CYNGOR SIR CEREDIGION COUNTY COUNCIL

Report to: Cabinet

Date of meeting: 17 July 2024

<u>Title:</u> Corporate Safeguarding Policy

Purpose of the report: The Corporate Safeguarding Policy has been updated

to reflect the revised Wales Safeguarding Procedures.

For: Decision

Cabinet Portfolio and Cabinet Member:

Councillor Alun Williams, Deputy Leader of the Council and Cabinet Member for Through Age and Wellbeing

<u>Introduction</u>

Safeguarding and protecting children and adults at risk takes the highest priority for Ceredigion County Council. We have a corporate responsibility to ensure that there are robust arrangements and procedures in place to safeguard the most vulnerable in the community.

This Corporate Safeguarding Policy provides a framework for every service within the Council setting out responsibilities in relation to safeguarding and protecting children and adults at risk as well as the methods by which the Council will be assured that it is fulfilling statutory duties.

Current Situation

The Corporate Safeguarding Group has now been re-established after a hiatus during Covid pandemic. The Group has overseen the drafting of the new revised Corporate Safeguarding Policy in readiness for its implementation and passage through the democratic process.

The last version of the Corporate Safeguarding Policy was drafted in 2017 and were underpinned by the All Wales Child Protection Procedures including vulnerable adults (2008). The Wales Safeguarding Procedures were implemented in 2019 and are now incorporated into the policy.

The policy applies to staff, Councillors, volunteers, and people carrying out work for or behalf of the Council.

Wellbeing of Future Generations:

Has an Integrated Impact Assessment been completed? If not, please state why.

Yes – Appendix 2.

Summary of Integrated Impact Assessment:

Long term: Positive steps to safeguard all people.

Collaboration: Corporate collaboration to implement the policy

Involvement: A policy to apply to all for utilisation and implementation safely. **Prevention:** The policy aims to identify, reduce, and address the risk of harm.

Integration: Fully integrated across the corporate responsibilities

Recommendation(s):

The Corporate Safeguarding Policy is agreed as the definitive document to ensure Ceredigion is a safe organisation and recognises its responsibilities to safeguard children and adults at risk.

Reasons for decision:

It is essential that the Council provides a policy framework to safeguard people delivering services on behalf of the Local Authority.

The revised Corporate Safeguarding Policy utilises the up-to-date relevant guidance and legislation.

Overview and Scrutiny:

The Policy was presented and agreed at the Overview and Scrutiny Coordinating Committee on 4 March 2024.

Policy Framework:

Wales Safeguarding Procedures 2019 Violence against Women, domestic abuse and sexual violence (VAWDASV) Multi Agency Public Protection Arrangements

Corporate Well-being Objectives:

Creating Caring and Healthier Communities

Finance and Procurement implications:

There are indirect financial implications that are linked to safeguarding and protecting individuals based on assessed risk and need.

The Council procures and commissions suitable services to assist in the safeguarding of the community and in conducting its core business.

Legal Implications:

Social Services and Well-being (Wales) Act 2014
Children Act 1989
Regulation and Inspection of Social Care (Wales) 2016
Modern Slavery Act 2015
Mental Health Act 1983
Mental Health (Wales) Measure 2010
Mental Capacity Act 2005
Equality Act 2010

Public Services Ombudsman (Wales) Act 2005

Staffing implications:

The staffing implications of the policy relate to the duty of the Council to support the workforce and all stakeholders to understand the policy. This includes the need for all stakeholders to be safely recruited and to receive underpinning and update training on safeguarding matters.

Property / asset implications:

None identified.

Risk(s):

There is a risk of significant harm to vulnerable individuals and groups if the Council fails to adequately draft, approve, implement, and promote suitable corporate safeguarding policies.

Statutory Responsibilities:

The Statutory Director of Social Services must oversee and report to Councillors regarding the operation, monitoring and improvement of child and adult safeguarding systems within the local authority.

Background Papers:

None

Appendices:

Appendix 1- Draft Corporate Safeguarding Policy Appendix 2- Integrated Impact Assessment

Corporate Lead Officer:

Audrey Somerton-Edwards, Corporate Lead Officer: Porth Cynnal & Statutory Director of Social Services

Reporting Officer:

Audrey Somerton-Edwards, Corporate Lead Officer: Porth Cynnal & Statutory Director of Social Services

Date:

21 June 2024



Corporate Safeguarding Policy

Protecting children, young people and adults at risk



Safeguarding is everybody's business



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Introduction

Safeguarding and protecting children and adults at risk is a high priority for Ceredigion County Council and ensuring that there are robust arrangements and procedures in place.

This Corporate Safeguarding Policy provides a framework for every service within the Council setting out responsibilities in relation to safeguarding and protecting children and adults at risk as well as the methods by which the Council will be assured that it is fulfilling its duties.

This policy applies to all Ceredigion County Council employees, Councillors, volunteers and also service providers that are commissioned by the Council.

Safeguarding is everyone's business whether they work for, or on behalf of the Council.

The Signs of Safety Practice Framework will underpin all aspects of service delivery across the corporate Organisation. This will ensure that there is greater consistency and transparency in what individuals and families can expect from us across the continuum of need.

The Signs of Safety Framework ensures there is emphasis on building individual, family and community strengths and robust assessment to identify clear goals, which will enable the organisation to deliver the right help at the right time to people in Ceredigion

Objectives of this Policy

To set out how Ceredigion County Council will meet its obligations towards the safeguarding of children and adults at risk;

To give assurances to the public, Councillors, staff, volunteers and people carrying out work on behalf of the Council that there are sound arrangements in place to safeguard children and adults at risk.

Scope

The operational Safeguarding Service within Porth Gofal will lead on dealing with enquires regarding concerns that individuals may be at risk of harm, everyone has a responsibility to safeguard the wellbeing of adults and children who may be at risk whatever their role.

The strategic responsibility for the implementation of the policy will be overseen by the Quality Assurance and Safeguarding Service, Porth Cynnal.

The policy covers all functions and services of the Council and applies to all Council employees, elected members, foster carer's, individuals undertaking work placements and volunteers working within the Council. Also independent contractors who are carrying out work on behalf of the Council.

The Council also has a duty to ensure that other organisation's commissioned to provide services on their behalf have regard to the need to safeguard and promote the wellbeing of adults and children.

The Social Services and Well-being (Wales) Act 2014 states:

A child at risk is a child who is experiencing or is at risk of abuse, neglect or other kinds of harm and; has needs for care and support whether or not the authority is meeting any of those needs.

An adult at risk is an adult who is experiencing or is at risk of abuse, neglect, has needs for care and support whether or not the authority is meeting any of those needs and; as a result of those needs is unable to protect him or herself against the abuse or neglect or the risk of it.

Context

Legislation which is contained within the various Acts and guidance that are identified below enshrine the right to protection of all individuals from abuse. The legal starting point in achieving this objective is professional's duty to report allegations or suspicion of abuse and neglect. The law also identifies the Local Authority as the lead organisation in making enquiries to identify whether an individual is at risk and in coordinating the response to protect.

In practice this is never achieved in isolation or without clear leadership and accountability for the work which is equally set out in law, along with the duty to cooperate and collaborate with others.

The Council recognises that good practice in safeguarding brings together all activity aimed at promoting safe practice with vulnerable groups and preventing abuse and neglect. For this reason and because the law, policy, guidance and regulations change from time to time, it is impossible to provide an exhaustive list of relevant documents but the most significant items are included below:

- Social Services and Well Being Act 2014
- Education Act 2002 plus 'Keeping Learners Safe'
- The role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002
- Children Act 1989 and 2004
- · Safeguarding Children: Working Together under the Children Act 2004'.
- In Safe Hands' 2000
- Section 17 of the Crime and Disorder Act 1998,
- Mental Capacity Act 2005
- Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015
- Housing Act 2004
- Licensing Act 2003
- Human Rights Act 1998
- Wales Safeguarding Procedures 2019

The Council will ensure that practice is compliant with the following policies and procedures:

- Wales Safeguarding Procedures 2019
- Ceredigion County Council Recruitment Policies
- Ceredigion County Council Whistle-Blowing policy
- Ceredigion County Council Dealing with Domestic Abuse & Sexual Violence
- Policy and procedures for Safeguarding children, young people and vulnerable adults (Education - March 2013)

Employees and Councillors should act in accordance with the relevant professional Code of Conduct.

The intention is that this Corporate Safeguarding Policy will supplement and not replace any responsibilities already set out in legislation, policy or guidance set out above.

Governance Arrangements

Governance Structure - Corporate Safeguarding Board



Corporate Safeguarding Board Membership

- Statutory Director of Social Services
- Elected Member and portfolio holder for Porth Cynnal and Porth Gofal
- Elected Member and portfolio holder for Porth Cymorth Cynnar
- Corporate Director
- · Corporate Lead Officer Porth Gofal
- Corporate Lead Officer Porth Cymorth Cynnar
- Corporate Lead Officer People and Organisation
- Corporate Lead Officer Schools
- Nominated Child Protection Officer Education
- Other departmental representatives as nominated
- Quality Assurance and Safeguarding Corporate Manager

The group meets quarterly.

Local Operational Group for Safeguarding Children and Adults

Safeguarding Boards are the key statutory mechanism for agreeing how the relevant organisation's in each area will cooperate to safeguard children and adults at risk, and for ensuring the effectiveness of what they do.

CYSUR: Child & Youth Safeguarding; Unifying the Region. They are responsible for delivering the following objectives:

- To PROTECT children within Mid & West Wales who are experiencing, or are at risk of abuse, neglect or other kinds of harm, and
- To PREVENT children within its area from becoming at risk of abuse, neglect or other kinds of harm

To discharge the **Mid & West Wales Safeguarding Board**'s objectives effectively, there is one Board which combines the safeguarding business for Children and Adults.

CWMPAS: Collaborative Working & Maintaining Partnership for Adult Safeguarding. They are responsible for delivering the following objectives:

- To PROTECT adults within Mid & West Wales who:
- Have needs for care and support, and are experiencing, or are at risk of, abuse or neglect; and
- To PREVENT those adults within Mid & West Wales from becoming at risk of abuse or neglect.



Roles and Responsibilities

All employees, Councillors and volunteers have the duty to report concerns or suspicion about abuse and neglect.

The Through Age Safeguarding Service within Porth Gofal and Porth Cynnal will be responsible for ensuring there are effective operational and strategic systems and processes in place to manage how the council receives and responds to new concerns about children and adults at risk.

All safeguarding concerns should be reported to Ceredigion County Council's Customer Contact (CLIC) service on 01545 574000.

Every Manager is responsible for:

- Recruiting employees/volunteers in accordance with relevant HR policy, including (where required) Disclosure and Barring Service checks.
- Ensure safeguarding is part of every employee/volunteer's induction.
- Identifying employees/volunteers who are likely to come into contact with children or adults at risk as part of their role.
- Ensuring training is delivered commensurate with role.
- Ensuring that all employees/volunteers are aware of how to report safeguarding concerns and to whom.
- Ensuring that all employees/volunteers are aware of the Council's Whistleblowing Policy.
- Ensuring that employees/volunteers are aware that they must conduct themselves in a manner which safeguards and promotes the wellbeing of children and adults at risk.
- Providing employees/volunteers with guidance about safeguarding concerns as required.

Statutory Director of Social Services. This role as defined by the Social Services and Well-Being (Wales) Act 2014 is fulfilled by the Statutory Director of Social Services who has the final and indivisible responsibility for safeguarding issues and accountability to safeguard and promote the welfare of children and adults at risk. They are responsible for ensuring that the Council has appropriate safeguarding measures to protect children and young people, adults and vulnerable older people and is responsible for reporting at a corporate level to Elected Members on their effectiveness

The annual Report of the Director of Social Services will provide evidence and scrutiny of the measures and activity of the safeguarding service.

Each **Corporate Director** through their Management Teams will be responsible for ensuring that all the statutory requirements in terms of safeguarding and promoting the welfare of children and adults at risk are addressed.

Service Commissioners will be responsible for ensuring that contractual arrangements specify responsibilities in relation to safeguarding in accordance with this Policy and existing commissioning policy.

Contractors, sub-contractors or other organisation's funded by or on behalf of the Council are responsible for arranging checks through the Disclosure and Barring Service (where required) and for ensuring that their staff comply with regulatory and contractual arrangements relating to safeguarding children and adults.

Contractors are also responsible for informing relevant managers of the Council about any concerns they may have and to refer such safeguarding concerns to the IAA service.

The Chief Executive will ensure that there are effective safeguarding arrangements in place, including policies and procedures, that those policies and procedures are implemented, that there are effective governance arrangements in place and that all statutory requirements are being met and that procedures for reporting concerns are in place and that these are implemented and known within the organisation.

The **Chief Executive** will ensure that there are effective safeguarding arrangements in place, including policies and procedures, that those policies and procedures are implemented, that there are effective governance arrangements in place and that all statutory requirements are being met and that procedures for reporting concerns are in place and that these are implemented and known within the organisation.

Liaison Arrangements

Regular meetings are held between the Corporate Lead Officer for Schools and Porth Cynnal and Porth Gofal services. Other parties may be included as required or deemed appropriate.

The Corporate Lead Officers for Porth Cynnal, Porth Gofal and Porth Cymorth Cynnar will meet regularly for consultation and information gathering,

Strategic Context

At a strategic level, this approach to safeguarding supports the delivery of the Council's priorities as set out in the Corporate Strategy 2022-2027.

- Boosting the Economy, Supporting Businesses and Enabling Employment
- Creating Caring and Healthy Communities
- Providing the Best Start in Life and Enabling Learning at All Ages
- · Creating Sustainable, Green and Well-connected Communities

At an All Wales level, keeping people safe contributes to the Wellbeing Goals as set out in the Well-being of Future Generations Act to improve the economic, social, environmental and cultural well-being of Wales.

Performance and Measures

Reporting, monitoring and reviewing

The Corporate Safeguarding Board for Safeguarding Children and Adults will present an Annual Report through the Ceredigion County Council Democratic Process, as well as providing information that will be detailed in the Statutory Director of Social Services Annual Report. This report will draw attention to the Council's performance in complying with the Corporate Policy and legislative guidelines.

Quarterly performance reports in relation to Children and Adults Safeguarding are reported to the Mid and West Wales Regional Executive Safeguarding Board where there is an opportunity to scrutinize and compare activity across the region. There is a local audit schedule through the Local Operational Group in place that provides a mechanism for ensuring quality assurance and opportunities for learning and development of services. This work is overseen by the Regional Executive Safeguarding Board

All **Elected Members** will be invited to attend training in respect of safeguarding children and adults at risk and additional safeguarding training needs, e.g. in relation to their portfolios will be addressed as part of ongoing Personal Development Reviews.

The Lead Member will work closely with and take professional advice from a range of Senior Officers within the Authority, as appropriate.

The Lead Member will liaise and consult with other Cabinet Members on individual matters likely to affect their portfolios as set out in the Council's Scheme of Delegation.

All **Corporate Lead Officers** must ensure that where those posts are designated as regulated activity. (see: https://www.gov.uk/government/organisation s/disclosure-and-

barring-service) Their staff are checked through the Disclosure and Barring Service (DBS) procedures and that their staff conform to the Policy and Guidelines for Safeguarding Children and Adults.

All Corporate Lead Officers must establish arrangements to ensure that they comply with the requirements of this policy and the Council's Criminal Records Policy.

All Corporate Lead Officers must arrange that records are kept of every check that is made by the DBS.

Risks

Safeguarding Risk Register

We will monitor the Risk Register on a regular basis.

Contact details

If an Elected Member (or any member of the public) has concerns regarding the safety of an individual, then they should contact the Customer Contact number (01545 574000) where they will be appropriately signposted to the most appropriate service

The Social Services Emergency Duty Team should be contacted on 0300 333 2222 if the issue arises after 5.00pm, Monday to Friday and on weekends and Bank Holidays.

The Police must be contacted immediately if the child or adult is in danger.

This document will be reviewed annually.

Glossary

Categories and indicators of abuse and neglect

Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

Safeguarding adults includes:

- Protecting their rights to live in safety, free from abuse and neglect.
- People and organisations working together to prevent the risk of abuse or neglect, and to stop them from happening.
- Making sure people's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account.
- Safeguarding children and promoting their welfare includes:
- Protecting them from maltreatment or things that are bad for their health or development.
- Making sure they grow up in circumstances that allow safe and effective care.
- Effective safeguarding arrangements should be underpinned by two key principles:
- Safeguarding is everyone's responsibility: for services to be effective each professional and organisation should play their full part; and

- A person-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of adults and children.
- Section 197(1)of the Social Services and Well-being (Wales) Act 2014 specifies the categories of abuse which are:
 - Physical
 - Sexual
 - Psychological / Emotional
 - Neglect
 - Financial

Financial abuse has been added as a new category for Children under the Social Services & Well-being (Wales) Act 2014.

Categories and indicators of abuse – adults at risk

Section 197(1)of the Social Services and Well- being (Wales) Act 2014 provides definitions of 'abuse' and 'neglect'.

Abuse means physical, sexual, psychological, emotional or financial abuse (and includes abuse taking place in any setting, whether in a private dwelling, an institution or any other place) and financial abuse which includes:

- having money or other property stolen
- being defrauded
- being put under pressure in relation to money or other property
- having money or other property misused

Neglect means a failure to meet a person's basic physical, emotional, social or psychological needs, which is likely to result in an impairment of the person's well-being (for example, an impairment of the person's health).

The following is a non-exhaustive list of examples for each of the categories of abuse and neglect:

Physical abuse

Hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions.

Sexual abuse

Rape and sexual assault or sexual acts to which the adult has not or could not consent and/or was pressured into consenting.

Psychological abuse

Threats of harm or abandonment, coercive control humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks (coercive control is an act or pattern of acts of assault, threats, humiliation, intimidation or other abuse that is used to harm, punish of frighten the victim).

Neglect

Failure to access medical care or services, negligence in the face of risk-taking, failure to give prescribed medication, failure to assist in personal hygiene or the provision of food, shelter, clothing; emotional neglect.

Financial abuse

In relation to people who may have needs for care and support and includes:

- an unexpected change to their will
- sudden sale or transfer of the home
- · unusual activity in a bank account
- sudden inclusion of additional names on a bank account

- signature does not resemble the person's normal signature
- reluctance or anxiety by the person when discussing their financial affairs
- giving a substantial gift to a carer or other third party
- a sudden interest by a relative or other third party in the welfare of the person.
- bills remaining unpaid
- complaints that personal property is missing
- a decline in personal appearance that may indicate that diet and personal requirements are being ignored
- deliberate isolation from friends and family giving another person total control of their decision-making;

Any of the above forms of abuse could be motivated by the personal characteristics of the victim. This may make it a hate crime. These involve a criminal offence perceived by the victim or any other person, to be motivated by hostility or prejudice based on a person's actual or perceived disability, race, religion and belief, sexual orientation and transgender.

Abuse categories

Extract from the Social Services & Wellbeing (Wales) Act 2014

Physical abuse - hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions.

Types of physical abuse

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)

- Involuntary isolation or confinement
- Misuse of medication (e.g. oversedation)
- · Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g. tying someone to a chair)

Possible indicators of physical abuse

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- · Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

Sexual abuse -rape and sexual assault or sexual acts to which the vulnerable adult has not or could not consent and/or was pressured into consenting

Indicators of sexual abuse can be both physical and behavioural, including:

- New emergence of sexually transmitted diseases (STDs)
- New difficulty sitting or walking
- Pelvic injury
- Bruises on inner thighs or around the genital area
- Anal or genital pain, bleeding, or irritation
- Bloody, torn, or stained undergarments
- · Extreme agitation
- · Withdrawal from social interactions
- Panic attacks, or emerging posttraumatic stress disorder (PTSD) symptoms
- Inappropriate, aggressive, or unusual sexual behaviour
- Suicide attempts

Psychological abuse -threats of harmor abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks (coercive control is an act or pattern of acts of assault, threats, humiliation, intimidation or other abuse that is used to harm, punish or frighten the victim);

Types of psychological or emotional abuse

- Enforced social isolation preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- · Threats of harm or abandonment
- Cyber bullying

Possible indicators of psychological or emotional abuse

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- · Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- · Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

Neglect - failure to access medical care or services, negligence in the face of risk-taking, failure to give prescribed medication, failure to assist in personal hygiene or the provision of food, shelter, clothing; emotional neglect. (See also self-neglect)

Types of neglect

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- · Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- · Ignoring or isolating the person
- Preventing the person from making their own decisions

Possible indicators of neglect:

- Poor environment dirty or unhygienic
- Poor physical condition and/or personal hygiene
- · Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction
- Inappropriate or inadequate clothing

Financial abuse in relation to people who may have needs for care and support

Possible indicators of this include:

- · unexpected change to their will.
- · sudden sale or transfer of the home
- · unusual activity in a bank account

- sudden inclusion of additional names on a bank account
- signature does not resemble the person's normal signature
- reluctance or anxiety by the person when discussing their financial affairs
- giving a substantial gift to a carer or other third party
- a sudden interest by a relative or other third party in the welfare of the person
- · bills remaining unpaid
- complaints that personal property is missing
- a decline in personal appearance that may indicate that diet and personal requirements are being ignored
- deliberate isolation from friends and family giving another person total control of their decision-making.

Self-Neglect

Capacity is a highly significant factor in both understanding and intervening in situations of self-neglect.

Self-neglect can happen as a result of an individual's choice of lifestyle, or the person may:

- · be depressed,
- have poor health,
- have cognitive (memory or decision making) problems, or
- · be physically unable to care for self.

Types of self-neglect

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- · Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Indicators of self-neglect:

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- · Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- · Neglecting household maintenance
- Hoarding
- Collecting a large number of animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury

Definitions of Child Abuse and Neglect

(All Wales Child Protection Procedures 2008) A child is abused or neglected when somebody inflicts harm, or fails to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. A child or young person up to the age of 18 years can suffer abuse or neglect and require protection via an inter- agency child protection plan.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or caregiver fabricates or induces illness in a child whom they are looking after.

Emotional abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally

being imposed on children. It may involve causing children frequently to feel frightened or in danger, for example by witnessing domestic abuse within the home or being bullied, or, the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or caregiver failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. In addition, neglect may occur during pregnancy as a result of maternal substance misuse.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including Penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Child sexual exploitation (CSE) 'Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Domestic violence and abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Domestic abuse and young people

Young people in the 16 to 17 age group can also be victims of domestic violence and abuse.

Controlling behaviour

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

A coercive or controlling behaviour offence came into force in December 2015. It carries a maximum 5 years' imprisonment, a fine or both. Victims who experience coercive and controlling behaviour that stops short of serious physical violence, but amounts to extreme psychological and emotional abuse, are able to bring their perpetrators to justice.

Hate Crime

A Hate Incident is any incident which the victim, or anyone else, thinks is based on someone's prejudice towards them because of their race, religion, sexual orientation, disability or because they are transgender.

Further information on Hate Crime (including how to report a hate crime) can be found on the Bridgend Community Safety Partnership website.

Modern slavery and human trafficking

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking.

These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. Although human trafficking often involves an international crossborder element, it is also possible to be a victim of modern slavery within your own country.

It is possible to be a victim even if consent has been given to be moved.

Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence.

Safeguarding children in education

All schools will have identified a
Designated Child Protection Teacher
(DCPT) with responsibility for safeguarding
and child protection. All schools will also
have their own child protection policy. The
policy will identify the key personnel.

Any concerns around safeguarding should be reported to the DCPT or the deputy in their DCPO's absence.

Staff should ensure they keep full and accurate records of their concerns, including details of any disclosures, and should include action taken e.g. 'referred to DCPT'.

Record keeping is vitally important when dealing with safeguarding and records should be clear, precise and distinguish fact and opinion.

Records must always include the name of the child, date of incident/concern, full name of the person making the record and details of action taken and people spoken to

Although the Designated Child Protection Teacher is the person with responsibility for child protection and safeguarding, if a member of staff has concerns that a matter has not been addressed they can make a referral themselves.

Remember Child Protection is everyone's responsibility and any individual can make a referral to children's services assessment team. Professionals cannot remain anonymous when making referrals.

Dyfed Powys Police Public Protection Unit

This unit assists local officers with some of the most sensitive criminal investigations, providing support and guidance for cases such as child and adult protection, domestic abuse, sexual offences, missing people and mental health.

The department also participates in MAPPA (Multi-Agency Public Protection Arrangements) with the probation service to effectively manage risks posed by violent and sexual offenders living in the force area.

The unit work with statutory partners and third sector agencies long after a case is closed in court to look after the wellbeing of victims and the general public.

The Police Unit can be contacted on 101.

Hywel Dda University Health Board (HDUHB)

The Health Board works closely with other agencies such as the police, social services and education to appropriately share information and safeguard adults and children at risk. Some of the situations children and adults at risk are affected by which require a safeguarding response include abuse & neglect, child sexual exploitation (CSE), domestic abuse, female genital mutilation (FGM), Deprivation of Liberty Safeguards (DoLS), Mental Capacity Act (MCA), human trafficking and radicalisation.

Under the Social Services and Well-Being (Wales) Act 2014 HDUHB has a statutory duty to inform the local authority of any adults or children who may be at risk.



General enquires:

www.ceredigion.gov.uk 01545 570881 clic@ceredigion.gov.uk

Safeguarding concerns:

01545 574000 contact-socservs@ceredigion.gov.uk





INTEGRATED IMPACT ASSESSMENT (IIA) TOOL

Proposal Details

Title of Policy / Proposal / Initiative	
Corporate Safeguarding Policy	
Service Area	Officer completing IIA
Porth Cynnal	Audrey Somerton-Edwards
Corporate Lead Officer	Strategic Director
Audrey Somerton Edwards	James Starbuck

Please give a brief description of the purpose of the proposal

This Corporate Safeguarding Policy provides a framework for every service within the Council setting out responsibilities in relation to safeguarding and protecting children and adults at risk as well as the methods by which the Council will be assured that it is fulfilling statutory duties.

The last version of the Corporate Safeguarding Policy was drafted in 2017 and were underpinned by the All Wales Child Protection Procedures including vulnerable adults (2008). The Wales Safeguarding Procedures were implemented in 2019 and are now incorporated into the policy.

Who will be directly affected by this proposal? HINT

There is potential for any member of the Ceredigion community to require safeguarding services in line with this policy.

The policy applies to all Ceredigion Council employees, Councilors, volunteers and also service providers that are commissioned by the Council

Have those who will be affected by the proposal had the opportunity to comment on it?

- The policy has been presented to:
- Through Age Wellbeing Programme Board
- Leadership Group
- Corporate Safeguarding Group
- Overview and Coordination Scrutiny.

The next stage of governance is Cabinet.

Version Control

The IIA should be used at the earliest stages of decision making, and then honed and refined throughout the decision-making process. It is important to keep a record of this process so that we can demonstrate how we have considered and included sustainable development, Welsh language and equality considerations wherever possible.

Version Number	Author	Decision making stage	Date Considered	Description of any amendments made
		<u>HINT</u>		HINT
1.0	Audrey Somerton- Edwards	Cabinet	24.06.2024	New policy

Council Corporate Well-being Objectives

Which of the Council's Corporate Well-being Objectives does this proposal address and how? Click here to read a summary of our Corporate Strategy 2022-27

Boosting the economy, supporting business, and enabling employment.	 Supporting Ceredigion County Council and partners as employers to achieve safe recruitment and working practices by understanding and being guided in their safeguarding responsibilities. Generating business opportunities that are safe and deliverable through safe commissioning and procurement.
Creating caring and healthy communities	 Ensuring that services and provision are safely delivered and promote a caring and healthy community.
Providing the best start in life and enabling learning at all ages	 Creating safe learning space for all learners across all services delivered by or on behalf of Ceredigion County Council in line with the Through Age Wellbeing model.

	 Creating safe care services for all people who need care and support delivered by or on behalf of Ceredigion County Council in line with the Through Age Wellbeing model.
Creating sustainable, greener, and well-connected communities	

National Well-being Goal: A Prosperous Wales

An innovative, productive, and low carbon society where everyone has decent work and there is no poverty.

Click here for information about a prosperous Wales.

Does the proposal contribute to this goal? Describe the positive or negative impacts. (Click <u>here</u> for information)

Positive

Supporting the workforce and partners of Ceredigion County Council to deliver and maintain safe services.

What evidence do you have to support this view?

The number of referrals received in respect of safeguarding because of input from the local authority will need to be monitored and reports to the Corporate Safeguarding Group when the policy is implemented.

What action(s) can you take to mitigate any negative impacts or better contribute to this National Well-being Goal?

Monitor and review safeguarding activity related to local authority service delivery and core business.

National Well-being Goal: A Resilient Wales

A society where biodiversity is maintained and enhanced and where ecosystems are healthy and functioning.

Click here for information about a resilient Wales.

Does the proposal contribute to this goal? Describe the positive or negative impacts. (Click here for information)

The proposal does not contribute to this goal.

What evidence do you have to support this view?

What action(s) can you take to mitigate any negative impacts or better contribute to this National Well-being Goal?

None identified

National Well-being Goal: A Healthier Wales

A society where people make healthy choices and enjoy good physical and mental health.

Click here for information about a healthier Wales.

Does the proposal contribute to this goal? Describe the positive or negative impacts. (Click here for information)

This policy does contribute to this goal. People who are appropriately safeguarded will have better physical and mental wellbeing.

What evidence do you have to support this view?

The word 'Safeguarding' in the United Kingdom and Ireland denotes measures to protect the health, well-being and human rights of individuals, which allow people – especially vulnerable people (children and/or adults) — to live free from abuse, harm and neglect.

What action(s) can you take to mitigate any negative impacts or better contribute to this National Well-being Goal?

None to note.

National Well-being Goal: A More Equal Wales

A society where everyone has an equal chance whatever their background or circumstances.

This section is longer because you are asked to assess the impact of your proposal on each group that is protected by the **Equality Act 2010**.

Click here for information about equality in Wales.

Do you think this proposal will have a positive or a negative impact on people because of their age? (Click here for information)

Children and Young People up to 18	None / Negligible
People 18-50	None / Negligible
Older people 50+	None / Negligible

Describe the positive or negative impacts.

People from all age groups need to be safeguarded. This policy does not discriminate against anyone because of their age.

It is worth noting that adults with capacity have the opportunity to consent or refuse safeguarding support.

What evidence do you have to support this?

Wales Safeguarding Procedures are explicit about safeguarding all people of all ages.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Ensure that there is appropriate communication with individuals who need to be safeguarded.

Do you think this proposal will have a positive or a negative impact on people because of their disability? (Click <u>here</u> for information)

Hearing Impairment	None / Negligible
Physical Impairment	None / Negligible
Visual Impairment	None / Negligible
Learning Disability	None / Negligible
Long Standing Illness	None / Negligible
Mental Health	None / Negligible
Other	None / Negligible

The Safeguarding Policy will help the Council and partners to identify all domains of abuse and neglect. The policy safeguards all vulnerable groups, it does not discriminate against people because they have a disability. The Corporate Safeguarding Policy must be applied consistently and fairly to all individuals or groups in the community who need to be safeguarded.

What evidence do you have to support this?

Wales Safeguarding Procedures and the Social Services and Wellbeing (Wales) Act 2014 set out the responsibilities of the local authority to safeguarding and protect.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Appropriate communication methods will be used when we work with individuals who have additional communication needs.

Strict adherence to legislation, policies and procedures will assist in negating negative impacts of safeguarding activities on individuals.

Do you think this proposal will have a positive or a negative impact on people who are transgender? (Click <u>here</u> for information)

Trans Women	None / Negligible
Trans Men	None / Negligible
Non-binary people	None / Negligible

Describe the positive or negative impacts

All people irrespective of sexual orientation will be safeguarded. The Corporate Safeguarding Policy will be applied equally to all individuals and groups in the community.

What evidence do you have to support this?

The Corporate Safeguarding Policy is written and applied in accord with the Wales Safeguarding Procedures which seek to protect all people.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will hav	e a positive or a negative impact on people
with different sexual orientation? ((Click here for information)

Bisexual	None / Negligible
Gay Men	None / Negligible
Gay Women/Lesbian	None / Negligible
Heterosexual/Straight	None / Negligible

Describe the positive or negative impacts

The Corporate Safeguarding Policy seeks to protect all people irrespective of gender. The Corporate Safeguarding Policy will be applied equally to all individuals and groups in the community.

What evidence do you have to support this?

The Corporate Safeguarding Policy is written and applied in accord with the Wales Safeguarding Procedures which seek to protect all people.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will have a positive or a negative impact on people who are married or in a civil partnership? (Click here for information)

People who are married	None / Negligible
People in a civil partnership	None / Negligible

The Corporate Safeguarding Policy seeks to protect all people irrespective of their marital status. The Corporate Safeguarding Policy will be applied equally to all individuals and groups in the community.

What evidence do you have to support this?

The Corporate Safeguarding Policy is written and applied in accord with the Wales Safeguarding Procedures which seek to protect all people.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will have a positive or a negative impact on people who are pregnant or on maternity leave? (Click here for information)

Pregnancy	None / Negligible
Maternity	None / Negligible

Describe the positive or negative impacts

The Corporate Safeguarding Policy seeks to protect all women experiencing pregnancy and maternity and their children. It will be applied equally to all women and in particular those who are pregnant or in the maternity phase in the community.

What evidence do you have to support this?

The Corporate Safeguarding Policy is written and applied in accord with the Wales Safeguarding Procedures which seek to protect all people.

What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?

Do you think this proposal will have a positive or a negative impact on people because of their ethnic origin? (Click here for information)

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Asian / Asian British	None / Negligible

Black / African / Caribbean / Black British	None / Negligible
Mixed / Multiple Ethnic Groups	None / Negligible
White	None / Negligible
Other Ethnic Groups	None / Negligible

The Corporate Safeguarding Policy seeks to protect all people irrespective of their ethnicity. The policy will be applied equally to all individuals and groups in the community.

What evidence do you have to support this?

The Corporate Safeguarding Policy is written and applied in accord with the Wales Safeguarding Procedures which seek to protect all people.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will have a positive or a negative impact on people with different religions, beliefs, or non-beliefs? (Click here for information)		
Buddhist	None / Negligible	
Christian	None / Negligible	
Hindu	None / Negligible	
Humanist	None / Negligible	
Jewish	None / Negligible	
Muslim	None / Negligible	
Sikh	None / Negligible	
Non-belief	None / Negligible	
Other	None / Negligible	

The Corporate Safeguarding Policy seeks to protect all people irrespective of their religion, beliefs, or non-beliefs.

What evidence do you have to support this?

The Corporate Safeguarding Policy is written and applied in accord with the Wales Safeguarding Procedures which seek to protect all people.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

Do you think this proposal will have a positive or a negative impact on men or women? (Click here for information)

Men	None / Negligible
Women	None / Negligible

Describe the positive or negative impacts

The Corporate Safeguarding Policy seeks to protect all adults and children. It will be applied equally to all individuals and groups in the community.

What evidence do you have to support this?

The Corporate Safeguarding Policy is written and applied in accord with the Wales Safeguarding Procedures which seek to protect all people.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between men and women?

Do you think this proposal will have a positive or a negative impact on people from the Armed Forces Community? (Click here for information)

Members of the Armed Forces	None / Negligible
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Veterans	None / Negligible
Spouses	None / Negligible
Children	None / Negligible

The Corporate Safeguarding Policy seeks to protect all people in the community. It will be applied equally to all individuals and groups in the community.

What evidence do you have to support this?

The Corporate Safeguarding Policy is written and applied in accord with the Wales Safeguarding Procedures which seek to protect all people.

What action(s) can you to take to mitigate any negative impacts?

Socio-economic Duty

Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, making it more difficult to access basic goods and services.

Family background or where a person is born still affects their life. For example, a child from a wealthy family often does better at school than a child from a poor family, even if the poorer child is more naturally academic. This is sometimes called socio-economic inequality.

Do you think this proposal will have a positive or
a negative impact on people experiencing socio-
economic disadvantage?

None / Negligible

Describe the positive or negative impacts

There are elements of safeguarding within the scope of the policy which relate to financial abuse and exploitation that can addressed. Adherence to the policy in line with the Wales Safeguarding Procedures will assist in eliminating this element of abuse.

Individuals do not always recognise that they are being financially abused. However, effective Information, Advice and Assistance in line with the Social Services and Wellbeing (Wales) Act 2014 will support people at an early stage to recognise abuse.

What evidence do you have to support this?

Referrals relating to Adult Safeguarding featuring financial abuse and exploitation are investigated by the Local Authority.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

National Well-being Goal: A Wales of Cohesive Communities

A society with attractive, viable, safe, and well-connected communities.

Click here for information about cohesive communities.

Does the proposal contribute to this goal? Describe the positive or negative impacts. HINT

The Corporate Safeguarding Policy seeks to promote a safe and socially cohesive communities that are viable places for all people to thrive.

What evidence do you have to support this view?

The participation of individuals in society demonstrates safe and well connected communities.

What action(s) can you take to mitigate any negative impacts or better contribute to the goal?

The number of referrals that are received with a corporate element will be monitored and used to inform future service delivery by all Council teams.

National Well-being Goal: A Wales of Vibrant Culture and Thriving Welsh Language

A society that that promotes and protects culture, heritage, and the Welsh language and which encourages people to take part in the arts, sports, and recreation.

Click here for information about culture and the Welsh language

Does the proposal contribute to this goal? Describe the positive or negative impacts.

All safeguarding activity is conducted in the language chose by the service user, to ensure they can express their hope, fears and aspirations articulately in their first language.

What evidence do you have to support this view?

- The Active Offer provided by Ceredigion County Council
- There are a high proportion of Welsh speakers across the whole Local Authority.

What action(s) can you take to mitigate any negative impacts or better contribute to the goal?

Ensure that we identify each service users language preference and record this for future engagement purposes.

With reference to the following, do you think this proposal will have a positive or negative effect on the Welsh language?

Click <u>here</u> for information

Opportunities for people to use the Welsh language	Positive
Treating the Welsh language, no less favourably than the English language	Positive

What evidence do you have to support this view?

As noted above.

What action(s) can you take to increase the positive impact or mitigate any negative impact on the Welsh language?

The Local Authority will continue to promote the Welsh Language and ensure that the workforce and partners can access suitable training as required.

National Well-being Goal: A Globally Responsible Wales

A society that considers how our actions might impact on other countries and people around the world.

Click <u>here</u> for information about global responsibility.

Does the proposal contribute to this goal? Describe the positive or negative impacts. HINT

The proposal does not contribute to this goal.

What evidence do you have to support this view?		
What action(s) can you take to mitigate any negative impacts or better contribute to the goal?		

Strengthening the Proposal

If you have identified any negative impacts in the above sections, please provide details of any practical changes and actions that could help remove or reduce the negative impacts.

What will you do?	When?	Who is responsible?	Progress
The Corporate Safeguarding Policy will be regularly reviewed.	Three-year intervals or sooner if there are legislative amendments or updates.	Corporate Manager, Quality Assurance	Year 1
Ensure that there is appropriate communication with individuals who need to be safeguarded.			
Strict adherence to legislation, policies and procedures will assist in negating negative impacts of safeguarding activities on individuals.			
Appropriate communication methods will be used when we work with individuals who have additional communication needs.			
The number of referrals that are received with a corporate element will be monitored and used to inform future service delivery by all Council teams,			
Ensure that we identify each service users language			

preference and record this for future engagement purposes.		
The Local Authority will		
continue to promote the Welsh		
Language and ensure that the workforce and partners can		
access suitable training as required.		
required.		

If no action is to be taken to remove or mitigate negative impacts, please justify why. (If you have identified any unlawful discrimination then the proposal must be changed or revised.)

How will you monitor the impact and effectiveness of the proposal?

Activity in line with the Corporate Safeguarding Group activity. The activity from this Group is reported to the Local Operation Group (subgroup of the Mid and West Wales Regional Safeguarding Board)

The Corporate Safeguarding Policy is reviewed by the Internal Audit mechanism and monitored for effectiveness and compliance with Audit Wales guidance.

Sustainable Development Principle: 5 Ways of Working

Describe below how you have implemented the five ways of working in accordance with the sustainable development principle of the Well-being of Future Generations (Wales) Act 2015

Long term Balancing short-term needs with long-term need and planning for the future. HINT	The Corporate Safeguarding Policy promotes the rights of individuals to be protected swiftly and efficiently as a means of securing a positive future.
Collaboration Working together with other partners to deliver. HINT	All safeguarding activity is undertaken in collaboration with statutory and partner agencies.

Involvement Involving those with an interest and seeking their views. HINT	All individuals experiencing safeguarding services have the right to express their views or access advocacy services for representation.
Prevention Putting resources into preventing problems occurring or getting worse. HINT	The Corporate Safeguarding Policy seeks to prevent abuse and neglect by guiding the Council, the workforce, and partners to recognise, report and address potential abuse. Timely referral and intervention at an early stage prevents escalation.
Integration Considering the impact of your proposal on the four pillars of well-being (social, economic, cultural and environment) the objectives of other public bodies and across service areas in the Council. HINT	The purpose of the Corporate Safeguarding Policy is to promote equality, safe services and people who are free to live their lives without abuse, neglect or fear. People who experience positive communities are able to participate in society socially and culturally

Risk

Summarise the risk associated with the proposal.

	1	2	3	4	5
Impact Criteria	Very Low	Low	Medium	High	Very High
Likelihood Criteria	Unlikely to occur	Lower than average chance of occurring	Even chance of occurring	Higher than average chance of occurring	Expected to occur
Risk Description		Impost	Probability	Score (Impact x Likelihood)	
IVISK DESCLIP	Duon	Impact	Probability	Score (Impact)	(Likelinood)
Inappropriate of the policy		2	2	4	(Likelinood)
Inappropriate		•			(LIKEIINOOD)

Sign Off

Position	Name	Signature	Date
Corporate Manager	Elizabeth Upcott	- EMED	28/06/2024
Corporate Lead Officer	Audrey Somerton- Edwards	Andrey Edwards	26/06/2024
Corporate Director	James Starbuck	M. S. C.	01/07/2024
Portfolio Holder	Councillor Alun Williams	Alen Wilhams	01/07/2024

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¹ Last updated 20/10/2023