

Safeguarding Policy

March 2025 Review

Foreword



Ensuring that the most vulnerable in our community are protected is something which is the responsibility of us all. This policy provides essential information about how we will deal with concerns about the safety of a vulnerable child and adult. This policy also sets out clearly how we will work with others and support people to report abuse or concerns. It also ensures that, through training and review of our policies, the council will always work in a way which promotes safeguarding and tackles any form of abuse of vulnerable people

Larissa Reed, Chief Executive, Swale Borough Council

“It’s not my job.” “It’s none of my business.”

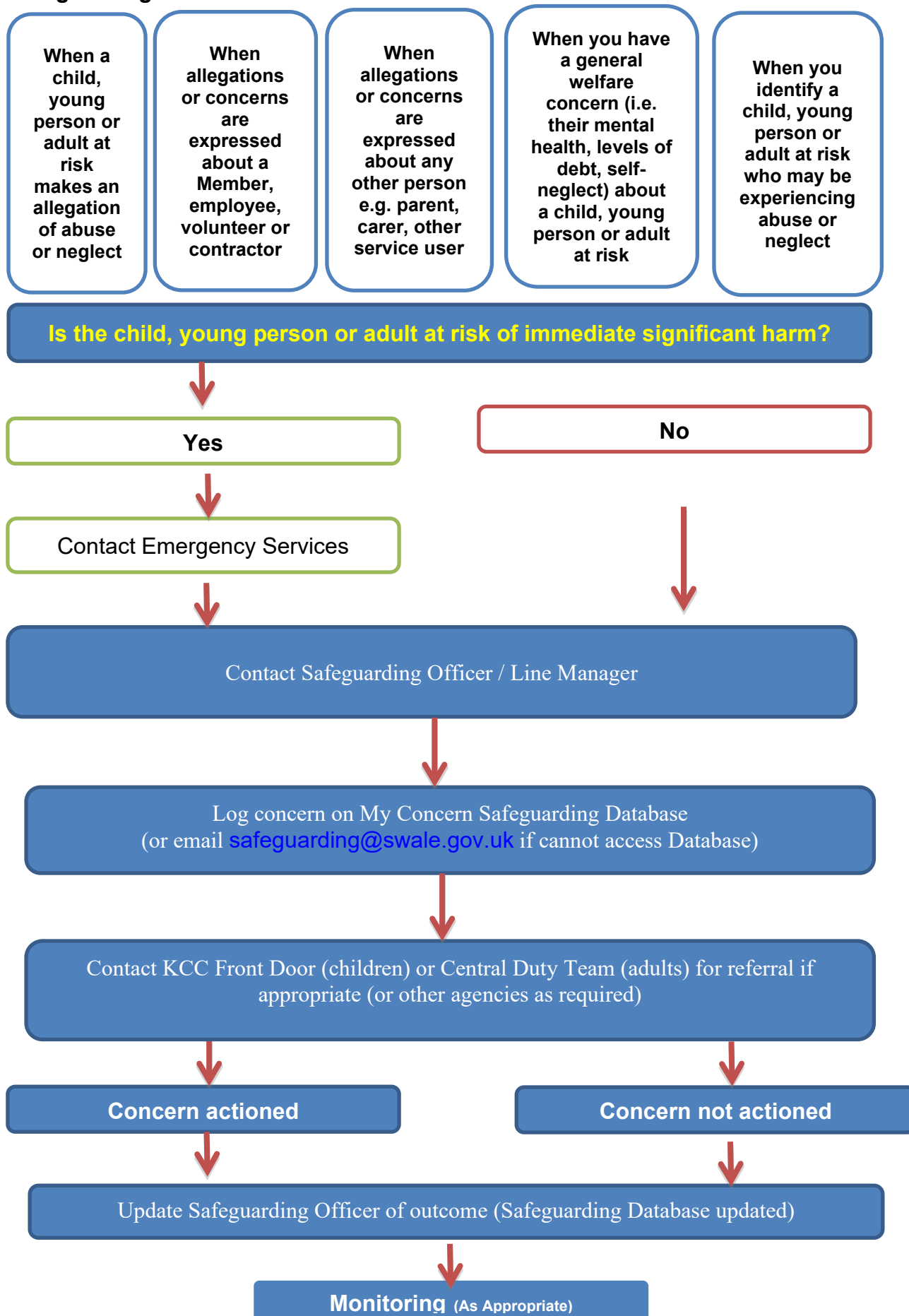
How many times have we heard or read that?

Well, Safeguarding is our job and it is our business. If in doubt, report it. Someone else can decide whether there is any substance – you don’t have to; you just have to be concerned. Imagine if it were one of your family. Wouldn’t YOU want someone to raise any concerns? Better to be Safe than Sorry.



Councillor Angela Harrison, Swale Borough Council

Safeguarding 'Quick View' Procedure



1. Introduction

Safeguarding is 'everyone's business'. This policy sets out Swale Borough Council's (SBC) responsibilities under the Children Act 2004, Care Act 2014 and other legislation to ensure children, young people and adults at risk are kept safe from harm.

2. Purpose

- 2.1** The purpose of this policy and the associated procedures are to protect and promote the welfare of the children, young people and adults using or receiving services provided or commissioned by SBC. The policy also aims to support the Council, its officers, elected members and volunteers in fulfilling their statutory responsibilities. Swale Borough Council is not a Children's Services Authority and it is not the role of the Council to investigate allegations of abuse. However, all Elected Members, employees, volunteers and contracted services providers have a clear responsibility to take action when they suspect or recognise that a child, young person or adult at risk may be a victim of significant harm or abuse.
- 2.2** This policy demonstrates how SBC will meet its legal obligations and reassure members of the public, service users, Members, employees, volunteers and those working on behalf of the Council as to:
- a) What they can expect SBC to do to protect and safeguard children, young people and adults at risk;
 - b) That they are able to safely voice any concerns through an established procedure;
 - c) That all reports of abuse or potential abuse are dealt with in a serious and effective manner;
 - d) That they can raise even a basic welfare concern for a child or adult and that appropriate action will be taken;
 - e) That there is an efficient recording and monitoring system in place;
 - f) That Members, employees, volunteers and contractors receive appropriate training;
 - g) That robust 'safer' recruitment procedures are in place.

3. Legal Duties

- 3.1** The Children Act 1989 states that the child's welfare is paramount and that every child has a right to protection from abuse, neglect and exploitation. Statutory guidance on making arrangements to safeguard and promote the welfare of children under Section 10, 11 and 13 of the Children Act 2004 and specifies what is required of SBC. This includes:
- Senior management commitment to the importance of safeguarding and promoting children's welfare;
 - A clear statement of the Council's responsibilities to children, available to staff;
 - Clear lines of accountability for work on safeguarding and promoting well being;

- Using the views of children and young people to help shape services;
 - Safer recruitment procedures for those coming into contact with children and young people;
 - Appropriate training for staff;
 - A duty to promote inter-agency cooperation between named agencies, including district councils;
 - Representation on, and participation in, local safeguarding children's boards;
 - Effective working relations within the Council and with other agencies to safeguard and promote well-being and to share information effectively.
- 3.2** Under the Children Act 2004 and Working Together to Safeguard Children 2023, SBC has a duty to co-operate with Kent County Council (KCC) in discharging its duties as a Children's Services Authority and to promote the well-being of children and young people. (app)
- 3.3** KCC is the lead agency for the protection of adults at risk. SBC is committed to working in partnership with KCC in delivering their responsibilities around Safeguarding Adults.
- 3.4** SBC must carry out its responsibilities by ensuring that the needs and interests of children, young people and adults at risk are considered by all Members, employees, volunteers and contracted services, when taking decisions in relation to service provision.
- 3.5** SBC policies and procedures are governed by The Care Act 2014 that provides the legal framework for how local authorities (in this case Kent County Council) and other parts of the system such as relevant partners (which includes SBC as a district council) should protect adults at risk of abuse or neglect. SBC has a duty to co-operate with KCC in the exercise of:
- (a) their respective functions relating to adults with needs for care and support
 - (b) their respective functions relating to carers, and
 - (c) functions of theirs the exercise of which is relevant to functions referred to in paragraph (a) or (b).
- 3.6** The Counter-Terrorism Act 2015 dictates that local authorities are vital to the Prevent work which exists to reduce the risk of people being drawn into terrorism. Local authorities must use counter-terrorism local profiles (CTLPS) for SBC must be used to assess the risk of individuals being drawn into terrorism. SBC must incorporate the duty into existing policies and procedures to fulfil safeguarding responsibilities ensuring there are clear and robust policies to identify and safeguard children at risk. Furthermore SBC must develop a Prevent action plan should there be a risk to identify interventions to be actioned. SBC must also ensure that appropriate frontline staff, including those of it's contractors, have a good understanding of Prevent and are trained to recognise vulnerability to being drawn into terrorism and are aware of available programmes to deal with the issue. The Community Safety Plan is utilised to ensure a consistent response to Prevent (Prevent guidance 2023) is provided across local partner agencies and that this duty is met by SBC. (app)

- 3.7** Under the Modern Slavery Act 2015 SBC has a statutory duty to report and provide notification to the National Crime Agency about any potential victims of modern slavery or trafficking that we encounter. Adult victims are able to remain anonymous should they wish to do so. SBC are under a duty to co-operate with the Commissioner. (app)
- 3.8** The Domestic Abuse Act 2021 had placed a number of additional duties on Swale Borough Council that must be considered within our safeguarding response. These include:
- The definition of Domestic Abuse has been changed to cover those ‘personally connected’;
 - Children are now to be seen as a victim of Domestic Abuse in their own right, if they hear or experience the effects of the abuse and should be able to access support;
 - Appropriate priority will be given to victims of Domestic Abuse and like for like lifetime tenancies will be upheld. Victims should not find that their tenure is affected by fleeing Domestic Abuse;
 - The individual fleeing DA should be offered safe accommodation or at the choice of the victim to remain in their own home have access to the sanctuary scheme and local support;
 - It is recognised that many people will wish to flee with animals, and will try to accommodate needs or look for solutions;
 - That there should be promotion of the one stop shops and local support groups and services;
 - Swale BC must contribute to the local partnership board and creation of a local needs assessment.
- 3.9** Section 68 of the Care Act 2014 requires that the Local Authority (upper tier authority) must arrange for an independent advocate to represent and support an adult who is the subject of a safeguarding enquiry or review, where the adult has ‘substantial difficulty’ in being involved in the process and where there is no other ‘appropriate person’ to represent them. For Swale Borough Council, although this duty does not apply directly to us, officers must have due regard to this need and ensure that appropriate signposting can take place to advocacy services as required. (see appendices and link to statutory advocacy)
- 3.10** Under the Care Act 2014, a carer is an individual who provides or intends to provide care for another adult. If a carer has any level of needs for support, they are entitled to a carer’s assessment, which would be conducted by Kent County Council. Swale Borough Council must have due regard for the needs of carers (Carers assessment) and make a referral for a care needs assessment, as required.
- 3.11** The Children and Social Work Act 2017 and Working Together to Safeguard Children 2023 places a number of duties on housing authorities to work jointly with a children’s services authorities in relation to housing of care leavers. All young people need to have safe and appropriate accommodation to meet their needs, with planned supportive transitions to independent living. Any

homelessness risks should be identified and acted upon at an early stage. This includes the expectation for keeping in touch with care leavers over the age of 21, and the non-mandatory reporting of care leaver deaths up to age 25 to improve learning and outcomes for this group of young people. (app)

- 3.12 The Police, Crime Sentencing and Courts Act 2022 received royal assent in April 2022. Part 2 of the PCSC Act creates a requirement for specified authorities to collaborate and plan to reduce or prevent serious violence. Statutory guidance was issued in December 2022 and provides details on the expectations on the Serious Violence Duty. For Swale Borough Council, this duty will be discharged mainly through its cooperation with the Swale Community Safety Partnership. However, If any victims of serious violence are identified through the safeguarding processes, appropriate referrals will be made to support agencies.

4. Policy Position

4.1 Principles

SBC believes Safeguarding is committed to the following principles for children, young people and adults at risk:

- Their welfare is paramount;
- Whatever their background and culture, parental or pregnancy status, age, disability, gender, racial origin, religious belief, sexual orientation and/or gender identity, they have the right to participate in society in an environment which is safe and free from violence, fear, abuse, bullying and discrimination;
- They have the right to be protected from harm, exploitation, abuse, and to be provided with safe environments to live and play;
- Working in partnership with them, alongside their parents or carers and other agencies, is essential to the promotion of their welfare.

4.2 Policy Statement

SBC is committed to safeguarding children, young people and adults at risk from abuse when they are engaged in services organised and provided by, or on behalf of, the Council. The Council will:

- a) Endeavour to keep residents and service users safe from abuse. Suspicion of abuse will be responded to promptly and appropriately. We will always act in the best interests of the child, young person or adults at risk;
- b) Proactively seek to promote the welfare and protection of all children, young people and adults at risk living in Swale at all times;
- c) Ensure that unsuitable people are prevented from working with children, young people and adults at risk through robust 'safer recruitment' procedures;
- d) Deal with any concern raised by a Member, employee, volunteer, contracted service provider, or member of the public appropriately and sensitively;
- e) Any Safeguarding referrals made by a Member, employee, volunteer or contracted service provider cannot be anonymous and should be made in the

knowledge that, during the course of enquiries, the referrers may be required as prosecution witnesses;

- f) Not tolerate harassment of any Member, employee, volunteer, contracted service provider or child, young person or vulnerable adult who raises concerns of abuse or neglect;
- g) Work in co-operation with KCC as required under the Children Act 2004 and the Care Act 2014 to make appropriate changes and amendments to improve the Council's safeguarding policies and procedures as recommended by Adult and Child Safeguarding Partnership Boards;
- h) Prevent abuse by using good practice to create a safe and healthy environment and avoid situations where abuse or allegations of abuse could occur;
- i) Use a trauma informed approach where appropriate.

4.3 Scope

4.3.1 This policy covers all Members, employees and volunteers at SBC, including contracted service providers

4.3.2 While Members, employees, volunteers and contracted services providers are likely to have varied levels of contact with children, young people and adults at risk as part of their duties and responsibilities for the Council, everyone should be aware of the potential indicators of abuse and neglect and be clear about what to do if they have concerns. Responsibilities are limited and it is important to remember the following:

IT IS NOT THE RESPONSIBILITY OF ANY SBC MEMBER, EMPLOYEE, VOLUNTEER OR CONTRACTED SERVICE PROVIDER TO DETERMINE WHETHER ABUSE IS ACTUALLY TAKING PLACE

HOWEVER:

IT IS THE RESPONSIBILITY OF THE MEMBER, EMPLOYEE, VOLUNTEER OR CONTRACTED SERVICE PROVIDER TO TAKE THE ACTIONS SET OUT IN THE PROCEDURE, IF THEY ARE CONCERNED ABUSE MAYBE TAKING

4.3.3 Domestic Abuse Policy, Staff Policy and procedures

Separate Domestic Abuse policies and procedures have been created and outline the Council's response specifically for members of the public, or staff, affected by domestic abuse. Although in the main responses to disclosure of domestic abuse will be in line with this Policy, these separate documents must be referred to.

4.4 Safeguarding Roles, Responsibilities and Governance in SBC

4.4.1 SBC offers a range of training dependent on the role. Safeguarding training offered ranges from basic awareness training via Elms E-Learning, to more in

depth training provided through the Safeguarding Boards or other external training providers. Staff at SBC are assigned a role category which determines the level of Safeguarding training required. Below are the categories of staff roles. All staff will be advised of the required safeguarding training for their level by the Safeguarding leads, as agreed with Senior Management Team. This training plan is shown in Appendix I.

0 – No contact with children/young people/adults at risk and/or parents/carers;

1 – Limited contact with children/young people/adults at risk/ and/or parents/carers-no unsupervised contact;

2a – Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact (Private Sector Housing Team, Environmental Response Team, some Open Spaces team and other roles as agreed by Safeguarding Officers)

2b - Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact (within the Housing Options team)

3 – Professional advisers and designated leads for children's and/or adults at risk safeguarding irrespective of the level of contact with children/young people/adults at risk and/or parents/carers.

4 - Strategic responsibility for safeguarding children and/or adults at risk for the organisation irrespective of the level of contact with children/young people/adults at risk and/or parents/carers.

4.4.2 Chief Executive or Officer from the Strategic Management Team (SMT)

The Chief Executive and SMT are responsible for ensuring that this policy and related procedures are implemented, monitored and consistently reviewed.

4.4.3 Housing and Health Committee

The Housing and Health Committee is responsible for ensuring the implementation, consistent monitoring and improvements of the Safeguarding Policy and related procedures.

4.4.4 Community Services Manager

The Community Services Manager is responsible on behalf of the Head of Housing and Community Services for implementing this policy and procedures and ensuring regular monitoring.

4.4.5 Safeguarding Team Lead

The Safeguarding Team Lead is responsible for the day-to-day oversight of the Safeguarding officer's and their response to safeguarding concerns.

4.4.6 Safeguarding Officer

The Safeguarding Officer is responsible for dealing with reports or concerns about the protection of children, young people and adults at risk appropriately and in accordance with the procedures that underpin this policy.

- 4.4.7 All Heads of Service** must ensure that appropriate employees are subject to Disclosure and Barring Service checks and that their staff members comply with this policy and the related procedures.
- 4.4.8 All Service Managers** (and Contract Managers responsible for contracted service providers) are responsible for ensuring that employees follow this policy and its related procedures and receive the safeguarding training and support they need, in line with their responsibilities and level of contact with children, young people and adults at risk.
- 4.4.9 All Members, employees and volunteers** are responsible for carrying out their duties in a way that actively safeguards and promotes the welfare of children, young people and adults at risk. They must also act in a way that protects them from wrongful allegations of abuse as far as possible. They must bring safeguarding concerns to the attention of the Safeguarding Officer.
- 4.4.10 Contractors, sub-contractors or other organisations funded by or on behalf of the Council** are responsible for applying the correct safeguarding procedures. Please see section 9 of this policy for more information.
- 4.4.11** Information sharing is vital to safeguarding and promoting the welfare of children and adults at risk. The lawful basis for processing most safeguarding-related personal data will usually be 'public task' or 'legal obligation', and the consent of the data subject is therefore not necessary. Information which is relevant to safeguarding will sometimes be 'special category' data, meaning it is particularly sensitive and therefore subject to more stringent restrictions. The Data Protection Act 2018 allows special category personal data to be processed without the consent of a child or an at-risk adult for the purpose of protecting their wellbeing or preventing harm to them, as long as the processing is necessary for reasons of substantial public interest and their consent cannot reasonably be obtained.

5. Safeguarding Procedures

5.1 Types of Concerns

- 5.1.1** The procedure for reporting a concern or allegation informs all SBC Members, employees, volunteers and those contracted service providers that have accepted this policy, of what actions they should take if they have concerns or suspicions, or encounter a case of abuse or neglect in any child, young person or adult at risk.

Even for those experienced in working with child or adult abuse it is not always easy to recognise a situation where abuse may occur or already has taken place. Whilst it is accepted that staff are not experts at such recognition all staff have a duty to act if they have any concerns and discuss with an appropriate Safeguarding representative within SBC.

5.1.2 Abuse is a form of maltreatment that can occur in several forms as shown below:

<p>For children, types of abuse include:</p> <p>Physical abuse</p> <p>Psychological / emotional</p> <p>Sexual abuse</p> <p>Grooming</p> <p>Criminal exploitation – sexual, gang and child on child can be related also referred to as extra familial abuse</p> <p>Neglect</p> <p>Domestic Abuse</p> <p>Female Genital Mutilation (FGM)</p> <p>Technology assisted abuse</p> <p>Domestic Abuse</p> <p>Self-neglect/Self-injurious</p> <p>Forced Marriage</p> <p>Risk of harm to unborn</p>	<p>Types of adult abuse include:</p> <p>Physical</p> <p>Sexual</p> <p>Psychological</p> <p>Discrimination</p> <p>Criminal Exploitation</p> <p>Financial</p> <p>Organisational</p> <p>Domestic Abuse - including Adolescent Parent Violence, Coercive control/ Stalking</p> <p>Self-neglect/Self-injurious</p> <p>Modern slavery/Human trafficking</p> <p>Neglect and acts of Omission</p> <p>Female Genital Mutilation (FGM)</p> <p>Inappropriate Restraint</p>
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5.1.3 It is important to note that these types of abuse are not mutually exclusive, and many different categories of concern may be occurring at the same time.

5.1.4 Many types of abuse might not be obvious and will require a level of professional curiosity to understand what is occurring within a household.

5.1.5 With an increasingly diverse community within the Borough, there is also a need to ensure greater awareness of different cultures and possible abuse that can occur within these, along with ensuring an appropriate response can be put into place.

5.1.6 There are a number of other concerns that may need to be flagged specifically related to children. This may include children that are missing, being home schooled, or private fostering arrangements have been put into place. Advice should be taken from safeguarding officers if there are any concerns regarding these types of concerns.

There are five main situations when Members, employees, volunteers and contracted service providers may need to respond and report a concern or case of alleged or suspected abuse. These are set out below:

5.2 When you identify a child, young person or adult at risk who may be experiencing abuse or neglect, you should:

- Stay calm and try to get another witness, if it does not compromise the situation;
- If you believe the person is 'at risk' of immediate significant harm, which includes situations which any Member, employee or volunteer would reasonably believe requires the emergency services, then you must contact the relevant emergency service and notify the Safeguarding Officer, Line Manager or Head of Service;

- Immediately report to and inform the Safeguarding Officer, Line Manager or Head of Service (as appropriate and where possible);
- Record all details you are aware of and log your concern, as soon as possible, on the My Concern Database (Safeguarding Database). If you are not registered on the Database, please email your concern to safeguarding@swale.gov.uk
- Consultation with the Kent Front Door (Children Social Services) or Central Referral Unit (Adult social services) and/or referral to be made and recorded with support from the Safeguarding Officer /Line Manager.
- Outcome of the consultation/referral to be recorded on the Safeguarding Database.

5.3 When a child, young person or adult at risk makes an allegation of abuse or bullying, you should:

- Stay calm and try to get another witness, if it does not compromise the situation;
- If you believe the person is 'at risk' of immediate significant harm, which includes situations which any Member, employee or volunteer would reasonably believe requires the emergency services, then you must contact the relevant emergency service and notify the Safeguarding Officer, Line Manager or Head of Service;
- Listen carefully to what is said and allow the person to talk at their own pace, being careful not to compromise potential evidence;
- Find an appropriate opportunity to explain it is likely that information will need to be shared with other responsible people, do not promise to keep secrets;
- Only ask questions for clarification, the use of open questions e.g. what, where, when, who? is advisable, do not ask leading questions (that suggest certain answers as this could compromise evidence);
- Reassure the child, young person adult at risk that they have done the right thing in telling you;
- Tell them what you will do next and who you will inform;
- Immediately report to and inform the Safeguarding Officer, Line Manager or Head of Service (as appropriate and where possible);
- Record all details you are aware of and log your concern, as soon as possible, on the My Concern Database (Safeguarding Database). If you are not registered on the Database, please email your concern to safeguarding@swale.gov.uk
- Referrals to Kent Children Social Services (Front Door or urgent support) and Adult Social Services referral must be recorded with support from the Safeguarding team / Line Manager.
- Outcome of any consultation/referral to be recorded on the Safeguarding Database.

5.3 When allegations or concerns are expressed about a Member, employee, volunteer or contracted service provider, you should:

- Take the allegation or concern seriously;
- Immediately inform the Safeguarding Officer, Line Manager, Head of Service or Contract Manager (as appropriate);

- The Safeguarding Officer informs Human Resources or Contract Manager at the earliest opportunity, provides a report of the incident and the intended action in accordance with 'Managing Allegations' procedure;
- If you believe the child, young person or adult is 'at risk' of immediate significant harm, which includes situations which you would reasonably believe requires the emergency services, then you should contact the relevant emergency service and then notify the Safeguarding Officer, Line Manager or Head of Service;
- Record all details you are aware of and log your concern, as soon as possible, on the My Concern Database (Safeguarding Database). If you are not registered on the Database, please email your concern to safeguarding@swale.gov.uk
- The Safeguarding Officer has a consultation with Kent Front Door/Kent Central Referral Unit or makes formal referral
- The Safeguarding Officer follows procedures outlined in 'Managing Allegations' procedure and makes contact with the KCC LADO Education Safeguarding Advisory Services (LESAS) formerly known as Local Authority Designated Officer (LADO). The KCC LESAS can support Human Resources or Contract Manager with appropriate decision-making.
- Any Member, employee or volunteer can make a referral to the KCC LESAS if they believe a case has been inappropriately or ineffectively investigated by SBC (app PIPOT guidance)

5.4 When allegations or concerns are expressed about any other person (e.g. parent, carer, other service user), you should:

- Take the allegation or concern seriously;
- If you believe the child, young person or adult is 'at risk' of immediate significant harm, which includes situations which you would reasonably believe requires the emergency services, then you should contact the relevant emergency service and then notify the Safeguarding Officer, Line Manager or Head of Service and immediately ;
- Immediately report to and inform the Safeguarding Officer & Line Manager or Head of Service (as appropriate);
- Record all details you are aware of and log your concern, as soon as possible, on the My Concern Database (Safeguarding Database). If you are not registered on the Database, please email your concern to safeguarding@swale.gov.uk or contact the team by phone.
- Referrals to Kent Children Social Services (Front Door or urgent support) and Adult Social Services referral must be recorded with support from the Safeguarding Team / Line Manager
Outcome of the consultation/referral to be recorded on the Safeguarding Database.

5.5 When you have a general welfare concern (i.e. their mental health, levels of debt etc) about a child, young person or adult at risk you should:

- Discuss your concern as soon as possible with a Safeguarding Officer – formal consultation or referrals to social care or the Police may not be needed, but a wider range of referrals to support agencies could be looked into and made.

5.6 When you have a concern that someone may be self-neglecting, you should:

- Discuss your concern with a Safeguarding Officer as soon as possible.
- The Kent and Medway Self Neglect Protocol is in place to guide all agencies in the process to follow for cases of possible self-neglect by adults. As an identifying agency, it may be that Swale BC needs to lead this process. This protocol can be found at <https://kmsab.org.uk/professionals/kmsab-policies>
- A self-neglect fact sheet has been developed (Appendix 2) for staff to follow to ensure an appropriate response is in place.

5.6.1 For all concerns, there may be cases identified to the Safeguarding Officers that meet the criteria for the multi-agency Swale Vulnerability Panel. This panel focuses on adults that have been or are likely to be a victim of crime or ASB; are isolated; felt to be self-neglect; have a diagnosed, or felt undiagnosed, mental health condition; meet the threshold for statutory services but limited engagement. Cases should be referred to this panel by the Safeguarding Officers if it is felt the criteria are met, for a multi-agency discussion on how best to support the adult.

5.7 Recording Concerns

If any Member, employee or volunteer has concerns about the welfare or safety of a child, young person or adult at risk, or has concerns about the behaviour of a Member, employee or volunteer, it is vitally important to record all relevant details regardless of whether or not the concerns are shared with the Police, KCC or other appropriate partners.

The My Concern Safeguarding Database is in place to record and manage all safeguarding concerns. A new Concern should be logged on the database for all events of concern (even if no referral is subsequently made).

The Safeguarding Database can be found at: <https://www.myconcern.education>.

It is the responsibility of the person who directly observes/witnesses the event (e.g. living situation) of concern or who has participated in the meeting/conversation that has caused concern, to record details of the concern. The record should be clear which person provided the information and there must be clear differentiation between opinion and fact.

If the person who has witnessed/observed/participated in the event of concern and is unable to log their concern on the Safeguarding database, the details of the concern should be emailed directly, as soon as possible, to safeguarding@swale.gov.uk to alert the Safeguarding Officer. Their Line Manager should also be alerted to this, who may be able to log the concern on their behalf.

Rational / decision making should be clearly documented with the case management. This includes decisions rational of not completing certain actions or referrals.

Records may be used for: Evidence for investigations and inquires; Court Proceedings; Monitoring Quality Assurance; and Disciplinary procedures. The Safeguarding Officer will then manage the process and follow guidance on information sharing, confidentiality, consent and making appropriate referrals to KCC and other agencies. It is also important that notes regarding capacity are made, as well as decisions/choices made by any adults at risk.

Appendix 3 details the case standards that are expected for the online case management of safeguarding concerns. This covers the logging of; ongoing management; and closure of concerns.

Employees will be allocated a My Concern Login within those teams that identify the greater number of safeguarding concerns. User accounts will be reviewed at least annually, or when notification of a leaver is received by the safeguarding team, with accounts deactivated as required.

5.8 Consent

It is always best practice to obtain consent from an adult at risk (or parent in relation to children/young people) prior to making referrals or sharing information with another agency.

However, consent is not required for a service referral/information sharing where an adult (or their children) are at high risk of serious harm.

There may be occasions when an adult at risk refuses consent for this information sharing or referrals for support. This may have to be accepted if there is no risk of serious harm to this person or another, however self-neglect (section 5.6 may need to be considered) or their capacity to make a safe decision (see section 5.10).

5.9 Making Safeguarding Personal

"No decision about me without me"

Making Safeguarding Personal (MSP) is about professionals working with adults at risk to ensure that they are making a difference to their lives. Considering, with them, what matters to them so that the interventions are personal and meaningful. It should empower, engage and inform individuals so that they can prevent and resolve abuse and neglect in their own lives and build their personal resilience. It must enhance their involvement, choice and control as well as improving quality of life, wellbeing and safety.

It should underpin all interactions and involvement with the adult at risk.

Processes should fit around the person to ensure that the persons views remain central in the safeguarding journey. Further detail can be found on the KMASB.

5.10 Capacity

There may be occasions when adults become unable to make decisions for themselves due to ill health or mental impairment. When this happens, the person is said to 'lack capacity'. The Mental Capacity Act protects and supports these people and outlines who can and should make decisions on their behalf.

It must always be assumed that everyone is able to make a decision for themselves, until it is proven that they cannot. The only way to do this is for a mental capacity assessment to be undertaken by a trained professional.

If there is a concern that an adult at risk may not have capacity to make a decision related to their safety or wellbeing, advice must be taken from the Safeguarding Officer as to how to proceed. Further guidance can be found KMASB. (App)

6. Recruitment

SBC is committed to safer recruitment procedures set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) Where it is identified that services or staff have regular contact with children, young people and adults at risk, or will hold safeguarding responsibility, then appropriate procedures are initiated by the recruiting Manager and the relevant Human Resources Officer. Managers who are recruiting for a post of safeguarding level 2 or 3 are required to have completed 'Safer Recruitment' training within the last 3 years.

It is the responsibility of the recruiting manager to undertake a risk assessment for the job description and person specification for those roles likely to involve regular and/or substantial unsupervised contact with children, young people or adults at risk before recruitment takes place. This will determine the safeguarding level of all roles and ensure that only appropriate individuals are selected to undertake DBS procedures. See appendix for relevant guidance.

7 DBS Disclosures

SBC is not a Children's Services Authority therefore scope for working directly with children, young people or vulnerable adults is limited. DBS disclosures should only be sought where an elected Member, employee or volunteer has substantial, regular or unsupervised contact with children, young people and adults at risk as part of their duties or responsibilities for, or on behalf of, the Council.

SBC will refer any elected member, member of staff or volunteer to DBS for consideration for the barred list(s) if SBC thinks a person has:

- harmed or poses a risk of harm to a child or vulnerable adult
- has satisfied the harm test; or
- has received a caution or conviction for a relevant offence and;

- the person they're referring is, has or might in future be working in regulated activity and;
- the DBS may consider it appropriate for the person to be added to a barred list

(Please see the separate DBS Policy for further information, Members DBS procedure Appendix 6)

8. Escalating Concerns and Case Reviews

There may be times when officers working on a safeguarding case cannot resolve the concern, or may disagree with another professional from another agency as to the best way forward. These should in the first instance be flagged to the Community Services Manager or Safeguarding Officer, if not already done so. These officers may determine the best path forward, particularly if relating to another agency, may be to raise to the Head of Housing and Communities. A referral can also be made to the Vulnerability Panel to problem solve an approach for a case.

The Kent and Medway Safeguarding Adults Board have an escalation policy in place for when professional disagree about a way forward with a safeguarding adult case. This can be found at <https://kmsab.org.uk/professionals/kmsab-policies>

The Kent Safeguarding Children Multi-Agency Partnership also has an escalation process in place for the same reason – this can be found at <https://www.kscmp.org.uk/procedures>.

There are also occasions when either the Kent and Medway Safeguarding Adults Board, Kent Children Safeguarding Multi-agency Partnership or Kent Community Safety Partnership convene a case review to identify any lessons that can be learnt from the handling of a case between agencies. There are set criteria for when each of these can be convened and procedures in place for their management, but are typically when there has been a death or serious harm caused. Details of these can be found as follows:

- Domestic Homicide review: <https://www.kent.gov.uk/about-the-council/partnerships/kent-community-safety-partnership/domestic-homicide-reviews>
- Safeguarding Adult Review - <https://kmsab.org.uk/professionals/kmsab-policies>
- Kent Child Safeguarding Practice review – <https://www.kscmp.org.uk/procedures>

The Community Safety Manager and Safeguarding Team Lead will hold details of the procedures for these reviews and will be the point of contact for the lead agencies that may convene these reviews.

Should any officers feel that a case that they are working on meets the criteria for one of these reviews, the Community Safety Manager will lead on the completion of any relevant notifications to the above Partnership(s) as appropriate.

9. Procurement and contract monitoring

Where Council services are contracted externally, assurance needs to be in place that the contractor or sub-contractor adequately deal with safeguarding concerns. The Safeguarding Contract Management Framework is in place to manage this compliance. At the point of all procurement, all contracts with a level of engagement with children, young people or vulnerable adults need to be graded 'Gold, Silver or Bronze' depending on their level of contact. Compliance to a range of measures will be confirmed by the Safeguarding Team. A contractors ongoing compliance to these safeguarding measures will also need to be monitored by the lead contract manager, in line with the Council's Contract Monitoring Procedure.

10. Safeguarding Partnership Boards

Kent Safeguarding Children Multi-Agency Partnership (KCSMP) is set-up as a result of the Working Together to Safeguard Children 2018 and is led by the Local Authority (Kent County Council), Kent Police and Health to ensure partners work together to safeguard children. Swale Borough Council has a duty to cooperate with this partnership and any relevant sub-groups, including compliance with its partnership policies. This includes to complete a bi-annual Section 11 Audit to ensure compliance with all safeguarding children legislation. Further details on the KSCMP are available at <https://www.kscmp.org.uk>.

There are a number of policies and procedures that Swale BC must follow in relation to our safeguarding response to children and these can be found on their website.

The Kent and Medway Safeguarding Adults Board is an equivalent statutory partnership to ensure member agencies work together to help keep adult's safe from harm and to protect their rights. Again, Swale Borough Council has a duty to cooperate with the partnership including its sub-groups; compliance with multi-agency policies; and to complete a bi-annual audit to ensure compliance with all legislation to safeguard adults. Further details of the KMSAB can be found at [Kent & Medway SAB website \(kmsab.org.uk\)](http://kmsab.org.uk)

There are a number of policies created by the Kent and Medway Safeguarding Adults Board to which SBC must follow. These are found on their website and have also been referenced within this Policy and within the attached appendices where appropriate.

Key updates and information are shared regularly by both Boards with the Safeguarding team and these are cascaded to other officers as appropriate.

11. Translators / Interpreters

Advisers must be sensitive to the potential for there to be communication difficulties between them and their client, even if they speak the same language. If it becomes clear that the client and adviser are unable to communicate clearly and easily, then the adviser must arrange for a suitable interpreter to be present when they meet their client.

An officer must be mindful of the fact that while clients and interpreters may share a common language, they may have significantly different cultural, political or religious beliefs.

If a client wishes a friend or family member to interpret for them, the officer must assess and decide if the person is sufficiently competent and able to do so. This includes assessing whether they understand the instructions, their role as interpreter, and can communicate clearly and accurately between themselves, the client and the officer. The officer must also ensure that the person interpreting is willing to act as an interpreter and understands the requirements relating to client confidentiality.

It is not appropriate to use a witness or potential witness as an interpreter in cases such as Domestic Abuse or Modern Slavery.

A suitable interpreter or translator is one who is competent to provide such service taking into account the client's needs and the nature of the matter to be conveyed. For example, a family member or friend may be suitable to help support the client in your initial meeting when you are generally discussing the client's case, options and costs, or in subsequent calls where you are seeking clarification on a point, however a qualified professional may be necessary where you are confirming a witness statement or drafting detailed representations. When seeing a professional interpreter or translator their relevant qualifications, experience, independence and membership of such organisations as the National Register of Public Service Interpreters (NRPSI) should be considered and costs for such services discussed with the client.

To access Language line call 0845 310 9900, ID /Password is required.

It is important to signpost or refer into the most appropriate supporting agency for the victim/survivor. There are many specialist supporting agencies nationally for victims/survivors who may be deaf, blind, male, BAME, LBGQT, exposed to HBV or FGM (this is not an extensive list). It is important that we consider the best placed support service for the victim.

A list of specialist services and options for accessing legal advice for non-molestation and occupation orders can be found on the service mapping document :

<https://midkentgovuk.sharepoint.com/sites/SBCCSU/SafeguardingInformation/Fo rms/AllItems.aspx>

12. Key Safeguarding Contacts

Safeguarding Officer:

Email: safeguarding@swale.gov.uk

This email must be used to ensure all safeguarding concerns or questions are picked up by the Officers and wider team. Personal email addresses should not be used for reporting of new concerns or urgent case updates.

Phone: 01795 417457 or 'Safeguarding Queue' on Teams

Kent County Council

Kent County Council Adults Social Services – **03000 41 61 61**

Social Services Children & Families – **03000 41 11 11**

Social Services Out of Hours – **03000 41 91 91**

Kent Police

Emergency – 999

Non-emergency – 101

13. Safeguarding Training

Table 1 details the agreed minimum level of training expected for each Safeguarding Contact Level (see section 4.4.1 for definition of levels).

E-learning will be required to be refreshed every three years. The Face-to-face (or virtual) training will also be three years, with the exception of Safeguarding Children (Designated Officer) which will be refreshed every two years.

All new starters, regardless of their Safeguarding Level, must complete the safeguarding e-learning modules. Level 2a, 2b, 3 and 4 staff should complete a short input with a member of the Safeguarding team to gain an oversight of our local procedures and training required.

A number of advisory training sessions are included within this training plan. Although not mandatory, it would be deemed best practice for all staff at that level to complete these.

A certain number of Face to face/Virtual Sessions of each training module for level 2 and above staff will be organised each year. These where possible will be spread throughout the year and delivered on different days/times to increase opportunities for staff to attend.

Deadlines will be set for all completion of training and compliance will be reported quarterly to Senior Management Team. The following steps will be taken to address non-compliance:

- Safeguarding Team Lead to flag training that is required, with completion date, to Officer and their Line Manager

- If still not completed within new time period, report of all those non-compliant staff to be provided to SMT.
- Head of Service to review list and contact Officer and their Line Manager regarding completion.
- Further action for non-compliance to be discussed on a case-by-case basis.

Table 1: Safeguarding Training Plan: Minimum learning requirement

Safeguarding Contact Level	Level of Contact definition	Minimum learning requirements
0	No contact with children/young people/adults at risk and/or parents/carers	Elms e-learning <ol style="list-style-type: none"> 1. Safeguarding Children 2. Safeguarding Adults 3. Combined Safeguarding Issues 4. Domestic Abuse
1	Limited contact with children/young people/adults at risk and/or parents/carers-no unsupervised contact	Elms e-learning <ol style="list-style-type: none"> 1. Safeguarding Children 2. Safeguarding Adults 3. Combined Safeguarding Issues 4. Domestic Abuse Recommended Awareness Session: Suicide Awareness Economical Abuse
2a	Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact (Specific roles within Private Housing, Environmental Response, Open Space and other teams)	Face-to-Face (or Virtual) <ol style="list-style-type: none"> 1. Prevent (Counter-Terrorism) training 2. Modern Slavery training 3. Child Exploitation training 4. Child Protection 5. Safeguarding Adults 6. Domestic Abuse Recommended Awareness Session Suicide Awareness Self-Neglect

2b	<p>Regular contact with children/young people/adults at risk and/or parents/carers or any unsupervised contact</p> <p>(Housing Options team)</p>	<p>Face-to-Face (or Virtual)</p> <ol style="list-style-type: none"> 1. Prevent (Counter-Terrorism) training 2. Modern Slavery training 3. Child Exploitation training 4. Child Protection 5. Safeguarding Adults 6. Domestic Abuse 7. DASH (Domestic Abuse Risk Assessment) 8. Mental Capacity <p>Recommended Awareness Sessions:</p> <p>Suicide Awareness</p> <p>Self-Neglect</p> <p>Domestic Abuse By and For Services</p>
3	<p>Professional advisers and designated leads for safeguarding children and/or adults at risk, irrespective of the level of contact with children/young people/adults at risk and/or parents/carers</p>	<p>Face-To-Face (or Virtual)</p> <ol style="list-style-type: none"> 1. Prevent (Counter-Terrorism) training 2. Modern Slavery training 3. Child Exploitation training 4. Child Protection 5. Safeguarding Adults 6. Domestic Abuse 7. Safeguarding Children (Designated Staff) 8. Mental Capacity 9. Self-Neglect <p>Recommended Awareness Sessions</p> <p>Domestic Abuse By and For Services</p>
4	<p>Strategic responsibility for safeguarding children and/or adults at risk for the organisation irrespective of the level of contact with children/young people/adults at risk and/or parents/carers.</p>	<p>Elms e-learning</p> <ol style="list-style-type: none"> 1. Safeguarding Children 2. Safeguarding Adults 3. Combined Safeguarding Issues

		<p>4. Domestic Abuse</p> <p>Face to Face</p> <ol style="list-style-type: none"> 1. Safeguarding Children (Designated Staff) 2. Safeguarding Adult
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Appendix 1 – Case Standards

Introduction

This case note guidance is to be used to inform the management of safeguarding cases by Swale Borough Council and its Safeguarding Leads. It aims to ensure that a 'good' standard is reached and maintained for all safeguarding case records.

It is important that case records are 'good' as they demonstrate the actions taken to safeguard individuals; can evidence why decisions were made and support provided; and allow for better information sharing and cross-agency communications. They may also be provided as evidence in case reviews by other agencies. It will also ensure that other members of the Safeguarding team can sufficiently cover the service in the absence of the Safeguarding Officers(s).

These standards have been compiled following guidance and advice from the Kent Safeguarding Multi-Agency Partnership and internal Audit team. (Swale also has a standalone DA procedure and guidance).

Recording of new cases

- All concerns should be logged on the My Concern database for management.
- All new cases should be logged within 2 working days of them being raised to the Safeguarding Leads,
- As far as possible, the officer raising the concern should be encouraged them to log the case on the database. If this is not possible, the reporting team should be included in the initial details of the concern.
- A new case should be logged for all concerns raised to the team.
 - If the personal details of the individual(s) in question are unknown such as name, these should be logged as 'unknown' but with as many details as possible to differentiate them.
- A case owner should be allocated to each case at the point it is logged, dependant on the date it is received by the team and the case loads of each officer.
- For concerns raised by Housing Options, their housing database must be reviewed at the point the concern is raised. Appropriate notes should be copied or transposed across to the Safeguarding Database to detail the safeguarding concern.
- All notes should be recorded in clear English, within any use of acronyms explained. These should also be explained in any notes copied over from the Housing Options database.
- As far as possible, distinction should be made between opinion and fact.

Ongoing case management

- Ongoing cases should be reviewed in a timely manner, a minimum of bi-weekly. If it is felt that a case does not require update on this frequency, the case notes

should reflect the reasoning for this e.g. a meeting is due to take place in 2 weeks.

- If there are no updates to note, but the case review has been completed, a note should be added to state this.
- Case owners are responsible for flagging to the Safeguarding Team Lead if their updates are falling outside of this time period.
- All case updates must be logged on the database within 2 working days of their receipt, or another team member be asked to complete if needed.
- An update should be logged that the case has been reviewed, even if there are no updates to provide.
- The case owner is responsible for logging of all updates on each case, unless they are on leave or off sick. In which case another member of the team will log these.
- Justifications should be added in for decision making where appropriate, such as information sharing or any deviation from procedures.
- Rational / decisions making should be clearly documented with notes along with the voice of the child / adult documented at every opportunity
- Emails that detail any specific issues with the case and action taken, should be attached as separate files, rather than the body of the text copied and pasted into a file note. This does not need to be all correspondence.

Referrals and Outcomes

- All referrals should be logged in the 'referral section' of the database.
- This should include when it is not necessary to make a referral, due to the case already being open to another agency.
- Outcomes of referrals must be chased prior to a case being filed. If an agency is unable or unwilling to provide an outcome, in discussion with the Safeguarding Team Lead a decision can be made to file a case without this.

Case Filing

- A case should be filed when:
 - I. the appropriate agencies are engaged with the family/individual and taking appropriate action;
 - II. The individual/family has been signposted to support;
 - III. The individual/family will not consent to referrals and its deemed they have capacity;
- When it is determined that a case can be closed, a note should be logged detailing the reasoning for this and the outcomes achieved.
- Case closures must be reviewed by the Safeguarding Team Lead or Community Safety Manager. A task must be raised for them to review and close the case. If it is the case that the Safeguarding Team Lead is the lead for a concern, the Community Safety Manager should review that case for closure.
- Case closures must be completed within 2 weeks of being raised.

- If the reviewing officer does not feel the case can be closed, this must be documented within the case notes and fed back to the case owner.
- All DA cases should have a DA closure check list completed and attached to the case.
- As far as possible, case closures should be completed by the Safeguarding Team Lead or an officer independent to the case.

Handovers

- A handover email should be sent to the other Safeguarding Officer (or Safeguarding Team Lead in the absence of the other Safeguarding Officer) at the end of a working period of any cases that require update, review or action for the following period.

Management Oversight and Review

- In Safeguarding Officer's 121s, cases that have been open longer than 3 months will be discussed. Any other cases that the Safeguarding Officer feels should be raised may also be discussed, including any that they are struggling to progress or are facing difficulty with.
- Team meetings will also be used monthly to highlight any cases that are of concern or an officer is unsure how to progress.
- A performance report will be presented to Senior Management Team on a quarterly basis. A Safeguarding Officer will be responsible for the development of this.

Re-opening of cases

- If a similar concern is raised for an individual within 1 month of a previous one being filed, the concern can be re-opened and where possible, allocated to the previous case lead.
- If a longer time period has passed or the concern is of a different nature, a new concern should be logged.

Review

This guidance will be reviewed on an annual basis.

Appendix 2 -Swale Borough Council Hoarding and Self Neglect Fact Sheet

This guidance will be referred to by Swale Borough Council staff where an adult at risk is believed to be self-neglecting or showing hoarding behaviour which puts them at risk.

Self-Neglect

SCIE (Social Care Institute of Excellence) defines self-neglect as “an extreme lack of selfcare, it is sometimes associated with hoarding and may be a result of other issues such as addictions”.

It can include:

- Lack of selfcare to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health, nutrition or environment
- Inability to avoid harm as a result of self-neglect
- Failure to seek help, support or access services to meet health and social care needs
- Refusal of services that would mitigate risk of harm.
- Unwillingness to manage one's personal affairs.

It is important to remember that self-neglect is not about someone being unable to care for themselves. Many people who come to the attention of adult social services do so because they are no longer able to perform the activities of daily living, such as attending to their personal care or nutrition. In these situations, an assessment under the Care Act and the provision of services will ensure that their needs are met.

Self-neglect is when someone is unwilling, for a number of reasons, to care for themselves. It can be longstanding or recent.

If a person is capacitated and able to make a particular decision, they are entitled to make an unwise decision for themselves as long as it does not have an adverse effect on others.

Hoarding

Hoarding is a recognised mental health diagnosis. It is the excessive collection and retention of any material to the point that living space is sufficiently cluttered to preclude activities for what they are designed for. Hoarding may be characterised by:

- persistent difficulty in discarding or parting with possessions because of a perceived need to save them.
- an intense emotional attachment to objects that may not be regarded as having the same value to others.
- distress at the thought of getting rid of the items.

It is important to recognise that self-neglect and hoarding may be related to medical conditions such as:

- **Diogenes syndrome** is described as an aggravation of eccentric and aloof/reclusive personalities, leading to isolation, severe self-neglect, extreme hoarding and squalid living condition. Further information is available on the NHS England [NHS England website](#) (page 29).
- **Wernicke/Korsakoff Syndrome** is a chronic memory disorder caused by severe deficiency of thiamine (vitamin B-1). Korsakoff syndrome is most commonly caused by alcohol misuse, but certain other conditions also can cause the syndrome. More information is available on the [Alzheimers Association website](#).
- **Frontal Lobe Damage**
- **Depression**

- **Obsessive Compulsive Disorder**
- **Schizophrenia**

Identifying Individuals who self-neglect or demonstrate hoarding behaviour

One or more of the following situations may be an indicator of self-neglect/hoarding and should be considered in the context of each individuals' specific circumstances and characteristics (this list is not exhaustive):

- a) living in very unclean and/or verminous circumstances
- b) neglecting household maintenance, and therefore creating hazards within and surrounding the property
- c) portraying eccentric behaviour / lifestyles
- d) poor diet and nutrition. For example, evidenced by little or no fresh food in the fridge, or what is there, being mouldy
- e) declining or refusing prescribed medication/treatment and / or other community healthcare support
- f) refusing to allow access to health and / or social care staff in relation to personal hygiene, treatment and/or care
- g) refusing to allow access to other organisations with an interest in the property, for example, staff working for utility companies (water, gas, electricity)
- g) not engaging with a required network of support
- h) repeated episodes of anti-social behaviour – either as a victim or perpetrator
- i) being unwilling to attend external appointments with professional staff, whether social care, health, housing or other organisations
- j) poor personal hygiene and/or health
- k) isolation
- l) difficulty in discarding or parting with possessions

The Kent Adults Safeguarding Board relevant policy sets out the legal responsibilities that everyone has under the Care Act 2014, and other associated legislation, with regards to safeguarding adults at risk. In relation to adults perceived to be at risk because of self-neglect/hoarding, authorities are expected to act within the powers granted to them. They must act fairly, proportionately, rationally and in line with the principles of the Care Act 2014, the Mental Capacity Act (2005) and consideration should be given to the application of the Mental Health Act (1983) where appropriate.

A decision on whether a response is required under safeguarding should be made on a case-by-case basis and “will depend on the adult’s ability to protect themselves by controlling their own behaviour”.

Additionally, there are powers that can be used when someone demonstrates hoarding behaviour that puts them or others at risk of harm but may not be self-neglecting. These powers are enabled through a number of Acts including; the Housing Act 2004, Fire Services Act, 2004, Public Health Act 1936, Prevention of Damage by Pests Act 1949, Environmental Protection Act 1990, Town and Country Planning Act 1990, The Animal Welfare Act 2006; Appendices 1 & 2 refer.

Information sharing

Information Sharing procedures can be found in the Kent and Medway multi-agency Policy, Protocols and Guidance document:

Protocol Section 6.1: *Making decisions about sharing confidential information in the [Kent and Medway Multi-Agency Policy, Protocols and Guidance Document](#)*

Swale Safeguarding process:

1. Using the clutter rating scale below (appendix 2) to assess the level of concern and or identify using the definition of self neglect above to identify areas of concern and evidence of self-neglect (appendix 1 tool kit below can also assist with this)
2. Discuss or refer to the Safeguarding team for further guidance
3. Necessary referrals will need to be completed as agreed with your safeguarding team
4. Consent should be obtained where possible and the thought and wishes of the individual documented. It is important to record whether the person consents, or not, to any safeguarding actions and whether the person has capacity to consent. If a person does not consent, action can still be taken where there is reasonable suspicion of a potential crime, risks to others, coercion or harassment of the person, or when it is in the public interest to do so. If a person lacks capacity to consent, a capacity assessment must be completed by the most relevant person and a Best Interests Decision made regarding the referral, or any planned action.
5. A risk assessment should be completed -a copy can be found within [Kent and Medway multi-agency policy and procedure to support people that self neglect or demonstrate hoarding behaviour \(kmsab.org.uk\)](#)
6. If the case does not meet the level for a Safeguarding enquiry to be opened the lead agency are required to call a multi-agency meeting using the template minutes for recording. (This can found in the document referenced above)
7. All actions and multi-agency meetings should be managed and monitored via MyConcern and each managed by a Safeguarding Officer. This does not replace the obligations of other departments and officers within SBC.

Assessment Tool Guidance

Guidance for practitioners

Listed below are examples of questions you may wish to ask where you are concerned about someone's safety in their own home, where you suspect a risk of self-neglect and/or hoarding.

The questions should be used alongside the clutter rating and professional judgement to identify level of risk. The questions are designed to help you ascertain what the primary issue or concern is for the individual and therefore what the most appropriate route for support may be.

The question set should be taken as a whole, and it should always be remembered to consider whether mental health and wellbeing support is needed alongside other solutions.

Most clients with a hoarding problem will be embarrassed about their surroundings. Try to ascertain information whilst being as sensitive as possible. The individual should be engaged in the process of seeking further support and their consent gained for referrals to be made.

Practical

- How do you get in and out of your property?
- Do you feel safe living here?
- Have you ever had an accident, slipped, tripped up or fallen? How did it happen?

- Is there hot water, lighting and heating in the property? Do these services work properly?
- Are you able to use all the rooms in your property e.g. the bathroom and toilet ok?
- Where do you sleep?
- Has a fire ever started by accident? Is the property at risk from fire?
- Do you have a housing support worker? Do you have any support from Adult Social Care?

Physical

- Do you have any physical health needs, mobility supports etc...
- Does your physical health prevent you from clearing your property?
- Do you have anyone helping you with your current situation

Consider:

- Is a referral to Adult Social Care needed?
- Does the person need to see their GP?

Psychological

- Do you have any difficulty with throwing things away? If so what stops you? If I was to throw something away right now how would you feel?
- Do you ever feel upset by your living situation?
- Do you ever feel down, depressed or hopeless?
- Do you ever have thoughts that you would be better off dead or thoughts of hurting yourself
- Have you ever had any support for your mental health before?

Consider

- Checking for current mental health support
- Support to self-refer into Mental Health / Wellbeing Services
- Does the person need to see their GP? (for acute mental health issues person should be referred to their GP or mental health crisis team)
- Give information about the Mental Health Buddy schemes where these exist
- Consider leaving self-help pack

Provision

- Would you like you some support to manage your current situation?
- Are you happy for us to share your information with other professionals who may be able to help you?

Ask person to sign consent form and liaise with other agencies as appropriate – refer to Consent section of the Procedures to Support People who Self-Neglect or Demonstrate Hoarding Behaviour

Bedroom Clutter Image Rating



1



2



3

Clutter Level 1 (image rating 1-3): Household environment is considered standard. No specialised assistance is needed. If the resident would like some assistance with general housework or feels they are declining towards a higher clutter scale, appropriate referrals can be made subject to circumstance.



4



5



6

Clutter Level 2 (image rating 4-6) Social Care Under Self-neglect: Household environment requires professional response to resolve the clutter and the maintenance issues in the property. Requires a referral to Social Care under Self Neglect.



7



8



9

Clutter Level 3 (image rating 7-9) Requires Safeguarding Alert: Household environment will require intervention with a collaborative multi-agency approach with the involvement from a wide range of professionals. This level of hoarding constitutes a Safeguarding alert due to the significant risk to health of the householders, surrounding properties and residents. Residents are often unaware of the implication of their hoarding actions and oblivious to the risk it poses.

Lounge Clutter Image Rating



1



2



3

Clutter Level 1 (image rating 1-3): Household environment is considered standard. No specialised assistance is needed. If the resident would like some assistance with general housework or feels they are declining towards a higher clutter scale, appropriate referrals can be made subject to circumstance.



4



5



6

Clutter Level 2 (image rating 4-6) Social Care Under Self-neglect: Household environment requires professional response to resolve the clutter and the maintenance issues in the property. Requires a referral to Social Care under Self Neglect.



7



8



9

Clutter Level 3 (image rating 7-9) Requires Safeguarding Alert: Household environment will require intervention with a collaborative multi-agency approach with the involvement from a wide range of professionals. This level of hoarding constitutes a Safeguarding alert due to the significant risk to health of the householders, surrounding properties and residents. Residents are often unaware of the implication of their hoarding actions and oblivious to the risk it poses.

Kitchen Clutter Image Rating



1



2



3

Clutter Level 1 (image rating 1-3): Household environment is considered standard. No specialised assistance is needed. If the resident would like some assistance with general housework or feels they are declining towards a higher clutter scale, appropriate referrals can be made subject to circumstance.



4



5

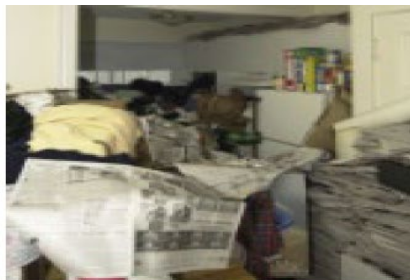


6

Clutter Level 2 (image rating 4-6) Social Care Under Self-neglect: Household environment requires professional response to resolve the clutter and the maintenance issues in the property. Requires a referral to Social Care under Self Neglect.



7



8



9

Clutter Level 3 (image rating 7-9) Requires Safeguarding Alert: Household environment will require intervention with a collaborative multi-agency approach with the involvement from a wide range of professionals. This level of hoarding constitutes a Safeguarding alert due to the significant risk to health of the householders, surrounding properties and residents. Residents are often unaware of the implication of their hoarding actions and oblivious to the risk it poses.

Appendix 3: Suicide Threat Procedural Guide

Someone discloses that they might/will/want to/feel like attempting suicide or you are concerned that they will



Where possible let the person know that as they have disclosed information like this that you will have to alert Safeguarding/Police due to being concerned for their welfare. (See attached guidance for questions to ask. Safeguarding team may need to call them back but they may not answer)



Contact Safeguarding team or Police colleagues in the Community Safety Unit who will ask you some questions to clarify the risk level (see attached document) and the circumstances surrounding the threat, and follow advice. If unable to get hold of us continue to next stage



If it is an emergency call 999, Ambulance and if necessary Kent Police



Alert the Safeguarding Officer by email if you haven't already



Do you know if the person has children? Are they at risk due to Parental Mental Health?



Yes



Complete Child Protection/Child in Need/Early Help referral to Social Services Children and Families. Call 03000411111 or follow advice from safeguarding team
Note: Where possible inform parent/carer of referral but if an immediate risk of significant harm then consent not required state on form whether consent obtained



No



Is this a new case or is there an ongoing case/relationship with this person?



New Case



Does the person give consent for you to inform their GP or alert CMHT /SS for support?
 If so consider submitting Kent Adult Safeguarding Alert Form / complete an urgent referral to mental health together plus/ contact GP where appropriate
 Consult the CMHT (MHT+) and see if they are known to them (if not can GP refer?)
 If no GP Contact KMPT Urgent mental health line **0800 783 9111**, 111 option 2, encourage person to do self referral for support
 Alert Safeguarding Officer/team
Safeguarding@swale.gov.uk



Consider the reasons/problems behind the suicide threat and signpost to relevant support and follow our other procedures where appropriate (e.g. financial struggles, DV/DA, Housing, relationship troubles etc.)



Email safeguarding if you haven't already, and monitor as appropriate and keep Safeguarding Officer/team up to date



Known/Pre existing



Are they already known to SS or CMHT or involved with their GP regarding mental health? If so update relevant agencies of events
 Update /
 Alert Safeguarding Officer/team
Safeguarding@swale.gov.uk

KMPT Urgent mental health line (SPOA) – 0800 783 9111 / 111 option 2

Swale Community Mental Health Team - 01795 418359

Kent County Council Adult Social Services – 03000 41 61 61

Social Services Children and Families – 03000 41 11 11

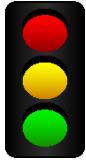
Release the Pressure Text the word **Kent** to 85258 or phone [0800 107 0160](tel:08001070160)

Citizens Advice Bureau - 03444 111 444

MIND: 0300 123 3393 [Mind helplines - Mind](#)

Samaritans - 08457 90 90 90

SANE Support line 0800 304 7000



Traffic light system



RISK ASSESSMENT

Do you currently have any thoughts of harming yourself or suicide?
How likely would you be to act on these thoughts? (*scale of 1 to 10*)
Have you made any plans to act on these thoughts? Have you made any preparations? Have you thought about how?
Is there anything that would prevent with carrying out these actions, (e.g. knowing things will change, impact on people who love you, religious beliefs)
Have you ever tried to harm yourself or take your own life in the past?
Have you ever been physically violent to others?
Were the police involved?
Are you currently at risk of physical harm or verbal / emotional abuse from someone else?

Emergency

- **Current suicidal thoughts**
- **Clear plan with means available and intent to end life**
- **Or suicide plan already implemented e.g. Overdose taken**
- **Or recent suicide attempt**

RED: Refer to Emergency Services
Safety plan
Refer to safeguarding Team

Urgent

- **Suicidal thoughts not easily dismissed AND/OR**
- **No immediate intent or plans but some idea about means AND/OR**
- **History of previous suicide attempts**
-

AMBER: Emergency contacts,
Safety plan where possible,
Urgent mental health referral
Refer to safeguarding Team
provide Mental health service support details

Routine

- **No history of suicide attempts**
- **No or fleeting suicidal thoughts easily dismissed**
- **No intent or plan**

GREEN: Safety plan & emergency contacts,
refer to GP
provide Mental health service support details
Refer to safeguarding Team

Three warning signs

1. Threatening to hurt or kill self, have experienced a loss of any type(person, home job etc.
2. Looking for ways to kill self: seeking access to pills, weapons or other means.
3. Talking or writing about death, dying or suicide.

Further warning signs

- Hopeless, feeling worthless or a burden
- Recent loss such as death, relationship, job etc.
- Rage, anger, seeking revenge
- Acting recklessly or engaging on risky activities, seemingly without thinking
- Feeling trapped, like there is no way out
- Increasing alcohol or drug use
- Withdrawing from friends, family or community
- Anxiety, agitation, unable to sleep or sleeping all the time
- Dramatic changes in mood
- No reason for living, no sense of purpose in life

Factors that increase risk

- Current ideation, intent, plan, access to means
- Previous suicide attempt or attempts
- Alcohol / substance abuse
- Current or previous history of psychiatric diagnosis
- Impulsivity and poor self control
- Hopelessness – presence, duration, severity
- Recent losses – physical, financial, personal – social, status, shame
- Recent discharge from an inpatient psychiatric unit
- Family history of suicide / loss of another
- History of abuse (physical, sexual or emotional)
- Co-morbid health problems, especially a newly diagnosed problem or worsening symptoms, pain, female – menopause
- Age, gender, race (elderly or young adult, unmarried, white, male, living alone), ethnicity - cultural
- Same-sex, sexual orientation / transgender
- Given birth in

Positive Factors

- Positive social support
- Spirituality
- Sense of responsibility to family
- Children in the home, pregnancy – hormone changes
- Life satisfaction
- Reality testing ability
- Positive coping skills
- Positive problem-solving skills
- Positive therapeutic relationship

Most affective approach

- A positive and compassionate encounter
- Identify and mitigate all risks
- Promotion of protective factors
- Instil hope
- Co-create a safety plan with explicit reference to removal of means – by agreement

Appendix 4: Did Not Attend / Was not Brought -Trauma Informed Practice

Individuals who have experienced trauma can often struggle to engage with professionals due to mistrust, fear of judgement and an unregulated nervous system which impacts executive functioning. A trauma informed approach will be taken when working with those who frequently do not attend (DNA) appointments and meetings to promote accessibility, holistic support and reduce the risk of harm.

Any adult with additional health or care needs or a child who rely on a care giver to attend appointments will be recorded as Was Not Brought (WNB) This should inform as to whether safeguarding advice is sought regarding appropriate needs being met.

Swale Borough Council will work to identify any barriers and communicate with the individual concerned and/or care giver along with professionals involved and allow for flexibility to build trusting relationships where possible. Consideration should be given to the following:

- The mental capacity of the adult
- Whether domestic abuse/HBV has been reported or there is a risk of this
- A Family First Approach (would children be impacted by the difficulty of the adult to engage fully with services)

Procedure:

Appointments will be made with the needs of the individual in mind to encourage engagement. Where possible, individuals will be given a choice of telephone/face to face meetings and a person's trauma will be considered in regard to their communication style, gender preference or place of safety. For example; someone who is experiencing domestic abuse may have a gender preference for an appointment and may require specific timings to safeguard themselves from the perpetrator.

All DNA appointments are to be recorded fully in a timely manner and reasons for the missed appointments are to be sought along with any potential barriers that person may be facing.

If vulnerabilities have been identified and there is an excess of three missed appointments, the relevant staff member will inform their line manager and/or Safeguarding team to determine whether further safeguarding enquiries need to be completed.

Professional curiosity and judgement is to be used if fewer than three appointments have been missed but the individual may be at risk of harm. SBC will ensure multi-agency working is upheld and communication between the individual is a priority. At no point will non- trauma aware language be used and the offer of service provision will not be withdrawn due to DNA. If an individual reapproaches, SBC will resume the support without judgement.

1. Policy Introduction

Any Member, employee, volunteer or contracted service provider who suspects that a colleague may be abusing a child, young person or vulnerable adult must act on their concerns. Also, action should be taken if there is reason to believe that colleagues are not following the codes of conduct. This action will serve not only to protect children, young people and vulnerable adults but Members, employees, volunteers, and contracted service providers from false accusations.

Members, employees or volunteers are often the first to realise that there may be something seriously wrong within their own working environment. However, they may not express their concerns because they believe that speaking up would be disloyal to their colleagues or the Council, and/or that there is a possibility that their concerns are unfounded. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may be a suspicion of malpractice.

However, safeguarding is 'everyone's business' and you have responsibility to report your concerns.

The Council acknowledges that 'Managing Allegations' is an extremely sensitive issue and assures Members, employees and volunteers it will fully support and protect anyone who in good faith reports a concern or an allegation that a colleague is, or may be, abusing a child, young person or vulnerable adult. Guidance can be sort from both Children and Adult safeguarding Boards with particular reference to:

- [Kent and Medway Managing Concerns around People in Positions of Trust \(PiPOT\) \(kmsab.org.uk\)](https://kmsab.org.uk)
- [Local Authority Designated Officer \(LADO\) - Kent Safeguarding Children Multi-Agency Partnership](#) – (September 2024 now referred to as **LADO Education Safeguarding Advisory Services LESAS**)

1. Types of investigation

Where there is a complaint of abuse against a Member, employee or volunteer, there are three types of investigation that may apply:

- criminal;
- child protection or adult protection; and
- disciplinary.

Civil proceedings could also be instigated by the person/family of the person who alleged the abuse.

The results of any Police and statutory services investigation may influence a disciplinary investigation by the Council, in some cases.

2. Confidentiality

In line with the Whistle Blowing Policy, we as a council make every effort to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a 'need to know' basis only. This is required in order to:

- protect children and vulnerable adults;
- facilitate enquiries;
- avoid victimisation;
- safeguard the rights of the person about whom the allegation has been made and others who might be affected; and
- manage any disciplinary or complaints aspects.

Those involved on a 'need to know' basis would be likely to be the following:

- the person making the allegation;
- the parents or carer of the child, young person or vulnerable adult alleged to have been abused;
- members of the team overseeing any investigation;
- KCC Local Area Designated Officer (LESAS) if involving a child or child services;
- Police; and
- the alleged abuser (and the alleged abuser's parents if the alleged abuser is under 18 years of age).

Any information will be stored in a secure place with access limited to the investigation team, and in line with data protection requirements.

3. Action to be taken

Poor Practice: if the Safeguarding Officer and/or statutory services have investigated an allegation against a member of staff and found evidence of poor practice this may lead to either disciplinary or capability proceedings. The evidence gathered during the investigation will be used as evidence in any proceedings, and the appropriate level of penalty will be determined in accordance with the relevant policy.

Suspected abuse: any suspicion that a Member, employee or volunteer has abused a child, young person or vulnerable adult should be immediately reported to the Safeguarding Officer, the Line Manager or Head of Service of the member of staff.

The manager informed should inform the designated Safeguarding Officer, who will:

- take such steps as they feel appropriate to ensure the safety of the child, young person or vulnerable adult;

- report the incident to the relevant Head of Service and the Human Resources, where consideration will be given to the next steps. These steps may include suspension on full pay, whilst the matter is investigated further;
- seek advice from the KCC Local Area Designated Officer (LESAS) who may involve the police; and
- in collaboration with the appropriate line manager, initiate an investigation in line with Swale Borough Council's Disciplinary Procedure to oversee the internal investigation. In most instances this team will include the Safeguarding Officer.

NB: if the Safeguarding Officer is the subject of the suspicion or allegation, the report must be made directly to the Chief Executive who will assume their role in the above procedure

4. Internal inquiries and suspension

Irrespective of the LADO (LESAS) or of police inquiries, the Council will assess all individual cases under its own disciplinary procedures to decide the appropriate management action. The Council will reach a decision based on the available information and decide on a balance of probability basis whether an allegation is true.

The welfare of the child, young person or vulnerable adult will always remain paramount during such assessments and decision-making.

5. Notification to Social Services

A consultation with LADO (LESAS) and or Adult Social Care (safeguarding team) should be made without delay, including a referral to statutory services under recommendation from KCC and the LADO (LESAS). This is the responsibility of the Safeguarding Officer.

Any further inquiries from KCC or the LADO (LESAS) and any other interested third party should be passed immediately to the disciplinary investigation team. A written record should be kept of any contact with third parties.

6. Support to the Subject of Allegations

Subject to the specific procedures the subject of the allegations should be:

- advised of their rights to be accompanied during any formal procedures;
- treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes;
- kept informed of the progress of the case and of the investigation;
- clearly informed of the outcome of any investigation and the implications for disciplinary or related processes; and
- provided with appropriate support (eg via occupational health or the Employee Assistance Programme).

7. Allegations of previous abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child by a member of staff who is still currently working with children). This should still be investigated as above because other children, young people, or vulnerable adults may be at risk from this individual.

8. Disclosure and Barring Service (DBS)

- As an employer of staff in a 'regulated activity', for Swale and, where appropriate, Swale Borough Council has a legal duty to refer concerns to the DBS in accordance with the Safeguarding Vulnerable Groups Act 2006.
- A staff member of Swale Borough Council must be referred to the Disclosure and Barring Service if:
 - they have been permanently removed from 'regulated activity' through dismissal or permanent transfer, or
 - they would have been removed or transferred if they had not left, resigned, retired or been made redundant, and if
 - they are believed to have engaged in 'relevant conduct' (i.e. been involved in an action or inaction that has harmed a child or vulnerable adult, or put them at risk of harm), or
 - they have satisfied the 'harm test' (i.e. no action or inaction was found to have occurred, but a significant risk remains that it could occur), or
 - they have received a caution or conviction for a 'relevant offence' (i.e. involving automatic barring, either with or without the right to make representations). See Appendix 1 for detailed information on 'relevant conduct'.
- When an allegation is made, it is important to investigate thoroughly, to establish whether or not it has foundation. This will inform any decision to dismiss or remove the individual from regulated activity. An investigation must always be completed, even if the staff member leaves Swale Borough Council employment in the meantime.
- The DBS has no investigative powers and bases its decisions on the evidence supplied to it. It is therefore essential that an investigation is as detailed as possible, in order to provide as much evidence as possible.
- If additional information becomes available after a referral is made, this should also be provided to the DBS.
- Following an investigation, if it is decided that the individual can return to regulated activity, there may not be a legal duty to make a referral.

- The duty to make a referral may not be triggered by temporary suspension and depends on whether there is sufficient information to meet the referral criteria. However, a person may be suspended where an allegation has been made and an investigation is pending.
- The website Making barring referrals to the DBS offers comprehensive guidance, as well as a DBS barring referrals flowchart.
- Referral is with the DBS secure online referral form, which includes on-screen guidance. Help and advice are also available from the DBS on 03000 200 190.

9. Misuse of the Procedure

Members, employees, or volunteers may not discuss any allegations of abuse, whether substantiated or otherwise with:

- anyone within Swale Borough Council, other than the manager who they consulted, the Chief Executive, and the Safeguarding Officer;
- any member of any external agency, other than as part of the formal reporting procedure as set out in this Policy or as part of the investigative process; and
- any other interested party, including parents, carers, and relatives of the child, young person or vulnerable adult, without the express permission of the person with overall responsibility for the investigation. (NB This does not limit the rights of an employee to consult with a trade union representative or Human Resources).

Any enquiries from the media concerning an allegation of child or vulnerable adult abuse must be referred to the lead investigating agencies press office, or the SBC Press Officer. Any direct question must be answered with the phrase “No comment”.

Malicious complaints about a member, employee or volunteer, and/or serious and/or persistent abuse of the Safeguarding Children, Young People and Vulnerable Adults. Policy will not be tolerated, and will be dealt with through the Council’s Disciplinary Policy.

Relevant conduct:

Vulnerable adults definition - A vulnerable adult is a person aged 18 years or over who is receiving a service or assistance which is classed as regulated activity for adults.

Any behaviour is classed as ‘relevant conduct’ if it:

- endangers a vulnerable adult or is likely to endanger a vulnerable adult
- if repeated against, or in relation to, a vulnerable adult, would endanger the vulnerable adult or be likely to endanger them
- involves sexual material relating to children

- involves sexually explicit images depicting violence against human beings (including possession of such images)
- is of a sexual nature involving a vulnerable adult. A person's conduct endangers a vulnerable adult if it:
 - harms a vulnerable adult
- causes a vulnerable adult to be harmed
- puts a vulnerable adult at risk of harm
- makes an attempt to harm a vulnerable adult
- incites another person to harm a vulnerable adult. A person's conduct satisfies the 'harm test' if they are thought likely to:
 - harm a vulnerable adult
- cause a vulnerable adult to be harmed
- put a vulnerable adult at risk of harm
- make an attempt to harm a vulnerable adult
- incite another person to harm a vulnerable adult

Appendix 6: Links to related guidance, advice and policy for sections within the Safeguarding policy

[Working together to safeguard children: statutory framework \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Prevent duty guidance: Guidance for specified authorities in England and Wales \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

[Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK \(www.gov.uk\) revised January 2024](https://www.gov.uk)

[Domestic Abuse: statutory guidance \(accessible version\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Swale BC Domestic Abuse Policy \(swale.gov.uk\)](https://www.swale.gov.uk)

[Intranet link Statutory advocacy flow chart SBCCSU - Flowchart for Statutory Advocacy.pdf - All Documents \(sharepoint.com\)](#)

[Referrals | The Advocacy People - https://www.theadvocacypeople.org.uk/makeareferral](https://www.theadvocacypeople.org.uk/makeareferral)

[Care Leavers - Moving On \(lea.kent.sch.uk\)](https://lea.kent.sch.uk)

[People In positions of trust - Kent and Medway Managing Concerns around People in Positions of Trust \(PiPOT\) \(kmsab.org.uk\)-](https://kmsab.org.uk)

[Making Safeguarding personal - Kent and Medway SAB - What is Making Safeguarding Personal \(kmsab.org.uk\)](https://kmsab.org.uk)

[Support for carers - Kent and Medway SAB - Support for Carers \(kmsab.org.uk\)](https://kmsab.org.uk) Carers assessment referral should be considered for all carers and referrals made via

[Capacity - Liberty Protection Safeguards \(LPS\) | SCIE](#)

[Professionals difference - Multi-agency escalation policy; resolving practitioner differences \(kmsab.org.uk\)](https://kmsab.org.uk)

[Kent and Medway SAB - Support for Carers \(kmsab.org.uk\)](https://kmsab.org.uk) [Support for carers - Kent County Council](#)

Internal policy / Procedures:

Safer recruitment Policy
Members DBS Process