

# Pulborough Parish Council

## Safeguarding Policy

### Children, Young People and Adults at Risk

<b>Adopted by Full Council</b>	11 <sup>th</sup> May 2026
<b>Minute reference</b>	[insert minute reference]
<b>Review date</b>	Annually, or sooner following a safeguarding incident, change in law, or change in Council activities
<b>Policy owner</b>	Clerk/RFO
<b>Safeguarding Lead</b>	Clerk/RFO, unless Full Council appoints another officer
<b>Deputy Safeguarding Lead</b>	Deputy Clerk
<b>Version</b>	1.0

This policy is intended for adoption by Pulborough Parish Council. Contact details in Appendix 2 must be checked before adoption.

## 1. Policy Statement

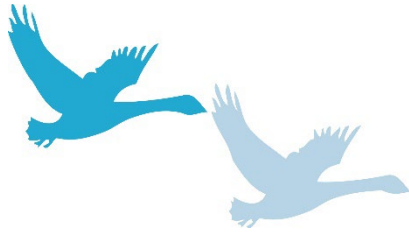
Pulborough Parish Council is committed to safeguarding and promoting the welfare of children, young people and adults at risk who use, visit, work with, volunteer for, or otherwise come into contact with the Council, its services, facilities, events, land, grants, contractors, hirers, councillors, staff, volunteers and working groups.

The Council recognises that safeguarding is everyone's responsibility. All councillors, staff, volunteers, contractors, working group members and others acting on behalf of the Council must act promptly and appropriately if they see, hear or suspect that a child, young person or adult at risk may be experiencing abuse, neglect, exploitation or harm.

The Council will not investigate safeguarding concerns itself. Its role is to recognise concerns, respond appropriately, record accurately, and refer matters to the relevant statutory safeguarding authority where required.

## 2. Scope

This policy applies to all councillors, employees, volunteers, working group members, committee and sub-committee members, contractors and suppliers, grant applicants and grant recipients where relevant, hirers, leaseholders and licence holders using Council facilities, and anyone representing or acting on behalf of Pulborough Parish Council.



Swan View, Lower Street, Pulborough, West Sussex RH20 2BF | 01798 873532 | deputy@pulboroughparishcouncil.gov.uk

This policy applies to all Council activities, including meetings, events, public engagement, recreation grounds, play areas, cricket nets, open spaces, allotments, Council facilities, grant awarding and monitoring, communications, emails, digital engagement, working groups, community projects, contracts, leases, licences and partnerships.

### 3. Definitions

Child or young person means anyone under the age of 18.

Adult at risk means an adult who has needs for care and support, is experiencing or at risk of abuse or neglect, and, because of those needs, is unable to protect themselves from that abuse, neglect or risk.

Safeguarding concern means any worry, disclosure, allegation, observation or information suggesting that a child, young person or adult at risk may be experiencing, or may be at risk of, abuse, neglect, exploitation or harm.

Abuse or neglect may include physical abuse, sexual abuse, emotional or psychological abuse, neglect, domestic abuse, financial or material abuse, discriminatory abuse, organisational abuse, self-neglect, modern slavery, online abuse or exploitation, harassment, bullying or intimidation.

### 4. Legal and Policy Framework

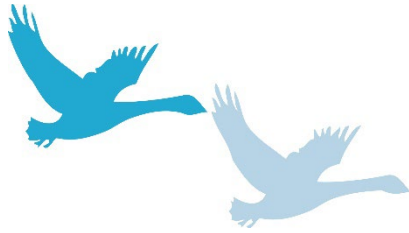
This policy should be read alongside:

- Children Act 1989 and Children Act 2004;
- Care Act 2014;
- Safeguarding Vulnerable Groups Act 2006;
- Data Protection Act 2018 and UK GDPR;
- Equality Act 2010;
- Pulborough Parish Council Data Protection Policy;
- Pulborough Parish Council Information Security Incident Policy;
- Pulborough Parish Council Equality and Diversity Policy;
- Pulborough Parish Council Grant Awarding Policy;
- Council Standing Orders, Financial Regulations, Code of Conduct, Terms of Reference and relevant risk assessments.

### 5. Safeguarding Principles

Pulborough Parish Council will:

1. Put the welfare of children, young people and adults at risk first.
2. Treat all people with dignity, respect and fairness.
3. Take all safeguarding concerns seriously.
4. Act promptly where there is a risk of harm.
5. Share information only where lawful, necessary and proportionate.



Swan View, Lower Street, Pulborough, West Sussex RH20 2BF | 01798 873532 | deputy@pulboroughparishcouncil.gov.uk

6. Keep accurate records.
7. Avoid unnecessary disclosure of personal or sensitive information.
8. Ensure contractors, hirers and grant recipients understand their own safeguarding responsibilities.
9. Maintain appropriate risk assessments for Council activities and facilities.
10. Review this policy regularly.

## **6. Roles and Responsibilities**

### **6.1 Full Council**

Full Council is responsible for:

- adopting and reviewing this policy;
- ensuring safeguarding is considered in relevant Council decisions;
- ensuring reasonable resources are available for implementation;
- ensuring Council facilities and activities are appropriately risk assessed;
- ensuring safeguarding requirements are considered in grants, contracts, leases and licences where relevant.

### **6.2 Clerk/RFO / Safeguarding Lead**

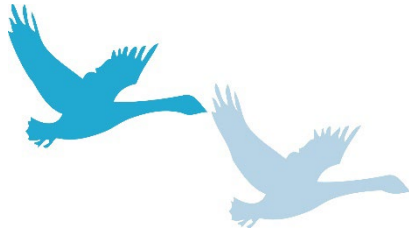
The Clerk/RFO, as Safeguarding Lead unless another person is appointed, is responsible for:

- receiving safeguarding concerns;
- ensuring urgent concerns are referred to the appropriate authority;
- keeping confidential safeguarding records;
- advising councillors, staff, volunteers and working groups on the Council's procedure;
- ensuring safeguarding is included in induction and relevant training;
- ensuring safeguarding considerations are built into grant, hiring and contractor processes where relevant;
- liaising with West Sussex safeguarding bodies, the police, the Council's Data Protection Officer, insurers or legal advisers where necessary.

### **6.3 Councillors, Staff, Volunteers and Working Group Members**

All councillors, staff, volunteers and working group members must:

- read and comply with this policy;
- act immediately if they believe someone is at risk of harm;
- report concerns to the Safeguarding Lead as soon as possible;
- call emergency services where there is immediate danger;
- keep information confidential and share it only on a need-to-know basis;
- not attempt to investigate safeguarding allegations themselves;
- avoid unsupervised one-to-one situations with children or adults at risk unless specifically authorised and risk assessed;
- comply with the Council's Data Protection Policy and any working group Terms of Reference.



## 7. Recognising a Safeguarding Concern

A safeguarding concern may arise from:

- something a person tells you;
- something you witness;
- changes in behaviour, appearance or wellbeing;
- inappropriate behaviour by an adult, councillor, volunteer, contractor or member of the public;
- unsafe activities, facilities or supervision;
- online messages, emails or social media content;
- concerns about misuse of personal data that may place someone at risk.

Examples may include:

- a child appearing distressed, frightened or neglected;
- an adult at risk appearing to be controlled, exploited or intimidated;
- unexplained injuries;
- inappropriate sexualised behaviour or comments;
- bullying, harassment or discriminatory behaviour;
- a person disclosing abuse, neglect or exploitation;
- unsafe practice by a contractor, hirer, coach, volunteer or event organiser;
- unauthorised sharing of sensitive personal information.

## 8. Responding to a Concern or Disclosure

If someone discloses abuse or harm:

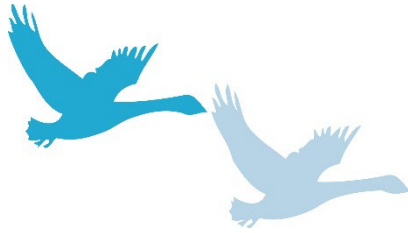
1. Stay calm and listen.
2. Do not promise confidentiality. Explain that you may need to share the information with someone who can help.
3. Do not investigate or ask leading questions.
4. Reassure the person that they have done the right thing by telling you.
5. Record the facts as soon as possible, using the person's own words where possible.
6. Report the concern to the Safeguarding Lead immediately.
7. If there is immediate danger, call 999.

Do not contact the alleged abuser, attempt mediation, or discuss the matter with others unless authorised by the Safeguarding Lead or required to protect someone from immediate harm.

## 9. Reporting Procedure

### 9.1 Immediate Risk

If a child, young person or adult at risk is in immediate danger:



Swan View, Lower Street, Pulborough, West Sussex RH20 2BF | 01798 873532 | deputy@pulboroughparishcouncil.gov.uk

- call 999 immediately;
- then inform the Safeguarding Lead as soon as it is safe to do so.

## 9.2 Non-Emergency Safeguarding Concern

Where there is no immediate danger but there is a safeguarding concern:

1. Report the matter to the Safeguarding Lead the same day.
2. Complete a safeguarding record form.
3. The Safeguarding Lead will decide whether referral is required to West Sussex Children's Social Care, West Sussex Adult Social Care, the police, the Local Authority Designated Officer where an allegation involves someone working with children, the Council's Data Protection Officer if personal data is involved, or the Council's insurer or legal adviser where appropriate.

## 9.3 If the Concern Involves the Safeguarding Lead

If the concern involves the Clerk/RFO or Safeguarding Lead, it should be reported to the Chair of the Council, unless doing so would create a conflict or risk of harm. The Chair must seek advice from the relevant statutory safeguarding authority without delay.

## 9.4 If the Concern Involves a Councillor

If the concern involves a councillor:

- safeguarding action must come first;
- where the matter may also involve the Code of Conduct, it should be referred to the Monitoring Officer at Horsham District Council;
- confidential safeguarding information must not be circulated to councillors generally.

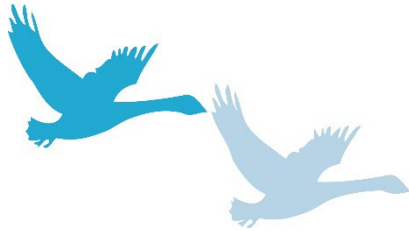
## 10. Confidentiality, Data Protection and Information Sharing

Safeguarding information is often sensitive personal data. It must be handled carefully, lawfully and securely.

Pulborough Parish Council's Data Protection Policy requires personal data to be processed fairly, lawfully, transparently, securely and only where necessary. The Council's Information Security Incident Policy treats unauthorised transfer of data to someone not entitled to receive it as an information security incident.

Therefore:

- safeguarding information must only be shared with people who need it to protect someone or fulfil a lawful role;
- emails containing personal or sensitive information must not be forwarded outside the authorised group without a lawful reason;
- working group members must comply with their Terms of Reference and this policy;
- personal data received through working groups, grants, complaints or community engagement must not be used for unrelated purposes;
- safeguarding records must be stored securely and separately from general correspondence where possible;



Swan View, Lower Street, Pulborough, West Sussex RH20 2BF | 01798 873532 | deputy@pulboroughparishcouncil.gov.uk

- any suspected data breach must be reported to the Clerk/RFO immediately.

Data protection law does not prevent appropriate safeguarding referrals where information sharing is necessary and proportionate to protect a person from harm. However, unnecessary or excessive sharing is not permitted.

## 11. Working Groups

All Council working groups must comply with this policy.

Working groups must:

- keep personal information confidential;
- share information only within the group unless authorised or legally required;
- consider safeguarding risks in their activities;
- report any safeguarding concern to the Safeguarding Lead;
- not investigate allegations themselves;
- comply with their Terms of Reference, the Council's Data Protection Policy and the Council's Information Security Incident Policy.

Where a working group involves residents, volunteers, children, young people or adults at risk, the Council should consider whether additional safeguards are needed, such as risk assessments, consent arrangements, supervision or data minimisation.

## 12. Grants

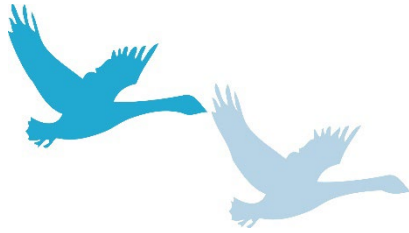
The Council's Grant Awarding Policy requires applicants to provide supporting financial information, normally including the previous year's audited accounts or bank statements where accounts are not prepared.

Where a grant application involves activities for children, young people or adults at risk, the Council may require the applicant to provide evidence of appropriate safeguarding arrangements, such as:

- a safeguarding policy;
- a named safeguarding lead;
- safer recruitment or volunteer procedures;
- DBS arrangements where legally eligible and appropriate;
- risk assessments;
- insurance;
- confirmation that staff and volunteers receive appropriate safeguarding guidance or training.

Grant applicants should provide only the information required by the Council's grant process. If accounts, reports or supporting documents contain personal data that is not required for the application, the applicant should redact it before submission. Councillors and officers must only share grant documents with those who need them for the grant assessment, audit, transparency or legal compliance.

Where safeguarding concerns arise from a grant-funded activity, the Council may suspend payment, seek further information, impose conditions, or request repayment where this is consistent with the grant terms and lawful decision-making.



### **13. Contractors, Hirers, Leases and Licences**

Where Council land or facilities are used by third parties, the Council will take reasonable steps to ensure appropriate safeguarding responsibilities are clear.

Where relevant, contracts, hire agreements, leases or licences should require the third party to:

- comply with safeguarding law and guidance applicable to their activity;
- have suitable safeguarding policies and procedures;
- carry out appropriate risk assessments;
- ensure staff and volunteers are suitable for their roles;
- maintain appropriate insurance;
- report safeguarding incidents connected with Council land or facilities to the Council, where lawful and appropriate;
- indemnify the Council where appropriate.

The Council does not assume responsibility for supervising children, young people or adults at risk merely because they are using public Council land or facilities, unless the Council is directly organising or supervising the activity.

### **14. Council Events and Activities**

For Council-run events or activities, the Council will:

- complete a risk assessment;
- consider safeguarding risks at the planning stage;
- identify whether children, young people or adults at risk are likely to attend;
- ensure suitable staffing, supervision and emergency arrangements;
- avoid unsupervised one-to-one contact where possible;
- ensure volunteers understand how to report concerns;
- provide clear information for parents, carers or participants where relevant;
- comply with data protection requirements when collecting contact details, consent forms or photographs.

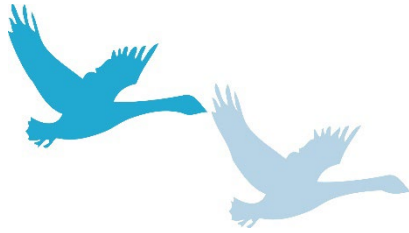
Where an event is run by a third party, the organiser remains responsible for safeguarding arrangements unless otherwise agreed in writing.

### **15. Play Areas, Recreation Facilities and Open Spaces**

The Council is responsible for provision, maintenance and inspection of children's playgrounds and recreational facilities within its remit.

The Council will:

- inspect and maintain play areas and relevant facilities in accordance with its inspection regime;
- respond promptly to reported hazards;
- ensure relevant signage and contact information is available where appropriate;



Swan View, Lower Street, Pulborough, West Sussex RH20 2BF | 01798 873532 | deputy@pulboroughparishcouncil.gov.uk

- risk assess Council-led activities on recreation land;
- require third-party sports clubs, coaches or organised users to maintain their own safeguarding arrangements where they work with children, young people or adults at risk.

Parents, guardians and carers remain responsible for supervising children using public play areas unless the Council has specifically organised a supervised activity.

## **16. Safer Recruitment and Volunteer Management**

Where the Council recruits staff or volunteers into roles involving contact with children, young people or adults at risk, it will consider proportionate safer recruitment measures, including:

- clear role descriptions;
- application and interview processes;
- identity checks;
- references;
- safeguarding induction;
- relevant training;
- DBS checks where the role is legally eligible;
- supervision and review.

The Council will not request DBS checks for roles that are not eligible. Where DBS checks are required or appropriate, they must be handled confidentially and in accordance with data protection law.

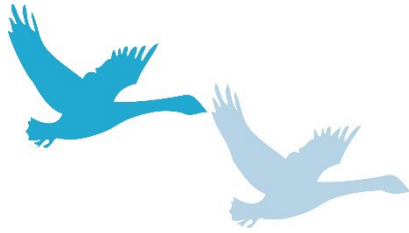
## **17. Conduct Expectations**

Councillors, staff, volunteers and working group members must:

- treat children, young people and adults at risk with respect;
- maintain appropriate boundaries;
- avoid favouritism or inappropriate personal relationships;
- avoid unnecessary physical contact;
- avoid being alone with a child or adult at risk where this has not been risk assessed;
- not exchange private messages with children or young people through personal social media or personal accounts when acting for the Council;
- not take photographs or videos of children, young people or adults at risk for Council use without appropriate consent;
- not share personal information obtained through Council business for personal, political or unauthorised purposes.

## **18. Photography, Filming and Social Media**

The Council will take reasonable care when using photographs, videos or names of children, young people or adults at risk.



Swan View, Lower Street, Pulborough, West Sussex RH20 2BF | 01798 873532 | deputy@pulboroughparishcouncil.gov.uk

Where the Council wishes to use identifiable images for publicity, it should obtain appropriate consent. Images should not be used in a way that places a person at risk, causes embarrassment, or discloses unnecessary personal information.

Photographs or videos taken at public Council meetings must also comply with the Council's policy on reporting and recording meetings.

## 19. Record Keeping

Safeguarding records must be:

- factual;
- dated and signed or attributable;
- stored securely;
- shared only on a need-to-know basis;
- retained in accordance with the Council's retention arrangements, safeguarding requirements and legal advice where necessary.

Records should include:

- the date, time and location of the concern;
- the name and contact details of the person reporting, where known;
- the person affected, where known;
- the nature of the concern;
- exact words used in any disclosure, where possible;
- actions taken;
- referrals made;
- decisions and reasons.

## 20. Training and Awareness

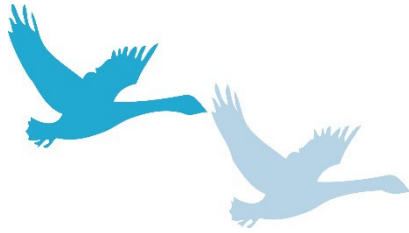
The Council will ensure that:

- councillors, staff and relevant volunteers are made aware of this policy;
- new councillors and staff receive safeguarding information as part of induction;
- the Safeguarding Lead undertakes appropriate safeguarding awareness training;
- refresher training or briefings are provided when needed;
- working groups are reminded of confidentiality and reporting requirements.

## 21. Whistleblowing and Raising Concerns

Anyone who believes safeguarding concerns are not being properly handled should raise this with the Clerk/RFO, Chair of Council, relevant safeguarding authority, police, Monitoring Officer, or other appropriate external body.

No person should suffer disadvantage for raising a genuine safeguarding concern in good faith.



## **22. Breaches of this Policy**

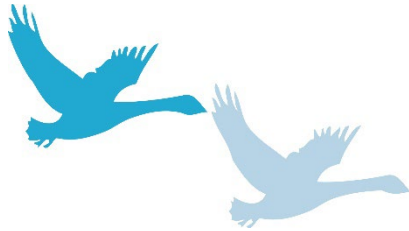
Breaches of this policy may be dealt with under the relevant procedure, depending on who is involved. This may include:

- employee disciplinary procedures;
- volunteer role termination;
- contractor or hirer action;
- grant conditions or repayment;
- referral to the Monitoring Officer for councillor conduct matters;
- referral to statutory safeguarding authorities or police;
- referral to the Data Protection Officer where personal data is involved.

## **23. Review**

This policy will be reviewed annually by Full Council, or sooner if:

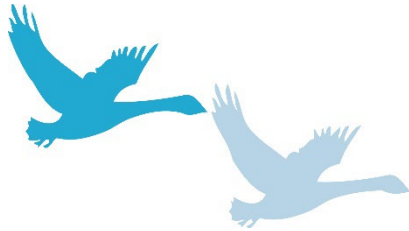
- there is a safeguarding incident;
- legislation or statutory guidance changes;
- Council services or facilities change significantly;
- a review is recommended by the Safeguarding Lead, insurer, auditor, legal adviser or safeguarding authority.



## Appendix 1: Safeguarding Concern Record Form

This form must be completed as soon as possible after the concern arises.

Item	Details
Date and time of concern	
Location	
Name of person affected	
Age/date of birth, if known	
Parent/carer details, if relevant and appropriate	
Name of person reporting concern	
Role/contact details	
What happened? Record facts only	
Exact words used, if a disclosure was made	
Any visible injuries or immediate risks?	
Action taken immediately	
Was 999 called?	
Safeguarding Lead informed? Date/time	
Referral made? To whom/date/time	
Further action required	
Form completed by	
Signature/date	



## Appendix 2: Local Safeguarding Contacts

To be completed and checked before adoption.

Contact	Details
Emergency	999
Police non-emergency	101
West Sussex Children's Social Care / MASH	[insert current contact details]
West Sussex Adult Safeguarding	[insert current contact details]
Out-of-hours safeguarding contact	[insert current contact details]
Local Authority Designated Officer	[insert current contact details]
Horsham District Council Monitoring Officer	[insert current contact details]
Council Data Protection Officer	[insert current contact details]
Council insurer	[insert current contact details]

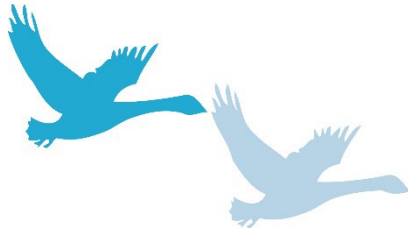
## Appendix 3: Safeguarding Declaration for Grant Applicants

Where a grant-funded activity involves children, young people or adults at risk, the applicant must complete the following declaration:

### Safeguarding Declaration

We confirm that:

1. the organisation has appropriate safeguarding arrangements for the activity or project;
2. where required, the organisation has a safeguarding policy;
3. staff, trustees, committee members, coaches, volunteers or contractors involved in regulated or relevant activity are suitable for their roles;
4. DBS checks are undertaken where legally eligible and appropriate;



Swan View, Lower Street, Pulborough, West Sussex RH20 2BF | 01798 873532 | deputy@pulboroughparishcouncil.gov.uk

5. safeguarding concerns will be reported to the relevant statutory authority;
6. Pulborough Parish Council will be notified of any serious safeguarding incident connected with the funded activity, where lawful and appropriate;
7. any personal data supplied to the Council will be limited to what is necessary for the grant application and will be redacted where appropriate.

Field	Details
Organisation	
Name	
Role	
Signature	
Date	

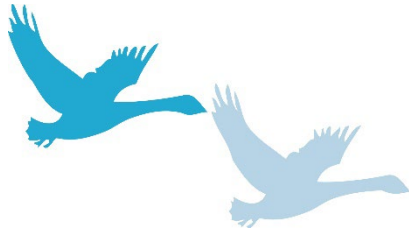
## Appendix 4: Working Group Safeguarding and Confidentiality Statement

All Council working groups must operate in accordance with their Terms of Reference, this Safeguarding Policy, the Council's Data Protection Policy and any other relevant Council policy.

Working group members must:

- treat all participants with dignity and respect;
- report safeguarding concerns promptly to the Clerk/RFO or Safeguarding Lead;
- not investigate concerns themselves;
- keep personal data confidential;
- not forward emails, documents or contact details outside the working group unless authorised or legally required;
- share only the minimum information necessary for the proper purpose of the group;
- avoid private one-to-one communications with children, young people or adults at risk when acting on behalf of the Council;
- raise any concern about inappropriate conduct, bullying, harassment or risk of harm.

Field	Details
Working Group	
Member name	
Signature	
Date	



Swan View, Lower Street, Pulborough, West Sussex RH20 2BF | 01798 873532 | deputy@pulboroughparishcouncil.gov.uk

## Appendix 5: Standard Safeguarding Clause for Hirers, Contractors, Licences and Leases

The following wording may be inserted into hire agreements, contracts, licences or leases where the activity may involve children, young people or adults at risk:

*The Hirer/Contractor/Licensee shall be responsible for ensuring that all safeguarding duties arising from its activity are properly met. Where its activity involves children, young people or adults at risk, the Hirer/Contractor/Licensee must maintain appropriate safeguarding policies, procedures, supervision, safer recruitment arrangements, DBS checks where legally eligible, risk assessments and insurance.*

*The Hirer/Contractor/Licensee must report any serious safeguarding incident connected with the use of Council land, premises or facilities to the appropriate statutory authority and, where lawful and appropriate, to Pulborough Parish Council.*

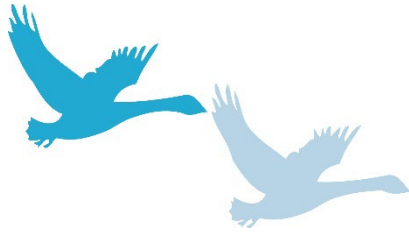
*The Hirer/Contractor/Licensee must not represent that Pulborough Parish Council is responsible for supervising or safeguarding participants in the Hirer/Contractor/Licensee's activity unless this has been expressly agreed in writing.*

## Appendix 6: Quick Reporting Flowchart

Situation	Action
Immediate danger	Call 999 → make the situation safe if you can → inform the Clerk/RFO or Safeguarding Lead.
Concern but no immediate danger	Record facts → report to Clerk/RFO or Safeguarding Lead the same day → Safeguarding Lead decides whether to refer to West Sussex Children's Services, Adult Social Care, police, LADO or another relevant body.
Concern involves the Clerk/RFO	Report to the Chair of Council → Chair seeks advice from the relevant safeguarding authority.
Concern involves a councillor	Safeguarding referral first → consider Code of Conduct referral to Horsham District Council Monitoring Officer.
Personal data wrongly shared	Report to Clerk/RFO immediately → Clerk/RFO informs the Data Protection Officer → follow the Council's Information Security Incident Policy.

## Appendix 7: Staff / Councillor Briefing Note

Key points to remember:



# PULBOROUGH PARISH COUNCIL

Working together for a better future

Swan View, Lower Street, Pulborough, West Sussex RH20 2BF | 01798 873532 | [deputy@pulboroughparishcouncil.gov.uk](mailto:deputy@pulboroughparishcouncil.gov.uk)

- Safeguarding is everyone's responsibility.
- If someone is in immediate danger, call 999.
- Do not investigate safeguarding concerns yourself.
- Do not promise confidentiality.
- Record facts, not opinions.
- Report concerns to the Clerk/RFO or Safeguarding Lead as soon as possible.
- Do not circulate safeguarding or personal information unnecessarily.
- If personal data has been wrongly shared, report it immediately as a potential information security incident.