

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	Safeguarding Policy
<b>Date of assessment</b>	January 2020
<b>Directorate and Service</b>	Internal – Policy & Corporate Support
<b>Manager</b>	Policy & Corporate Support Manager
<b>Officer conducting assessment</b>	Policy & Projects Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<p>The Safeguarding Policy aims to safeguard and promote the welfare of children and adults at risk, who access Dartford Borough Council services by ensuring that all staff, Members, volunteers and contractors are aware of their responsibilities should a disclosure, allegation or concern of abuse or neglect arise. Responsibilities include making a safeguarding referral to Kent County Council Children’s Social Work Services/Adult Social Services; and ensuring that such referrals are actively considered. It is not, however, the Council’s responsibility to determine whether abuse or neglect is or has taken place or to carry out investigations – only to inform.</p> <p>The Safeguarding Policy is overseen by the corporate Safeguarding Steering Group, which includes representatives from each Council directorate and representatives from Children’s Social Work Services and Adult Social Services local teams. An internal Safeguarding Guidance document also assists staff in implementing the Safeguarding Policy.</p>
<b>2. Who will be affected by the activity or proposal?</b>	<p>The Safeguarding Policy is a corporate policy document and makes clear that safeguarding is everyone’s responsibility regardless of service type and function. Therefore, all staff, Members, volunteers and contractors will be affected by the Safeguarding Policy.</p> <p>All children and adults at risk who come into contact with Dartford Borough Council services and activities will be affected by the Safeguarding Policy should they be identified as requiring safeguarding from harm.</p>

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	<p>A child is anyone under the age of 18. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection. Safeguarding duties apply to children if they:</p> <ul style="list-style-type: none"> <li>• have or are likely to suffer significant harm, through neglect, physical, emotional or sexual abuse (Child Protection – Section 47 of the 1989 Children Act); or,</li> <li>• are unlikely to achieve or maintain a reasonable standard of health or development or development is likely to be significantly impaired (Child in Need – Section 17 of the 1989 Children Act).</li> </ul> <p>An adult is anyone over the age of 18. Safeguarding duties apply to adults who:</p> <ul style="list-style-type: none"> <li>• have needs for care and support (whether or not they are receiving any services); and</li> <li>• are experiencing, or at risk of, abuse or neglect; and</li> <li>• as a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse or neglect (Section 42 of the Care Act 2014).</li> </ul>
<p><b>3. How does the activity or proposal contribute to:</b>  <b>a) any key performance indicators?</b>  <b>b) policies, values or objectives of Dartford Borough Council?</b></p>	<p>a) There are no key performance indicators relating to the Safeguarding Policy. However, the Council’s Safeguarding Steering Group monitors the number of child and adult safeguarding referrals made and their outcomes.</p> <p>b) The Safeguarding Policy relates to the Corporate Plan strategic aim of ‘creating a safer borough in which to live, work and socialise’. It supports the strategic objective to ‘use the Council’s statutory functions to ‘increase public safety in the borough’.</p>
<p><b>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</b></p>	<p>The Council’s duties towards safeguarding children and adults at risk is outlined in the following legislation:</p>

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<b>Step 1: Scoping the assessment</b>	<ul style="list-style-type: none"> <li>• Children Act 2004: Section 10 sets out a duty to cooperate to improve children’s wellbeing and Section 11 sets out a duty to safeguard and promote the welfare of children.</li> <li>• Care Act 2014: Part 1 sets out a duty to co-operate in order to protect adults from abuse or neglect.</li> </ul> <p>The Council’s procedures for safeguarding take account of national statutory guidance (i.e. ‘Working Together to Safeguard Children’, ‘What to do if you’re worried a child is being abused’, ‘Care and Support Statutory Guidance’), and Kent-wide policies, protocols and procedures.</p> <p>Referral procedures are contained within the Council’s Safeguarding Policy, and these follow Kent County Council’s procedures. In terms of discretion, safeguarding is a subjective and sensitive matter, especially in terms of interpreting and deciding to act on concerns or disclosures. Consequently, staff do have to exercise a degree of discretion and professional judgement when considering and risk assessing the welfare of children and adults at risk. The Safeguarding Policy advises that staff should consult the Kent Support Levels Guidance (for children) and the Kent and Medway Multi-Agency Safeguarding Policy, Protocols and Guidance (for adults); and discuss the matter with their Line Manager or Safeguarding Steering Group Representative, or call Kent County Council’s Central Duty Team for further guidance if needed when making a safeguarding referral. A training programme also provides guidance to staff on making appropriate referrals. The Safeguarding Steering Group also monitors referrals to provide assurance that referrals are made appropriately.</p>
<b>Step 2: Information collection</b>	
<b>5. What do you know about the groups of people who will be affected?</b> (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity,	<p>The referral forms for safeguarding children and adults at risk are owned by Kent County Council and they collect information in relation to the protected characteristic groups of age, sex and ethnicity. The adult safeguarding referral form also collects information on religion.</p>

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Step 2: Information collection																																										
religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)	<p>County-wide information regarding individuals, who are subject to safeguarding adult enquiries, is publically available through the Kent &amp; Medway Safeguarding Adults Board Annual Report. However, no equivalent information with regards to child safeguarding referrals has been sourced at the time of this review. The latest available data regarding adults subject to safeguarding enquiries in Kent and Medway for 2018/19 is presented as follows:</p> <p><b>Age</b></p> <table border="1" data-bbox="1108 539 2094 906"> <thead> <tr> <th>Age group</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>18-24</td> <td>5%</td> </tr> <tr> <td>25-34</td> <td>8%</td> </tr> <tr> <td>35-44</td> <td>6%</td> </tr> <tr> <td>45-64</td> <td>9%</td> </tr> <tr> <td>55-64</td> <td>11%</td> </tr> <tr> <td>65-74</td> <td>14%</td> </tr> <tr> <td>75-84</td> <td>22%</td> </tr> <tr> <td>85+</td> <td>25%</td> </tr> <tr> <td>Total</td> <td>100%</td> </tr> </tbody> </table> <p><b>Gender</b></p> <table border="1" data-bbox="1108 978 2094 1090"> <thead> <tr> <th>Gender</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>39.1%</td> </tr> <tr> <td>Female</td> <td>60.6%</td> </tr> </tbody> </table> <p><b>Ethnicity</b></p> <table border="1" data-bbox="1108 1161 2094 1345"> <thead> <tr> <th>Ethnic group</th> <th>Number</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>5,264</td> <td>80.7%</td> </tr> <tr> <td>BME</td> <td>279</td> <td>4.3%</td> </tr> <tr> <td>Not obtained/stated</td> <td>981</td> <td>15.0%</td> </tr> <tr> <td>Total</td> <td>6,524</td> <td>100.0%</td> </tr> </tbody> </table>	Age group	Percentage	18-24	5%	25-34	8%	35-44	6%	45-64	9%	55-64	11%	65-74	14%	75-84	22%	85+	25%	Total	100%	Gender	Percentage	Male	39.1%	Female	60.6%	Ethnic group	Number	Percentage	White	5,264	80.7%	BME	279	4.3%	Not obtained/stated	981	15.0%	Total	6,524	100.0%
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	In respect of safeguarding referrals sent by the Council – in 2018/19, 67% of referrals were for children and 33% of referrals were for adults. The largest proportion of safeguarding referrals are made by the Housing Service. Information by protected characteristic group is not routinely collated and analysed by the Council, only the number and the outcome of referrals are monitored.
<b>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b>	Consultation specific to the Safeguarding Policy has not been undertaken with service users as it was not considered to be required since the Safeguarding Policy is written in line with established legislation, national guidance and Kent-wide procedures. The Council’s Safeguarding Steering Group is always consulted on the revisions to the Safeguarding Policy. There have been no issues raised in the consultation with the Group around equality issues.
<b>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</b>	No

Step 3: Assessing the equality impact	
<p><b>8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:</b></p> <p><b>a) tackling unlawful discrimination</b>  <b>b) promoting equality of opportunity</b>  <b>c) promoting good relations</b></p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> <li>• The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration</li> <li>• For existing activities, consider how they are working in practice for each relevant protected group</li> <li>• For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group</li> <li>• If there is no identified equality impact, please tick the ‘No Impact’ box and explain why in question 9</li> <li>• If the equality impact is unclear, please tick the ‘Unknown’ box and explain why in question 9</li> </ul>	

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	The Safeguarding Policy is specifically targeted at ensuring the safety of children and adults at risk of all ages and accordingly has a positive impact.		<input type="checkbox"/>	<input type="checkbox"/>
Disability	All groups of people have the right to access and understand the Council's approach to safeguarding, including the systems that are in place to disclose abuse and to make a complaint if there is ever a concern regarding the organisations safeguarding actions. For sight and hearing impaired people, there is a Translation and Alternative Format strapline in the Safeguarding Policy. Braille, Audio tape and large print versions of this document are available upon request. Calls can be taken by NGT Relay.		<input type="checkbox"/>	<input type="checkbox"/>
Sex			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	All groups of people have the right to access and understand the Council's approach to safeguarding, including the systems that are in place to disclose abuse and to make a complaint if there is ever a concern regarding the organisations safeguarding actions. For people whose first language is not English, there is a Translation and Alternative		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	Format strapline in the Safeguarding Policy. Translated versions of this document and use of a language interpreting service are available upon request.			
<b>Religion/Belief</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sexual Orientation</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy/Maternity</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership*</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>

\* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

Step 3: Assessing the equality impact	
<b>9. If 'no impact' or 'unknown' was selected, please explain</b>	The Safeguarding Policy applies to all protected characteristic groups equally because it recognises that abuse and neglect can happen to anyone regardless of their protected characteristics.
<b>10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups</b>	<p><b>Kent County Council</b></p> <p>The Council makes safeguarding referrals to Kent County Council (Children's Social Work Services and Adult Social Services) and the onus is on the referring officer to ensure that the Council fulfils its statutory obligation to receive confirmation from Kent County Council that they have actively considered the referral. The Safeguarding Policy states that the referring officer must follow-up the referral if they have not heard from Kent County Council within 72 hours. Referral outcomes are monitored through the Safeguarding Steering Group as a standing agenda item. Any occasions where there have been issues with referrals are discussed and addressed through the Group, which includes representation from Specialist Children's Services and Adult Social Services. There have been no circumstances identified that have given rise to any negative equality</p>

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	<p>impacts between different groups due to this partnership working arrangement.</p> <p><b>Kent Safeguarding Boards</b>            The Kent Safeguarding Children Multi-agency Partnership Board and Kent &amp; Medway Safeguarding Adults Board provide the strategic lead for safeguarding in the county. The Council is externally audited by the Kent Safeguarding Children Board under Section 11 of the Children Act 2004. This audit assesses the effectiveness of the arrangements for safeguarding and promoting the welfare of children. Where the Council identifies any areas where standards are not being met, actions are put into place to meet the standards. The Council is also asked by the Kent &amp; Medway Safeguarding Adults Board to complete an Annual Agency Report to provide assurance of its safeguarding arrangements.</p> <p><b>Contractors</b>            The duty to promote the welfare of children and adults at risk extends to parties that provide services on the Council's behalf. The Council's Services and Professional Consultancy Services contracts have an optional safeguarding clause that require contractors engaged in a 'regulated activity' and/or whose positions are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended) to carry out DBS checks and to notify of any issues regarding breaches by their staff. Contractual requirements also stipulate the service provider's obligations around safeguarding e.g. to have their own safeguarding policy in place.</p>
11. Any other comments	<p>Although the Safeguarding Policy applies to all protected characteristic groups equally, the Council does recognise that certain groups of people may be disproportionately affected if they are at risk to discrimination or if they are less able to protect themselves. The Safeguarding Guidance document reminds staff to be alert to recognising that different groups of people may experience different risk factors in relation to abuse and neglect. For example:</p>

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Step 3: Assessing the equality impact	
	<ul style="list-style-type: none"> <li>• A person’s dependency on others and susceptibility to harm or abuse may be increased due to age related frailty and health conditions that disproportionately affect older people, such as dementia</li> <li>• Disabled children and adults may be in vulnerable situations that increases their dependency on others and makes them less able to protect themselves from harm or abuse. Their needs may relate to physical disability; learning disability; disability arising from illness; mental health needs; and impaired mental capacity</li> <li>• People from minority ethnic, cultural and faith backgrounds may be at an increased risk of abuse or harm if their family life supports the practice of certain forms of abuse; such as witchcraft, spirit possession, female genital mutilation, forced marriage and honour based violence</li> <li>• People may be at risk of hate crime motivated by a hatred or prejudice against someone’s ethnicity, religion, sexual orientation, gender identity or disability</li> </ul> <p>The Safeguarding Guidance document also explains that certain groups, communities and individuals may find it difficult to communicate to someone that they are suffering abuse. They may also lack confidence, or be frightened of reprisals, or fear losing control. For example:</p> <ul style="list-style-type: none"> <li>• Children may be less able than adults to access relevant information, and take the right steps, to report and stop abuse towards themselves</li> <li>• Children, young people and adults at risk may feel they cannot communicate their concerns because they are being coerced by the abuser, or are subject to undue influence or duress, or are dependent on the abuser for care and support</li> <li>• People who do not have English as their first language may find it difficult to communicate what is happening to them</li> <li>• Disabled children, young people and adults may have speech, language and communication needs which may make it difficult to tell others what is happening to them</li> </ul>

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Step 3: Assessing the equality impact	
	<ul style="list-style-type: none"> <li>• Adults who lack mental capacity may find it difficult to tell others what is happening to them</li> <li>• There may be stigma or ‘dishonour’ attached to someone who discloses abuse if they come from certain cultural backgrounds.</li> </ul> <p>Furthermore, to help reduce the barriers and improve the experience of disclosure, the Safeguarding Policy includes good practice guidance on talking to children and vulnerable adults about their concerns. Disclosure can also occur when a member of staff notices the signs and impact of abuse and asks about it. The Safeguarding Guidance document gives information on how to recognise the signs and indicators of various types of abuse.</p>

Step 4: Action plan
<p><b>12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:</b></p> <p>a) any gaps in information and consultation  b) how any negative impacts on equality will be mitigated or eradicated</p>

**a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?**

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None					

**b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?**

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None					

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Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer

Step 5: Decision making and future monitoring	
13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	Strategic Director (External Services) – Safeguarding Champion
14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
15. How will you continue to monitor the activity or proposal on protected characteristic groups?	Through the Safeguarding Steering Group
16. When will you review this Customer Access Review?	Annually

Step 6: Final steps	
17. Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer	
18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded	