

Broxbourne Council
Child Protection Policy
March 2026

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1.0 Introduction

Section 11 of The Children Act (2004) places a duty on all statutory agencies working with children and young people to safeguard and promote their welfare. This duty means that the Council must make arrangements to ensure its functions are discharged with full regard to the need to safeguard and promote the welfare of children and young people. It also needs to ensure any services that are contracted out to other organisations also have regard to that need.

This policy and accompanying procedures outline how the Council will meet its legal responsibilities and provides assurance to the public, service users, elected members (councillors), employees, and those working on behalf of the Council that:

- They can expect the Council to take appropriate steps to protect and safeguard children and young people
- There is a clear and accessible procedure for raising concerns
- All reports of abuse or suspected abuse are taken seriously and responded to effectively
- Robust systems are in place for recording, monitoring, and reviewing safeguarding concerns

This policy replaces the Council's previous Child Protection Policy that was adopted in August 2022. It reflects changes in legislation and practice, and includes good practice provided by the National Society for the Prevention of Cruelty to Children (NSPCC), the Hertfordshire Safeguarding Children Partnership (HSCP), the Local Government Association (LGA), and others.

The policy applies to all staff, volunteer workers, councillors and organisations providing services under contract with the Council.

1.1 Policy Statement

The Council has a duty of care as far as is reasonably practical to safeguard all children and young people and protect them from harm and abuse when they are engaged in activities, events or services provided or organised by, or on behalf of, the Council.

The Council will respond promptly and appropriately to any reports of suspected abuse or neglect. It will always act in the best interests of the child or young person.

The Council will proactively seek to promote the welfare and protection of all children and young people always living in the Borough.

2.0 Scope of the Policy

This policy applies to all services and situations within the Council's operation which could possibly involve children and young people or impact upon their wellbeing. This includes, but is not limited to, leisure provision, investigations into youth anti-social behaviour, home visits where children and young people are present, grant funding of external organisations and the provision of support and advice around housing issues and homelessness.

3.0 Legislative background to the Policy

The following legislation relates to this policy:

- The Children Act (1989)
- The Children Act (2004)
- Working Together to Safeguard Children (2018)
- Working Together to Safeguard Children (2023)
- The Domestic Abuse Act (2021)
- The Counter Terrorism and Security Act 2015
- The Modern Slavery Act (2015)

4.0 Hertfordshire Safeguarding Children's Partnership.

The Hertfordshire Safeguarding Children Partnership (HSCP) ensures that all agencies and organisations who work with children and young people work together to keep them safe in accordance with Section 13 of The Children Act 2004. The joint leaders of HSCP are Hertfordshire County Council, Hertfordshire Constabulary and the Hertfordshire and West Essex Integrated Care Board.

The Council is committed to maintaining an effective working relationship with the HSCP to help achieve its mutual aims in respect of child safeguarding. The Council shares the HSCP's vision that multi-agency arrangements to safeguard children in Hertfordshire must be:

- Of the highest quality
- Keep the child at their heart
- Continuously improve
- Evolve to reflect changing needs and circumstances

5.0 Definitions

The phrase 'children or young person' is used to refer to anyone under the age of 18 years, including unborn children. 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 for children and young people, does not change their status or entitlement to services or protection under The Children Act (1989).

All children and young people irrespective of their age, class, religion, culture, disability, gender, ethnicity or sexual preference have the right to protection.

The term parent/carer is used as a generic term to represent anyone with legal parental responsibility.

5.1 Types of Abuse

Working Together to Safeguard Children (2023) defines four main forms of child abuse.

Physical abuse

Deliberate physical harm to a child, such as hitting, shaking, burning, poisoning, or suffocating. It also includes causing illness or faking symptoms.

Emotional abuse

Persistent behaviour that harms a child's emotional development. This can include making a child feel worthless, placing inappropriate expectations on them, restricting their freedom, exposing them to the ill-treatment of others, or serious bullying (including online).

Sexual abuse

Forcing or encouraging a child to take part in sexual activities. This can involve physical contact or non-contact acts such as showing sexual materials, encouraging sexualised behaviour, or grooming.

Neglect

Ongoing failure to meet a child's basic physical or emotional needs. This can include lack of food, clothing, shelter, supervision, medical care, or education. Neglect may also begin during pregnancy due to substance misuse.

6.0 Aim of the Policy

The aim of this policy seeks to ensure that the Council adheres to the requirements of the above pieces of legislation. The Council will achieve this by:

- Having clear policies and procedures in place to enable staff to identify possible safeguarding concerns to the Designated Officer with responsibility to report these concerns as they deem necessary
- Raising awareness throughout the Council of the statutory "duty of care" relating to children and young people. This will include mandatory "introduction to safeguarding" training for all staff, presentations to councillors and the publication of relevant child safeguarding updates on the Council's intranet and in Staff News.
- Creating a safe and healthy environment within all its services, limiting situations where abuse or allegations of abuse may occur
- Recruiting, training, supervising and supporting staff, councillors and volunteers who work with children and young people to adopt best practice to safeguard and protect children and young people from abuse, and themselves against false allegations
- All staff and volunteers who work with children and young people will be subject to an Enhanced Disclosure and Barring Service (DBS) check
- Responding to any allegations appropriately and implementing the appropriate disciplinary and appeals procedures
- Requiring staff, councillors and volunteers to adopt and abide by the Council's Child Protection Policy and Procedures, together with any procedures and good practice guidelines that may be published from time to time, through the inclusion of a clause within every job description

- Respecting and promoting the rights, wishes and feelings of children and young people Listening to children and young people, minimising dangers and working closely with other agencies
- Making sure organisations that are awarded grant funding or that do business with the Council have a child protection policy whenever there is the likelihood of contact with children and young people

7.0 Governance

- To ensure oversight of child safeguarding, there are twice-yearly reports to the Council's Corporate Management Team.
- The Council's internal safeguarding officers' group, comprising of the safeguarding leads, deputies and representatives from customer-facing teams, will meet quarterly so that safeguarding is embedded within these teams and that there are opportunities to discuss safeguarding concerns and situations.
- The Council's safeguarding leads will actively participate in the District Safeguarding Leads meetings organised by the Hertfordshire Safeguarding Children Partnership and the Hertfordshire Safeguarding Adults Board.

The Council is committed to learning from Child Death Reviews, Child Safeguarding Practice Reviews and Domestic Homicide Reviews in which it has participated, or which have taken place in Hertfordshire or are of national significance. The outcomes of these reviews will be shared with the internal safeguarding officers working group to identify if any of the Council's policies and practices need to be amended in response to the reviews finding and recommendations.

8.0 Training

It is important that staff can recognise the signs and symptoms of abuse and know the correct procedures to report such observations or disclosures. All staff must be trained appropriately according to their level of contact with children to recognise signs of abuse and neglect, as well as how to raise concerns using the internal reporting procedures. The appropriate level of training has been identified for every post.

The three levels of training are:

- Level 0 - all staff receive this training which includes how to identify and report safeguarding concerns to the Safeguarding Officers. This is provided via the Council's online training portal and is part of the induction process for all new staff
- Level 1- for staff who have limited contact with children
- Level 2- for those staff who have regular or extensive contact with children

Additional training is provided by both Hertfordshire County Council and external courses for the Safeguarding Officer.

Staff and councillors are required to refresh safeguarding training every three years.

9.0 Designated Officer for Vulnerable Child Protection Officer

Pursuant to this policy the Council will appoint a Designated Child Protection Officer (DCPO) and a Deputy. Details of the named officer can be found at appendix 1.

The role of the Designated Officer is to ensure the aims of the policy are implemented and their effectiveness monitored and reviewed. Key elements are:

- Refer concerns about individuals to Hertfordshire County Council (HCC) in a timely way.
- Coordinate and receive such reports from individual members of staff, elected members, and residents.
- Act as local champion for the issue and keep abreast of the issues including the Hertfordshire agenda as well as national policy initiatives.
- Develop and implement a training programme for staff working in conjunction with the Designated Officer for Vulnerable Adults, Community Safety Manager and Human Resources to ensure this is effectively rolled out and monitored.
- Advise and support individual staff as and when required.
- Monitor and review this policy as and when required recommending changes where appropriate.

10.0 Record Keeping

It is essential that any incident raising concern is reported within 24 hours using the Council's safeguarding mailbox. Staff reporting a concern should provide a comprehensive account of the interaction between the individual and staff member, including any actions taken including offering support and guidance.

All reports must be sent to safeguarding@broxbourne.gov.uk These reports are centrally logged in a secure database, allowing for ongoing monitoring and updates as further actions are taken.

11.0 Whistleblowing

The Council's Whistleblowing policy can be used to support safeguarding when:

- A staff member has not responded appropriately to a safeguarding concern e.g. did not make a referral.
- A staff member is suspected to be the perpetrator of abuse.

12.0 Responding to Concerns

Staff must report any concerns that a child *is* or *may be* at risk of abuse to the Council's Designated Child Protection Officer (DCPO), following the process below. If a child is in immediate danger, call 999. Referrals may lead to a referral to HCC social workers or the Police.

12.1 Allegations of Abuse Against Employees, Volunteers, Councillors or a Contracted Service Provider

An allegation is any information that indicates that a councillor, employee, volunteer or contracted service provider may have:

- Behaved in a way which has, or may have harmed a child under any aspect of their life
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in a way that indicates they are unsuitable to work with children.

This applies to any child that the member of staff, volunteer or councillor has contact with in their personal, professional or community life.

If a councillor, employee, volunteer or contracted service provider receives an allegation that falls in the category above, they should:

- Take the allegation or concern seriously
- Immediately report it to the DCPO
- Record details in secure safeguarding files and spreadsheet

The DCPO will inform the Assistant Director of Resources to agree the next steps. These usually involve:

- the immediate suspension of the individual against whom the allegation has been made
- in the case of councillors, this will be referred to the Standards Committee, who may require an investigation under the Member Code of Conduct.
- informing the HCC Local Authority Designated Officer (LADO) whose role it will be to investigate the allegation. This should be made immediately and always within one working day of when an allegation is made about abuse against a child or young person as the individual may work in multiple settings for multiple employers.

Failure of the Council to act in accordance with the Safeguarding Vulnerable Groups Act 2006 in responding to allegations made against its staff, volunteers or councillors may result in the prosecution of the Council.

Nothing in the Council's processes for handling allegations against an employee or councillor replaces the need for the Council to refer cases to HCC, the Police and other agencies as appropriate in line with county-wide safeguarding policies and the requirements under the Children Act 2004.

Child Protection concerns made against a councillor, employee, volunteer or contracted service provider must link directly to the related policies, specifically the Council's Disciplinary Policy, the Whistleblowing Policy, the Complaints Procedure and the Data Protection Policy.

12.2 Responding to Allegations or Concerns About Any Other Person e.g. Parent, Carer, Other Service Users, or member of the public

If a councillor, employee, volunteer or contracted service provider is in this situation, they should:

- Take the allegation or concern seriously
- Immediately report it to the DCPO

- Record details on a Child Protection Incident Reporting Form (Appendix 7), providing as much information as possible. This may not always be possible when receiving anonymous letters of concern or calls to the Council's helpline.

The Council's DCPO will inform HCC's Children Services and the police as appropriate. This should be within 24 hours of receiving the referral if not immediately. Customer Service staff should refer callers with child protection concerns that do not relate directly to the Council's services to the HCC Children Services' call centre on 0300 123 4043. This also applies to the Council's out-of-hours service.

If members of the public make safeguarding referrals directly to the Council, either via letter, email, telephone or the website, these will be reviewed at a basic level to ensure all necessary information is provided and will then refer on to HCC Children Services to investigate under their statutory duties. No public referrals will be ignored but they should not be encouraged, rather directing them to HCC. This information is stored in the secure safeguarding files and spreadsheet.

12.3 Responding to a child or young person making an allegation of abuse or demonstrating behaviours or other symptoms that might indicate abuse or neglect.

If a councillor, employee, volunteer or contracted service provider is in this situation, they should:

- Stay calm
- Listen carefully to what is said and allow the child, young person or vulnerable adult to talk at their own pace
- Find an appropriate opportunity to explain that it is likely that the information will need to be shared with other responsible people – do not promise to keep secrets
- Only ask questions for clarification and do not ask leading questions that suggest certain answers
- Reassure the child, young person or vulnerable adult that they have done the right thing in telling you
- Do not touch them to comfort them or take them home
- Tell them what you will do next and who you will inform
- Immediately report it to the Council's Designated Child Protection Officer (DCPO) or their deputy (see section A1.4)
- If a child is in immediate risk of harm and the DCPO cannot be contacted, call the police on 999 (you should still inform the DCPO subsequently).
- Record all the details you are aware of, as soon as possible, using the child or young person's own words. If you have concerns because the child or young person is demonstrating symptoms of abuse, note what these are and when and how they were demonstrated. This is particularly vital when working with children or young people who cannot verbalise what is happening to them e.g. in a crèche.
- Include the date, time, location and the child's details as known (name, address, date of birth)
- Only record fact and/or what has been observed and what causes concern. Do not make any judgement in the report
- Sign and date the form if used.
- Send the report or the form to the DCPO via email to safeguarding@broxbourne.gov.uk marking the email "child"

The Council's DCPO will inform HCC Children Services and the police as appropriate. This should be within 24 hours of receiving the referral if not immediately. It is not the Council's role to investigate this concern, but the DCPO should receive updates from the social worker and/or police as to the progress of the investigation as it may impact on service delivery or other interactions with the young person and their family. Current legislation suggests that parents should be informed of the intended referral if it does not put the child/young person at further risk of harm. Consent is not required to breach confidentiality and make a referral where a serious crime is believed to have occurred, where vulnerable people are at risk or where the alleged perpetrator may go on to abuse others.

13.0 Low Level Concerns / Early Help

There may be circumstances in which officers may be concerned about the well-being of a child, although it is not a child protection concern. Under these circumstances, trained professionals can initiate multi-agency support through a Families First Assessment. Families First is the term used in Hertfordshire for services that work together to support families who need this extra help. These are also known as early help services.

The Council will continue to identify staff across appropriate service areas to be trained on the Families First Assessments to enable the Council to support local families when required and to make referrals to support families before they reach crisis point.

Information on Families First, and details of early help services, can be found at www.hertfordshire.gov.uk/familiesfirst

14.0 Recruitment and Staffing

In line with the Safeguarding Vulnerable Groups Act 2006 the Council's Human Resources department will take reasonable steps to ensure that staff working with children and young people are safe to do so, using the best practice found on the Hertfordshire Safeguarding Children Board's Procedures Manual.

Before recruiting staff (whether paid or unpaid), the Council will ensure that:

- Job advertisements state that the Council takes safeguarding seriously and, where appropriate, will require an enhanced Disclosure and Barring Service check to be undertaken before employment can commence – this can help deter unsuitable individuals from applying
- The Human Resources department should work with the line manager for the recruit and the DCPO to agree whether the post requires an enhanced DBS check
- Checks are made of an applicant's identity, work history and references
- All job applicants are asked to declare any criminal convictions
- All employees must provide at least two references, which must be received and accepted as satisfactory to the Council before employment commences. One referee must be the current employer, or if the applicant is not employed, the most recent employer. References must cover the last three years of employment and if in education be provided by the course tutor. Referees must be previous employers, not friends and must not be related to the applicant
- Proof of qualifications are obtained

- Evidence of the person's right to work in the UK is obtained (employees only)
- An Enhanced DBS Disclosure is carried out including checks of the Independent Safeguarding Authority's Barred Lists
- There are always two members of staff interviewing candidates for positions working with children and young people
- Confirmation of employment will be subject to the receipt of necessary DBS checks and references
- A probationary period and close supervision of the person is undertaken
- Existing employees who have changed jobs and in the opinion of the line manager or Human Resources, new duties bring them into contact with children, young people and vulnerable adults must complete DBS checks
- DBS disclosures must be renewed every three years
- It will be made clear to applicants that have a substantial contact children and young people that the position is exempt from the provisions of the Rehabilitation of Offenders Act 1974, that is, certain convictions will never become 'spent'

A person who is barred from working with children will be breaking the law if they work or volunteer or try to work or volunteer with children. The Council is required to refer to the police any individuals seeking employment who are barred.

15.0 Contracted Service Partners

Section 11 of the Children Act (2004) places a responsibility on the Council to ensure that its contracted service partners, regardless of the value of the contract, have in place sufficient arrangements to meet the criteria within Section 11 guidance to ensure that their arrangements meet the requirement to safeguard and promote the welfare of children.

The provisions within Section 11 of the Children Act (2004) apply to all contracted service partners and agencies commissioned to carry out functions on behalf of the Council. The determination of the specific terms of the application of this policy, to contractors and agencies delivering services on behalf of the Council, shall be specified where appropriate in contractual documents, including procurement standards, monitoring and quality assurance.

Where the contractor is working directly with children and young people, the contracting managers must receive, before the commencement of the contract, a copy of the contractor's child protection policy and DBS disclosures for all staff working with children and young people.

15.1 External Organisations using Council Facilities

Independent sports clubs and other organisations involved with children, and young people who regularly use leisure centres, parks, open spaces, community halls and outdoor sports facilities operated by or on behalf of the Council must have a child protection policy. Furthermore, they must ensure that their staff or volunteers who have contact with children and young people have had a satisfactory DBS check as a condition of hire.

15.2 Grant Applications

A child protection policy and satisfactory DBS checks for staff and volunteers are required from any organisations who seek grant funding from the Council for projects working with children and young people. This information will be requested at the application stage and applications will not be processed without the relevant documentation.

16.0 Official Visits

The Council also has a duty to protect children when organising visits from official visitors, VIPs and celebrities. All official visits shall be pre-arranged and always overseen by a member of staff.

17.0 Confidentiality and Information Sharing

Employees must not discuss any allegation of child abuse, with or without evidence, except with:

- the Designated Child Protection Officer (DCPO)
- the Chief Executive (or Deputy in their absence)
- the Assistant Director of Resources (if the allegation concerns a member of staff)
- external agencies only as required by the formal reporting procedures in this policy

Staff must not discuss allegations with any other party, including parents or carers, unless authorised by the person leading the investigation.

Employees may still seek advice from a solicitor, trade union representative, or other legitimate legal adviser.

Media enquiries must be directed to the investigating officer at HCC or the Chief Executive/Deputy Chief Executive. All others should respond “no comment” and refer enquiries to the appropriate officer.

Breaching confidentiality may harm the child, their family, and any subsequent child protection investigation.

17.1 Data Protection

Information sharing is essential for effective safeguarding.

- Paper records of Child Protection cases must be stored securely by the DCPO and must not be removed from Council premises.
- Child protection information must not be taken off-site in any format, including portable media.
- Electronic safeguarding records are stored in password-protected files on the Council’s secure network.
- Referrals are submitted to HCC Children’s Services through a secure, password-protected online portal.

- Staff must follow the Council's Computer Usage policies to prevent unauthorised access.

17.2 Consent

Under Working Together to Safeguard Children (2023), families have the right to:

- be told when a professional has concerns about their child
- give consent before a request for support is made on their behalf
- be at the centre of plans to keep their child safe

However, consent or prior discussion is not required if doing so would place the child at greater risk of harm. Protecting a child from abuse or neglect takes precedence over protecting the privacy of the person failing to safeguard them. Families should be informed about what information is shared when it is safe and practical to do so.

18.0 Review of Policy

This policy will be reviewed annually or sooner when there are significant changes in legislation or statutory guidance in this area.

19.0 Related Policies and Procedures

- Safeguarding Vulnerable Adults Policy
- Working for Broxbourne

APPENDIX 1

Lead Designated Child Protection Officer

Steve Whitlam, Economic and Community Development Manager

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01992 785555 ext. 5909

Deputy Designated Child Protection Officer

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