



# **Safeguarding Policy**

## **2025- 2028**

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# 1. Executive summary

Pendle Borough Council is fully committed to its duties and responsibilities to safeguard and promote the welfare of children, young people and adults at risk of abuse, neglect and exploitation. This policy outlines how we will fulfil our duty to protect individuals from abuse, neglect, and exploitation, in line with statutory requirements and best practices.

This policy applies to all Council employee and elected members

This safeguarding policy reinforces that commitment and provides assurance that the Council will act in the best interests of the local community.

Safeguarding cannot be achieved by one agency alone and the role we play, alongside our partners to effectively deliver this commitment across Pendle is paramount. We will therefore demand good public services from our partner agencies in this regard.

All children, young people and adults have the right to participate and be safe whatever their age, gender identity, marriage and civil partnership, pregnancy and maternity, sexual orientation, race, religion or belief, disability, culture or circumstance. This includes a right to protection from abuse, neglect and any form of exploitation.

This safeguarding policy aims to ensure that a consistent approach to safeguarding exists across all council services. It outlines key roles and responsibilities of individual officers to embed safeguarding policies, practices and procedures into the council's everyday business. The policy also covers early help and outlines the Council's approach to addressing low level concerns and early help support needs.

## 2. Policy statement

Pendle Borough Council is committed to working in partnership with others to safeguard children and adults at risk from all forms of abuse, neglect or exploitation. The Council will raise awareness of safeguarding issues to ensure that the needs and interests of children, young people and adults at risk are incumbent in decision making processes and through service provision.

This policy aims to ensure that an overarching approach to safeguarding is embedded within all council services and that employees, elected members, those delivering contracts on behalf of the council and volunteers understand their role and responsibilities in supporting all residents to live a life free from abuse, exploitation and intimidation.

We will create an environment where staff are trained to an appropriate level and encouraged to think of safeguarding as being their responsibility, understanding the need for them to play a full and active part in the delivery of the council's response. We will also create an organisational culture where the reporting of abuse and exploitation is encouraged and staff, elected members and contractors feel supported to do so. The Council will ensure that it complies with all relevant safeguarding legislation, data protection legislation and government guidance.

Pendle Borough Council is committed to the following principles and actions:

- We will ensure that a safeguarding culture is in place and is actively promoted within the organisations and will work together with other agencies to safeguard vulnerable children, young people and adults at risk.
- We will implement procedures to safeguard children, young people and adults at risk and take all reasonable steps to protect them from harm, discrimination and to respect their rights, wishes and feelings.
- All employees who work with children, young people and adults at risk will be recruited with regard to their suitability for that responsibility. Employees who have substantial access to children, young people and adults at risk are subject to an enhanced Disclosure Barring Service (DBS) check prior to appointment, which includes a check against the vetting and barring scheme in line with the Safeguarding Vulnerable Groups Act 2006.
- All employees have a responsibility to report concerns of suspected abuse or poor practice and we will provide designated points of contact to deal with such reports.
- Employees are expected to work in an open and transparent way avoiding any conduct that may cause a reasonable person to question their motives and intentions.
- We will promote good practice that encourages a safe environment, protects all parties and avoids mistaken allegations of abuse.
- We will take all incidents of poor practice and allegations or suspicions of abuse seriously and these will be responded to swiftly and appropriately.
- We will respond promptly to suspicions or allegations involving employees and appropriate disciplinary and appeals procedures will be implemented.

This policy will be reviewed every three years or whenever there is a change in the relevant legislation or any other adopted standard of best practice.

### 3. Statutory responsibilities

As a District Council we have specific legal safeguarding responsibilities under:

- Children Act 1989/2004 (Section 11)
- Children and Social Work Act 2017
- Care Act 2014
- Mental Capacity Act 2005
- Counter Terrorism and Security Act 2015
- Modern Slavery Act 2015
- Housing Act 1996
- Homelessness Reduction Act 2017
- Domestic Abuse Act 2021

## 4. Definitions and supporting information

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| <b>Child, or young person</b>                | Anyone under the age of 18  |
| <b>Adult at Risk</b>                         | A person aged 18 years or over, who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.  |
| <b>Parent</b>                                | Parent, carer or guardian   |
| <b>Staff, elected members and volunteers</b> | Anyone working on behalf of, delivering a service for, or representing Pendle Borough Council.  |
| <b>Abuse</b>                                 | <p>Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It can take many forms, including the following:</p> <ul style="list-style-type: none"> <li>• Discriminatory Abuse: Includes abuse on the grounds of race, faith or religion, age, disability, gender, sexual orientation or any of the other protected characteristics</li> <li>• Domestic Abuse: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional abuse.</li> <li>• Financial or material abuse: includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.</li> <li>• Physical Abuse: is the non-accidental infliction of physical force that results (or could result) in bodily injury, pain or impairment.</li> <li>• Sexual abuse: is the direct or indirect involvement in sexual activity without consent or forcing or enticing children or young people in sexual activities.</li> </ul> |
| <b>Neglect</b>                               | Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life such as medication, adequate nutrition and heating.  |
| <b>Organisational abuse</b>                  | Is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where the adult lives or that they use.  |
| <b>Psychological abuse</b>                   | Sometimes called Emotional Abuse is behaviour that has a harmful effect on emotional health, well-being and development.  |
| <b>Self-Neglect</b>                          | This covers a wide range of behaviours including neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.<br><a href="http://www.lancshiresafeguarding.org.uk/media/1458/Multi-Agency-Self-Neglect-Framework-Final-March-2019.pdf">www.lancshiresafeguarding.org.uk/media/1458/Multi-Agency-Self-Neglect-Framework-Final-March-2019.pdf</a>   |
| <b>Child Sexual Exploitation (CSE)</b>       | A form of child abuse. It occurs where anyone under the age of 18 is persuaded, coerced or forced into sexual activity in exchange for, amongst other things, money, drugs/alcohol, gifts, affection or status. Consent is irrelevant, even where a child may believe they are voluntarily engaging in sexual activity with the person  |

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|   | who is exploiting them. CSE does not always involve physical contact and may occur online.  |
| <b>County Lines</b>                                 | County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and adults at risk to move and store drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities. County lines may also involve the commission of the offences of ‘slavery, servitude, forced or compulsory labour’ and ‘human trafficking’ as defined by the Modern Slavery Act 2015.  |
| <b>Child Criminal Exploitation (CCE)</b>            | Child Criminal Exploitation is common in county lines but is broader than it, e.g. those being forced to work on cannabis farms or to commit theft. CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. It can be perpetrated by individuals or groups, males or females, and young people or adults. Criminal exploitation does not always involve physical contact and can occur through the use of technology. It may also involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. CCE often occurs without the child’s immediate recognition, even though activity may appear to be consensual and despite the fact that victims frequently believe that they are in control of the situation. In reality, they are often exposed to injuries, trauma, sexual violence, debt bondage and danger. |
| <b>Cuckooing</b>                                    | Cuckooing is where the property of a vulnerable resident is taken over by others with the intention of exploiting them for their own money and/or to use the property for criminal activity such as prostitution; drug use, dealing or manufacturing; handling stolen goods; hiding offensive weapons; human trafficking or modern slavery or organised crime group activity.   |
| <b>Prevent</b>                                      | <p>As part of the national counter-terrorist strategy Prevent aims to stop vulnerable people becoming involved in terrorist activity or supporting terrorism by working with individuals and communities to address issues before they become a criminal matter, and to stop people moving from extremism into terrorist-related activity. Individuals who are identified as being at risk will be referred to the Channel Panel programme.</p> <p>There is no expectation for the council to take on a surveillance or enforcement role as a result of Prevent. Rather, the council will work with partner organisations to contribute to the prevention of terrorism by safeguarding and protecting vulnerable individuals and making safety a shared endeavour.</p>  |
| <b>Modern Slavery (and Human Trafficking)</b>       | Encompasses slavery, human trafficking, forced labour and domestic servitude.   |
| <b>Honour Based Abuse, including Female Genital</b> | Honour Based Abuse is violence and abuse in the name of honour, covering a variety of behaviours (including crimes), mainly but not exclusively against females, where the person is being punished by their family and/or community for a perceived transgression against the ‘honour’ of the family or community, or is required to undergo certain activities or procedures in ‘honour’ of the family.   |

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| <b>Mutilation and Forced Marriage</b> | <p>Honour Based Abuse is not a crime itself, however the practices used to punish individuals are criminal acts, i.e. abduction, forced marriage, assault and murder and includes physical abuse, sexual abuse, emotional and/or psychological abuse, financial abuse, forced marriage and female genital mutilation.</p> <p>Female Genital Mutilation is a collective term for illegal procedures which include the removal of part/all external female genitalia for cultural or other nontherapeutic reasons. The practice is not required by any religion. It is painful, medically unnecessary and has serious health consequences at the time it is carried out and in later life. The procedure is typically performed on girls of any age, but is also performed on new born girls and on young women before marriage/pregnancy. A number of girls die as a direct result of the procedure, from blood loss or infection. FGM may be practised illegally by doctors or traditional health workers in the UK, or girls may be taken abroad for the operation.</p> <p>A Forced Marriage “is a marriage conducted without the valid consent of both parties, where duress is a factor” (‘A Choice by Right’ HM Government 2000). It is illegal under the Anti-Social Behaviour, Crime and Policing Act 2014 to:</p> <ul style="list-style-type: none"> <li>• use violence, threats or any other form of coercion for the purposes of causing another person to enter into a marriage; and</li> <li>• believe, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.</li> </ul> <p>Duress can involve physical, psychological, sexual, financial and/or emotional pressure.</p> <p>The legislation also applies to a person deceiving someone into going abroad for the specific purpose of forcing them to marry and is committed whether or not the forced marriage goes ahead.</p> |
| <b>Early Help and low-level needs</b> | <p>Early help support is a preventative approach that provides support to children, young people, families and vulnerable adults to address challenges before they escalate into more serious issues. It aims to improve outcomes, build resilience, and prevent problems from worsening by offering assistance at the earliest sign of need. Signs of low-level needs can manifest in various ways, often indicating a struggle to meet basic needs or cope with challenges. These can include difficulty managing emotions, inconsistent routines, lack of age-appropriate behaviour, and concerns about a child's future. Other indicators might involve social isolation, relationship difficulties, hoarding, financial strain, or experiencing hate crimes.</p>   |

## 5. Reporting concerns – everyone’s responsibility

It is not an officer’s job to establish whether or not abuse is taking place but it is everyone’s responsibility to report any concerns they have over the welfare of children, young people or adults at risk. This responsibility includes; spotting signs of abuse, reporting concerns and handling any allegations reported by members of the public

As a general rule, if something does not feel right it may not be and so should be reported.

## 6. Who to Tell

The reporting process for Pendle Borough Council is outlined in **Appendix 1**.

### Early Help concerns

This policy also covers early support for families and vulnerable adults who have lower-level needs, to minimise risk of it escalating into a safeguarding issue. Not all concerns Council officers observe will be considered a safeguarding issue. In fact, most of the concerns officers encounter will be an early help/ family wellbeing nature.

Staff and elected members are encouraged to consider if a family or individual may benefit from early support from another service (or services), and suggest this to them, gaining their consent to make contact, wherever possible.

Pendle's Transforming Lives Panel can support the more complex cases, for example, those with multiple needs (ie rough sleeping, self-neglect, substance misuse). Officers will need to gain consent from the individual for any referrals to this Panel.

Further details of support available in Pendle is available at:  
[www.pendle.gov.uk/homepage/125/new\\_pendle\\_support\\_hub](http://www.pendle.gov.uk/homepage/125/new_pendle_support_hub)

### Safeguarding concerns

All staff are encouraged to report any safeguarding concerns direct to Lancashire County Council:

- Lancashire County Council Adult Social Care: 0300 123 6721
- Lancashire County Council Children's Social Care:  
0300 123 6720 (Monday – Friday 9am -5pm)  
0300 123 6722 (Out of Hours)

Lancashire Police – **999** in an emergency.

Pendle Borough Council has a Designated Safeguarding Lead and Deputy to offer advice and guidance on any suspicions, concerns and disclosures that staff encounter during working hours and can support with any safeguarding referrals, along with the line manager.

### Radicalisation concerns

All staff and elected members are encouraged to report radicalisation concerns through the Prevent referral process, using the [national prevent referral form](#). Completed forms will then be sent to [concern@lancashire.police.uk](mailto:concern@lancashire.police.uk)

### Domestic Abuse concerns

Any concerns about domestic abuse will need to be reported to the Pendle Domestic Abuse service, as outlined in **Appendix 2**.

All staff and elected members reporting a Safeguarding, Prevent or Domestic Abuse incident, or making a referral to a support organisation, will record this via the on-line Recording Safeguarding Incident Recording form.



## 7. What happens after reporting or raising a safeguarding concern

Once concerns have been raised with the manager/ Designated Safeguarding Lead (DSL) or Deputy DSL, the action that follows will largely depend on the nature of the concerns raised.

When considering reporting a safeguarding concern, it is important to have as much information about the case as possible before proceeding. Adult mental health concerns should be referred to mental health rather than safeguarding services unless there is evidence of abuse or exploitation.

Once discussed with the manager and then, the Designated Safeguarding Lead (DSL) or Deputy DSL, depending on the nature of the concern, if the matter is referred on to an appropriate agency or officer, the final outcome may not necessarily be disclosed to the reporting officer.

However, staff should be assured that any concerns will be taken seriously. Appropriate action will be taken to deal with the concern or it will be escalated to the appropriate level.

Whilst officers may not learn the eventual outcome of concerns raised, the following are some potential outcomes.

- referral to an appropriate individual agency for intervention
- a multi-agency response to support the vulnerable person
- criminal investigation
- the instigation of criminal proceedings
- internal disciplinary proceedings

All safeguarding concerns that are reported to either LCC/ police or referred to another organisation for support must be recorded via the on-line Safeguarding Recording form, found here: [pendle.gov.uk/xfp/form/492](https://pendle.gov.uk/xfp/form/492)

## 8. Allegations against staff, elected members or volunteers

Staff who work with children can experience malicious or misplaced allegations against them. Unfortunately, there are also occasions where some adults/professionals are perpetrators of child abuse or display unsuitable behaviours which would harm the children they work with.

Such allegations made against staff, either paid or unpaid, are serious and dealt with by the **Local Authority Designated Officer (LADO)**, a professional independent of Pendle Borough Council and appointed by the Lancashire Safeguarding Board.

LADO contact details can be found at <https://www.lancashire.gov.uk/practitioners/supporting-children-and-families/safeguarding-children/local-authority-designated-officer/> or telephone 01772 536 694

If someone (a child, parent, service user, fellow colleague, etc) makes an allegation to an officer about another member of staff, this should not be investigated but will need escalating to the line manager. They will contact the Human Resources Manager who will then contact the LADO directly at the earliest available opportunity.

Pendle Borough Council is committed to following the correct process for dealing with any allegation against a member of staff, but it is also mindful of the welfare of that staff member and will provide appropriate help and support to them.

## 9. Responding to disclosures of abuse

People often don't disclose abuse, and when they do it's rarely directly to professionals. Partly this is due to lack of awareness of services, and partly to do with trust and a fear of losing control of a situation. It is very important that if a child or young person discloses abuse to an officer, they should:

- Listen carefully
- Respond sensitively and take the matter seriously
- Let the child know that it's not possible to 'keep it secret' and disclose any evidence of abuse to the appropriate agency
- Make a note of everything that was discussed as soon as possible after the disclosure

Alternative confidential support is available from the NSPCC; their Helpline Number is 0808 800 5000.

For adults, their consent is needed to make any referrals.

If officers are made aware of any instance of abuse, or have any concerns about it, it is important to note down the details in writing as soon as possible as this will aid discussions with a manager, and where appropriate, the Designated Safeguarding Lead (DSL). All staff will need to record their concerns and action taken on the on-line Recording Form:

[www.pendle.gov.uk/xfp/form/492](http://www.pendle.gov.uk/xfp/form/492)

Records will be kept for an appropriate amount of time to comply with legislation.

## 10. Training

All staff will receive the appropriate level of training to be confident and competent when working with children, young people and vulnerable adults and being able to recognise and respond to safeguarding concerns. This will include recognising the impact of trauma on children and young people, how we can promote welfare, Prevent and where to go to get help and advice.

All staff will be required to undertake Safeguarding Awareness learning every 3 years to ensure an understanding of abuse, the Council's Safeguarding procedures and how we can promote welfare. It is the responsibility of the line manager to ensure this training happens. Basic Safeguarding Training will be offered on the 'Member Training Programme' for all councillors.

Front line staff will be required to undertake the equivalent of Level 2 Safeguarding training every 3 years to ensure they have an in depth knowledge and understanding of the Safeguarding policy and procedure.

The 3-year training will be supplemented with additional learning opportunities and communication, to remind staff of their safeguarding responsibilities.

New starters will have an introduction to the safeguarding policy and procedures through their induction process. Those staff who are more likely to come into contact with children will be required to undertake more in-depth Safeguarding Children training every 3 years.

## 11. Equality impact assessment and monitoring

The operation of this policy will be monitored for its impact on different equality groups in line with the Equality Act 2010. This will enable the Council to assess whether any differences have an adverse impact on a particular group, such that further action would be required.

Monitoring of the Safeguarding Policy will be undertaken via annual Safeguarding Update reports to Pendle Borough Council Executive.

## 12. Data Protection

In implementing this policy, the council will ensure that any personal data relating to the application of this policy will be obtained, processed and destroyed in line with Data Protection requirements.