



Safeguarding Policy and Procedures Guide

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All Services

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INTRODUCTION

1.1 Purpose and scope

This Safeguarding Policy and Procedures Guide is intended to ensure that Stroud District Council (SDC), are aware of their legal obligations in meeting its responsibilities to safeguarding children, young people, and adults with a consistent approach across the organisation.

This policy and procedures guide applies to SDC staff, elected members, volunteers, contractors and partners delivering services on the Council's behalf.

1.2 Terms and definitions

In this Safeguarding Policy and Procedures Guide:

Stroud District Council (SDC): References to SDC include staff, elected members, volunteers and contractors delivering services on the Council's behalf.

Safeguarding means: Protecting peoples' physical health, mental wellbeing, and human rights.

Procedures means: Our methods, processes, and practices in relation to our safeguarding responsibilities as previously defined above.

Child, Young Person, or Young People means: "Anyone who has not yet reached their 18th birthday. The fact that they have reached 16 years of age; are living independently or in further education; are a member of the armed forces; in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under the Acts and this policy" (Working Together to Safeguard Children, 2018 statutory guidance, and based on the Children Act, 2004).

Adult means: Anyone aged 18 or over.

Vulnerable Adult: An adult is deemed as vulnerable if they:

- Have needs for care and support (whether or not the local authority is meeting any of those needs).
- Is experiencing or at risk of abuse or neglect.
- As a result of those care and support needs, is unable to protect themselves from the risk of, or the experience of abuse or neglect.
- Lacks capacity in order to promote their rights as laid down in the Mental Health Capacity Act (2005) and Deprivation of Liberty Standards (2007).

Domestic Abuse: All types of domestic abuse are safeguarding matters and therefore are integral in the application of this policy. Identifying and responding properly to domestic abuse issues is therefore supported by SDC related training (Section 5.6) and policies (Section 12.0). Definitions can be found in these documents.

2.0 LEGAL DUTIES AND SAFEGUARDING ARRANGEMENTS IN GLOUCESTERSHIRE

2.1 Primary Legal Duties:

SDC has a legal duty of care to protect all children, young people and adults, who come into contact with our services. Subsequently, we need to ensure that people are supported to gain good access to support services, remain well and thrive.

This duty is in-line with the Childrens Act (2004), Working Together to Safeguard Children Statutory Guidance (2018), the Care Act (2014) and the Care and Support Statutory Guidance (2014), Mental Health Capacity Act (2005), and Deprivation of Liberty Standards (2007).

We do not have legal duties with specific regards to asylum seekers.

2.2 Safeguarding Arrangements in Gloucestershire:

SDC are partners of the Gloucestershire Safeguarding Childrens Partnership (GSCP) and are subsequently required to undertake responsibilities in accordance with their role in this Partnership. <https://www.gloucestershire.gov.uk/gscp/>

SDC are partners of the Gloucestershire Safeguarding Adult Board (GSAB) and are subsequently required to undertake responsibilities in accordance with this Board. <https://www.gloucestershire.gov.uk/gsab/>

Our internal procedures should complement that of the GSCP and the GSAB in which to meet our responsibilities.

2.3 Additional Legislation and Safeguarding Directives:

For additional legislation and safeguarding directives, please see section 13.1 Appendix A*

3.0 ROLES AND RESPONSIBILITIES

3.1 Introduction

3.1.1 SDC (its staff and elected members) has a statutory responsibility and duty of care to cooperate, communicate and report issues relating to safeguarding to the appropriate internal person(s), other authorities and partner agencies.

3.1.2 The cooperation, communication and reporting are to be consistent and timely across all service areas. Safeguarding is not a practice or service that operates in isolation and is to be embedded within the whole organisation culture through these functions.

3.2 Safeguarding Children and Young People

3.2.1 SDC have a duty under the Children Act (2004), Working Together to Safeguard Children Statutory Guidance (2018*) and as a partner of the Gloucestershire Safeguarding Children Partnership (GSCP), to ensure the following:

- a) They safeguard, protect and / or empower children and young people when carrying out their functions.
- b) Identify children and young people who may be at risk and subsequently alert the appropriate services.
- c) Comply with the requirements laid out in Section 11 (Childrens Act 2004) in meeting the Reportable Standards defined by the GSCP Audit Framework – see section 13.2 Appendix B

*The Statutory Guidance was revised by UK Government in December 2023 and is subject to assessment by the GSCP, with full implementation of new arrangements across the partnership due within 12 months.

3.3 Safeguarding Adults

3.3.1 SDC have a duty under the Care Act (2014) and Care and Support Statutory Guidance (2014) and Gloucestershire Safeguarding Adults Board (GSAB) to ensure the following:

- a) We identify and subsequently alert the appropriate services, adults who:
 - May have care and support needs.
 - Are experiencing or are at risk of abuse and / or neglect.
 - Are unable to protect themselves from either the risk of, or the experience of abuse or neglect.
 - Lack capacity in order to promote their rights as laid down in the Mental Health Capacity Act (2005) and Deprivation of Liberty Standards (2007).
- b) We comply with the requirements laid out by the GSAB with regards to their Reportable Standards.

3.4 SDC Designated Safeguarding Lead Officers

3.4.1 SDC has designated safeguarding lead officers, who are responsible for championing the importance of safeguarding and promoting the welfare of children, young people and adults in need of care and support. They are:

Strategic Safeguarding Lead: *Strategic Director of Communities*

Operational Safeguarding Lead: *Youth Strategy and Safeguarding Manager*

Operational Safeguarding Support: *Senior Community Services Officer*

Their role is also to support staff and provide information, advice, and guidance to aid implementation of the SDC Policy and Procedures.

3.4.2 In the event of allegation concerns arising in relation to a member of SDC staff, or a volunteer, the Head of Human Resources will also be notified / involved.

3.5 Representing SDC on GSCP and GSAB

SDC is represented on the Gloucestershire Safeguarding Adult Board (GSAB) and the Gloucestershire Safeguarding Partnership (GSCP) by the following officers in accordance with their respective lead roles:

GSAB: *Strategic Director of Communities (Youth Strategy and Safeguarding Manager to deputise if necessary)*

GSCP: *Youth Strategy and Safeguarding Manager and Senior Community Services Officer*

3.6 SDC Service Safeguarding Report Lead Officers

3.6.1 Each service area has nominated service reporting lead officers, who are responsible for supporting staff with safeguarding concerns and / or incidents that occur.

3.6.2 Service Safeguarding Report Lead Officers are also responsible for reporting concerns and / or incidents through the relevant internal processes and referrals through the external processes. The following services have respective officers to carry out this role:

Service Area
Community Services
Customer Contact Centre
Environmental Health Service
Housing / Tenant Services
Housing Strategy & Housing Advice Services
Human Resources
Museum in the Park
Leisure Facilities (Pulse & Stratford Park Leisure Centre)
Revenue and Benefits Service

3.6.3 Staff or volunteers in services not listed above, should speak to their line manager in the first instance. Elected Members should speak to a Service Safeguarding Report Lead Officer in the first instance.

3.6.4 A list of Service Safeguarding Report Lead Officers feature on the Hub and Members Hub.

3.7 Whole Organisation Responsibilities

3.7.1 SDC Strategic Leadership Team will ensure that:

- a) The Council meets its legal obligations.
- b) Where applicable, the safeguarding of children, young people and adults in need of care and support is considered in strategies, and service plans.
- c) The best safeguarding practices are embedded and maintained across all services to ensure continuous improvement and compliance with national and local policies.
- d) All safeguarding matters are expedited in a timely manner and treated seriously.
- e) Staff and elected members are supported on all aspects of safeguarding and ensure that procedures are adhered to.

- f) Ensure that safeguarding training at Level 1 and 2 is mandatory across the authority and that Level 3 training is undertaken by those staff who are part of the Strategic Leadership Team, Leadership Management Team, are Designated Safeguarding Leads (Strategic and Operational), Service Safeguarding Reporting Leads and other staff with defined roles according to their job descriptions – a defined list is held by SDC Human Resources.

3.7.2 SDC Service Managers will ensure that:

- a) The safeguarding policy and procedures are adhered to across the organisation.
- b) Staff complete and implement the appropriate safeguarding training.
- c) Staff handling safeguarding issues are fully supported and follow the procedures.
- d) They take responsibility for the quality of safeguarding children, young people and adults in need of care and support in their service area.
- e) All staff and volunteers working with children, young people and adults in need of care and support, are subject to the Disclosure and Barring Service checks appropriate to their role and legislative requirements - a defined list is held by SDC Human Resources.

3.7.3 SDC Human Resource Service will ensure that:

- a) The relevant policies and procedures are in place for Safer Recruitment, Disclosure and Barring Service checks and Disciplinary Procedures.
- b) Managers and elected members are supported in the use of these policies and procedures directly and indirectly associated with safeguarding.
- c) Provide support with the pre-employment checks (including through the Disclosure and Barring Service).
- d) Work with SDC Corporate Safeguarding Group to ensure the following:
 - All staff complete safeguarding training at Level 1 and Level 2 via the SDC eLearning portal as part of their induction and on a 2-year cyclical basis. Bespoke training to these levels will be delivered to casual staff and those undertaking work experience placements.
 - All staff who are part of the Strategic Leadership Team, Leadership Management Team, Designated Safeguarding Leads (Strategic and Operational), Service Safeguarding Reporting Lead Officers, and other staff with defined roles according to their job descriptions should complete Level 3 training. All staff subsequently complete the relevant courses on a 2-year cyclical basis.

- A training programme for all staff, elected members and volunteers evolves with the requirements of safeguarding policy, guidance and practice.

3.7.4 SDC Staff will:

- Treat all safeguarding matters seriously and be aware of all relevant policies.
- Report concerns and / or incidents as per the reporting procedure. This includes completing the report form available on the SDC HUB and submitting it to the Operational Safeguarding Lead and Operational Safeguarding Support Officers via email: safeguarding@stroud.gov.uk
- Complete safeguarding level 1 and level 2 training on induction and subsequently, refresher training at both levels on a 2-year cyclical basis.
- Staff who are part of the Strategic Leadership Team, Leadership Management Team, Designated Safeguarding Leads (Strategic and Operational) Service Safeguarding Reporting Lead Officers, and other staff with defined roles according to their job descriptions should complete Level 3 training. All staff subsequently complete the relevant courses on a 2-year cyclical basis.

3.7.5 Elected Members should always:

- Report their concerns about a child or adult's welfare or someone else's behaviour with regards to a child or adult, by following the procedures and completing a report forms available on the SDC HUB.
- Adopt good practice in terms of safeguarding at all times when carrying out their council duties.
- Seek support or raise concerns with the SDC Designated Safeguarding Leads when necessary.
- Complete safeguarding level 1 and level 2 training on induction at the beginning of each four-year elected term or following a By-election, with 6 months of the respective election.

Elected members are uniquely placed to support the safeguarding of children, young people, and adults in need of care and support within their community. They can also provide input to ensure that the council is fulfilling its corporate responsibility.

3.8 Others affected by this Safeguarding Policy and Procedures Guide (including Contract Procurement and Commissioning):

In addition to employees and elected members of SDC, this guide applies to the procurement of services, properties and the following people, agencies, or organisations:

3.8.1 Procurement of Services and Grant Giving

All contracts and grants awarded with external agencies for the provision of goods and services must make specific reference to safeguarding and the duties imposed on staff, elected members and volunteers. Steps must be taken to ensure the safeguarding of children, young people and adults is commensurate with the type of service being provided on behalf of, or in partnership with the Council. These steps should be carried out at the commissioning and contract initiation stage for each contract and the beginning of all volunteering placements.

3.8.2 Contractors

SDC will ensure that:

- a) All contractors providing services directly related to children, young people and adults have safeguarding policy and practices which are in line with and complement to the council's requirements related to safeguarding.
- b) 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. Council staff will ensure that relevant safeguarding practices are adopted by the contractor. This assurance should be carried out at the commissioning and contract initiation stage.

3.8.3 Partners

All partners working with SDC must demonstrate regard to safeguarding.

For joint projects, partner agencies will be required to pass a copy of their safeguarding policy to SDC to ensure that it aligns with the SDC's safeguarding requirements - or alternatively, where no such policy exists, the partner will be required to adopt this policy for the duration of the project.

Taxi drivers licensed by SDC must attend specific safeguarding training in accordance with that stated in section 5.4 of this document.

3.8.4 Volunteers

Any volunteers operating either as individuals, or as part of a larger organisation on behalf of SDC working with children, young people and / or adults (including those delivering regular recorded sessions) will be required to undertake a Disclosure and Barring Service check. They will be made aware of the SDC Safeguarding Policy and Procedures as part of their overall induction.

3.8.5 Modern Apprentices, Work Experience and Workers under the age of 18

- a) Staff will need to be aware that the above duty will apply to their interaction with work experience and modern apprentice workers (under the age of 18). Such workers are still deemed as children under this policy and the law, whilst also themselves being responsible under the duty imposed by Section 11 of the Children Act (2004).
- b) It will be necessary to consider the impact of this in all risk assessments carried out in relation to such members of staff, in line with the SDC Risk Management Policy and Strategy.

- c) If a work experience placement involves working with a member of staff off site or working with a member of staff on their own for longer than half a day, the students' parents or guardians should be informed prior to the work experience placement. In addition, when the student goes off-site the employee must advise a Senior Officer where they are going, the reason for the visit and how long the visit will take.

4.0 CORPORATE SAFEGUARDING GROUP

SDC have a dedicated Corporate Safeguarding Group. The purpose and function of the group is outlined in its Terms of Reference, and includes:

- a) Having operational oversight of the SDC safeguarding policy and procedures guide and other matters regarding safeguarding.
- b) Being chaired by the Strategic Safeguarding Lead and co-facilitated by the Operational Safeguarding Lead.
- c) Reporting to the SDC Strategic Leadership Team.
- d) Meeting at least 4 times a year on a quarterly basis.
- e) A group membership involving the Designated Safeguarding Lead Officers and the Service Safeguarding Reporting Lead Officers, plus other officers representing various services.

5.0 SAFEGUARDING TRAINING

5.1 Staff Mandatory Training

5.1.1 Induction Training

All staff must complete safeguarding training at Level 1 and Level 2 via the SDC eLearning portal as part of their induction. Managers are responsible for assuring all staff complete safeguarding training as part of their induction. Bespoke training to these levels, will be provided for casual staff and those undertaking work experience placements not having access to the SDC eLearning portal.

5.1.2 Additional Higher-Level Training

All staff who are part of the Strategic Leadership Team, Leadership Management Team, Designated Safeguarding Leads (Strategic and Operational) Service Safeguarding Reporting Leads and other staff with defined roles according to their job descriptions, should complete additional higher-level training at Level 3 – this is available on the SDC eLearning portal.

5.1.3 Refresher Training

All staff are required to subsequently complete the relevant safeguarding training courses at Levels 1, 2 and 3 respectively according to their role, on a 2-year cyclical basis. An automated reminder will be generated by the SDC eLearning portal for all staff with regards to refresher training at Levels 1 and 2. A bespoke reminder will be provided by the SDC HR Service regarding Level 3.

5.2 Elected Member Mandatory Training

Elected members must complete safeguarding training at level 1 and level 2 via the SDC eLearning portal as part of their induction. This should be done at the beginning of each four-year elected term or following a By-election, within 6 months of the respective election.

5.3 Voluntary and Community Sector Partner Training

Voluntary and community sector partners will be offered safeguarding training at Level 1 and Level 2 via the SDC eLearning portal. This will be facilitated on an ad-hoc basis.

5.4 Taxi and Private Hire Driver Training

Safeguarding training for taxi and private hire drivers will be facilitated through Cheltenham Borough Council. All new drivers should take this training prior to being issued a licence.

In accordance with the SDC Taxi and Private Hire Policy all taxi and private hire drivers must complete the respective safeguarding training course every 3 years.

5.5 Prevent Training

Due to the relationship between safeguarding legislation and practices, and that of Prevent (the UK Government led counter terrorism strategy and programme), training on Prevent will be accessible via a link to the respective UK Government Home Office training course. The link will be situated at the end of the safeguarding training courses on the SDC eLearning portal.

5.6 Domestic Abuse Training

Due to the relationship between safeguarding legislation and practices, and that of domestic abuse, the relevant Gloucestershire Domestic Abuse Support Service training is accessible via a specific link to their programme. The link will be situated at the end of adult safeguarding training courses on the SDC eLearning portal.

5.7 Monitoring of Staff and Elected Member Training

The participation in safeguarding training by staff and elected members will be monitored via data collected from the SDC eLearning portal by the Human Resource Service.

The data will be presented to the Corporate Safeguarding Group by the Human Resource Service for scrutiny and safeguarding management purposes on a 6 monthly basis.

Managers are responsible for assuring all staff complete safeguarding training as part of their induction.

5.8 Types of Harm or Abuse

A list of various types of harm or abuse to support training received, can be found in section 13.3 Appendix C

6.0 SAFEGUARDING PRACTICES

6.1 Safer Recruitment:

SDC operates safer recruitment principles that are followed for all staff appointments.

Polices are in place for Safer Recruitment and Section 2.7.2 of the Employee Handbook covers the Disciplinary Policy and Procedure, which all staff must adhere to.

6.1.1 Recruitment Process and Disclosure Barring Service checks

SDC Human Resources (HR) Service is responsible for managing the staff recruitment process - this includes carrying out pre-employment checks through the Disclosure and Barring Service (DBS) for roles where it is deemed necessary.

Staff DBS checks are recorded on our new HR management system, which features a reminder function automatically activated at 3-year intervals regarding each member of staff.

Reference to SDC's commitment to Safer Recruitment features in the promotion of all vacancies – the statement is:

'Our organisation is committed to safeguarding the welfare of vulnerable adults, young people, and children. Safe recruitment practices are applied to all job vacancies.'

6.1.2 Job Descriptions

All Job Descriptions feature a statement with regards to safeguarding responsibilities – the statement is:

'To undertake all appropriate duties required to meet the Council's safeguarding obligations according to the Care Act 2014, the Children's Act 2004 and Working Together to Safeguard Children 2018 statutory guidance.'

6.2 Supervision and Support for Staff

Safeguarding should be a standard topic on agendas, as part of staff supervision meetings and service team meetings. Sufficient time should be made available to discuss general safeguarding concerns and enable staff to discuss policy, training, and practice matters.

Staff should feel able to raise concerns and feel supported in their role. This includes having access to members of the Corporate Safeguarding Group for information, advice or guidance.

6.3 Access to Safeguarding Information, Advice, and Guidance

Staff and elected members should have access to safeguarding information, advice, and guidance, including documents relating to SDC's Safeguarding Policy and Procedures Guide. This information will be accessed via the SDC HUB.

The continued professional development of staff and elected members should ensure that they have knowledge, skills and expertise to carry out their duties according to SDC's Safeguarding Policy and Procedures Guide.**6.4 Safeguarding Allegations against a Member of Staff or Volunteer:**

SDC takes any allegations or complaints about the conduct of staff and volunteers very seriously in respect of their contact with children, young people and adults in need of care and support.

All allegations or complaints received by SDC will be investigated fully, and where applicable, action may be taken internally against the member of staff or volunteer, via the SDC disciplinary procedure. If deemed necessary, the member of staff or volunteer may be suspended whilst the investigation takes place. The decision to suspend lies ultimately with Strategic Leadership Team and Human Resources Service.

SDC will involve and take advice from the Local Authority Designated Officers (LADO) team employed by Gloucestershire County Council.

Information on allegation management and the LADO team can be found via: <https://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/lado-allegations/>

6.5 Support for Staff and Volunteers during Allegation Process:

Support will be provided for any member of staff or volunteer who may be subject to an allegation as indicated in the SDC Employee Handbook section 2.7.2 Disciplinary Policy and Procedure.

SDC assures all staff and volunteers that it will fully support and protect anyone who in good faith (without malicious intent) reports his or her concerns about a colleague's practice, or the possibility that a child, young person or adult may be being abused or bullied.

The person who receives information concerning a suspected case of abuse by another member of staff or volunteer should make a full record of what has been said, as soon as possible and pass the information on to their Line Manager or Head of Service.

6.6 Management of Safeguarding Concerns and Incidents Data

All data obtained (from SDC staff, volunteers and elected members) through reporting procedures with regards to safeguarding concerns and incidents, are to be held on one secure internal database. The database will comply with General Data Protection Regulation (GDPR).

The data held, regarding the safeguarding of children, young people and adults, will be used and concur with, that passed on to the Gloucestershire Childrens Help Desk and Referral Portal and the Gloucestershire Adult Helpdesk and Referral Portal, through their respective referral procedures.

The responsibility of managing the database for all safeguarding concerns and incidents is held by the Designated Safeguarding Officers.

6.7 Internal Safeguarding Report Forms

To enable staff, volunteers, and elected members to follow correct procedures in the reporting of safeguarding concerns and incidents, a set of official internal reporting forms are available as templates, via the SDC HUB.

The report form templates are formatted to obtain information that is important to the effective management of data, regarding safeguarding concerns and incidents, regardless of whether the concern or incident is referred through the respective referral procedures for children, young people and adults.

The format of each form typically includes the following:

- Identifying whether it's a concern or incident.
- Details of the Person Filling in the form.
- Details of the adult or child being reported.
- Details of the concern or incident.
- A case log.
- Additional Information.

Completed report forms are held as confidential documents electronically and password protected, alongside the internal database on a corresponding file.

6.8 Access to Safeguarding documents

All SDC safeguarding documents relating to policy, procedures, report templates and information, advice and guidance, will be accessible via the Safeguarding page situated on the SDC HUB. The link is: <https://hub.stroud.gov.uk/resources/safeguarding>

7.0 SAFEGUARDING PROCEDURES

7.1 Introduction to Procedures

7.1.1 All SDC staff and elected members have a responsibility to safeguard children, young people and adults in need of care and support and to follow the safeguarding procedures in a timely manner.

7.1.2 It is not the responsibility of SDC staff and elected members to investigate whether abuse is taking or has taken place. This is the duty of the Gloucestershire Childrens Help Desk (Multi-Agency Safeguarding Hub) and Gloucestershire Adult Helpdesk including Community Social Work Team, respectively.

7.1.3 All staff and elected members are required to work with the SDC Designated Safeguarding Officers or Service Safeguarding Reporting Leads, to determine whether the reported concern or incident meets the criteria for referral to the appropriate agencies.

7.1.4 The threshold for referral to the appropriate agencies, should be determined on a 'case by case' basis and reflective of knowledge and experience, through training and practice and with the support of SDC Designated Safeguarding Officers or Service Safeguarding Reporting Leads.

7.1.5 It is vital that any decision not to refer a concern or incident to the appropriate agencies, is taken with great consideration. Any level of doubt about doing so, should result in contacting the Gloucestershire Safeguarding Childrens Helpdesk (the Multi Agency Safeguarding Hub), or the Gloucestershire Safeguarding Adult Helpdesk to obtain advice and assistance.

7.2 Statutory Procedures

Through the statutory arrangements for safeguarding children, young people, and adults in Gloucestershire, as described in sections 2 and 3, there are a series of statutory procedures

that SDC should follow. These include internal reporting and making external referrals – specific reference to this can be found in section 7.2.4.

7.2.1 Emergency Procedure

As referenced in section 7.1, all staff or elected members have safeguarding responsibilities. This includes, in an emergency whereby a child, young person or adult is of immediate risk of harm, the Police should be contacted via the 999-emergency number.

Subsequently, depending on the context of the case the Internal and / External Procedures (7.2.2 and 7.2.3) should be followed (all staff and elected members should be appropriately trained to make this judgement – see section 5.1 and 5.2).

7.2.2 Internal Procedures

- a) Internal procedures include the reporting of all safeguarding concerns and incidents, to SDC Service Safeguarding Reporting Leads or in their absence, the SDC Designated Safeguarding Officers, using the Internal Safeguarding Report Forms, as stated in section 6.6.
- b) The SDC Service Safeguarding Reporting Leads and the SDC Designated Safeguarding Officers are required to follow the internal reporting procedure – this includes determining if the reported concern or incident should be referred to the appropriate external agencies (see section 7.1).

7.2.3 External Procedures

- a) All staff and elected members have the responsibility to comply with external procedures for safeguarding. These procedures are based upon the responsibility of SDC and its staff and elected members, as outlined in section 3.
- b) External procedures predominantly involve the referral process for safeguarding concerns and incidents. The referral processes are designed by the Gloucestershire Safeguarding Childrens Partnership and the Gloucestershire Safeguarding Adults Board, respectively.
- c) Any referral will be determined by the Gloucestershire Safeguarding Childrens Helpdesk (the Multi Agency Safeguarding Hub), or the Gloucestershire Safeguarding Adult Helpdesk, respectively.
- d) All referral enquires should be made by the SDC Service Safeguarding Reporting Leads or in their absence, the SDC Designated Safeguarding Officers, using the Internal Safeguarding Report Forms, as stated in section 8.6, as the reference point for the enquiry.

It is the responsibility of the Gloucestershire Safeguarding Childrens Helpdesk (the Multi Agency Safeguarding Hub), or the Gloucestershire Safeguarding Adult Helpdesk to make further enquiries, decisions and take any necessary action on all matters regarding safeguarding concerns or incidents.

However, any concern or incident may require SDC to help obtain further information about the respective concern or incident, as part of our statutory responsibilities to working with the

Gloucestershire Safeguarding Childrens Partnership and Gloucestershire Safeguarding Adult Board.

7.2.4 Reporting Process

Reference to our emergency, internal and external procedures are outlined in Section 7.2.1, 7.2.2 and 7.2.3 above. More details on the respective reporting processes are as follows:

- a) If you have a concern about the welfare or actions of a child, young person or adult, you are required to:
 - Ensure that you maintain confidentiality.
 - Gain permission from the child, young person or adult where possible, to share your concern with a professional.
 - Inform your Line Manager and / or your Service Safeguarding Reporting Lead immediately.
 - Submitting the report form within 5 days, to the Operational Safeguarding Lead and Operational Safeguarding Support via email: safeguarding@stroud.gov.uk

- b) If an incident of abuse had occurred that affects the immediate safety of a child, young person or adult, you are required to:
 - Ensure that you maintain confidentiality.
 - Gain permission from the child, young person or adult where possible, to share your concern with a professional.
 - Follow the Emergency Procedure detailed in 7.1.1
 - Inform your Line Manager and / or your Service Safeguarding Reporting Lead immediately
 - Submitting the report form within 5 days, to the Operational Safeguarding Lead and Operational Safeguarding Support via email: safeguarding@stroud.gov.uk

7.2.5 Referral Processes

Reference to our emergency, internal and external procedures are outlined in Section 7.2.1, 7.2.2 and 7.2.3 above. More details on the respective referral processes are as follows:

- a) Referrals to Gloucestershire Childrens Help Desk (Multi-Agency Safeguarding Hub) and Referral Portal.

Gloucestershire Childrens Help Desk (Multi-Agency Safeguarding Hub) includes a Community Social Work Team member who is available to discuss matters of concern relating to children and families prior to making a referral and to give advice on 01452 426565 or email a summary to: childrenshelpdesk@gloucestershire.gov.uk

The helpdesk can offer support to reflect on your concerns, explore what needs to happen next, and complete a follow-up conversation with you at a later time and date to ensure that you feel confident in completing the agreed actions, as well as any support you may require around this.

All referrals need to be made via a Multi-Agency Referral Form (MARF) via a portal: <https://children.gloucestershire.gov.uk/web/portal/pages/home>

For safeguarding concerns or incidents relating to child criminal exploitation or child sexual exploitation, a screening tool should be used and submitted, alongside that of a MARF. This

screening tool is available via: <https://www.gloucestershire.gov.uk/gscp/professional-resources/child-criminal-sexual-exploitation/>

Some referrals may also need to include the submission of a Police Intelligence Form. This is available via: <https://www.gloucestershire.gov.uk/gscp/traded-services-for-educational-settings/safeguarding-in-education/police-information/>

b) Referrals to Gloucestershire Adult Helpdesk and Referral Portal.

Gloucestershire Adult Helpdesk includes a Community Social Work Team member who is available to discuss matters of concern relating to adults and families prior to making a referral and to give advice on 01452 426868 or email them a summary socialcare.eng@gloucestershire.gov.uk

All referrals need to be made via the Gloucestershire County Council Adult Social Care Portal: <https://adultsocialcareportal.gloucestershire.gov.uk/web/portal/pages/home>

Registration in advance, is required to be made in which to access and use the portal.

A response to the referral is given by the portal to the person making the referral – this response will outline the details of the referral, which must subsequently be forwarded to the SDC Operational Safeguarding Lead and Operational Safeguarding Support via email: safeguarding@stroud.gov.uk

8.0 PRE AND POST REFERRAL MULTI-AGENCY INVOLVEMENT

Through our statutory responsibilities, SDC Services are required to be involved in pre and post referral multi-agency work on safeguarding matters.

Pre-referral work may include the following:

- Community Response Network Meetings – facilitated by GCC Early Help Team
- Missing and Child Exploitation Locality Group Meetings – facilitated by the Missing and Child Exploitation Team (Public Protection Bureau)

Post-referral work will be determined by the Gloucestershire Safeguarding Childrens Helpdesk (the Multi Agency Safeguarding Hub), or the Gloucestershire Safeguarding Adult Helpdesk.

This may include the following:

- Multi-Agency Risk Assessment Conferences (MARACs)
- Case Conferences involving Housing and Tenancy matters.

Records of this work, including data relating to safeguarding concerns and incidents, should be held on secure and confidential files alongside previously record information about cases. This information should be passed to the SDC Designated Safeguarding Officers.

9.0 ESCALATION POLICY / HEALTHY CHALLENGE

If you as an SDC employee, disagree with any safeguarding decisions made / taken by related organisations, you can challenge and seek resolution.

Please discuss the matter with your line manager, the SDC Strategic Safeguarding Lead and the SDC Operational Safeguarding Lead. Then follow the respective escalation policies for

the Gloucestershire Safeguarding Childrens Partnership (GSCP) and Gloucestershire Safeguarding Adults Board (GSAB), which can be found on their websites.

GSCP Escalation Policy:

<https://www.gloucestershire.gov.uk/media/2124436/escalation-policy-july-2021-v13-approved.pdf>

GSAB Escalation Policy:

<https://www.gloucestershire.gov.uk/media/2112431/gsab-escalation-protocol-jan-2022.pdf>

10.0 GENERAL INFORMATION, ADVICE AND GUIDANCE ON SAFEGUARDING

As general guidance on safeguarding matters, the following information and advice should be taken into consideration during your practice.

10.1 Listening and Responding to Children and Adults in need of Care and Support

As adults with trust and influence, SDC employees and Elected Members are in a powerful position to recognise and receive information/disclosure about abuse or need for care and support. However, it is not their responsibility to decide if a child, young person or adult in need of care and support is being abused.

All SDC employees have a role to act on their concerns in-line with the SDC safeguarding policy, guide, flow charts and forms situated on the SDC Hub.

If a child/young person or adult in need of care and support tells a member of staff about potential or alleged abuse, all employees are to please ensure that they say and /or do the following:

- Remain calm.
- Listen carefully to what the child/young person or adult has to say (without making any judgement).
- Try not to ask interrogative questions, but if you have to, make sure they are open-ended to clarify understanding and not to probe or investigate.
- Do encourage the child/young person or adult to talk.
- Do not give an opinion or offer advice.
- Be honest with them about what you can and cannot do.
- Tell them that you are not able to keep what they have told you secret.
- For children/young people tell them that you will try to find them the help they need.
- For adults in need of care and support, ensure that you ask if they would like you to seek help and subsequently gain their permission (in line with Making Safeguarding Personal, The Care Act, MCA and DoLs principles), please visit <https://www.local.gov.uk/msp-toolkit>
- When the child/young person or adult has finished talking, make a detailed note of what they have said, using only their words. Then follow the relevant checklist and forms completion, as detailed on the SDC Hub.

- **Do not** contact or confront the individual who is alleged to be responsible.
- Re-assure the child / young person / adult in need of care and support that they have done the right thing.
- Maintain confidentiality and ensure that you inform only your Line Manager at this stage.

10.2 Maintain Confidentiality

It is extremely important that any allegations are not discussed (unless absolutely necessary) as any breaches could be damaging to the child or adult with care and support needs and to any investigation which may follow. Any information given is also subject to the Data Protection Act 2018 and GDPR and confidentiality and security of information must be maintained at all times. SDC's policy can be accessed via this link:

<https://www.stroud.gov.uk/council-and-democracy/about-the-council/access-to-information/privacy-notice-and-cookie-policy/safeguarding>

Any requests for information from members of the public (including parents, guardians or carers) or the media should be directed to the SDC Strategic Safeguarding Lead and Data Protection Officer.

10.3 Allegations of previous abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children). Where such an allegation is made, the employee should follow the same safeguarding procedure as detailed in the SDC Safeguarding page on the SDC Hub.

11.0 REVIEW OF SAFEGAURDING POLICY AND PROCEDURES

The effectiveness and content of this policy will be reviewed by the SDC Corporate Safeguarding Group on an annual basis.

The next review is scheduled for: March 2025

12.0 RELATED POLICIES AND DOCUMENTS

12.1 The Domestic Abuse Act 2021 places a statutory duty on first tier councils (county and unitary councils) to prepare a domestic abuse strategy. Gloucestershire County Council has prepared a Domestic Abuse Strategy 2021-24:

<https://www.gloucestershire.gov.uk/media/2110605/gcc-domestic-abuse-strategy.pdf>

SDC plays an important role in the delivery of the countywide Domestic Abuse Strategy, working in a multi-agency partnership with the Gloucestershire County Council and others including the Police, the Gloucestershire Domestic Abuse Support Service (GDASS) and Stroud Beresford Women's Refuge. SDC has the following Domestic Abuse policies:

SDC Domestic Abuse Policy for Employees:

<https://hub.stroud.gov.uk/media/471262/256-domestic-abuse-policy-2024.docx>

SDC Domestic Abuse Policy for SDC Housing Services (Tenants and Leaseholders)

<https://www.stroud.gov.uk/media/2345192/domestic-abuse-policy.pdf>

12.2 Working Together to Safeguard Children is the UK Government statutory guidance on multi-agency working to help protect and promote the welfare of children. Access to the latest version can be found via this link:

<https://www.workingtogetheronline.co.uk/>

13.0 APPENDICES

13.1 Appendix A - Additional Legislation and Safeguarding Directives:

There are several specific legislative acts and / or government directives that constitute abuse which could affect both children, young people and adults, as follows:

13.1.1 Child Sexual Exploitation (CSE)

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person will have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common. Additionally, involvement in exploitative relationships are being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

More information and guidance can be found via:

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

13.1.2 Modern Slavery

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. It involves people being forced to work through mental or physical threat, owned or controlled by an 'employer' usually through mental or physical abuse or the threat of abuse, dehumanised and being treated as a commodity or bought and sold as 'property'.

More information and guidance on the **Modern Slavery Act 2015** can be found via:

<https://www.gov.uk/government/collections/modern-slavery-bill>

13.1.3 Forced Marriage

In a forced marriage you are coerced into marrying someone against your will. You may be physically threatened or emotionally blackmailed to do so. It is an abuse of human rights and cannot be justified on any religious or cultural basis. It is not the same as an arranged marriage where you have a choice as to whether to accept the arrangement or not. The tradition of arranged marriages has operated successfully within many communities and countries for a very long time.

More information and guidance on **Forced Marriage** and the **Anti-social Behaviour, Crime and Policing Act 2014**, as amended by the Marriage and Civil Partnership (Minimum Age) Act 2022, can be found via:

<https://www.gov.uk/guidance/forced-marriage>

13.1.4 Female Genital Mutilation (FGM)

FGM is a collective term used for illegal procedures, such as female circumcision, which include the partial or total removal of the external female genital organs, or injury to the female genital organs for a cultural or non-therapeutic reason.

More information and guidance on the **Female Genital Mutilation Act 2003** can be found via:

<https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack>

13.1.5 Honour Based Violence (HBV)

HBV is 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.

It is a form of domestic abuse which relates to a victim who does not abide by the 'rules' of an honour code. This will have been set at the discretion of relatives or community; the victims are punished for bringing shame on the family or community.

13.1.6 Cyber Crime

Cybercrime is defined as criminal activity carried out by means of computers or the internet. Criminals are increasingly exploiting the speed, convenience and anonymity of the internet to commit a diverse range of criminal activities without physical or virtual borders. These crimes can cause serious harm and pose significant threats to victims worldwide.

More information and guidance on the **Cyber Crime** and the **Data Protection Act 2018** can be found via:

<https://www.gov.uk/government/news/cyber-laws-updated-to-boost-uks-resilience-against-online-attacks>

13.1.7 Stalking

The Protection of Freedoms Act (2012) defines “stalking” as an offence. However, there is no legal definition, but examples include: following or spying on a person or forcing contact with the victim through any means including social media. Any of these examples carried out repeatedly or persistently can cause significant alarm or distress.

More information and guidance on the **Stalking** and the **Stalking Protection Act 2019** can be found via:

<https://www.gov.uk/government/publications/management-information-stalking-protection-orders/review-of-stalking-protection-orders-accessible-version>

13.1.8 Prevent

Prevent is a government strategy which aims to raise awareness and resilience to radicalisation. It recognises that children and vulnerable adults can be susceptible to extremist views and coerced into criminal behaviour.

More information and guidance on **Prevent** and the **Counter Terrorism and Security Act 2015** can be found via:

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

13.1.9 Human Trafficking

Takes place when a victim is moved from one place to another for the purpose of exploitation, this could be through sexual exploitation, domestic servitude, forced labour, forced criminality or organ harvesting. The trafficker is able to control and exploit through violence, coercion or deception.

More information and guidance on Human Trafficking and the **Modern Slavery Act 2015** can be found via:

<https://www.gov.uk/guidance/human-trafficking-migrant-health-guide>

13.2 Appendix B – GSCP Section 11 Audit Framework Reportable Standards

Indicators exist under the following standard titles:

- Standard 1 – Leadership and Accountability
- Standard 2 - Staff Safe Recruitment, Induction, Training and Development.
- Standard 3 - Safeguarding Policies and Procedures.
- Standard 4 - Understanding and communicating with and for Children and Young People.

13.3 Appendix C - Types of Harm and / or Abuse

The safeguarding of children, young people and adults, who may be in need of care and support encompasses the following types of harm and/or abuse:

13.3.1 Children & Young People

A child and/or young person may be at risk of abuse in many ways, as detailed by the following:

TYPE	DEFINITION	SIGNS
Emotional	The persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional Development. Can also include cyber bullying	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 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 basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development	Inadequate food, clothing or shelter. Inadequate access to appropriate medical care or treatment, isolation, truanting, lateness
Physical	May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Also includes bullying and cyber bullying	Unexplained bruising, burns, fractures, weight gain or loss, repeat illness.
Domestic Violence	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, cowering or flinching, bruising consistent with being hit, detachment.

<p>Child Criminal Exploitation</p>	<p>Child criminal exploitation (CCE) takes a variety of forms but ultimately it is the grooming and exploitation of children into criminal activity. Across each form that CCE takes, the current reality is that children who are coerced into criminal activity are often treated as perpetrators by statutory agencies rather than as victims of exploitation. This is in part because safeguarding partners are working to different understandings of what constitutes criminal exploitation. Recently, CCE has become strongly associated with one specific model known as 'county lines', but it can also include children being forced to work in cannabis factories, being coerced into moving drugs (often forced to insert drugs in their vagina or anus in a practice known as 'plugging') or money across the country, forced to commit financial fraud, forced to shoplift or pickpocket www.childrenssociety.org.uk</p>	<p>The signs for child criminal exploitation and child sexual exploitation, can be similar to those regarding emotional, physical and sexual abuse.</p> <p>Additional signs may include: self-harm, someone having a much older boyfriend or girlfriend, association with a known criminal gang, substance misuse, social isolation, disengagement from education, repeated sexual transmitted infections, being estranged from their family, sense of urgency to respond to a caller on a mobile device, having more than one mobile device, missing from home or care placement</p>
<p>Child Sexual Exploitation</p>	<p>An individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person (under 18 or under 24 for those with special educational needs), into sexual activity in exchange for something the victim needs or wants, and / or for the financial advantage or increased status of the perpetrator or facilitator. <i>(Independence Enquiry Child Sexual Abuse)</i></p>	<p>These are just some examples and reference to training programme information, advice and guidance should also be taken.</p> <p>Other information can be accessed via the CCE / CSE GSCP link in section 7.2.5 a)</p>
<p>Modern Slavery</p>	<p>The trafficking of people, forced labour, servitude, and slavery.</p> <p>Children (under 18) are considered victims of trafficking, whether or not they have been coerced, deceived or paid to secure their compliance. They need only to have been recruited, transported, received or harboured for the purpose of exploitation.</p>	<p>There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. It involves people being forced to work through mental or physical threat, owned or controlled by an 'employer' usually through mental or physical abuse or the threat of abuse, dehumanised and being treated as a commodity</p>

		or bought and sold as 'property'.
Forced Marriage	In a forced marriage you are coerced into marrying someone against your will.	You may be physically threatened or emotionally blackmailed to do so. It is an abuse of human rights and cannot be justified on any religious or cultural basis. It is not the same as an arranged marriage where you have a choice as to whether to accept the arrangement or not. The tradition of arranged marriages has operated successfully within many communities and countries for a very long time.
Female Genital Mutilation (FGM)	FGM is a collective term used for illegal procedures, such as female circumcision, which include the partial or total removal of the external female genital organs, or injury to the female genital organs for a cultural or non-therapeutic reason.	<p>Before its happened:</p> <p>Someone known as a 'cutter' visiting from abroad, a special occasion or ceremony taking place for a girl, when she becomes a woman, a family arranges a long holiday overseas, a girl has a long absence from school, girl goes missing or plans to run away.</p> <p>Might have taken place:</p> <p>Difficulty walking, spending longer in a bathroom, appearing quiet, anxious or depressed, acting differently after an absence from school or college, reluctance to go to a GP Surgery or have routine medical examinations.</p> <p>www.nspcc.org.uk</p>

13.2.2 Adults, including those who may be in need of Care and Support (Vulnerable Adults)

A vulnerable adult may be at risk of abuse in many ways, as detailed in the following:

TYPE	DEFINITION	INDICATORS
Physical	Physical The 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.	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.
Sexual	Direct or indirect involvement in sexual activity without consent.	Incontinence, difficulty/discomfort in walking, excessive washing, sexually transmitted diseases, bruising/bleeding in genital areas, bruising, urinary infections.
Emotional / 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, emotional or physical care needs (incl. dressing), failure to provide access to appropriate health care, withholding medication, adequate nutrition and heating
Financial and Material Abuse (including scams)	Unauthorised, fraudulent obtaining and improper use of funds, property or any resources of an adult at risk. Scamming and coercion in	Unexplained or sudden inability to pay bills, unexplained withdrawals of money from accounts, personal possessions going missing, unusual

	relation to an adult's financial affairs	interest by a friend/relative/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. This includes discrimination on the grounds of race, faith or 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.	Inciting others to commit abusive acts, lack of effective communication, bullying.
Modern Slavery / Human Trafficking / Illegal Working	Encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude	Poverty, isolation, drug and alcohol misuse
Institutional/ Organisational	Where the culture of the organisations places the emphasis on the running of the establishment above the needs and care of the person	Lack of care plans, contact with the outside world not encouraged, no flexibility or lack of choice
Self-neglect	Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding	A deterioration in physical appearance, lack of grooming, rapid weight gain/loss
Honour Based Violence	HBV is 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.
Forced Marriage	A forced marriage is where one or both people do not or cannot consent to the marriage and pressure or	In a forced marriage you are coerced into marrying someone against your will. You may be physically threatened or emotionally blackmailed to do so. It

	<p>abuse is used to force them into the marriage.</p> <p>www.gov.uk</p>	<p>is an abuse of human rights and cannot be justified on any religious or cultural basis. It is not the same as an arranged marriage where you have a choice as to whether to accept the arrangement or not. The tradition of arranged marriages has operated successfully within many communities and countries for a very long time.</p>
Female Genital Mutilation (FGM)	<p>FGM is a collective term used for illegal procedures, such as female circumcision, which include the partial or total removal of the external female genital organs, or injury to the female genital organs for a cultural or non-therapeutic reason.</p>	<p>Before its happened:</p> <p>Someone known as a ‘cutter’ visiting from abroad, a special occasion or ceremony taking place for a girl, when she becomes a woman, a family arranges a long holiday overseas, a girl has a long absence from school, girl goes missing or plans to run away.</p> <p>Might have taken place:</p> <p>Difficulty walking, spending longer in a bathroom, appearing quiet, anxious or depressed, acting differently after an absence from school or college, reluctance to go to a GP Surgery or have routine medical examinations.</p> <p>www.nspcc.org.uk</p>
Cyber Crime	<p>Cybercrime is defined as criminal activity carried out by means of computers or the internet.</p>	<p>Criminals are increasingly exploiting the speed, convenience and anonymity of the internet to commit a diverse range of criminal activities without physical or virtual borders. These crimes can cause serious harm and pose significant threats to victims worldwide.</p>
Stalking	<p>The Protection of Freedoms Act (2012) defines “stalking” as an offence.</p>	<p>However, there is no legal definition, but examples include: following or spying on a person or forcing contact with the victim through any means including social media. Any of these examples carried out repeatedly or persistently can cause significant alarm or distress.</p>

