Safeguarding Policy for Children and Vulnerable Adults

Equality Impact Assessment

Screening

<table>
<thead>
<tr>
<th>1 Name of policy/ activity/ project/ practice</th>
<th>A review of an existing policy and procedures</th>
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<tr>
<td></td>
<td><strong>Safeguarding Policy for Children and Vulnerable Adults</strong></td>
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<tr>
<td></td>
<td><strong>Organisational Lead: Lesley Wearing</strong></td>
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2. Screening undertaken (please complete as appropriate)

<table>
<thead>
<tr>
<th>Head of Service</th>
<th>Dale Robertson-Head of Performance and Change</th>
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<tbody>
<tr>
<td>Lead Officer for developing the</td>
<td>Silvina Katz (Policy and Consultation Manager)</td>
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<td>policy/activity/practice</td>
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<tr>
<td></td>
<td>Hannah Lavender (Performance Officer)</td>
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<tr>
<td>Other people involved in the</td>
<td>EIA Focus Group- including</td>
</tr>
<tr>
<td>screening</td>
<td>Philip Holmes; Hannah Lavender; Gill Page; AJ</td>
</tr>
<tr>
<td>(this may be people who work for</td>
<td>Gray; Nicole MacDonald</td>
</tr>
<tr>
<td>NBC or a related service or</td>
<td>A representative from the LSCBN has been</td>
</tr>
<tr>
<td>people outside NBC)</td>
<td>included in the process</td>
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3. Brief description of policy/activity/project/practice: including its main purpose, aims, objectives and projected outcomes, and how these fit in with the wider aims of the organisation.

The main aim of this review is to make the Safeguarding Policy process more accessible and effective through improving understanding, introducing a clear line of accountability and simplification of reporting.

The policy is a key corporate document and supporting procedures are to be available to all staff. Application of the policy is to be proportionate – employees with regular contact with children or with responsibility for ensuring safe environments will take priority.

The purpose of this policy and associated procedures is to protect and promote the welfare of the children and vulnerable adults using or receiving services provided or commissioned by Northampton Borough Council and to protect the Council, its officers, elected members and volunteers. Safeguarding children and vulnerable adults is the responsibility of NBC employees.

The ultimate beneficiary from this policy will be the local community in terms of reassurance as to how the council will deal with safeguarding issues.

Northamptonshire Local Safeguarding Children Board provides the strategic lead
in relation to safeguarding children in Northamptonshire. Northampton Borough Council has a duty to co-operate with Northamptonshire County Council in discharging its duties as Children’s Services Authority and to promote the well-being of children and young people. Northamptonshire County Council is also the lead agency for the protection of vulnerable adults.

Northampton Borough Council seeks to ensure that the needs and interests of children, young people and vulnerable adults are considered by all councillors, employees, volunteers and contracted services when taking decisions in relation to service provision.

### 4 Relevance to Equality and Diversity Duties

**Promote equality of opportunity** The Council acknowledges that children, young people and vulnerable adults have the right to participate, have fun and be safe in the services provided for them and the activities they, their parents or carers, choose.

**Eliminate discrimination, harassment and victimisation?** The policy seeks to protect and promote the welfare of all children, young people and vulnerable adults who receive or access council service and address discrimination, harassment and victimisation effectively.

**Promote good community relations?** The ultimate beneficiary from this policy will be the local community in terms of reassurance as to how the council will deal with safeguarding issues.

**Promote positive attitudes towards people with protected characteristics?** This policy aims to promote positive attitudes towards the intended beneficiaries.

**Encourage participation of people with protected characteristics?** Providing access to ‘children friendly’ feedback mechanisms and involving children in designing safe environments was highlighted during initial gap analysis work.

**Does it cause harm or a benefit to any group(s) differently to others?** The policy has been designed to differentially and positively affect children (people under the age of 18) and vulnerable adults.

**Protect and promote Human Rights?** Are there any aspects, including how it is delivered, or accessed, that could contribute to inequalities? (This should relate to all areas including Human Rights.) **No**

The policy does not appear to have a differential negative impact on any group.

### 5 Evidence Base for Screening

List the evidence sources you have used to make this assessment (i.e. the known evidence)
(e.g. Index of Multiple Deprivation, workforce data, population statistics, any relevant reports, customer surveys, equality monitoring data for the service area.)

- An all service Section 11 audit was undertaken against the Local Safeguarding Children’s Board *Northamptonshire* assessment framework in December 2010.
• In addition to the audit tool a safe recruitment checklist was completed by Human Resources.

• Leisure and Sports Development Safeguarding Children’s Policy

• Current Safeguarding Children Policy (2004 version)

• LSCBN Annual Safeguarding Report 2009-2010 (containing details of Serious case reviews)

• Interviews and focus group records taken in the course of the safeguarding audit.

• Regard to the Governments EIA for changes to CRB requirements Feb 2011 http://www.homeoffice.gov.uk/publications/legislation/freedom-bill/eia-vbs-reforms?view=Binary

• Safeguarding Adults and the Role of Health Service-Analysis of Impact on Equality Published March 2011

Are there any significant gaps in the known evidence base? If so what are your recommendations for how and by when those gaps will be filled?

• Lessons learnt and findings from serious case reviews

• Frequency and type of cases referral to Northamptonshire County Council

• Frequency and type of enforcement activity undertaken with regards to safeguarding e.g. alcohol and gambling licensing, building control

• Type of information sharing between agencies NCC to NBC and vice versa

• List of job roles with specific responsibilities for safeguarding children (both NBC employees and those working on our behalf e.g. agency workers) – to allow a proportionate approach to procedure roll out and training.

• List of specific contracts / partnerships with responsibility for children and vulnerable adults

• Feedback held from children and vulnerable adults – what are the general themes, is this useful?

• Are safeguarding concerns often linked to other background factors? E.g. protected characteristics, areas of town e.g. IMD, houses of multiple occupation. This will be considered when annual report is produced

• Safeguarding details kept in relation to vulnerable adults

6 Requirements of the equality duties:

Will there be/has there been consultation with all interested parties? Yes
Please explain:

• Consultation with service area leads who were designated by Heads of
Service to complete audit tool – via spreadsheet tool and facilitated workshops December 2010
- Sign off of audit tool by Management Board January 2011
- Managers Session January 2011
- Completed audit tool with LSCB Northamptonshire for review of compliance
- Review of lessons learnt from those involved in serious case reviews e.g. Lesley Wearing
- Consultation with those using procedures
- Discussions with LSCBN March 2011
- Focus Group with key services March 2011

**Are proposed actions necessary and proportionate to the desired outcomes?**
Yes

**Please explain:** A separate action plan will be produced, incorporating actions/mitigation identified during this screening, and this will be used to enable the Council deliver this policy, identify gaps and propose what is required to achieve its aims.

**Where appropriate, will there be scope for prompt, independent reviews and appeals against decisions arising from the proposed policy/practice/activity?**
Yes

**Please explain:**

It is not NBC responsibility to,
- Determine whether abuse is or has taken place
- Investigate or judge, only to inform

**Does the proposed policy/practice/activity have the ability to be tailored to fit different individual circumstances?** Yes

**Please explain:** Scenarios will be outlined with procedures to provide examples for people.
Different routes for reporting safeguarding concerns will be available.

Where appropriate, can the policy/practice/activity exceed the minimum legal equality and human rights requirements, rather than merely complying with them **Yes**

**Please explain:** Some services have a lot of experience in this field and they will be used as exemplars. It is expected that the criteria will apply when commissioning and when using contractors.
### Key risks (the harm or 'adverse impacts') and opportunities (benefits and opportunities to promote equality) from this policy/practice/activity

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<tr>
<th>Characteristic</th>
<th>Risks (Negative)</th>
<th>Opportunities (Positive)</th>
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<tr>
<td>Race</td>
<td>None identified affected by application of this policy—although cultural and language awareness issues may need to be recognised and addressed.</td>
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<tr>
<td>Disability</td>
<td>Adult (see below)</td>
<td>Safe environments for children and vulnerable adults</td>
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<tr>
<td>Gender or Gender Identity/Gender Assignment</td>
<td>None identified affected by application of this policy</td>
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<tr>
<td>Pregnancy and Maternity (including breastfeeding)</td>
<td>None identified affected by application of this policy</td>
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<tr>
<td>Sexual Orientation</td>
<td>None identified affected by application of this policy</td>
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</table>
| Age (including children, youth, midlife and older people) | - Acknowledgement that safeguarding has particular impact for children and older adults  
- Staff become over sensitive or desensitised to safeguarding issues (where policy = compliance)  
- In general awareness has been high in relation to children and young people's issues. The needs of vulnerable adults will need to be highlighted e.g. financial abuse of the elderly  
- Physical environment needs for children and vulnerable adults to be considered more e.g. when calls received about property conditions; when designing services | - Safe environments  
- Raised awareness of staff to safeguarding issues  
- Clear procedures for reporting concerns  
- Improved information sharing between agencies  
- Greater involvement of children in decisions that affect them  
- Improved record keeping |
| Religion, Faith and Belief | None identified affected by application of this policy | |
| Human Rights   | - Too much reliance on procedures for safeguarding  
- Staff become over sensitive or desensitised to safeguarding issues (where policy = compliance) | - Access to education e.g. museum work / indirectly through having safe environments at home  
- Procedures to safeguard from degrading treatment (within limits of borough council responsibilities) |
| General        | People need to know how to identify and refer and who can help. Document to include quick reference for ease of use by all staff  
- Reporting mechanisms—clear flowcharts needed  
- Record keeping—what does NCC need from NBC  
- Identifying concern-specific scenario for relevant service areas  
- Use of social media | |
| Action (including mitigation) | The issues raised have been incorporated in the policy and/or will be addressed in the Safeguarding Policy Action Plan with specific details for delivery. Cultural awareness and Safeguarding training needed at the appropriate level. | |

7 Proportionality Opportunities will be more likely in service areas.

8 Decision

Date of Decision: March 2011

We judge that a full impact assessment is not necessary because whilst the Council acknowledges the higher representation groups of individuals with specific characteristics affected by safeguarding, the application of this policy is expected to improve outcomes for the target groups.