Trowbridge Town Council

Working for your Community

Safeguarding Policy

(Protection of Children & Adults at Risk)

&

Disclosure and Barring Services Checking Policy & Procedure

UPDATE TIMELINE

Reference Number	Version	Owner	Approval Date	Review Date
46	1	Leisure Services Manager, First Aid & Safeguarding Lead	2nd March 2026	March 2027

Safeguarding Policy
(Protection of Children & Adults at Risk)

It is a legal requirement for any organisation working with young children or adults at risk to ensure that there are procedures in place which provide for their safety and protect the staff and volunteers working for Trowbridge Town Council. The Council operates a number of activities for children and adults at risk; it is important that we adopt a robust policy and set of procedures to protect both individuals and the Council.

Trowbridge Town Council believes everyone has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status. Trowbridge Town Council recognises that health, well-being, ability, disability and need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, in communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

Purpose of the policy

- To raise awareness to all staff of the importance of safeguarding children & adults at risk, and of their responsibilities for identifying and reporting actual or suspected abuse
- To ensure children and parents are aware that the Council takes the safeguarding agenda seriously and will follow the appropriate procedures for identifying and reporting abuse and for dealing with allegations against staff
- To promote effective liaison with other agencies in order to work together for the protection of all children
- To support children's development in ways which will foster security, confidence, and independence
- To integrate a safeguarding curriculum within the existing activities allowing for continuity and progress through all developmental stages
- To take account of and inform policy in related areas such as bullying and e-safety

A child is anyone under the age of 18 years; and an adult at risk is anyone 18 years or older, who by reason of mental or other disability, age, infirmity, or illness, is unable to take care of themselves or unable to protect themselves against significant harm or exploitation.

The Council seeks to implement this Safeguarding Policy by:

- Ensuring that all staff that have direct and unsupervised contact with children and adults at risk are carefully selected, including a check with the Disclosure & Barring Service, at least two written references and are trained and accredited where necessary
- Ensuring that any Trowbridge Town Council contractors who have regular, direct, and unsupervised contact with children and adults at risk, have effective policies and procedures in place
- Giving all the parties involved e.g., parents and the public, information about what they can expect from the Council in relation to protecting and safeguarding children and adults at risk
- Ensuring that there is a clear complaint procedure in place that can be used if there are any concerns
- Sharing information about concerns with appropriate agencies that need to know and involving parents and/or carers as appropriate

Responsibilities

The responsibility for safeguarding falls on everybody who is employed at Trowbridge Town Council. All adults who work at the Council are expected to support the Safeguarding Policy, with overall responsibility delegated to the Council's Designated Safeguarding Lead (DSL), including where there is suspicion of abuse/neglect of a child or if a child discloses abuse or allegations of abuse. Trowbridge Town Council will follow the child protection procedures set out by the Wiltshire Safeguarding Vulnerable People Partnership (WSVPP) and will have regard to statutory guidance issued by the Department for Education.

The **Designated Safeguarding Lead** is a senior member of staff designated to take lead responsibility for:

- Managing all child protection issues (leads on allegations against staff)
- Keeping secure child protection plans, written records and reports
- Child protection policy and procedures: evaluation, review, and revision, ensuring availability to staff and parents
- Induction and training of staff & volunteers on safeguarding issues
- Understanding (and participating in) early help assessments and processes for early help
- Liaising with the local authority and local safeguarding children's board
- Working in partnership with other agencies on referrals, support, and information sharing
- Ensuring a culture of listening to children and taking account of their wishes and feelings

The Designated Safeguarding Lead (DSL) is:

- **Aaron Seviour** – Leisure Services Manager
  Telephone: 01225 965422 or email: aaron.seviour@trowbridge.gov.uk

The Deputy Designated Safeguarding Leads (DDSLs) are:

- **Hannah Lyddy** - Trowbridge Museum Manager
  Telephone: 01225 965418 or email: hannah.lyddy@trowbridge.gov.uk
- **Varsha Rickitt** – Director of Resources, Culture & Community Engagement
  Telephone: 01225 965290 or email: varsha.rickitt@trowbridge.gov.uk
- **Richard Rees –** Operations and Development Officer
  Telephone: 01225 965561 or email: richard.rees@trowbridge.gov.uk

Individual Responsibility

Every staff member, volunteer or councillor who supports activities involving children or adults at risk, has a duty of care to themselves and to others and should familiarise themselves with the procedures relating to the safeguarding of children and adults at risk. This policy applies to all councillors and staff regardless of whether they have direct contact with children and adults at risk. For the purposes of the policy, staff includes part time and full-time employees, casual staff, volunteers, work experience placements and trainees. This policy should also be read in conjunction with other Council policies.

This policy seeks to ensure that all councillors and staff have a clear understanding of their responsibilities when working with children and adults at risk. The aims of these procedures are to ensure that both councillors and staff:

- Recognise the signs of abuse and what appropriate course of action should be taken in such circumstances
- Understand the potential risk to themselves and ensure that good practice is always adhered to
- Recognise signs of improper behaviour from others and report it to the DSL or DDSL at the earliest opportunity

It is possible to reduce situations where abuse may occur and below are specific examples of the care which should be taken when working with children or adults at risk.

Individuals must:

- Be identifiable including wearing a Trowbridge Town Council name badge
- Treat all children and people with dignity and respect
- Provide an example for good conduct that others can follow
- Challenge unacceptable behaviour e.g., bullying and report allegations/suspicions of abuse
- Ensure when possible, that there is more than one adult present during activities with children and young people, or at least be within sight or hearing of others
- Respect their right to personal privacy and encourage children and adults at risk to feel comfortable enough to point out attitudes or behaviours they do not like
- Remember that someone else might misinterpret certain actions, no matter how well intentioned
- Be aware that any physical contact with a child or adult at risk may be misinterpreted
- Recognise that special caution is required when discussing sensitive issues with children or adults at risk
- Always operate within the Council's policies and procedures

Individuals must not:

- Have inappropriate or unwarranted physical or verbal contact with children or adults at risk
- Be drawn into inappropriate attention seeking behaviour or make suggestive or derogatory remarks or gestures in front of children or adults at risk
- Jump to conclusions about others without checking facts
- Exaggerate or trivialise any abuse issues
- Show favouritism to any individual
- Rely on your good name or that of the Council to protect you
- Believe 'it could never happen to me'
- Take a chance when common sense, policy or practice suggests another more prudent approach

Reporting Procedures

When there is a suspicion of abuse taking place, it should be reported to the DSL who in turn should report all incidents to the Town Clerk. If the DSL is unavailable, then the incident should be reported to one of the Deputy DSLs. There may be exceptional circumstances where it is necessary to restrain a child or an adult at risk to prevent them from hurting or inflicting harm on themselves or others. Only the minimum reasonable force necessary may be used. All incidents of physical restraint must be recorded on an incident form and submitted to the DSL, or if unavailable, to one of the Deputy DSLs, as well as informing the parents and/ or carer as soon as possible. Staff and councillors should acquaint themselves with the types of abuse and how to recognise signs of abuse.

What constitutes child abuse and neglect?
All adults who work or volunteer with children should be able to identify concerns about child abuse. The types of abuse described in Working Together to Safeguard Children 2023 are as follows:

Main Forms of Abuse:

a) **Physical**. This may involve actions such as hitting, shaking, and burning, as well as the use of inappropriate restraint. Physical abuse, as well as being a deliberate act, can be caused by an omission or failure to act to protect. In the case of children, it includes the giving of alcohol, inappropriate drugs, or poison to them.
b) **Emotional**. Emotional abuse is a persistent lack of love and affection. A child may be constantly verbally abused, threatened, ignored, or taunted. Other forms of emotional abuse include excessive overprotection and unrealistic pressure to succeed. In addition, it may include intimidation, humiliation, verbal abuse, harassment, or discriminatory harassment to adults.
c) **Sexual**. Involves forcing or enticing a child or adult at risk to take part in sexual activities whether or not the child or adult at risk is aware of, or consents to what is happening. It may also involve non - contact activities such as showing pornographic material, sexual innuendo or encouraging someone to behave in a sexually inappropriate way.
d) **Neglect**. The persistent failure to meet a child's or adult at risk's basic physical and/or psychological needs. These needs include adequate food and warm clothing and medical care, social care, and educational services. Neglect may include simply being left alone or excluded.

Other forms of abuse include:
Bullying and cyberbullying, child exploitation, child trafficking, criminal exploitation and gangs, domestic abuse, female genital mutilation, grooming and online abuse.

Specific Safeguarding Issues
The Council recognises other safeguarding issues: child sexual exploitation, female genital mutilation, bullying (including cyber-bullying), domestic violence, drugs, fabricated or induced illnesses, faith abuse, forced marriage, gangs and youth violence, gender-based violence/violence against women and girls, mental health, radicalisation, sexting, teenage relationship abuse, trafficking

(See Appendix A, Allegations & Concerns against adults in education settings and Appendix B, Guidance Flowchart – What to do if you are worried a child is being abused or neglected)

Safeguarding Legislation

This is compliant with United Nations directives on the rights of disabled people and commitments to the rights of older people. It is covered by:

- The Human Rights Act 1998
- The Data Protection Act 2018
- General Data Protection Regulations 2018

The practices and procedures within this policy are based on the relevant legislation and government guidance.

- England - The Care Act 2014
- Care and Support Statutory Guidance 2014 (see section 14 on Safeguarding)

Children with Special Educational Needs

Children with additional needs face an increased risk of abuse and neglect; it is expected that additional care is taken to interpret correctly apparent signs of abuse or neglect and report as for other children.

Wiltshire Council provides targeted support services for children and young people with Special Educational Needs and/or a Disability who need additional support with:

- Communication
- Learning and processing information
- Experiencing the world around them, including sensory difficulties
- Physical or medical conditions that affect their life and learning
- Coping with social and emotional challenges

The SEND services can be contacted on **01225 712620.**

Further contact information is available on the Contact SEND section on the Wiltshire Council website.

Emergency – If you or someone you know is in immediate danger, **dial 999** to speak with the emergency services.

Recognising Abuse

This is not always easy, and it is not the responsibility of members or staff to decide whether or not abuse has taken place, or if a child or adult at risk is at significant risk. However, the Council does have a responsibility to act and report promptly if they have any concerns or suspicions. It is the responsibility of the member of staff to report any concerns to the DSL or if unavailable, to one of the Deputy DSLs, and they must complete a child welfare and child concerns sheet *(See Appendix C: Front Door Referral Form).*

Indications that a child or person may be subject to abuse include:

- Unexplained or suspicious injuries such as bruises, cuts and burns particularly if situated on parts of the body not normally prone to such injuries
- Injuries for which an explanation seems inconsistent
- Fear of parents or carers being approached about such injuries
- Flinching or cowering when touched or approached
- Sudden or unexplained changes in behaviour
- Fear of being left with a specific person
- Changes in appearance - sudden loss of hair, dirtiness, weight loss etc
- In children, a failure to grow and thrive and showing difficulties in making friends or socialising
- In adults, a loss of assets and possessions

This list is by no means exhaustive, and it is important to remember that many children and people will exhibit some of these indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring. It is crucial that councillors and staff realise that this is only a process of observation and that at no point should councillors or staff actively seek out abuse or an abuser. The Council's responsibility is to ensure that any concern about the welfare of someone is reported and to never assume that others will do it.

Responding to Allegations and Suspicions of Abuse

It is vitally important the details of an allegation or an incident of abuse or mistreatment are carefully recorded, regardless of whether or not the concerns are later shared with a statutory agency. An accurate record should be made of:

- The date and time of the incident and/or disclosure
- The parties who were involved
- What was said and done by whom
- The full name of the person reporting and to whom reported

And where appropriate:

- Any action taken by the Council
- Reasons why there was no referral to a statutory agency

(See: Appendix A, Allegations & Concerns against adults in education settings and Appendix B: Guidance Flowchart: What to do if you are worried if a child is being abused or neglected.)

Responding to disclosures: guidance for staff

If a child wishes to confide in you, the following guidance should be adhered to:

- Create a safe environment
- Take the child to a private safe place
- Ask the child's permission before doing anything for them which is of a physical nature, such as assisting with dressing, physical support during PE, music or administering first aid
- Maintain appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language
- Be aware that the personal and family circumstance and lifestyles of some children lead to an increased risk of neglect and or abuse

Responding to a child or adult at risk making an allegation of abuse.

Individuals must stay calm and listen carefully, allowing the child/person to continue at their own pace and reassure them that they have done the right thing in speaking out. It may be necessary to ask questions for clarification only. Asking questions that suggest a particular answer (i.e., leading questions) should be avoided. The record keeping advice should be followed and, at an early opportunity, it must be explained to the child /adult at risk that the information will need to be shared. Do not promise to keep secrets. These allegations should be recorded and reported to the DSL or if unavailable, to one of the Deputy DSLs, at the earliest opportunity and reported immediately to the Town Clerk. If the allegations are made in respect of the Town Clerk, then the report must be made to the leader of the Council or the Mayor.

Responding to suspicions of abuse or failure to follow the code of good practice

Anyone that suspects a colleague may be abusing a child or an adult at risk should act on their suspicions immediately. These suspicions should be recorded and reported to the DSL, or if unavailable, to one of the Deputy DSLs at the earliest opportunity and reported immediately to the Town Clerk. If the suspicions are raised in respect of the Town Clerk, then the report must be made to the leader of the Council or the Mayor who will discuss the matter with the Designed Safeguarding Lead. If the matter relates to poor practice the disciplinary/capability procedures may be followed. If it relates to abuse, the matter will later be referred to the DSL who may also involve the Police. The person concerned is likely to be suspended pending the outcome of an investigation. The Council acknowledges that this is

an extremely sensitive issue. The Council will fully support and protect anyone who, in good faith, reports a concern that a colleague is or may be abusing a child or adult at risk.

Confidentiality

It is important to ensure confidentiality about any suspicions, or allegations being made by a child or adult at risk. Whilst it is recommended that notes are made as soon as possible, these should be treated in confidence until required by investigating authorities. The legal principle that the welfare of the child or adult at risk is paramount means that the consideration of confidentiality, which might apply to other situations within the Council, should not be allowed to override the right of the person to be protected from harm. However, where possible every effort should be made to ensure that confidentiality is maintained for and by all concerned when an allegation is made and whilst it is being investigated. The Council will seek to balance protecting children and adults at risk from harm whilst protecting its staff from the risk of unfounded allegations. The Town Clerk will be responsible for dealing with all allegations and suspicions of abuse concerning a member of staff, in conjunction with any relevant authorities and agencies. The Town Clerk will not decide if the allegations have been substantiated - this is the task of Wiltshire Council's DSL, which has the legal responsibility through a multi-agency approach, taking into account the balance of probabilities based upon the evidence available.

Emotional Distress

It is possible that anyone having abuse reported to them or identifying the signs of abuse may be affected emotionally. In such cases staff, volunteers or councillors should contact the DSL or if unavailable, one of the Deputy DSLs, or the Emergency Duty Team at Wiltshire Council for advice and support.

Positions of Trust

All persons employed in a 'Position of Trust', those working directly with children and young people will require a full Disclosure and Barring Service (DBS) Check, and will be subject to greater restrictions, such as not being in a close intimate relationship with anyone aged 16 or 17. Anyone without a Disclosure and Barring Service (DBS) check must not support activities where there is the possibility of unsupervised contact with a child or adult at risk occurring. Any staff member, volunteer or councillor who is engaged in supporting activities involving one to one supervision of a child or adult at risk must be DBS checked first. See Disclosure and Barring Services Checking Policy & Procedure below, for full details.

Welcoming other professionals

Visitors with a professional role, such as social workers will have had the appropriate vetting checks undertaken by their own organisation. Any professional working with Trowbridge Town Council should provide evidence of their professional role and employment details (for example, identity badge). If felt necessary, Trowbridge Town Council will contact the relevant organisation to verify the individual's identity. Professionals will complete signing in/out forms and wear an identity badge if required to do so.

Recruitment

Trowbridge Town Council takes the safeguarding of children and adults at risk very seriously. We make this clear on all vacancies that are advertised and this policy is available to access on our website at: trowbridge.gov.uk/job-vacancies/

We also advise those applying for vacancies, that a satisfactory DBS check will be required where the role is deemed to be a position of trust or requires a person to directly supervise children or adults at risk and a new DBS will be required every three years.

All recruitment interviews for such staff will include either the DSL or one of the Deputy DSLs, or a member of the HR team with safer recruitment training. Staff who regularly have direct contact with children or adults at risk will have training to raise their awareness of protection issues at their induction and at regular intervals throughout their employment, provided by the DSL. A Disclosure and Barring Services Self Certification form *(See Appendix D)* will be issued to all persons offered employment or those in an educational volunteering role upon their role commencing. This includes a section on disqualification by association. All employees and educational volunteers will be required to complete a Self-declaration and Disclosure form annually. (See Appendix E).

Safer Recruitment

- In addition to the above, the Council also requires two satisfactory employment references prior to any offer of employment being confirmed. This is also applicable to volunteers
- The Council will ask safeguarding questions at all interviews, where the position requires interaction and or supervision of children and or adults at risk. This information will be submitted by the DSL or Deputy DSL
- The Council keep records relating to all staff/potential staff's right to work in the UK, in line with the Council's retention policy
- All recruitment information and personnel documentation are kept confidential and with HR at all times
- All staff involved in the recruitment of children and/or adults at risk have undertaken safer recruitment training

Staff training and induction

- The DSL will attend safeguarding training at least once every three years, attend safeguarding forums and keep up to date with recommendations from serious case reviews, changes to national guidance and guidance issued by the Wiltshire Safeguarding Vulnerable People Partnership (WSVPP)
- The whole staff group will receive safeguarding training at least every three years with annual up-dates and notifications of any necessary changes, reminders being made available as required
- All core staff working with children will also complete specific safeguarding training i.e., Prevent
- All employees, casual workers and volunteers will be given a copy of the Safeguarding Policy, and will be asked to sign the policy to confirm their understanding
- All new employees will receive a safeguarding induction to ensure their understanding of the Safeguarding Policy

Safer working practice

Statement about the importance of safer working practice to Trowbridge Town Council.

Safe working practice ensures that children are safe and that all staff, volunteers, and councillors:

- Are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Work in an open and transparent way
- Work with other colleagues where possible in situations open to question

- Discuss and/or take advice from management over any incident which may give rise to concern
- Record any incident of decisions made
- Apply the same professional standards regardless of gender, race, disability, or sexuality
- Be aware of confidentiality policy
- Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them

Retention

- Where a concern or allegation is made, regardless of threshold, including low-level concern, against someone not part of the organisation, the information will be securely transferred to the appropriate authority and retained for one year
- Where a concern or allegation is made, regardless of threshold, including low-level concern, against an employee or volunteer of Trowbridge Town Council, records will be retained at least until the accused has reached normal pension age or for 10 years from the date of the allegation, if that is longer
- Cases in which an allegation was found to be false, unfounded, unsubstantiated, or malicious should not be included in employer references. Any repeated concerns or allegations that have all been found to be false, unfounded, unsubstantiated, or malicious should also not be included in any reference. Substantiated safeguarding allegations that meet the harm threshold should be included in references, provided that the information is factual
- The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction, and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

Additional Information / Support

If you think a child or young person is at risk of significant harm, or is injured, contact:

0300 456 0108 - Multi-Agency Safeguarding Hub (MASH), standard working hours:

- Monday to Thursday from 8.45am to 5pm
- Friday from 8.45am to 4pm

0300 456 0100 - Out of hours service:

- Monday to Thursday 5pm to midnight, Friday 4pm to midnight
- Weekends and Bank Holidays from 9am – midnight

Phones are diverted to the Social Work Standby Service from midnight to 9am (7 days a week

Disclosure and Barring Services Checking Policy & Procedure

Introduction

Trowbridge Town Council ("the Council") uses the Disclosure and Barring Service ("DBS") to help assess the suitability of employees/workers, volunteers and outside staff, who are likely to come into contact with children, and/or adults at risk during their work. This document has been developed with reference to the DBS's Code of Practice (appendix F) (revised November 2015): As well as detailing the Council's policy regarding obtaining disclosures, it covers the recruitment of ex-offenders, and the use, handling, storage, retention and disposal of disclosure information.

Policy

To indicate an individual's suitability to work, with children, and/or adults at risk, it is Council policy that employees/workers, volunteers, councillors and outside staff undergo checks, via the DBS. Any costs incurred in obtaining a disclosure required by the Council from the DBS will be met by the Council. The Town Clerk will, in consultation with the appropriate line manager, decide if;

- Any variations to the disclosure requirements are necessary
- The Council's disclosure requirements have been met

DBS Requirements

1. Employees/Workers, Casual Workers, Volunteers and Councillors

Persons undertaking specific roles (detailed below) on behalf of the Council, are required to have a satisfactory DBS disclosure at either enhanced or basic level depending on the job role. An updated disclosure will be required every three years. Failure to provide a satisfactory disclosure when requested, may result in employment being terminated. Once a DBS disclosure has been obtained, it is the responsibility of the employee/casual worker/volunteer/councillor to ensure their manager, or HR has sight of the original certificate and records the certificate number and expiry date ***(see section 14, Storage & Retention).***

2. Safeguarding Lead and Deputy Safeguarding Leads

The Designated Safeguarding Lead and the Deputy Safeguarding Leads are required to have an enhanced DBS Disclosure.

3. Active Trowbridge

Persons undertaking roles which require the direct supervision of children and/or adults at risk as part of the activities provided by Active Trowbridge, including sports coaching, holiday fun days, road-show activities, etc. require an enhanced DBS. This includes but is not limited to the department managers, supervisors, team leaders, coaches, and administrative support staff, including casual staff, freelance staff, and contractors.

4. Trowbridge Museum

Persons undertaking roles which require the direct supervision of children and/or adults at risk as part of the education activities provided by Trowbridge Museum, including school visits, regular activities, holiday fun days, and outreach activities, etc. require an enhanced DBS. This includes but is not limited to the Learning and Outreach Officer, Education Assistants, Volunteers, and support staff, including casual staff, freelance staff, and contractors.

5. Community Engagement

Persons undertaking roles within Community Engagement and Community Events, which require contact with the public including adults at risk and children, must have a basic DBS disclosure.

6. Licence Holders and Security Industries Association (SIA) badge holders

Persons undertaking roles which require the employee to obtain a Personal Licence or and SIA badge require a basic DBS. *Please note renewals are not required for personal licence holders.*

7. Others

Persons employed or in a voluntary position, including councillors, who undertake a role likely to give substantial access to adults at risk and children, will also be required to obtain an enhanced disclosure before starting such a role.

8. External Staff / Bought in Staff

If an activity requires the buying in of outside expertise which require a DBS e.g., children's entertainers or trainers, then individuals should have their own DBS certification which should be checked:

- Only the original document can be accepted as proof of a DBS - photocopies must not be accepted.
- Certificates more than three years old must not be accepted.
- Bought in staff without DBS's must not have unsupervised access to children or adults at risk at any time during the course of activities.

9. Unsatisfactory DBS

If a DBS disclosure is returned to the Council revealing a previously undeclared conviction in respect of an **employee, councillor, volunteer, or casual worker**, the following steps will be taken:

- The individual's line manager (or, in the case of a councillor or volunteer, the appropriate supervising officer) will discuss the details of the disclosure with the Town Clerk to determine what action, if any, should be taken.
- Where the Town Clerk identifies any concerns, a meeting will be arranged between the individual concerned, the relevant manager or supervising officer, and the Town Clerk to discuss the matter. The individual may be accompanied at the meeting by a work colleague, representative, or friend.
- The individual will then be formally advised of the outcome.

10. Exceptional Circumstances

In exceptional circumstances, it may be possible for outside staff to be hired to provide support in areas where they might otherwise be excluded i.e., play areas, museum activities, children's fun days. In such circumstances the following procedure must be followed:

- A risk assessment form must be completed by the relevant departmental manager.
  Note: The risk assessment must be annotated to include:
  - Time on site
  - Date of event
  - Name of individual(s) carrying out work
  - Name of supervisory staff member (*see below*).
- The Designated Safeguarding Lead must be notified of the requirement in writing
- A member of staff who has suitable DBS clearance must constantly supervise the individual(s) while they undertake their work

11. Recruitment of ex-offenders

As an organisation using the DBS service, the Council undertakes to treat all applicants for positions fairly. In line with its Equal Opportunities Policy, it promotes equality and welcomes applications from a wide range of candidates, including those with criminal records.

The Council will not discriminate unfairly against any subject of a disclosure on the basis of a conviction or other information revealed.

Disclosures are requested for specified permanent, temporary, full- or part-time positions. Recruitment documentation and job adverts for such roles will contain a statement that a disclosure will be required in the event of the individual being offered a position.

As a disclosure forms part of the recruitment process for such roles, applicants are asked to provide details of their criminal record at an early stage in the application process. The Council guarantees that the information will only be seen by those who need to see it as part of the recruitment process.

The Council will ensure that:

- This statement on the recruitment of ex-offenders is made available to all disclosure applicants at the outset of the recruitment process
- Anyone who is subject to a disclosure is aware of the existence of the DBS Code of Practice *(see Appendix F)* and that a copy is available on request
- All those involved in the recruitment process are suitably trained to identify and assess the relevance and circumstances of offences
- All those involved in the recruitment process receive appropriate guidance and training in relevant legislation relating to the employment of ex-offenders, e.g., the Rehabilitation of Offenders Act 1974 (*see Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975*)
- Candidates selected for interviews are based on their skills, qualifications, and experience.
- During the interview, or in a separate discussion, an open and measured discussion takes place about any offences or other matter that may be relevant. ***Note:*** Failure to reveal information that is directly relevant to the position sought could lead to the withdrawal of an offer of employment

- Any matter revealed in a disclosure will be discussed with the person seeking a position before withdrawing a conditional offer of employment

Having a criminal record will not necessarily bar anyone from working with the Council. This will depend on the nature of the position and the circumstances and background of the offences. Please refer to Guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975.

12. Photography and images

To protect children, Trowbridge Town Council will:

- Obtain parental consent for photographs taken or published (for example, on our website, social media and in newspapers or publications)
- Where possible, only use Trowbridge Town Council equipment to take photos and videos. Photos will be held on Town Council devices and deleted immediately when no longer needed, or if consent is withdrawn. If you use your own device, please refer to the **Information Technology Policy,** in particular **section 8.2 Equipment (Including Use of Own Devices)** to ensure compliance with this policy
- Only take photos and videos with the purpose of supporting the Council's work
- Use only the child's first name with an image
- Ensure that children are appropriately dressed
- We will discuss informally with children regarding any photographs that are taken of them
- If you are in charge of organising an event, please ensure that the appropriate signage is displayed, which is available from the Marketing department
- If we are provided with photographs via a reputable third party such as the Wiltshire Times, we will credit the source on our images

13. Handling and usage of information

DBS disclosure information will only be used for the specific purpose for which it was requested, and the Council recognises that it is a criminal offence to pass any information related to a disclosure to anyone who is not entitled to receive it.

Information should only be passed to those who are authorised to receive it in the course of their duties. This will include Trowbridge Town Council officers who are required to process applications, record and store disclosure records, and schools or other partner organisations who require proof of disclosure.

14. Storage and retention

No copies of a disclosure or its content, in any format, will be made, unless it is done so with the prior agreement of the employee/volunteer/councillor. Details of disclosure numbers and issue dates are held, on a password protected spreadsheet, maintained by authorised officers. Certificate numbers and issue dates will also be held on the employee's YouManage personnel record.

Once details of the disclosure number and issue dates are recorded, the disclosure is returned to the applicant.

To see how we handle, store, process and delete your personal information, see our privacy notice on YouManage, or request a copy from a member of the HR team at hr@trowbridge.gov.uk, who will print for you if required.

15. Branch

In its capacity as a DBS Checking 'Branch' of Wiltshire Council, Trowbridge Town Council will take all reasonable steps to ensure that any organisation, on whose behalf we are supporting applications and receiving disclosure information, can fully comply with the DBS Code of Practice. All reasonable steps will be taken to ensure that the information provided by Trowbridge Town Council to these organisations will be handled, used, stored, retained and disposed of in full compliance with the DBS Code of Practice and in accordance with this policy. In addition, the Council will ensure that anybody or individual at whose request applications for Disclosure are supported has a written policy and, if necessary, will provide this policy for that body to use or adapt for this purpose.

16. DBS procedure for authorised officers

- Authorised Officers are responsible for meeting with the applicant in person, to check all relevant documents, ensure that it is the true identity of that applicant and then complete the last page of the form, ensuring that it is signed clearly
- The application will be completed online. The completion of the form can be done in accompaniment accompanied by an Authorised Officer
- Authorised Officers are responsible for ensuring they record the following information from each application: date completed, name of applicant, application number. This information should be stored on a password protected spreadsheet or in a book which must be locked away confidentially.
- Authorised Officers should encourage applicants to make a note of their individual application number. Applicants are responsible for tracking the progress of their own applications and this can be done by visiting: https://secure.crbonline.gov.uk/enquiry/enquirySearch.do
- Should a new member of staff have a current DBS (dated within the last two years,) the authorised officer should check with the Town Clerk to establish whether this can be temporarily used
- It is the DSL's duty to inform the DBS of any safeguarding issues that may arise during any individual's employment