

Safeguarding Policy

Protecting Vulnerable Adults, Children and
Young People at Risk



Monitoring and review

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| Tabatha Breame Operational Safeguarding Advisor | | | Every three years (or sooner if required) |

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1. Introduction

What is safeguarding?

Safeguarding is everyone's responsibility. Starting with prevention.

This means helping people stay safe by recognising risks and responding before harm occurs.

It means protecting a person's right to live in safety, free from harm.

Safeguarding is about working together to support children, young people, and adults at risk to make informed decisions about the risks they face, and protecting those who are unable to protect themselves

Safeguarding is a legal duty for Councils working with vulnerable people, underpinned by statutory legislation and guidance.

Broadland District and South Norfolk Councils (hereafter 'the Councils') are committed to safeguarding all individuals and preventing harm before it occurs. This includes protecting vulnerable adults and children from abuse, neglect, exploitation, and other forms of harm.

Safeguarding is everyone's responsibility. This policy sets out the safeguarding duty to the Councils' customers, residents, workers, volunteers and elected members.

The Councils recognise both their legal and moral duty to uphold the health, wellbeing, and human rights of individuals. Through early intervention and proactive support, the Councils aim to prevent issues from escalating and to empower people to live safely and independently, free from harm.

2. Policy Principles

This policy outlines the Councils commitment to safeguarding through the following principles:

Training and awareness

Safeguarding is a shared responsibility, though the nature of that responsibility varies across roles. All staff will receive regular safeguarding training to ensure they understand their specific duties and develop the knowledge, skills, and confidence to identify and respond to potential risks. This training will equip staff to recognise signs of abuse and neglect, including situations where an individual may be at risk of serious harm.

Multi-agency collaboration

The Councils work in partnership with other agencies to ensure access to support services and advocacy for individuals for whom a safeguarding concern is identified.

Mental health and emotional resilience

Supporting the psychological wellbeing of customers, residents, workers, volunteers and elected members is central to safeguarding practice.

Safe and supportive environments

The Councils promote safe working conditions and psychological safety for staff, elected members and customers.

Dignity, choice, and independence

Safeguarding actions prioritise the best interests of individuals, promoting autonomy and respect.

Participation in decision-making

Individuals should be actively involved in decisions that affect their future, including safeguarding actions and the support they may receive. This reflects the principle of empowerment, ensuring that people are supported to have a voice and make informed choices wherever possible.

When an individual does not consent to the sharing of their information (but it is necessary for safeguarding reasons), this may limit the extent to which professionals can safely involve them in planning and decision-making.

However, in line with the principles of protection and partnership, every effort will be made to engage the individual meaningfully, balancing their wishes with the duty to safeguard their wellbeing.

Safe recruitment

Robust vetting and induction procedures help prevent unsuitable individuals from working with vulnerable groups.

Protection for whistleblowers

The Councils are committed to protecting those who raise safeguarding concerns. Where applicable, this will be done in line with the Councils whistleblowing policy.

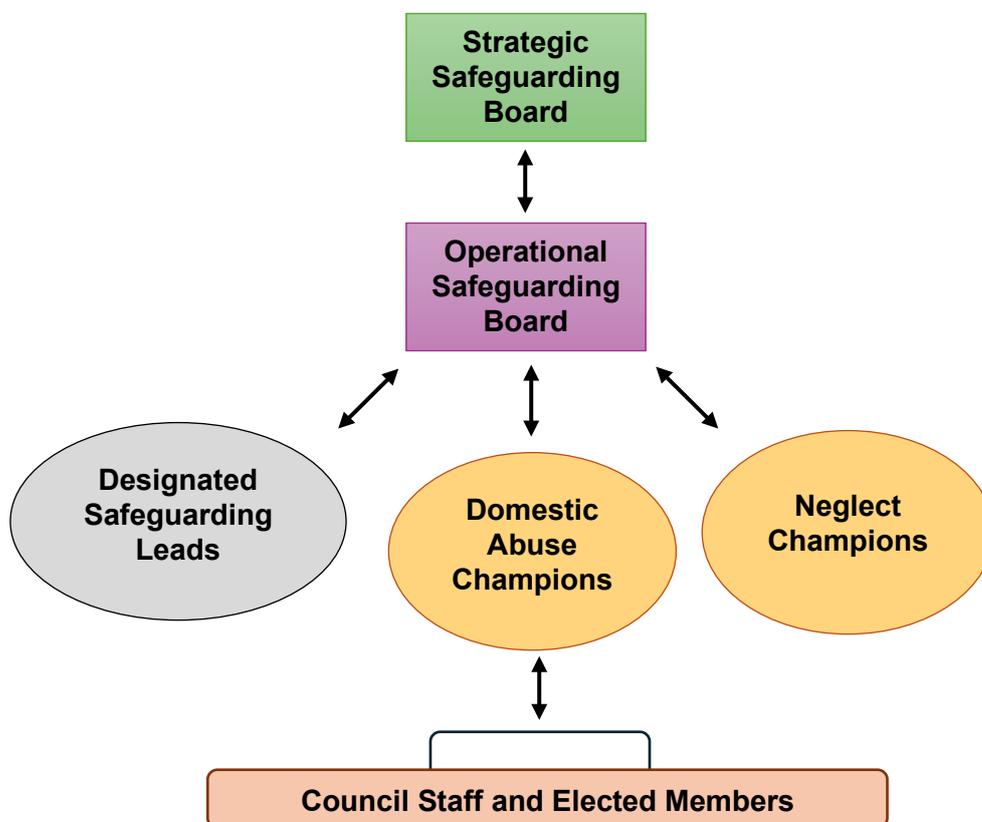
How the Councils apply the Policy Principles

The Councils apply the Policy Principles by:

- Accepting the moral and legal duty of care for children, young people and adults, given in Section 11 of the Children Act 2004 and the Care Act 2014.
- Having procedures to safeguard the well-being of children, young people and adults, protecting them from abuse and offering a safe way for anyone to report neglect and abuse.
- Respecting and promoting the rights, wishes and feelings of children, young people, and adults.
- Ensuring no person or group is treated any less favourably than others, in being able to access services which meet their needs in accordance with the Equality Act 2010.
- Requiring all workers, volunteers and elected members to abide by this Safeguarding Policy and related procedure.
- Ensuring that service providers commissioned by the Councils have Safeguarding Policies and service delivery supports appropriate and timely safeguarding
- Consistently working in close partnership with statutory and voluntary sector partners to keep people safe and protect from further harm.

3. Governance and Safeguarding Structures

The image below details the Councils safeguarding arrangements:



The Strategic Safeguarding Board

The Strategic Safeguarding Board provides strategic oversight, governance, and assurance of safeguarding arrangements within the Councils.

The board ensures that safeguarding is embedded in all aspects of the Councils operations and culture by:

- Reviewing safeguarding data, trends, and risk indicators.
- Approving and reviewing the Safeguarding Policy and procedures.
- Promoting a culture of continuous improvement in safeguarding practice.
- Overseeing safeguarding training and capacity-building initiatives to ensure staff are trained and supported in safeguarding responsibilities.
- Monitoring the implementation and impact of action plans from audits or incident reviews.

The Operational Safeguarding Board

The Operational Safeguarding Board reports to the Strategic Safeguarding Board and is responsible for:

- Reviewing day-to-day oversight of safeguarding activities across departments and staff structures
- Identifying risks and trends in safeguarding concerns
- Reporting data and information on safeguarding to the Strategic Board
- Identifying areas of concern for consideration by the Strategic Board

Members of the Operational Safeguarding Board disseminate relevant information between their teams.

These meetings will regularly evaluate and review strategic and operational activities to continue to ensure continuous improvement.

Safeguarding reports will be submitted to the Councils' Corporate Leadership Team to ensure senior level oversight and accountability of safeguarding on at least an annual basis.

The Councils will promote transparency in safeguarding governance, ensuring that findings, improvements and learning are shared appropriately across teams and with relevant partners.

Designated Safeguarding Leads

The Designated Safeguarding Lead (DSL) is responsible for overseeing safeguarding practices, supporting staff with concerns, and ensuring that safeguarding policies are followed and regularly reviewed within their teams.

The DSL will support staff or members to make safeguarding referrals to the relevant organisation, recognising that it is best practice for the person who received the disclosure or witnessed the concern to lead on the referral. Where required/appropriate, the DSL may make the referral themselves, ensuring it is timely and appropriate.

4. Information sharing

Overview of information sharing and safeguarding

Information sharing is key in order to prevent harm, promote welfare, and support safeguarding interventions. This includes concerns, disclosures, or relevant details shared with appropriate professionals.

The following table outlines the **7 Golden Rules** of Information Sharing in safeguarding, based on UK government guidance.

1. Data protection is not a barrier

Data protection laws such as UK GDPR and the Data Protection Act 2018 are designed to support appropriate information sharing. They do not prevent the sharing of information when it is necessary to safeguard a child or vulnerable person.

2. Be open and honest

Where appropriate, inform the individual about what information you intend to share, with whom, and why. Do not inform them if doing so would place someone at risk.

3. Seek advice if in doubt

If you are unsure about sharing information, seek guidance from your Designated Safeguarding Lead, manager, or Operational Safeguarding Advisor. You can do this without revealing the identity of the individual initially.

4. Share with consent where appropriate

Try to obtain consent before sharing personal information. However, if there is a safeguarding reason to share without consent, there are exemptions (please see below).

5. Consider safety and wellbeing

Always make decisions about sharing information with the safety and wellbeing of the vulnerable person/child as your primary concern.

6. Ensure information is appropriate

Only share information that is necessary, proportionate, relevant, accurate, timely, and secure, with those that need to know. Avoid sharing excessive or irrelevant details.

7. Keep a record

Document your decision to share or not share information in line with the Councils' Safeguarding procedures. Include what was shared, with whom, and the reasons for your decision.

Sharing of information

Deciding who needs to know, and what needs to be known should be done on a case-by-case basis.

If there is an immediate risk of harm, you must call 999.

Before you share information, you should always ask yourself:

- Do I have the person's permission to disclose personal data?

Consent should be the most relevant and most relied upon gateway to share data.

If you cannot rely on consent, consider whether you have the legal power to share data. Points to consider are:

- Is there a duty to protect the wider public interest, are other people at risk?
- Do you need to take action to protect the vital interest of the person as they are at risk of serious harm, including as result of self-neglect.

Where there is any doubt as to whether information can be shared, seek advice.

NB: When sharing information, the Mental Capacity Act requires assessing whether the person can understand what will be shared, with whom, and the consequences, and if not considered to have capacity to make a decision, decisions must be made in their best interests.

Sharing information that may be in the public interest includes:

- when there is reasonable cause to believe someone is suffering, or is at risk of suffering serious harm
- to prevent the person from harming someone else.
- detecting crime
- apprehending offenders
- maintaining public safety.

Staff may feel cautious, but it is vital to understand that appropriate safeguarding disclosures are lawful if done in line with this Policy and wider legislation. Whilst legislation sets out clear rules for handling personal information, it also recognises that safeguarding concerns may require proportionate and justified information sharing.

Below are examples of when professionals need to share information with the right people at the right time to safeguard individuals:

- prevent death or serious harm
- coordinate effective and efficient responses
- to prevent the escalation of risk, often via early intervention
- prevent abuse and harm that may increase the need for care and support
- address self-neglect by ensuring timely support and intervention to reduce harm and promote wellbeing
- reveal patterns of abuse that were previously undetected and that could identify others at risk of abuse
- identify low-level concerns that may reveal people at risk of abuse
- help people to access the right kind of support to reduce risk and promote wellbeing
- help identify people who may pose a risk to others and, where possible, work to reduce offending behaviour.ⁱ

Multi - Agency Collaborations and Data Sharing

Effective safeguarding relies on multi-agency collaboration, where professionals share information to build a fuller picture of risks, needs, and circumstances. The Councils host and participate in multi-agency meetings that support real-time, information exchange under established agreements and protocols. All information sharing in these contexts need to follow this Policy.

When external partners request personal data from the Council, the Council will assess:

- relevance to the safeguarding concern
- what lawful basis under GDPR we have to share the information
- whether any information held has been obtained from a third party.

ⁱ Social Care institute for excellence

If the data that the Council's hold has been obtained from a third party, it may decline the request and advise the partner to approach the primary source.

5. Training

The Councils are committed to providing safeguarding training to all staff and elected members so they are equipped to have the confidence to identify safeguarding concerns and can respond safely and appropriately, and to understand their responsibilities and know their role in the safeguarding process.

All staff will undertake safeguarding training to ensure they have a good understanding of safeguarding and their responsibilities. Additional and regular training will be provided for all DSL's and other staff who require more detailed and frequent training.

An introduction to Safeguarding adults, young people and children training is part of a new employee's induction to work for the Council.

6. Safe recruitment

The Councils are committed to safeguarding children, young people, and vulnerable adults. Safe recruitment is central to creating a workforce that upholds this commitment. All appointments must ensure individuals are suitable, competent, and safe.

Principles of safe recruitment

From the outset, recruitment materials will highlight pre-employment checks (e.g. enhanced DBS) in job adverts.

Selection procedures

To ensure suitability for roles involving vulnerable groups, recruitment includes:

- structured interviews with safeguarding questions (role specific):
- employment history checks, including gaps
- robust references with safeguarding enquiries
- values-based assessments where appropriate.

Where a basic or enhanced DBS is required for roles, employment will not commence unless a satisfactory DBS certificate has been provided.

Ongoing safeguarding culture

Risk cannot be fully eliminated, so safeguarding continues post-recruitment through:

- Clear procedures and supervision
- A culture of vigilance and accountability
- Prompt action on concerns via safeguarding and disciplinary routes.

7. Photography and Filming

Personal Use by Attendees

When children, parents, carers, or spectators take photos or videos for personal use, safeguarding guidance will be clearly communicated via event programmes or announcements. This will promote respectful sharing and protect children's privacy and dignity.

Council filming - Consent and Notification

Attendees will be informed that photography/filming is part of the event. Written or digital consent is required for any images used by the Councils, ensuring individuals feel safe and informed of how images will be used and for the period they will be used/stored for.

Respecting non-consent

Where consent is withheld, we will discreetly identify individuals who must not be photographed / filmed without singling them out or excluding them from activities.

Professional or Public Use

Journalists, professional photographers, or students must seek prior permission for public or professional use of photographs/filmed material. This allows safeguarding checks and consent procedures to be followed.

8. Licensing

Alcohol and Entertainment Licensing

Under the Licensing Act 2003 and Section 11 of the Children Act 2004, the Councils must ensure safeguarding is embedded in licensing policies. This includes assessing all applications with safeguarding in mind. Refer to:

- (point 7 pages 13-15) [Licensing Act SNC Policy](#)
- (point 7 pages 13-15) [Licensing Act BDC Policy](#)

To support safe public events, the Councils operate a Safety Advisory Group (SAG), involving local authorities, police, fire, and ambulance services. While SAG offers guidance, event organisers remain responsible for event management including ensuring there are appropriate safeguarding arrangements in place.

Gambling Licensing

Under the Gambling Act 2005, the Councils must protect children and vulnerable adults from harm or exploitation. Safeguarding measures are outlined in local gambling policies.

See: [South Norfolk Council Gambling Act Statement of Principles | Broadland and South Norfolk](#)

Taxi and Private Hire Licensing

The Councils ensure licensed drivers are “fit and proper” under Sections 51 and 59 of the Local Government (Miscellaneous Provisions) Act 1976. Safeguarding is upheld through:

- A Code of Conduct for drivers
- Mandatory Safeguarding and Disability Awareness training
- Possible PREVENT training

Non-compliance may lead to referral to the Licensing Committee and potential suspension or revocation of licences.

More details: [Taxi and Private Hire licensing policies | Broadland and South Norfolk](#)

Appendices

Appendix 1: Related Safeguarding Legislation

The requirement and safeguarding duties for the Councils are identified within the following legislation:

The Children Act 2004 – Section 11

Under Section 11 of the Children Act 2004, relevant partners such as the Councils have a statutory duty to safeguard and promote the welfare of children, which includes sharing relevant information with tier 1 local authorities to enable them to investigate and take appropriate action.

This includes making steps that:

- Prevent impairment of children’s mental and physical health or development
- Ensuring children grow up in safe and effective care
- Taking action to enable all children to have the best outcomes

Mental Capacity Act 2005

- Protects and empowers those 16+ who may not be able to make decisions for themselves.

Where there is a concern that the decision to consent to sharing information is affected by a cognitive impairment, the principles of the Mental Capacity Act should be applied (please refer to related procedure for further information).

The Equality Act 2010 – Public Sector Equality Duty

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not.
- Foster good relations between people who share and do not share a protected characteristic.
- Protected characteristics: Age, Disability, Gender reassignment, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation, Marriage and Civil Partnership.

The Care Act 2014

Tier 2 local authorities (district/borough councils) have a duty under **Section 6** of the Care Act 2014 to cooperate with the lead safeguarding authority (county council) and other relevant partners in care and support functions, including safeguarding adults.

This duty applies where cooperation is relevant and proportionate to the individual's care and support needs, and includes:

- Sharing information appropriately and lawfully,
- Participating in safeguarding enquiries where required,
- Supporting prevention and early intervention efforts,
- Contributing to multi-agency safeguarding arrangements.

All councils, including Tier 2 authorities, must act in ways that promote an individual's wellbeing.

This includes:

- Protection from abuse and neglect,
- Respect for personal dignity,
- Supporting independence and participation in community life.

Section 42 – Safeguarding Enquiries

Under the Care Act 2014, the **lead authority** (county council) must undertake enquiries when an adult:

- Has care and support needs,
- Is experiencing or at risk of abuse or neglect,
- And cannot protect themselves due to those needs.

Tier 2 councils **do not investigate** safeguarding concerns. Their role is to:

- Share relevant information (e.g. housing, environmental health),
- Support multi-agency responses,
- Deliver safeguarding-related actions within their services.

Their duty is to cooperate, not to lead or conduct enquiries.

PREVENT duty under The Counter Terrorism and Security Act 2015 - Section 26

- Authorities must have due regard to the need to prevent people being drawn into terrorism.

The Modern Slavery Act 2015

- Local authority must notify the government if they believe someone may be a victim of slavery or human trafficking.

The Data Protection Act 2018

- Governs the General Data Protection Regulation (GDPR).

Children and Social Work Act 2017

- Improves joint work at the local level to safeguard children.
- Enables better learning to improve child protection practices.

Worker Protection Act 2024 (Amendment of Equality Act 2010)

- Introduces a legal obligation for employers to take reasonable steps to protect workers from sexual harassment