

# SALISBURY CITY COUNCIL

## Report

**Subject** : Safeguarding Children and Adults at Risk Policy Audit and Review  
**Committee** : Full Council  
**Date** : 02/09/2024  
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### 1. Report Summary:

- 1.1. This report introduces the findings of a recent safeguarding audit and policy review undertaken by the Head of Community Services

### 2. Background:

- 2.1. Both the Safeguarding Adults at Risk and the Safeguarding Children Policy were last updated in November 2023 to reflect changed locations of safeguarding information on the SharePoint document system and the revised pathways for reporting due to changes in senior leadership.
- 2.2. The policies were due for full review in December 2024
- 2.3. The review was undertaken in February 2024 – April 2024 upon the publication of the full range of updated guidance from professional bodies.
- 2.4. The audit was under-taken using the NSPCC audit tools and published best-practice resources from Wiltshire Safeguarding Vulnerable People Partnership (2024).
- 2.5. Policies were also checked against
  - 2.5.1. new statutory guidance issued by The Department for Education (DfE) when they published a new edition of its statutory guidance Working together to safeguard children in December 2023.
  - 2.5.2. The Out Of School Alliance updated guidance for 2024 and NSPCC recommended ratio guidance July 2024
- 2.6. All reporting details to the Wiltshire Integrated Front Door and MASH have also been checked and found to be up to date.

### 3. Key findings of the audit and review

- 3.1. All appendix flowcharts and reporting forms have been checked against those currently provided by the Wiltshire SVPP and Wiltshire safeguarding children board and are up to date as of 08/08/2024
- 3.2. According to “Working Together to Safeguard Children 2023” (Background Paper 9.4) SCC activity remains outside of the definition of a regulated setting or regulated activity, meaning that we remain outside of the scope of Ofsted Registration. The exemptions from Ofsted registration are set out on GOV.UK in Exemptions from registration, which replaces the former guidance *Annex A: Registration not required*. There are three exemptions which are usually relevant to activity clubs:

**Exemption 11:** Providing no more than two activities out of the following list:

- school study support or homework support

- sport
- performing arts
- arts and crafts
- religious, cultural or language study

**Exemption 2:** Providing care where no child attends for more than two hours per day, even if the childcare is open for longer than two hours

**Exemption 1:** Providing childcare for children over the age of eight

- 3.3. However, the guidance sets out a clear responsibility for all sectors to commit to multi-agency working and shared responsibility which should be reflected in our policies, as outlined below.
- 3.4. The guidance also recommends that policy sets out an expectation of clear communication pathways between parents, carers and SCC whenever someone is
- 3.4.1. Volunteering
  - 3.4.2. Participating in a regular activity
  - 3.4.3. Using a direct service of the city council under our responsible supervision.
- 3.5. It is now considered best practice to have a standalone Safer Recruiting Policy, and whilst our current recruiting procedure does cover the requirements of safer recruiting, creating a stand-alone policy or establishing a clear Safer Recruiting Statement within current policy, is a statement of good practice and prioritisation of safeguarding.
- 3.6. Guidance on ratios of supervision remain unchanged since the last full policy review in December 2022. It should be noted that SCC activity for children complies to Ofsted registered standards, as a mark of best practice, but this is not currently directly referenced in our policy.
- 3.7. Safeguarding policies should refer to a lone working policy, in which lone working with children or adults at risk is prohibited except in specific, risk assessed circumstances. Policies should be amended accordingly.
- 3.8. There is no mandatory safeguarding training with reference to the services we provide. However, in terms of best practice our current provision of regular internal training for all staff, and specialist training for a designated pool of staff with specific responsibilities to adults at risk and children, meets best practice guidance.
- 3.9. Guidance now considers volunteers in the same terms as staff when supporting children and adults at risk. Therefore, basic safeguarding training/briefings should be extended to all volunteers working with children or adults at risk, as planned, in 2024. This should be reflected in both policies.
- 3.10. The NSPCC audit highlights bullying and harassment as a key area for safeguarding which is not reflected in our safeguarding policy documents. There are clear processes and safeguarding in place for staff through HR policies, however, consideration should be made for clear processes for participants in activity, service users and volunteers.
- 3.11. Wiltshire Safeguarding Vulnerable People Partnership (SVPP) have identified raising awareness of referral processes for adults as a key area for safeguarding improvement in Wiltshire and have produced a new guidance document which should be referred to within our adults at risk policy.

#### 4. Recommended areas of change - Safeguarding Adults at Risk and Safeguarding Children Policies

Changes are outlined in Policy Drafts – Background Papers 9.6 & 9.7

- 4.1. **Information Sharing** - Both the Adults at Risk and Safeguarding Children policies require an information sharing statement and supporting process, called “how to share information with others”, to ensure we are sharing vital safeguarding information with key partners effectively.
  - 4.1.1. The recommended procedure can be found as Background Paper 9.3 and adjacent policy and procedure action 5.5.
- 4.2. **Activity Registration** - Both policies should include guidance on the information gathered on volunteers and child participants in activity to ensure vital information sharing is possible. To include
  - 4.2.1. GP name and address
  - 4.2.2. D.O.B
  - 4.2.3. Whether the individual has a key worker, support worker or social worker in place
  - 4.2.4. Both policies must state that “*A direct and named contact will be provided to parents or carers named on the registration form of any child or adult at risk who is participating in or volunteering on SCC activity.*” To support ease of communication in raising concerns
- 4.3. **Safeguarding Leads** - policies should
  - 4.3.1. Refer to the DSL – Designated Safeguarding Lead, and to the DDSL – Deputy Designated Safeguarding Lead
  - 4.3.2. Name designated safeguarding leads
  - 4.3.3. Define the required level of training for people in this role, to include SVPP advanced practitioner training.
- 4.4. **Lone Working**
  - 4.4.1. Both policies should state that the expectation of SCC is that “*no work with a child or adult at risk takes place on a one-to-one basis, unless a specific need creates a clear service case, and a risk assessment has been undertaken and signed off by the DSL.*”
  - 4.4.2. Both policies should state that those who are lone working cannot admit children or adults at risk into their workspace.
  - 4.4.3. The lone working policy should also be revised to refer to the safeguarding policy.
- 4.5. **Confidentiality - Data** - Both policies should include a statement on the storage and retention of safeguarding reporting information to reflect current processes and systems.
- 4.6. **Partnership Work** – SCC should create a safeguarding in partnership agreement for use in all partnership projects where children, adults at risk, or volunteers are involved. This agreement will act as an agreement between the parties outlining whose safeguarding policy is followed, under which circumstances and processes for information sharing.
- 4.7. **Hiring of SCC Facilities** – All hirers of SCC facilities delivering work for children or adults at risk on SCC premises must also, as part of their hire agreement, provide a signature declaring that they take full responsibility for the safeguarding of their participants or service users while on SCC premises, operating under their own policies and procedures and must also provide a safeguarding policy in certain circumstances outlined in the language below. This should be referred to in both policies.

## **Language to be included in all hire agreements**

*Is your event/activity, in/on an SCC building or land, for or largely targeted at*

- a) *children, young people (under 18, including family events) YES/NO*  
or  
b) *adults at risk, who are not accompanied by a parent or carer. YES/NO*

*If YES to either of the above, please initial to indicate that you will provide a copy of your safeguarding policies along with your signed hire agreement.*

*Initial: \_\_\_\_\_*

### **Safeguarding Responsibility**

*In signing this hire agreement, I understand that safeguarding for their event is their responsibility and any concerns raised to SCC about safeguarding will be shared with our Designated Safeguarding Lead who will contact you immediately.*

4.8. **Grants and Subsidies** – Both safeguarding policies should refer to our grants policy, stating that all public funds directed to activity working with children or adults at risk, require the receipt of an up-to-date safeguarding policy from the recipient organisation.

4.9. **Supervision Ratios** – The SCC Safeguarding Children Policy should include a statement on expected supervision ratios for and the requirement for risk assessments of an individual, group or setting to make a clear case for any differences in ratio requirements.

#### **Language to be included in policy**

*SCC follows best practice guidance from the NSPCC in adult to child ratios when delivering work for children and young people. In non-statutory settings the NSPCC advises having at least two adults present when working with or supervising children and young people.*

*SCC, following NSPCC recommendations, adheres to the following adult to child ratios as the minimum numbers to help keep children safe:*

- **under 2 years** - one adult to three children
- **2 - 3 years** - one adult to four children
- **4 - 8 years** - one adult to six children
- **9 - 12 years** - one adult to eight children
- **13 - 18 years** - one adult to ten children

4.10. **Training** – a training statement should be included in both policies to reflect current practice at SCC including volunteer training and induction.

#### **Language to be included in the policy**

***SCC provides the following mandatory training to all staff***

<b>Staff group</b>	<b>Level of safeguarding Training</b>	<b>Internal/External</b>
<i>Staff working to support children and/or adults at risk &amp; Managers responsible for safeguarding at public events</i>	<ul style="list-style-type: none"> <li>• <i>Induction safeguarding overview video</i></li> <li>• <i>Level 2 , Plus internal procedures</i></li> </ul>	<i>Internal</i>
<i>All staff</i>	<ul style="list-style-type: none"> <li>• <i>Induction safeguarding overview video</i></li> <li>• <i>Level 1, plus internal procedures</i></li> </ul>	<i>Internal</i>
<i>Volunteers working directly to support children and/or adults at risk</i>	<ul style="list-style-type: none"> <li>• <i>Induction safeguarding overview video</i></li> <li>• <i>Level 1, plus internal procedures</i></li> </ul>	<i>Internal</i>
<i>Designated safeguarding Leads (inc deputies)</i>	<ul style="list-style-type: none"> <li>• <i>Induction safeguarding overview video</i></li> <li>• <i>Level 2 , Plus internal procedures</i></li> <li>• <i>Specialist Advance Practitioner Training</i></li> </ul>	<i>Internal</i> <i>External</i> <i>External</i>

4.11. **Adults at risk referral pathways awareness** – the SCC Safeguarding Adults at Risk policy should refer to, and include as new appendix, the SVPP “Safeguarding Adults Concerns, A Brief Guide for Referrers”

## 5. Adjacent Policy and Procedure Actions

- 5.1. To amend the language in our Recruiting Policy for Salisbury City Council to refer to safer recruiting practices.
- 5.2. To revise the SCC lone working policy to refer to the changes to safeguarding policies outlined above
- 5.3. To revise the SCC DBS policy in line with our Safe Recruiting Policy and changes to the safeguarding policies outlined above.
- 5.4. To create a Safeguarding: Multi-agency information sharing procedure. See Background Paper 9.3 – SCC Safeguarding – Multi-agency information share procedure)
- 5.5. To create an SCC Safeguarding Working in Partnership Agreement

## 6. Next Steps in Pursuit of Best Practice

- 6.1.1. By the point of the next safeguarding review in April 2025 the Head of Community Services and the Communities Team will have established a children, young people, parents and carers focus group or feedback process. This will look specifically at safety, bullying and communication and the overall improvement of our services for children and young people.
- 6.2. Code of conduct – once the revisions outlined above are completed Senior Management should review the SCC code of conduct to ensure it reflects Safeguarding best practice.

6.3. In the next 12 month a process for reporting bullying and harassment for volunteers, service users and participants should be created.

## 7. Recommendation:

It is recommended that the Committee

- 7.1. Vote to support the recommend areas of change 4.1 – 4.11
- 7.2. To approve the publication of background papers 9.6 and 9.  
SCC Safeguarding Children Policy – (Revised May 2024 – DRAFT)  
SCC Adults at Risk Safeguarding Policy – (Revised May 2024 – DRAFT)
- 7.3. To approve the Adjacent Policy and Procedure Actions 5.1 – 5.4
- 7.4. To approve the Next Steps in Pursuit of Best Practice action 6.1 to 6.3

## 8. Wards Affected: All

## 9. Background papers:

- 9.1. SCC Safeguarding Children Policy (Current)
- 9.2. Adults at Risk Policy (Current)
- 9.3. SCC Safeguarding & Multi-agency information sharing procedure DRAFT
- 9.4. [Working Together to Safeguard Children – DFE Guidance](#)
- 9.5. SVPP - Safeguarding Adults Concerns, A Brief Guide for Referrers
- 9.6. SCC Safeguarding Children Policy – (Revised May 2024 – DRAFT)
- 9.7. SCC Adults at Risk Safeguarding Policy – (Revised May 2024 – DRAFT)

## 10. Implications:

- 10.1. **Financial:** Nil in relation to this report
- 10.2. **Legal:** This review has considered legislation and statutory guidance related to the safeguarding of adults at risk and children and made recommendations in line with both
- 10.3. **Personnel:** Significant ongoing time resource from the Head of Community Services and DSL
- 10.4. **Environmental Impact:** Nil in relation to this report
- 10.5. **Equalities Impact Statement:** Revisions outlined in this report include those that give voice to marginalised groups and children, improving our provision of a fair, equitable and safe service to the community.