



**POLICE & CRIME
COMMISSIONER**
for Leicester,
Leicestershire & Rutland
Your Communities - Your Commissioner

POLICE AND CRIME COMMISSIONER

Safeguarding Policy

Policy Owner: Chief Executive

Role Responsible: Policy and Compliance Officer

Protective Marking: Official

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Review log

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1. Purpose

- The purpose of this policy is to set out the expectations and key principles that all staff in the OPCC and Violence Reduction Network (VRN), contractors, volunteers and visitors need to be aware of safeguarding children, young people, and adults at risk of harm or abuse.
- The OPCC recognises their responsibility to the welfare of children, young people and vulnerable adults in Leicester, Leicestershire and Rutland (LLR).
- The OPCC and Violence Reduction Network recognises their responsibility to monitor the effectiveness of safeguarding in LLR's policing area and is included in the governance and scrutiny arrangements of the PCC.
- Ensure that any services the PCC commission from third parties are compliant with a legal duty to safeguard and promote the welfare of children according to the Children's act 2004 and of adults according to the Care Act 2014

2. The Scope

- This Policy covers all staff including temporary employees, agency staff, contracted staff, and volunteers.
- The aim of this policy is to raise staff awareness around the duties placed on staff in relation to safeguarding, which can include signposting to prevention or early intervention services. Demonstrating compliance and best practice.
- The policy will comply with all relevant safeguarding legislation including:
 - [Childrens' Act 1989 and 2004](#)
 - Care Act 2014
 - Children and Social Work Act 2017
 - Police Reform and Social Responsibility Act 2011, section 1(8)(H);
 - The Human Rights Act 1998;
 - Council of Europe Convention on Action against Trafficking in Human Beings;
 - Safeguarding Vulnerable Groups Act 2006
 - The Mental Capacity Act 2005
 - [The Equality Act 2010](#)
 - [Working Together to Safeguard Children 2015 and 2023.](#)
- This policy considers the range of contextual factors that may increase individuals' vulnerability to abuse or create potential barriers to disclosure. Including but not exclusive to:
 - Current or previously looked after children.

- Children and adults with care and support needs, including but not exclusive to those with a mental, physical, or cognitive condition.
- Asylum seeking or refugees.
- A baby under a year of age.

3. What do we mean by Safeguarding?

- In this policy a child is defined as anyone under the age of 18 years and includes an unborn child.
- In this policy an adult is defined as anyone aged 18 years or over.
- A child¹ or an adult may be at risk because of their situation and/ or circumstances, they are unable to take care of or protect themselves or others from harm, abuse, or exploitation. The following definitions of abuse are given to support staff in recognising potential situations of abuse but may not cover all potential situations.
 - **Physical abuse** – when someone is deliberately hurting, causing physical harm and can involve hitting, kicking, shaking, throwing, poisoning, burning, or suffocating, misuse of medication, restraint or inappropriate physical sanctions. It can also include parent or carers making up or causing the symptoms of illness (known as fabricated or induced illness – FII).
 - **Physical Neglect** - The persistent failure to meet a child or vulnerable adult’s basic physical and/or psychological needs which is likely to result in serious impairment. It may involve failure to provide adequate food, clothing, warm shelter, adequate supervision, or access to medical care (sometimes referred to as medical neglect). It can also happen during pregnancy if the pregnant person neglects their own mental health or uses or uses substances harmful to her baby in the womb.
 - **Self-neglect** – This covers a wide range of behaviour relating to an individual neglecting their own personal hygiene, physical/emotional health, or personal surroundings (such as hoarding).
 - **Emotional Neglect** – This is where the emotional need of a person is ignored or love, nurture and stimulation are withheld. For example, being cold and emotionally unavailable during interactions.
 - **Emotional/psychological abuse** – is the persistent emotional maltreatment of someone which may include ignoring, humiliating, putting down or regularly criticising someone. Shouting, threatening or being verbally abusive. Controlling, manipulating or isolating someone or exposing someone to a distressing event or situation. Mocking, degrading or humiliating, blaming or ‘gaslighting’, making someone feel they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
 - **Domestic abuse** – “Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those

¹ <https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.” Which can include but not limited to:

- Psychological/emotional abuse.
- Physical.
- Sexual.
- Economic/financial abuse.

It can also include controlling and/or coercive control, “honour” based violence, female genital mutilation (FGM), forced marriage, online/digital abuse. Children witnessing these situations are also being exposed to abuse and harm.

- **Sexual abuse** – Can involve physical contact or no contact abuse and can happen online or in person. Including any form of sexual touching of any part of the body, rape/penetration, forcing or encouraging someone to take part in a sexual activity or watch/hear sexual acts. Making, viewing, or distributing sexual images of children, sexual grooming, sexual harassment, or sexual exploitation.
- **Financial/material/digital abuse** – Involves the control of money or resources. It could involve scams such as internet or doorstep crime, theft or fraud. 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 can also be forms of financial abuse.
- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational abuse** – Is a form of abuse which happens within a specific care setting or services. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. This may range from one off incidents to on-going ill-treatment.

The action we take to promote the welfare of children and adult at risk- and protect them from harm - is everyone’s responsibility. Everyone who comes into contact with children, vulnerable adults and families has a role to play.”

4. Situations where concerns may be raised.

- A child or adult at risk may tell you about something or someone that has upset or harmed them. They may do this directly or indirectly.

- Directly: Making a verbal disclosure or non-verbal disclosures like writing or drawing
- Indirectly: Making ambiguous statements or displaying behaviour signals something is wrong.
- Someone else might report that a child or adult at risk has told them, or that they believe that a child or adult at risk has been or is being harmed.
- A child or adult at risk might show signs of physical injury for which there appears to be no explanation, or the explanation does not fit the injury observed. A referral should be made for any bruise or mark on a non-mobile baby.
- A child or adult at risk's behaviour may suggest he or she is being abused or harmed.
- The behaviour or attitude of a professional towards a child or adult at risk that worries you.
- A child or adult at risk demonstrates worrying behaviour towards other children or adult at risk.
- These situations may happen directly but may also happen indirectly through letters or calls received by staff of the OPCC and VRN.

5. Responsibilities

Everyone has a responsibility:

- To safeguarding children, young people and adults at risk.
- To recognise the welfare of the children and adults at risk as our primary consideration in everything we do;
- To ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children, young people and adults at risk-;
- To ensure appropriate action is taken in the event of incidents/concerns of abuse and that support is provided to the individual(s) who raise or disclose the concern;
- To ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- To prevent the employment/deployment of unsuitable individuals;
- To ensure robust safeguarding arrangements and procedures are in place.

6. Safeguarding Roles

- The Chief Executive Officer and the Senior Management Team (SMT) are responsible for ensuring that this policy and related procedures are implemented, monitored and consistently reviewed;

- The Chief Executive Officer is responsible for ensuring the implementation, consistent monitoring and improvements of the Safeguarding Policy and related procedures.
- The Designated Safeguarding Officers- Leads (DSL) - Director of Strategy, Partnerships and Commissioning also the Programme Manager (VRN) are responsible for dealing with reports or concerns about the protection of children, young people and adults at risks appropriately and in accordance with the procedures that underpin this policy;
- Staff must bring safeguarding concerns to the attention of the Designated Safeguarding Officer Lead

7. OPCC Processes & Signposting Information

- The PCC and his office will work with partner organisations to improve the protection and wellbeing of children and adults at risk in Leicester, Leicestershire and Rutland. Including Integrated Care Boards and Local Authorities.
- OPCC and VRN staff will have a clear responsibility, process and actions to follow when they suspect or recognise that a child, young person or adult at risk may be a victim of harm or abuse.
- OPCC staff and VRN staff will ensure that any safeguarding concerns identified are taken seriously and dealt with in an effective manner that complies with legislation.
- Making a disclosure of abuse takes a great amount of courage and often people fear no one will believe them. It is important that care is taken to support a child or adult at risk throughout the disclosure. The following guidance can help reduce causing further harm to those disclosing or compromise any future criminal investigation.

When a child, young person or adult at risk makes a **disclosure of abuse or bullying, you should:**

- Stay calm.
- Listen to what is being said without judgment allowing the person to talk at their own pace,
- Take what is being said seriously.
- If you believe the person is 'at risk' of immediate significant harm, which includes situations which any employee would reasonably believe requires the emergency services, then you must contact the relevant emergency service and notify the Designated Safeguarding Officer.
- Be honest and do not make promises to keep secrets. Be clear about your duty to report concerns if you feel someone is being or at risk of being hurt or harmed in anyway.
- 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 or adult at risk that they have done the right thing in telling you.
- Find an opportunity to explain what might happen next and who the information will be shared with and why.
- Do not ask the child to repeat what they have told you to another member of staff.
- Immediately report to and inform the Designated Safeguarding Officer. Designated Safeguarding Officer will also notify CEO of the incident referral. Do not discuss with anyone who does not have a designated safeguarding role.
- As soon as possible you need to record details of the disclosure on a Safeguarding Reporting Form (SRF). Do not destroy any notes you may have made during the disclosure as these may be required should a criminal case happen.
- Record the date, time, place, words used by the child or adult and how the child or adult at risk appeared to you – be specific. Record the actual words used; including any swear words or slang.
- **You do not need a person's consent to make a safeguarding referral however it is best practice to notify the DSL who will make a decision/ or lead on whether to inform a child's legal guardian unless in the exceptional circumstances that it may put the child at more risk to do so. Referrals related to fabricated and Induced illness should not be disclosed to a parents/guardians.**
- Referral process – see below

8. Referral Process:

- **If you are concerned for the safety of a child or adult at risk, or there is an immediate risk to a child or adult at risk ring 999**
- **To report a crime or raise a concern about abuse with Leicestershire Police, phone the non-emergency number 101. But if it is an emergency always dial 999.**
- **Area Safeguarding Contacts:**

Child Safeguarding Contacts:

Concerned about a Child? If, you are worried about a child at risk, please contact the relevant authority using the details below:

Leicester City Council

Telephone: [0116 454 1004](tel:01164541004) (operational 24 hours a day, 7 days a week)

Visit: Customer Service Centre, 91 Granby Street, LE1 6FB to call from a free telephone.

Following an initial telephone discussion you may be directed to complete and submit a MARF form <https://www.leicester.gov.uk/health-and-social-care/support-for-children-and-young-people/children-s-social-care/>

Leicestershire County Council

Telephone: [0116 3050005](tel:01163050005) (operational 24 hours a day, 7 days a week)

Following an initial telephone discussion you may be directed to complete and submit a MARF form: www.leicestershire.gov.uk/report-abuse-of-a-child.

Rutland County Council

Email: childrensreferrals@rutland.gov.uk

Call: [01572 758 407](tel:01572758407)

Open: Monday to Thursday, 8.30am to 5pm and Friday, 8.30am to 4.30pm.

Outside of these hours, call: [0116 305 0005](tel:01163050005)

<https://www.rutland.gov.uk/children-young-people-families/report-concern-about-child-or-young-person>

Adult Safeguarding Contacts

Concerned about an adult? If you are worried about an adult at risk, please contact the relevant authority using the details below:

Leicester City Council

Telephone: [0116 454 1004](tel:01164541004) (operational 24 hours a day, 7 days a week)

Visit: Customer Service Centre, 91 Granby Street, LE1 6FB

<https://www.leicester.gov.uk/contact-us/concerned-about-a-child-or-an-adult/>

Leicestershire County Council

Telephone: [0116 305 0004](tel:01163050004)

(Monday to Thursday, 8.30am to 5pm, Friday 8.30am to 4.30pm)

Emergency Duty Team:

Telephone: [0116 255 1606](tel:01162551606)

(Evenings, weekends, Bank Holidays)

[Report abuse of an adult | Leicestershire County Council](#)

Rutland County Council

Telephone: [01572 758 341](tel:01572758341)

Open: Monday to Thursday, 8.30am to 5pm and Friday, 8.30am to 4.30pm

Outside of these hours, call: [0116 305 0005](tel:01163050005)

<https://www.rutland.gov.uk/adultsocialcare/safeguarding-adults>

Concerns about adults who work with children.

Contact the Local Authority Designated Officer (LADO) If you are concerned that someone in a position of trust has harmed a child or behaved in a way

that indicates that they may be unsuitable to be in a position of trust, please contact the LADO to discuss your concerns promptly, before speaking to the person of concern.

Any allegation against staff that indicate that they may have:

- Behaved in a way that has harmed a child or adults at risk, or may have harmed a child or adult at risk;
- Possibly committed a criminal offence against or related to a child or adults at risk; or
- Behaved towards a child, children or adult at risk in a way that indicates s/he is unsuitable to work with children and adults at risk.
- Will be reported immediately to the Designated Safeguarding Officer
- If the allegation made to a member of staff concerns the Designated Safeguarding Officer, the person receiving the allegation will immediately inform the Chief Executive Officer.
- The name of any member of staff considered not suitable to work with children and adults at risks will be referred to the Disclosure and Barring Service (DBS) with the advice and support of the Office & HR Manager.

Leicester City Council

Telephone: [0116 454 2440](tel:01164542440).

Email Lado-allegations-referrals@leicester.gov.uk or Lado-allegations-referrals@leicester.gcsx.gov.uk if using a secure email address.

Leicestershire County Council Safeguarding Referral process:

Telephone: [0116 305 4141](tel:01163054141)

Email: CFS-LADO@leics.gov.uk

Rutland County Council Safeguarding Referral process:

Telephone: [01572 720 454](tel:01572720454)

[Local Authority Designated Officer \(LADO\) | Rutland County Council](#)

9. Recruitment

- The PCC is committed to ensuring that appropriate procedures are in place, where staff, contractors, volunteers have direct or indirect contact and access to information relating to children and vulnerable adults.
- It is the responsibility of the line managers 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 ensure that only appropriate individuals are selected to undertake vetting procedures.

- For roles involving safeguarding, full employment references and information about employment gaps will be sought. For all other roles;
- employment references and information about employment gaps covering a period of 3 years will be sought;
- Should the OPCC recruit volunteers, recruitment will be rigorous and take into account regulated and supervised activity.

10. Commissioning

- As a commissioner of services, the OPCC has a responsibility to ensure safeguarding responsibilities are detailed in all contracts. The OPCC will work with providers to ensure that responsibilities are understood and adhered to in line with best practice arrangements and ensure this is monitored as part of the contract management process.
- All recipients of commissioned or grant funding should produce agreed Safeguarding Procedures or give written agreement to adopt OPCC procedures as part of due diligence and contract agreements.

11. Training

- All OPCC staff will receive training in relation to safeguarding and their responsibilities in upholding this policy as part of their induction programme. For those in roles where there is more direct involvement with services and/or service users best practice would encourage additional training annually on specific areas of safeguarding, for example domestic abuse or exploitation.

Children's safeguarding training is available through the Leicester, Leicestershire and Rutland Safeguarding board: <https://www.eventbrite.co.uk/o/leicester-safeguarding-children-partnership-board-and-leicestershireamrutland-safeguarding-children-partnership-8043549452>

Adult safeguarding training is available through Leicestershire and Rutland's safeguarding board <https://www.lscdg.org/events/> or Leicester City Adult Safeguarding board <https://www.leicester.gov.uk/health-and-social-care/adult-social-care/what-support-do-you-need/safeguarding-adults-board/information-for-professionals-and-practitioners/>.

12. Confidentiality

- Information will be gathered, recorded and stored in accordance with Data Protection Legislation and the Information Management Policy
- All OPCC staff have a professional duty to share information with other agencies in order to safeguard children and adults at risks. The public interest in safeguarding children and adult at risk may override confidentiality interests. The Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and adult at risk safe.
- All OPCC staff cannot promise service users or their families/carers that they will keep secrets
- Sharing of Information with other agencies, staff will have regard to the Information Commissioner's Office Sharing Code of Practice and any relevant non –statutory guidance including:

- Caldicott principles derived from the 1997 Caldicott Report and subsequent 2013 Caldicott Review
- Seven 'golden' rules of information sharing set out in HM Government's Information Sharing 2015 (Advice for practitioners providing safeguarding services to children, young people, parents and carers) as per Appendix 1.

13. Equality and Diversity

- The PCC is firmly committed to promoting equality of opportunity for all local people and communities. It aims to ensure that in its organisational structures, decision-making processes, ways of working, communicating and managing, diversity is welcomed and embraced.
- The OPCC shall treat all individuals, regardless of age, colour, disability, ethnic or national origin, gender, gender reassignment, marital status, nationality, race, religion and belief and sexual orientation with dignity and respect. It shall provide a working environment which is free from harassment, bullying, victimisation or discrimination and in all our contacts with members of the community the principles of respect, dignity and fairness will be upheld.
- Staff and volunteers of the OPCC will demonstrate their commitment to this statement by ensuring that all policies and procedures reflect these aims and by challenging any behaviour which fails to uphold these principles.
- The OPCC extends this commitment to cover all aspects of diversity.

14. Data Protection Act 2018, General Data Protection Regulations (GDPR)

- The Data Protection Act 2018 – General Data Protection Regulations (GDPR), replaces current data privacy legislation. This law gives more rights to you as an individual and more obligations to organisations holding your personal data.
- One of the key rights enshrined in the new legislation is a right to be informed, which means that the Office of the Police and Crime Commissioner (OPCC) must give you detailed information about the ways in which we use, share and store your personal information.
- The OPCC has published a [Privacy Notice](#) which is documented on the PCC's website. The PCC may need to make changes to the Privacy Notice from time to time, so please continue to check our websites for updates. If there are important changes that affect the way we handle your personal data we will contact you directly where instructed to do so by the new legislation.

15. Monitoring

- Compliance with, and effectiveness of, this policy will be reviewed a year after implementation and then every three years, or in the event of;
 - Changes in legislation and/or government guidance;
 - As a result of any other significant change or incident

- This policy will be reviewed by or on behalf of the PCC or CEO to ensure that it remains accurate and fit for the purpose.

This is the Safeguarding Policy of The Police and Crime Commissioner



Signed:

Position: Chief Executive Officer

Date: 31/1/2024

The Seven Golden Rules to Sharing information

1. Remember that the Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately,
2. Be open and honest with individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or you're your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it- whether it is share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.