



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Corporate Safeguarding Policy

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Introduction

Safeguarding and protecting children and adults is a high priority for Neath Port Talbot Council.

This Corporate Safeguarding Policy sets out the Council's duty and commitment to safeguard and promote the health, wellbeing and human rights of adults and children at risk.

This Corporate Safeguarding Policy provides a framework for every Service within the Council setting out responsibilities in relation to safeguarding and protecting children and adults at risk. It lays out the methods by which the Council will be assured that it is fulfilling its duties and that effective practices are in place to support individuals to live their life free from harm, abuse and neglect.

This policy applies to all Neath Port Talbot's employees, including Councillors, volunteers and all those who carry out work on behalf of the council for example, agency workers or contractors and also service providers that are commissioned by the Council. It does not though apply to those staff employed directly by governing bodies working in schools where a separate safeguarding and child protection policy applies.

Safeguarding is everyone's business whether they work for, or on behalf of the Council

Objectives of this Policy

- To set out how Neath Port Talbot Council will meet its obligations towards the safeguarding of children and adults at risk;
- To give assurances to the public, councillors, employees, volunteers and people carrying out work on behalf of the Council that there are sound arrangements in place to safeguard children and adults at risk.

Principles

- At Neath Port Talbot Council 'equality' lies at the heart of everything we do. Equality means understanding and tackling barriers so that everyone has a fair chance to fulfil their potential.
- The Council is committed to practices that protect adults and children from harm regardless of age, sex, disability, racial heritage, religious belief, sexual orientation or any other protected characteristic as covered by the Equality Act 2010.
- Every child and adult has a right to participate in a safe society without any violence, fear, abuse, bullying or discrimination.

- Every child and adult has the right to be protected from harm, neglect, exploitation and abuse.
- All councillors, employees, volunteers and all those who carry out work for or with the Council have a responsibility for protecting children and adults at risk from abuse and neglect and working in a way that promotes and supports their best interests.
- The Council will invest in preventative and early intervention services and endeavour to prevent situations arising where abuse, neglect or harm may occur.

Scope

Whilst the Social Services Directorate lead on dealing with enquires regarding concerns that individuals may be at risk of harm, everyone has a responsibility to safeguard the well-being of adults and children who may be at risk whatever their role. This policy covers all functions and services of the Council and applies to all Council employees, elected members, foster carers, individuals undertaking work placements, volunteers and anyone carrying out work on behalf of the Council, including independent contractors.

The Council also has a duty to ensure that other organisations commissioned to provide services on their behalf have regard to the need to safeguard and promote the well-being of adults and children.

The Council will work to safeguard children and adults at risk in line with the Social Services and Wellbeing (Wales) Act 2014 which defines:

- A **child at risk** is a child who is experiencing or at risk of abuse, neglect or other kinds of harm and;
- Has needs for care and support whether or not the authority is meeting any of those needs.
- An **adult at risk** is an adult who is experiencing or is at risk of abuse or neglect and;
- Has needs for care and support whether or not the authority is meeting any of those needs and;
- As a result of those needs is unable to protect him or herself against the abuse or neglect or risk of it.

Related Legislation, Policy and Guidance

Legislation which is contained within the various Acts and guidance that are identified below enshrine the right to protection from abuse. The legal starting point in achieving this objective is professionals' duty to report allegations of abuse and neglect. The law also identifies the Local Authority as the lead organisation in making enquiries to identify whether an individual is at risk and in coordinating the response to protect. In practice this is never achieved in isolation or without clear leadership and accountability for the work which is equally set out in law, along with the duty to cooperate and collaborate with others.

The Council recognises that good practice in safeguarding brings together all activity aimed at promoting safe practice with vulnerable groups and preventing abuse and neglect. For this reason, and because the law, policy, guidance and regulations change

from time to time, it is impossible to provide an exhaustive list of relevant documents but the most significant items are below:

- [Social Services and Wellbeing \(Wales\) Act 2014](#)
- Education Act 2002 – plus “Keeping Learners Safe 201” – The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002
- Children Act 1989 and 2004
- Section 17 of the Crime and Disorder Act 1998
- Mental Capacity Act 2005
- Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015
- Housing Act 2004
- Licensing Act 2003
- Human Rights Act 1998

The Council will ensure that practice is compliant with the following policies and procedures:

- [Wales Safeguarding Procedures](#)
- [Social Services and Wellbeing \(Wales\) Act 2014 - codes of practice and guidance](#)
- [NPT’s Whistleblowing Policy](#)
- [NPT’s Recruitment Policies](#), which includes Safe Recruitment Policies and Safeguarding in Employment Guidance

Employees, and councillors should also act in accordance with the relevant professional Code of Conduct.

The intention is that this Corporate Safeguarding Policy will supplement and not replace any responsibilities already set out in legislation, policy or guidance set out above.

Strategic Context

At a strategic level, this approach to safeguarding supports the delivery of the Council’s three wellbeing objectives as set out within the [Corporate Plan 2019-2022](#)

At an All Wales level, keeping people safe contributes to the Wellbeing goals set out in the Wellbeing of Future Generations Act to **improve the economic, social, environmental and cultural wellbeing of Wales**.

Governance

The Council will discharge its strategic statutory safeguarding responsibilities through Designated Safeguarding Leads (DSL) in each Council Directorate. These DSLs will represent their Directorate at the Corporate Safeguarding Group (CSG) and act as a conduit for the dissemination of safeguarding information from the CSG.

The CSG has reporting responsibilities to the Corporate Director’s Group, Cabinet Committee and relevant Scrutiny Committees.

In addition, the Council has a role as Lead Partner and member of the West Glamorgan Safeguarding Board (WGSB).

The Board works to protect and safeguard adults and children, is a multi-agency statutory partnership which has responsibility:

- To protect children who are experiencing, or are at risk of abuse, neglect or other kinds of harm and to prevent children from becoming at risk of abuse, neglect or other kinds of harm.
- To protect adults who, have care and support needs (whether the local authority is meeting any of those needs), and are experiencing or at risk of abuse or neglect. To prevent those adults from becoming at risk of abuse or neglect.

The Board has a statutory duty to develop an Annual Plan on a regional basis and has an overall responsibility for challenging relevant agencies in relation to the measures that are in place to protect children and adults at risk.

Roles and Responsibilities

Under the Social Services and Wellbeing Act (Wales) 2014 **all employees, councillors and volunteers** have the duty to report concerns about abuse and neglect.

Schools across the local authority use a model Safeguarding and Child Protection policy provided by the Education Leisure and Lifelong Learning directorate. All schools personalise the model to make it specific to them. The model is based on legislation specific to schools, Welsh Government guidance and the model policy in Keeping Learners Safe.

Children and Young People Services have the responsibility for **receiving and responding to new concerns about children** and **Adult Services** have the responsibility for **receiving and responding to new concerns about adults at risk**. All safeguarding concerns, for Children, Young People and Adults, including concerns about a professional or persons in a position of trust, should be reported to the Neath Port Talbot Single Point of Contact Team (SPOC).

Every manager is responsible for:

- Safely recruiting employees/volunteers/agency workers in accordance with the relevant HR policy, by ensuring all required pre-employment/screening checks, including the appropriate Disclosure and Barring Service check (where relevant), are satisfactorily completed **prior** to commencing in their roles.
- Ensure that safeguarding is always included in every employee/volunteer's induction
- Identifying employees/volunteers/agency workers who are likely to come into contact with children or adults at risk as part of their role
- Ensuring training is delivered commensurate with role
- Ensuring that all employees/volunteers are aware of how to report safeguarding concerns and to whom
- Ensuring that all employees/volunteers/agency workers are aware of the Council's Whistleblowing Policy

- Ensuring that all employees/volunteers/agency workers are aware that they must conduct themselves in a manner which safeguards and promotes the wellbeing of children, and adults at risk
- Providing employees/volunteers/agency workers with guidance about safeguarding concerns as required

Service Commissioners will be responsible for ensuring that contractual arrangements specify responsibilities in relation to safeguarding in accordance with this Policy and existing Commissioning Policy.

Contractors, sub-contractors or other organisations funded by or on behalf of the Council are responsible for completing the required screening checks which includes Disclosure and Barring Service checks (where required) and for ensuring that their staff comply with regulatory and contractual arrangements relating to safeguarding of children and adults. Contractors are also responsible for informing relevant managers of the Council about any concerns they may have and to refer such safeguarding concerns to either the SPOC team or Gateway Team.

All elected Members will be required to have training in respect of safeguarding children and adults at risk and additional safeguarding training needs.

Lead Member for Corporate Safeguarding – the Leader of the Council acts as “champion” for Corporate Safeguarding. The Lead Member will work closely with, and take professional advice from a range of Senior Officers within the Authority, as appropriate. The Lead Member will liaise and consult with other Cabinet Members on individual matters likely to affect their portfolios as set out in the Council’s Scheme of Delegation.

Each Service Director through their Management Teams will be responsible for ensuring that all the statutory requirements in terms of safeguarding and promoting the welfare of children and adults at risk are addressed.

They are also responsible for putting in place appropriate systems within their service areas that ensure compliance with this policy:

- Ensuring appropriate training is delivered
- Communicating information about who staff need to contact and making sure this information is reviewed regularly so that it is up to date and accurate
- Compiling a report in respect of their Safeguarding arrangements that will be used to inform the Director of Social Services’ Annual Report

The Principal Officer for Safeguarding Adults and Children, and the Head of Service for Children and Young People and Adults Services will work with the Council’s statutory Director for Social Services to ensure there are effective arrangements to safeguard and protect children and adults at risk across the Council. Specifically to:

- Monitor the implementation of and compliance with this Policy across the Council
- Ensure that there is a corporate safeguarding training programme in place
- Set out clear lines of accountability
- Ensure that there are Designated Safeguarding Leads within each service area
- Ensure that the Council implements the UN Convention on the Rights of the Child

- Ensure that annual service reports are prepared
- Ensure that the annual corporate safeguarding report for Scrutiny is delivered

Statutory Director of Social Services – This role, as defined by the Social Services and Wellbeing Act 2014, is fulfilled by the NPT Director of Social Services who has the final and indivisible accountability to safeguard and promote the welfare of children and adults. The annual service reports will be an opportunity for challenge and used to inform the Director of Social Services – Annual Report.

The Chief Executive will ensure that there are effective safeguarding arrangements in place, including policies and procedures, that those policies and procedures are implemented, that there are effective governance arrangements in place and that all statutory requirements are being met.

Recognising and raising concerns about an adult or child where abuse or neglect is suspected.

All employees should be alert to the possibility of abuse. An individual may become concerned about the safety or wellbeing of an individual in a number of ways:

- The person may tell you.
- The person may say something that worries you.
- A third party may voice concerns.
- You may see something – an incident or an injury or other sign.

Whilst Neath Port Talbot Council members, employees, volunteers and contracted service providers will have varied levels of contact with adults and children at risk as part of their engagement with the Council, everyone should be aware of the potential indicators of abuse and neglect and be clear about what to do if they have any concerns.

It is not the responsibility of any one individual to determine whether or not abuse has taken place or if an individual is at risk of harm; however they do have a responsibility to act if they have any concerns.

Reporting a Concern

Any employee/volunteer with concerns regarding the safety of a child or adult, or the behaviour of a professional or person in a position of trust towards a child or adult, (see appendix 1) should contact SPOC immediately.

Report concerns about children and adults: Tel: 01639 686803 or spoc@npt.gov.uk

The Emergency Duty Team operates between: 5.30pm to 1.30am (Weekdays) 9am to 1.30am (Saturday/Sunday/Bank Holidays) Tel: 01639 895455

If a child, young person or adult at risk is considered to be in immediate danger, the Emergency services (Police, Ambulance, Fire and Rescue) must be contact immediately.

Safeguarding in Employment Guidance for Managers (excluding school based staff) can be found on the intranet (under Safe Recruitment).

More detailed information can be found on the West Glamorgan Safeguarding Board website:

<http://www.wgsb.wales/21509>

Appendix 1

What Constitutes Abuse?

Social Services and Wellbeing Act 2014 (Section 7)

Section 197(1) of the Act provides definitions of “abuse” and “neglect”:

“**abuse**” means physical, sexual, psychological, emotional or financial abuse (and includes abuse taking place in any setting, whether in a private dwelling, an institution or any other place), and

“**financial abuse**” includes, having money or other property stolen; being defrauded; being put under pressure in relation to money or other property; having money or other property misused;

“**neglect**” means a failure to meet a person’s basic physical, emotional, social or psychological needs, which is likely to result in an impairment of the person’s wellbeing (for example, an impairment of the person’s health or, in the case of a child, an impairment of the child’s development)

The following is a non-exhaustive list of examples for each of the categories of abuse and neglect:

- Physical Abuse – hitting, slapping, over or misuse of medicine, undue restraint, or inappropriate sanctions;
- Sexual Abuse – rape and sexual assault or sexual acts to which the person has not or could not consent and/or was pressurised into consenting;
- Psychological Abuse – threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks; coercive control is an act or pattern of acts of assault, threats, humiliation, intimidation or other abuse that is used to harm, punish or frighten the victim;
- Neglect – failure to access medical care or services, negligence in the face of risk-taking, failure to give prescribed medication, failure to assist in personal hygiene or the provision of food, shelter, clothing; emotional neglect;
- Financial Abuse in relation to people who may have needs for care and support:
 - Unexpected change to their will;
 - Sudden sale or transfer of home;
 - Unusual activity in a bank account;
 - Sudden inclusion of additional names on a bank account;
 - Signature does not resemble the person’s normal signature;
 - Reluctance or anxiety by the person when discussing their financial affairs;
 - Giving a substantial gift to a carer or other third party;
 - A sudden interest by a relative or other third party in the welfare of the person;
 - Bills remaining unpaid;
 - Complaints that personal property is missing;

- A decline in personal appearance that may indicate that diet and personal requirements are being ignored.

Harm/Abuse outside the family home i.e. Exploitation, Peer on Peer Abuse, Serious Violence, Gang related etc.) –

Those working with children, young people and adults must also consider risk and harm through a contextual safeguarding lens as well as the traditional family focused approach. Contextual Safeguarding is an approach to understanding, and responding to, children's, young people's and adults' experiences of harm beyond their families. It recognises that different relationships are formed in their neighborhoods, schools and online that can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of such abuse can undermine parent-child relationships.

Therefore, all practitioners need to engage with individuals and sectors who do have influence over/within harm outside of the family home contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of the safeguarding systems in recognition that people are vulnerable to abuse in a range of social contexts: their neighborhoods, schools, parks, town centre. Therefore employees and volunteers working for/on behalf of the Local Authority are asked to think of abuse in the context of place, person (suspected to be of concern), premises (location) and to report it.