



COTSWOLD
District Council

Safeguarding Policy and Procedures



Safeguarding is Everyone's Concern

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Versions

Document Control	Date	Author
Version 1	21.10.2020	Enabling Manager
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Documents of influence:

Ref No	Acts and Policies of Influence	Date of Issue
	Legal Framework	
	Children Act 1989 and 2004 and Working Together to Safeguard Children 2023	
	Care Act 2014	
	Mental Capacity Act 2005	
	Partners	
	Gloucestershire Safeguarding Adults Board	
	Gloucestershire Safeguarding Children Partnership	
	Associated Acts	
	Domestic Abuse Act 2021	
	Crime and Disorder Act 1998	
	Police, Crime, Sentencing and Courts Act 2022	
	Modern Slavery Act 2015	
	UK Data Protection Legislation	
	Prevent Duty	
	Policies	
	Suicide Prevention Guidance	October 2024
	Whistle-Blowing Policy	January 2022
	Anti-Harassment and Bullying Policy and Procedure	September 2023
	Recruitment Policy and Procedure	February 2024

1. Introduction

Safeguarding refers to measures and practices put in place to protect adults at risk, young people and children from harm, abuse or neglect. More widely it is about early prevention, health, wellbeing and human rights.

The purpose of the policy and procedures are to ensure that Cotswold District Council, (the Council) are aware of their legal obligations to meet their responsibilities in safeguarding adults at risk, young people and children with a consistent approach.

This guide applies to employees, elected members, casual workers, volunteers, contractors and partners delivering services on behalf of the organisation.

2. Background and Aims

Safeguarding does not operate in isolation; its relevance is important to all services and has direct links to other policies, see the table above for Documents of Influence. This policy will raise awareness of safeguarding and what to do if there are suspicions that abuse is taking place.

The Council advocates that SAFEGUARDING IS EVERYONE'S BUSINESS and that all people have the right to live in safety, free from abuse, harm and neglect.

The Council aims to create an environment where employees, elected members, volunteers and contractors are aware of their obligations and are adequately trained and encouraged to think of safeguarding as being part of their responsibility, understanding the need for them to take a full and active part in the prevention and response to safeguarding.

The Policy aims to ensure:

- Protection for adults at risk, young people and children while using services that the Council are responsible for, whether directly delivered or commissioned.
- Employees, elected members, casual workers, contractors and volunteers involved in working with adults at risk, young people and children, implement good working practices to ensure a safe and healthy environment.
- Awareness of safeguarding is raised and what to do if a form of abuse is suspected or identified.
- Sound recruitment and selection procedures are operated for employees and volunteers to ensure their suitability for working with adults at risk, young people and children.
- Provide appropriate training for employees, and volunteers who work with adults at risk, young people and children.

- Sharing information is done in compliance with our Data Protection Policy, the Data Protection legislation (currently the UK General Data Protection Regulations (GDPR) and the Data Protection Act 2018).

There are fundamental differences between the legislative framework for safeguarding adults and children, which recognises an adult's right to self-determination.

Safeguarding Adults at Risk

The Council have a duty under the Care Act 2014, with responsibilities applying to adults who:

- Have care and support needs (whether the local authority is meeting any of those needs or not).
- Are experiencing, or at risk of, abuse or neglect.
- Are unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Safeguarding Children and Young People

The Council have a duty under the Children Act 2004 to ensure that they consider the need to safeguard and promote the welfare of children and young people when carrying out their functions.

3. Terms, Types of Abuse and Definitions

Terms

Term	Definition
Safeguarding	Actions taken to protect an individual's health, wellbeing, and human rights, ensuring they live free from harm, abuse, and neglect.
Adult At Risk	An adult at risk is any person aged 18 or over who: <ul style="list-style-type: none"> - Has needs for care and support. - Is experiencing, or at risk of, abuse or neglect. - As a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect. - Lacks capacity to promote their rights as laid down in the Mental Health Capacity Act (2005) and Deprivation of Liberty Standards (2007).
Young Person	A young person is anyone aged 16-17, acknowledging their increased autonomy and potential for making choices about their own safety, even if those choices are unwise.
Children	A child includes everyone under the age of 18.
Child Protection	Activities undertaken to prevent children suffering or being likely to suffer significant harm.

Adult Abuse

Type	Definition	Example Indicators
Physical	Non accidental use of physical force that results or could result in bodily injury, pain or impairment including assault, hitting, slapping, pushing, misuse of medication and restraint.	Unexplained bruising, covering or flinching, bruising consistent with being hit, unexplained burns, unexplained fractures.

Domestic Abuse	An incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality.	Unexplained bruising, covering or flinching, bruising consistent with being hit, isolation from friends and family, emotional abuse, withholding finances, gaslighting, coercive and controlling.
Sexual	Direct or indirect involvement in sexual activity without consent.	Incontinence, difficulty/discomfort walking, excessive washing, sexually transmitted diseases, bruising/bleeding in genital areas, bruising, urinary infections.
Emotional or Psychological	Acts or behaviour which impinge on the emotional health of, or which causes distress or anguish to individuals.	Disturbed sleep, anxiety, confusion, extreme submissiveness or dependency, sharp changes in behaviour, loss of confidence or appetite.
Neglect and Acts of Omission	Ignoring or withholding physical or medical care needs which result in a situation or environment detrimental to the individual.	Ignoring medical, physical or emotional care needs (incl. dressing), failure to provide access to appropriate health care, withholding medication, adequate nutrition and heating.
Financial and Material Abuse	Unauthorised, fraudulent obtaining and improper use of funds, property or any resources of an adult at risk. Scamming and coercion in relation to an adult's financial affairs.	Unexplained or sudden inability to pay bills, unexplained withdrawals of money from accounts, personal possessions going missing, unusual interest by a friend/neighbour in financial matters.
Discriminatory	When values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals. Including discrimination on grounds of	Inciting others to commit abusive acts, lack of effective communication, bullying.

	<p>race, faith, religion, age, disability, gender, sexual orientation and political views, along with racist, sexist, homophobic or ageist comments or jokes or comments and jokes based on a person's disability or any other form of harassment, slur or similar treatment.</p>	
<p>Institutional or Organisational</p>	<p>Where the culture of the organisations places the emphasis on the running of the establishment above the needs and care of the person.</p>	<p>Lack of care plans, contact with the outside world not encouraged, no flexibility or lack of choice.</p>
<p>Self-neglect</p>	<p>Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.</p>	<p>A deterioration in physical appearance, lack of grooming, rapid weight gain or loss.</p>

Child Abuse

Type	Definition	Example Indicators
Emotional	Persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development. This includes coercive control, a pattern of controlling, coercive, threatening, or abusive behaviour.	Conveying to children that they are worthless or inadequate; imposing age or developmentally inappropriate expectations; serious bullying; exploitation; isolation; segregation.
Sexual	Forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening, including use of images through social media or other IT.	Inappropriate sexual behaviour, use of language, fear of adults, recoiling from physical contact.
Neglect	The persistent failure to meet a child's psychological needs, likely to result in the serious impairment of the child's health or development.	Inadequate food, clothing or shelter. Poor access to appropriate medical care or treatment, isolation, truanting, lateness.
Physical	May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child.	Unexplained bruising, burns, fractures, weight gain or loss, repeat illness.
Criminal and Sexual Exploitation	Using a child for profit, labour, sexual gratification or some other personal or financial advantage.	Challenging behaviour; Appears to be making unwise choices. Don't understand that they are being exploited. Criminal exploitation is a main method used by County Lines gangs.

		<p>Sexual exploitation can occur through use of technology without the child's recognition such as being persuaded to post sexual images on social media or other IT.</p>
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Acts that constitute abuse.

Type	Definition
Female Genital Mutilation (FGM)	FGM is defined by the World Health Organisation as all procedures, involving partial or total removal of the external female genitalia, or injury to the female genital organs for non-medical reasons.
Honour Based Violence (HBV)	HBV refers to acts of violence, threats or abuse that are committed to protect or defend the perceived honour, dignity or reputation of a family or community.
Forced Marriage	Forced marriage is a marriage in which one or both parties do not, or cannot, give full and free consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.
Stalking	Stalking is a pattern of repeated, unwanted behaviour that causes a person to feel alarmed, distressed or fearful for their safety or the safety of others.
Radicalisation	Radicalisation is the process by which a person comes to adopt or support extreme political, social or religious ideas often associated with terrorism, violence or other forms of extremism.
Modern Slavery	Modern Slavery refers to individuals being exploited and forced to work through threats, violence, coercion, deception, or abuse of power. It is the illegal exploitation of people for personal or commercial gain. Local authorities have a duty as designated 'first responder' agencies, to identify and refer all potential child victims and consenting adult victims.
Human Trafficking	Human Trafficking is the recruitment, transportation, transfer, harbouring or receipt of people through

	force, fraud or coercion for the purpose of exploitation.
Cyber Crime	Cyber-crime is any criminal activity committed using computers or the internet including attacks on systems, theft of data, online fraud and exploitation. These crimes can cause serious harm and pose significant threats to adults at risk, young people and children. Cyber-crime may take the form of cyber bullying, the process of using the Internet, mobile phones or other devices to send or post text or images intended to hurt or embarrass another person. The harassment can have wide-reaching effects on the victim, as the content used to harass the victim can be spread and shared easily among many people and often remains accessible for a long time after the initial incident.

4. Governance

Confidentiality, Data Protection and Sharing of Information

Information sharing is vital in identifying and tackling all forms of abuse and neglect. The Data Protection laws should not prevent, or limit, the lawful sharing of information for the purposes of keeping adults at risk, young people and children safe. Lawful and secure information sharing between Social Services and other local agencies is essential for keeping adults and children safe and ensuring they get the support they need. Lawful sharing of information needs to be justified and documented.

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (**DPA, Part 2,18; Schedule 8, 4**).

Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of adults, young people and children. As with all data sharing, appropriate organisational and technical safeguards must be in place.

All employees and volunteers must comply with legislative requirements and the Council guidelines with regard to Confidentiality, Data Protection and Information Sharing.

The Council recognises that all information regarding the safeguarding of adults at risk, young people and children should be kept confidential. However, in order for individuals to be protected from harm, in some circumstances, usual considerations of confidentiality that might apply to other situations within the Council may be overridden.

The Council will abide with the relevant Safeguarding Board Information Sharing Protocols.

[Gloucestershire Safeguarding Adults Board](https://www.gloucestershire.gov.uk/media/vftpj3xi/gsab-information-sharing-guidance-may-2023.pdf)

<https://www.gloucestershire.gov.uk/media/vftpj3xi/gsab-information-sharing-guidance-may-2023.pdf>

[Gloucestershire Safeguarding Children Partnership](https://www.gloucestershire.gov.uk/gscp/professional-resources/effective-information-sharing-and-consent/)

<https://www.gloucestershire.gov.uk/gscp/professional-resources/effective-information-sharing-and-consent/>

The Council understands the importance of ensuring that personal data is always treated fairly, lawfully and appropriately and that the rights of individuals are upheld. The Council are fully committed to compliance with the requirements of the Data Protection Act.

The Council are required to share information for several reasons, including when information is requested in connection with an assessment of a child's needs under section 17 of the Children Act 1989, or an enquiry under section 47 of that Act, or in connection with court proceedings.

Under certain circumstances, the Council may need to share information about a child or young adult with other agencies. This information sharing is coordinated by the relevant Multi-Agency Safeguarding Hub.

The type of information that may be shared includes names, contact details, information about a person's physical or mental health or relations with others. The sharing of this information will be restricted to those who have a demonstrable need to know and robust protections, such as encryption of electronic data, will be used to share this information.

All employees and volunteers must comply with the Council's internet and e-mail policy and IT Security Policy.

The Lead Safeguarding Officer(s) will act as a first point of contact for notification of any deaths of adults at risk, young people and children on Council premises.

Information must only be shared on a 'need-to-know' basis, but Council Officers do not need consent to share information if an adult at risk, young person or child is suffering, or at risk of, serious harm.

Employees or volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

Timely information sharing is essential to effective safeguarding.

5. Responsibilities

Local Authorities have a statutory responsibility and duty of care to report issues relating to Safeguarding to the appropriate authorities/agencies, furthermore the Council will actively contribute to any Audit of safeguarding practises:

The Council are members of the Gloucestershire Safeguarding Adults Board (GSAB) and the Gloucestershire Safeguarding Children Partnership (GSCP).

We will ensure safeguarding practice reflects statutory responsibilities, Government guidance and complies with best practice and Safeguarding Boards' requirements.

All employees and elected members must ensure that they are fully aware of all policies and procedures in relation to safeguarding, are fully trained and will contribute to raising awareness, and reporting any issues or concerns around safeguarding.

Designated Senior Leaders

The Chief Executive of the Council has overall responsibility for safeguarding ensuring that their organisation fulfil safeguarding duties and responsibilities and that clear lines of accountability are established.

Leadership Team

The Leadership Team will ensure that:

- The Council meets its legal obligations.
- All safeguarding matters are treated seriously and dealt with in a timely fashion.
- Safeguarding, where applicable is considered in strategies, plans and services to ensure compliance with national and local policies.
- Employees and members are supported on all aspects of safeguarding to ensure procedures are adhered to.
- Appropriate training is facilitated, in particular, for frontline employees.
- There is a consistent overview of all contracts to ensure that the aims of this safeguarding policy are always embedded.

Designated Safeguarding Officers (DSO)

- Designated Safeguarding Lead (DSL)
- Deputy Designated Safeguarding Lead (DDSL)

Designated Safeguarding Officers will ensure that they:

- Support the leadership team, employees and elected members.
- Provide guidance and advice to aid implementation of this policy and in making a referral to appropriate agencies and to fulfil their roles in relation to safeguarding.
- Manage the logging of issues of concern and associated details.
- Provide supervision and support for all employees in matters of safeguarding issues of concern.
- Communicate to all employees when the safeguarding policy is updated with a summary of the amendments and provide easy access to the updated policy.

Safeguarding Support Officers

Safeguarding Support Officers will ensure that they:

- Support the leadership team, employees and elected members.
- Provide guidance and advice to aid implementation of this policy and in making a referral to appropriate agencies and to fulfil their roles in relation to safeguarding.
- Triage all reported issues of safeguarding concern and action appropriately.
- Manage the logging of issues of concern and associated details.

Service Managers

Service Managers will ensure that:

- The safeguarding policy is adhered to across the organisation.
- They and their employees complete and implement the appropriate safeguarding training and that this is reinforced through team meetings, 121s etc.
- Employees handling safeguarding issues are fully supported.
- They take responsibility for the quality of safeguarding adults at risk, young people and children in their service area.
- All employees and volunteers working with adults at risk, young people and children are subject to the Disclosure and Barring checks appropriate to their role and legislative requirements relevant to their role.
- They implement a culture of open communication between employees, apprentices, employers, and mentors.
- Consideration is given to social interaction in the workplace and outside within the team when working with Apprentices.

- They report any concerns in compliance with the policy.

Human Resources

Human Resources will ensure that:

- The relevant policies are in place e.g. Safer Recruitment, Disciplinary Procedures, Whistleblowing, Safeguarding Apprentices and Young People in the workplace.
- Managers are supported in the use of these policies directly and indirectly associated with safeguarding.
- Provide support with the pre-employment checks (including through the Disclosure and Barring Service (DBS)).
- All relevant posts are subject to a satisfactory disclosure being received. This will be detailed in an employee's written statement of terms and conditions of employment.
- All existing employees whose role requires a DBS certificate will be required to have a recheck every three years.
- There is awareness within the workplace for all employees working with apprentices where they are under 18, classed as young people or children, and that therefore there may be different considerations in the language used and their interaction with them.

Employees

Employees will:

- Treat all safeguarding matters seriously.
- Report any concerns in compliance with the policy.
- Be aware of and adhere to the safeguarding policy and referenced policies.
- Complete safeguarding training relevant to their role covering children, adults, prevent, domestic abuse and modern slavery.
- Demonstrate active professional curiosity.

Elected Members

Elected Members are uniquely placed to support the safeguarding of adults at risk, young people and children within their community. They can also provide effective leadership to ensure that the council are fulfilling its corporate responsibility.

Elected Members should:

- Work and abide in accordance with the Council's Safeguarding Policy and Procedures.
- Report their concerns about an adult at risk, young person or child's welfare or someone else's behaviour regarding an adult at risk, young person or child as outlined in this policy.
- Adopt good practice in terms of safeguarding when carrying out their council duties.
- Seek support or raise concerns with the Safeguarding Support Team when necessary.
- Undertake safeguarding awareness training covering children, young people, adults, domestic abuse and modern slavery.

Commissioning and Procurement

When services are commissioned and procured on behalf of the Council, it still retains a duty to ensure that those services comply with relevant statutory safeguarding responsibilities.

As part of the tendering process, the tenderer will be required to evidence documentation of their safeguarding compliance where appropriate.

The Lead Commissioner for an individual contract will be responsible, with support of the DSL and Legal team, to ensure compliance with safeguarding regulations at all stages of the commissioning process.

Contractors

The Council will ensure that:

- All contractors providing services directly related to adults at risk, young people or children must have a safeguarding policy and safeguarding practices aligning with the Council's requirements.
- Contractors providing a service to the Council such as maintenance work at a council property will be made aware of the council's procedures and policies.
- Relevant safeguarding practices are adopted by the contractor.

Volunteers

All service areas must ensure that volunteers are aware of and have received appropriate training and are fully DBS compliant in relation to this Policy.

Council owned buildings

Council owned buildings may be used by organisations providing services or activities for adults at risk, young people or children. As a condition of occupancy, all agreements relating to occupancy of the building must seek assurances that organisations have robust protocols in place to mitigate any specific safeguarding concerns and that they have a safeguarding policy in place that adheres to the principles of the relevant county Adult Safeguarding Board and Children Safeguarding Partnership.

6. Training

The following must be adhered to in relation to training:

- All new employees and members will receive general awareness of safeguarding training at induction.
- All employees must complete the Mandatory iHASCO training modules of Level 2 Safeguarding Adults and Level 2 Safeguarding Children and subsequent refresher modules. Specific focus will be put on timing of undertaking the training for those involved in the training and mentoring of apprentices and young people.
- Responsible and Lead Officers should ensure that there is the right level of staff trained to Level 3 Safeguarding.
- All employees must complete the Prevent Duty classed as Mandatory in iHASCO.
- Employees are encouraged to complete the Modern Slavery training which is an optional module in iHASCO.
- All employees must complete the Business Compliance training which includes elements of Modern Slavery which is an iHASCO Mandatory module.
- All Taxi and Private Hire Drivers must undertake safeguarding training. This is facilitated by the Council prior to a licence being issued. A refresher must be undertaken every three years. If a driver has their licence suspended, they must provide a renewed certificate of safeguarding for a licence to be reissued.
- The Council will seek to ensure that any knowledge is cascaded appropriately across the organisation and opportunities to enhance and upskill through additional training are shared.

7. How To Report A Concern

Our duty of care extends to employees, adults at risk, young people and children and as adults with trust and influence, our employees are in a powerful position to recognise and receive information about abuse.

It is not the responsibility of an employee to take responsibility for deciding whether abuse is taking place. It is their responsibility to take all allegations seriously whether the allegation is about an employee or the public and raise the issue of concern by following the procedures detailed in the flowchart below.

Where there are concerns about an employee's behaviour outside the workplace towards an adult at risk, young person or child, this should be reported at the earliest opportunity to the Designated Safeguarding Lead or appropriate Service Manager.

The Council assures all employees and volunteers, that it will fully support and protect anyone who in good faith (without malicious intent) report his or her concerns about a colleague's practice or the possibility that a person may be being abused or bullied. Furthermore, the Council recognises it has a duty of care to an employee against whom allegations have been made.

Issues of concern

[Link to the Council's Portal for page to raise an issue of concern](#)

<https://portal.cotswold.gov.uk/cdc-portal/ls/content/4599586769073599/support/safeguarding>

Gloucestershire direct referrals

For children – contact the Children and Families Front Door service Monday to Friday 9am to 5pm Tel: 01452 426565 or email a completed MARF form to

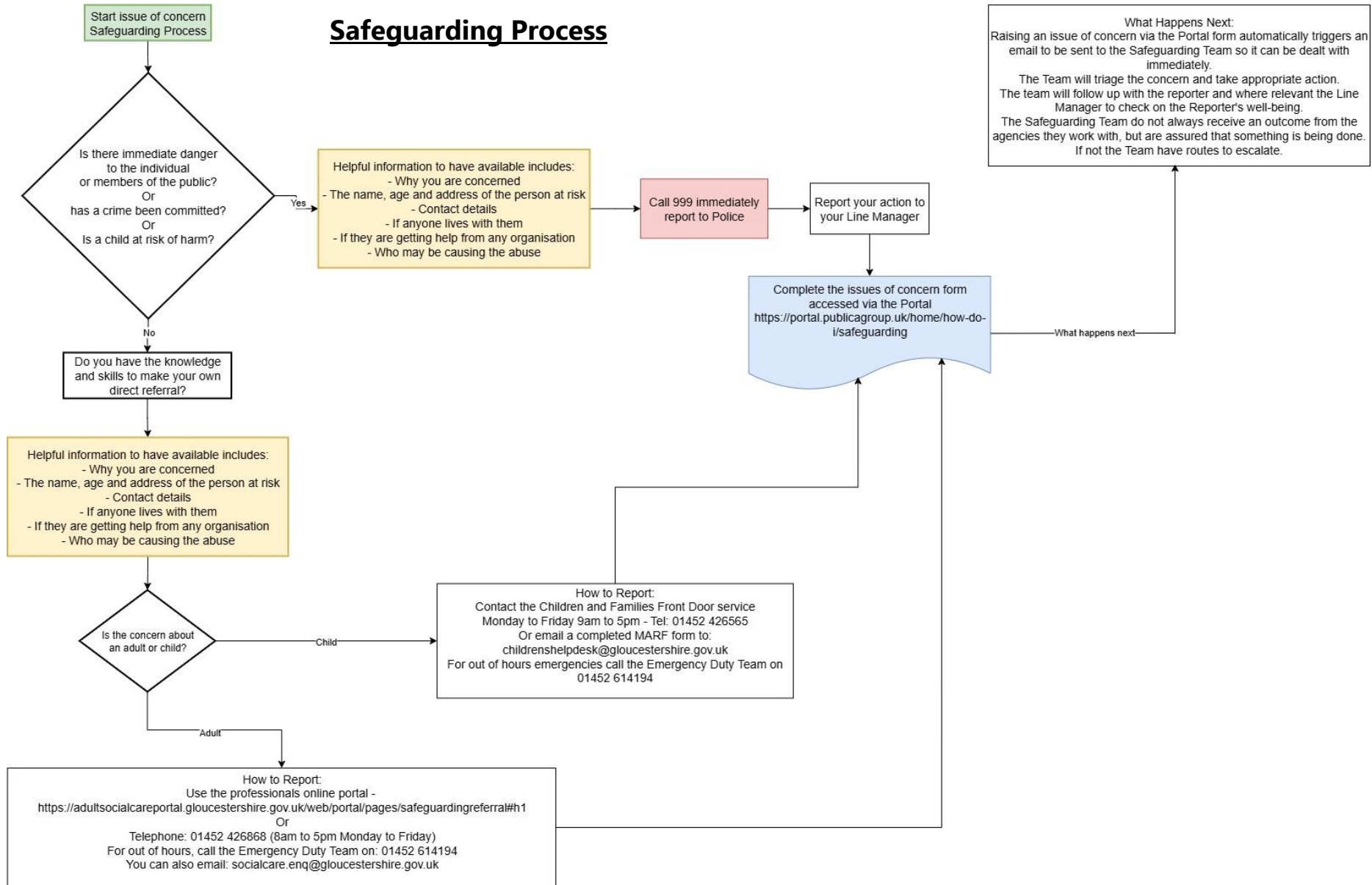
childrenhelpdesk@gloucestershire.gov.uk

For out of hours emergencies, call the Emergency Duty Team: 01452 614194

For adults – use the [Professionals online portal](#) or call: 01452 426868 (8am to 5pm Monday to Friday)

For out of hours emergencies, call the Emergency Duty Team: 01452 614194

Safeguarding Process



What Happens Next

If the issue of concern is referred directly to an external organisation, they will undertake their own investigation and determine next steps in the process. We may not receive any feedback on the outcome.

If the issue of concern is reported through the Portal, the Safeguarding Support Team/Leads will consider the information provided and decide whether or not the concern needs reporting to the appropriate Safeguarding bodies, whether signposting to support groups or other organisations is required, or if no further action should be taken. The person reporting the issue of concern may be contacted by a member of the Safeguarding Team to discuss the matter further and to check in on wellbeing.