy, integrating new tools:</b> The slight tweak referencing the risk assessment aligns this section with former Appendix G, reinforcing that the Council has a mechanism to vet third parties.</p> <p>The original content was sound, and only a small update was needed to ensure readers know to apply the formal risk assessment for contractors, grants, or licensees as part of safeguarding due diligence.</p>
<b>Recruitment</b>	<p><b>Section shorted, linked to intranet:</b> The Recruitment section was shortened in narrative and the table (based on the diagram previously in the Appendix moved to the policy section). More details on the intranet – to be added.</p> <p>Details on the recruitment procedure for posts where ‘Disclosure’ (formally police checks) are required is still in the Appendices. NEED TO DECIDE WHETHER TO REFERENCE etc.</p>	<p><b>Ensuring safer recruitment and avoiding redundancy:</b> The old appendix on recruitment duplicated standard HR procedures and contained details that could change (like DBS eligibility criteria). The new approach is to host the detailed recruitment guidance on the HR intranet and include a simplified overview in the policy. By doing so, the policy still underscores that safe recruitment is essential (and shows the critical steps in an easy-to-follow format),</p>

		<p>but it doesn't repeat entire HR policies. The inserted table (taken and summarised from the original appendix) makes the process clear at a glance which is practical for managers.</p> <p>The reason for this change is both to improve clarity (visual timeline of actions) and to prevent outdated info: as DBS rules or HR practices update, the intranet can be updated accordingly without changing the policy document.</p>
<b>Current Employees and Safeguarding</b>	<p><b>No substantive change:</b> This section addresses safeguarding considerations for existing employees (e.g. how to handle concerns about staff, ongoing responsibilities, etc.). The content was largely retained.</p> <p>It continues to emphasise that safeguarding obligations extend to all staff and even those under 18 or on work experience, and that internal mechanisms (like support and training) are in place.</p>	<p><b>Already fit for purpose:</b> Keeping it unchanged maintains continuity – the expectations of their conduct and the support they receive (like welfare support or TRiM for traumatic incidents) remain steady.</p>
<b>Induction and Training</b>	<p><b>Revised training approach:</b> Clearly sets out a tiered approach to safeguarding training. This sets out the different levels and expectations, with additional emphasis on modern slavery, domestic abuse and self-neglect/hoarding.</p>	<p>This incorporates best practice around targeted training for specific teams – while guaranteeing that the entire council has a strong baseline of understanding, it also ensures teams understand mandatory training requirements clearly.</p>
<b>Support for Staff</b>	<p><b>Enhanced emphasis on staff welfare:</b> This subsection continues to recognise that staff may themselves be affected by safeguarding issues (like domestic abuse) and outlines support.</p> <p>The content was updated slightly to strengthen this message. The new draft explicitly commits to a "zero tolerance for abuse" in the workplace and encourages a supportive culture. It reiterates that any employee</p>	<p><b>Caring for the carers:</b> The updates here serve to underline the Council's dedication to its employees' welfare. By adding "zero tolerance" and clearly inviting those experiencing domestic abuse to seek support, the policy sends a strong message that staff safety is also a priority.</p>

	<p>suffering domestic abuse can confidentially seek help (line manager or HR welfare officer) and will receive support.</p> <p>It then covers how the Council will treat any allegations or convictions of domestic abuse by employees on a case-by-case basis using appropriate HR policies – this remained as before.</p> <p>The Trauma Risk Management (TRiM) programme is still included.</p> <p>The support offered (Vivup, TRiM) are explicitly set out in simplified, plain-English to ensure support is accessible.</p>	
<b>Useful Links and Further Information</b>	<p><b>Expanded and formatted as reference list:</b> In the old policy, this was a brief section listing a few key contacts or resources in text form.</p> <p>The updated draft greatly expands this into a comprehensive contact directory in table format. It now provides a list of relevant agencies and helplines with descriptions and up-to-date contact information, making it much more practical.</p> <p>This means the policy now serves as a handy reference for anyone needing to quickly find where to report or seek advice on a safeguarding issue.</p>	<p><b>Improved utility and comprehensiveness:</b> The change here was to turn a simple list into a robust (but accessible) resource. The rationale is to ensure that no matter the situation (child concern, adult concern, concern about staff, general advice), the reader can find the right contact easily.</p> <p>Presenting it in a table ensures readability and quick access.</p>
<b>Appendix A: Legislation and Guidance</b>	<p><b>Retained in name, content pared down:</b> Appendix A in the old policy contained “A summary of the key legal requirements” – multiple paragraphs describing various Acts (Children Act, Care Act, etc.). In the new version, the appendix is removed, and the policy instructs readers to consult the intranet for the summaries instead of including them.</p>	<p><b>Up-to-date and slimmed down:</b> The reasoning for this change is that while it’s important to cite relevant legislation, maintaining lengthy descriptions in the policy is impractical. Laws can change and the summaries can become obsolete. By keeping a brief list of statutes (in the main text) and moving detailed descriptions to an intranet page, the Council can</p>

		update legal references more nimbly. This also prevents the policy from becoming too long.
<b>Appendix B: Indicators of Abuse</b>	<p><b>Replaced with concise definitions and link:</b> Appendix B was drastically overhauled. The original appendix spanned around 12 pages of detailed signs and indicators for each type of abuse (physical, emotional, sexual, domestic, etc.).</p> <p>In the revised policy, Appendix B is now a short summary table of abuse types with short definitions. After the table, the policy notes that “extended indicator tables are available on the intranet or NSCP/NSAB websites” for staff who need more detailed symptomology.</p>	<p><b>Making the policy digestible and current:</b> The full indicator tables are more suitable for training reference than for a policy document – they were very lengthy and could quickly go out-of-date as guidance evolves.</p> <p>The new Appendix B approach gives all readers a common understanding of each abuse category (so terminology is clear) while directing those who need in-depth indicators to external resources (which are kept updated by expert bodies). This reduces the policy by approximately 12 pages, hugely improving readability.</p> <p>The reason for keeping short definitions is to ensure the policy still defines its scope – it lists what constitutes abuse in general terms – fulfilling a glossary function. The intranet link ensures no loss of information, merely a relocation. This strikes a balance between comprehensiveness and practicality.</p>
<b>Appendix C: Guidance Notes (Recording Concerns &amp; Allegations)</b>	<p><b>Removed from policy:</b> Appendix C, which provides step-by-step guidance on how to document safeguarding concerns and allegations, has been removed.</p>	<p><b>Moved to intranet for practical usage:</b> These guidance notes may be a useful tool for staff to handle disclosures correctly but is not practical within the policy itself.</p>
<b>Appendix D: Internal Safeguarding Referral Form</b>	<p><b>Removed from policy:</b> Appendix D in the old policy contained both the internal form for reporting a concern (a blank template) and guidance for filling it out.</p> <p>In the new draft, the blank template is no longer included. The text in the policy now guides users to</p>	<p><b>Moved to intranet for practical usage:</b> If the idea was to complete the copy found on the policy, then it is an overcomplicated and unusual approach. Better to have a downloadable version that can be filled out using guidance from the policy, which is retained.</p>

	complete the live form on the intranet instead of providing a static form.	The approach now is to ensure everyone uses the form available on the intranet (if it isn't there already, it should be added).
<b>Appendix E: Good Practice for Staff/Members (Guidelines)</b>	<p><b>Removed from policy:</b> Appendix E, which contained the detailed guidelines ("Always do this, Never do that") for staff and volunteers, was removed in its entirety.</p> <p>The content (two pages of bullet-pointed best practices) is no longer printed in the policy. Instead, the key points have been summarised into the "golden rules" section in the main body.</p>	<p><b>Overlong and impractical:</b> The rationale was that Appendix E's content, while useful, was much too overlong to be useful. It also made the policy lengthy. The solution is to collate it into a brief in-policy summary. This way, employees still have access to guidance (which can be updated in one place), but the policy document remains concise.</p>
<b>Appendix F: Recruitment and Selection of Staff</b>	<p><b>Removed from policy (intranet and table replacement):</b> Appendix F, which gave specific instructions on safe recruitment (including annual DBS eligibility updates, procedural steps, etc.), has been removed. Its content is now intended to reside on the HR intranet, and the policy body itself was supplemented with a simplified table of the recruitment process (as described in the Recruitment section above).</p>	<p><b>Preventing outdated HR info and focusing on process:</b> The recruitment guidelines can change (especially DBS rules or best practices), so having them in an appendix posed a maintenance issue. Moreover, much of Appendix F reiterated standard HR policy. In place of the appendix, the policy now gives a visual summary that is unlikely to change (the need for DBS, reference checks, etc. in sequence). This keeps the policy lean and ensures alignment with HR's official procedures. If HR updates the recruitment process or legal requirements shift, those can be addressed in the intranet guidance without touching the Council's Safeguarding Policy text.</p>
<b>Appendix G: Safeguarding Risk Assessment (for contracts/grants/licences)</b>	<p><b>Removed from policy:</b> Appendix G has been removed from the policy. The assessment will be used by procurement, but the team consider its use to be rare.</p>	<p><b>Irrelevant:</b> Appendix G has been removed as the risk assessment will only be used for certain procurement processes.</p>

<b>Appendix H: Internal Safeguarding Group Terms of Reference (ToR)</b>	<b>Removed from policy:</b> Appendix H contained the Terms of Reference for the Council's Internal Safeguarding Group. This content has been removed from the policy.	<b>Internal detail moved out:</b> The Terms of Reference are procedural/administrative details about an internal committee – not essential for the general policy reader.
<b>NEW Appendix</b>	<b>Domestic Abuse Policy Statement:</b> Comprehensive standalone appendix developed, aligning clearly with the Domestic Abuse Act 2021, the Norfolk Domestic Abuse Strategy, best practice and the councils own prospective DAHA status.	Provides focused guidance and meets statutory requirements. It offers clear accessible information for staff handling DA concerns, without over committing the council in the short term. This is set out on the acknowledgment that a more in-depth review of domestic abuse policy may be required in coming years.