



Derbyshire Dales District Council Safeguarding Policy

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INTRODUCTION

Derbyshire Dales District Council (referred to as 'the Council') is committed to ensuring that all children and vulnerable adults are protected and kept safe from harm.

The Council as a Local authority has a duty under Section 11 of the Children Act 2004 and The Care Act 2015 to ensure that their functions, and any services provided on their behalf, are discharged having regard to the need to safeguarding and to promote the welfare of children, and keep them safe from harm, and to work with partners to ensure that vulnerable adults, who are at risk of abuse, receive protection and support.

The Council has a responsibility to safeguard and promote the wellbeing of children and vulnerable adults so that they enjoy a safe and positive atmosphere free from harassment and bullying. However, not all children and vulnerable adults have positive experiences in their life, and the Council is committed to improving the welfare of children and vulnerable adults by encouraging good practice. The Council does not directly provide social or personal care services but is aware that safeguarding issues in its customers/ service users may arise in providing its general services.

The purpose of the Safeguarding Policy is to make explicit the responsibilities of all professionals, volunteers and agencies working together to protect those most at risk from harm and abuse. All Local Authorities have a duty to safeguard children and vulnerable adults and where they do not have a statutory lead for adult or child care services, they must work in partnership with their upper tier authority and other partner agencies to ensure they are safeguarded against abuse.

1.1. Policy Aim

This policy aims to:

- Implement and maintain systems of working practice to safeguard children and vulnerable adults taking part in Council activities
- Ensure that adults, children and their parents have confidence in Council staff, policies and practices in respect of the safe supervision of children and vulnerable adults
- Ensure that concerns about abuse are reported promptly to the appropriate authorities
- Ensure that Council Staff are aware of the legal framework regarding safeguarding, including the principles of making safeguarding personal for adults
- Ensure we work in partnership with local organisations and people by contributing where possible to the development of individual safety plans, particularly around Vulnerable Adults Risk Management Meetings (VARM)
- Offer guidance and support to all employees, volunteers and Councillors involved in Council activity to assist them in recognising, reporting and responding to the signs of possible abuse
- Work where possible with partners to prevent abuse occurring, such as providing early information and support to vulnerable adults, or signposting families struggling with complex issues such as mental health or alcohol
- Ensure that the Council's role and responsibility in protecting children and vulnerable adults from abuse is clear
- Raise awareness around safeguarding both of children and vulnerable adults and extremism
- Live up to our Corporate Plan to promote fairness and equality
- Raise awareness of issues and procedures
- Work in compliance with the [Derby and Derbyshire Safeguarding Children Procedures](#) and the most relevant legislation relating to Vulnerable Adults (Derbyshire Adults Safeguarding Board).
- Ensure those experiencing Domestic Abuse are signposted to receive appropriate support
- Review the Policy every 3 years or whenever there are relevant changes in legislation

1.2. Key Principles

Guidance given in this policy document is based on the following key principles:

- The welfare and protection of children and vulnerable adults is the primary concern
- All children and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have the right to protection from abuse
- All incidents of suspected poor practice and/or allegations should be taken seriously and responded to quickly and appropriately. This includes allegations of poor practice against employees, volunteers, Councillors and contractors.

1.3. Responsibility to Act

It is not the responsibility of any employee of the Council or elected Member to decide whether or not abuse is taking place. There is, however, a responsibility to act on any concerns and to protect children and vulnerable adults in order that appropriate agencies (Police, DCC Children's Social Care and Adult Social Care) can make enquiries and take necessary action. The flowcharts in Appendix B provide a 'quick reference' guide for referring suspicions of abuse, both in respect of children and vulnerable adults. The report forms in Appendix C provide a template for recording such concerns and action.

2. SCOPE

The policy covers all of the functions and services of the Council, as well as the operations of partners, contractors and voluntary organisations that deliver services on its behalf, unless they have their own policy which has been recognised as an adequate substitute.

The policy covers children and vulnerable adults who are affected by the services delivered by or on behalf of the Council.

The Council recognises that Derbyshire County Council's (DCC) Children's Social Care Service and the Police are the lead agencies in the District with regard to Child Protection. Derbyshire Adult Social Services is the lead agency with regard to vulnerable adults. The Council also recognises that everyone has a responsibility for identifying and reporting Safeguarding concerns and this includes all employees and Elected Members who come into contact with children and vulnerable adults. Young

people and families within our community also have a role to play as well as the community at large.

It considers that all children and vulnerable adults should be treated equally and fairly. As a service provider, the Council is committed to equality. The Council will endeavour to work with parents and other relevant parties to organise the environment and to plan activities to ensure that all children and vulnerable adults are able to take part at levels appropriate to their needs. Language and cultural requirements will also be taken into account.

2.1 Working Partners

The Council regularly works with partners and contractors from a variety of sectors. This policy will be drawn to the attention of, and made available to, all agencies and organisations in joint working situations.

Certain professional bodies may also have additional policies. Members of professional bodies need to contact their body to find out about any additional child protection policies they must apply. If the allegations are made against a qualified coach/leader/teacher, the senior manager will also need to inform the relevant National Governing Body.

2.2. Contractors

Contractors will be expected to follow the Policy unless they have their own Policy, which has been recognised as an adequate substitute. Should the Contractor make a referral to Call Derbyshire, the Safeguarding Officer or appointed substitute should be informed, using either the SIRF found in appendix C or equivalent form.

Safe recruitment practice will include those persons who may not have direct contact with children, but because of their presence will still be seen as safe and trustworthy.

The principles of safe recruitment will, therefore, be included in the terms of any contract drawn up between the Council and contractors or agencies that provide services for, or adults to work with, children and vulnerable adults for whom the Council provides is responsible.

The Council will monitor compliance with these contracts that will also include a requirement that the provider will not sub-contract to any personnel who have not been part of a safe recruitment process.

3. PROCESS

3.1 Recognition of Abuse, Bullying and Extremism

The ***Definitions of Abuse*** are located in Appendix A of this document.

It is not always easy to recognise when a Safeguarding referral needs to be made. Council employees are not expected to be experts at recognising such situations, but employees do have a responsibility to undertake basic awareness training so that they are able to identify potential instances of Safeguarding. If they have any concerns about the safety of a child or vulnerable adult they are advised to contact Call Derbyshire on 01629 533190 where appropriate advice and guidance can be given.

It is important to note that any concerns about an adult's safety should be discussed with the adult first and that their views are carefully noted before a Safeguarding referral is made. This is a key part of making care personal to an individual, as defined in the Care Act 2014.

All employees have an opportunity to discuss any concerns they may have about the welfare of a child or vulnerable adult with their line manager or another appropriate senior member of staff, but must do so as soon as possible to prevent undue delay in making any subsequent safeguarding referral.

3.2 Responding to Suspicions and Allegations of Abuse and Poor Practice

There are a number of barriers that exist which prevent a child or vulnerable adult from telling others about abuse, some of the main barriers are that they may:

- Be scared because they may have been threatened
- Think they will be taken away from home

- Believe they are to blame, or they may feel guilty
- Think it happens to others
- Feel embarrassed
- Not want their abuser to get in trouble
- Have communication or learning difficulties
- Not yet have the vocabulary to describe what has happened
- Be afraid that they won't be believed
- Think they have already told someone e.g. by dropping hints
- Have told someone before and weren't believed, so what's the point in trying again

We take any allegation seriously and investigate immediately and thoroughly.

Action to be taken if a disclosure or allegation is made:

- React calmly
- Reassure the person that they were right to tell you
- Do not make promises of confidentiality, let the person know that you may have a duty to report concerns, seek consent to share the information
- Try to reduce any questions you may choose to ask, to an absolute minimum and concentrate on listening to the person. Questions should never be leading, they should consist of Who? Where? When? What?
- Make a full written record of what has been said, heard and/or seen as soon as possible using a Safeguarding Incident Report Form (SIRF). There are different forms for children and vulnerable adults and both are detailed in Appendix C
- If you believe there is an imminent danger to life or a crime is in progress, contact the Police immediately on 999
- If you believe there is a Safeguarding issue contact Call Derbyshire and immediately thereafter notify the Safeguarding Officer (or his substitute) of your actions, and pass on the completed SIRF at the earliest opportunity
- If you are unsure whether or not the matter should be a Safeguarding referral, complete a SIRF and discuss your concerns with the Safeguarding Officer (or his substitute) as soon as possible, preferably on the same working day
- If you believe that a crime has been committed, encourage the victim to report it to the Police

Actions to be avoided:

- Panic
- Allow shock and/or distaste to show
- Probe to find out more information than offered
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Make promises to agree to keep it a secret
- Discuss the issue with anyone other than the Safeguarding Officer or his substitute

3.3. Safeguarding Children - Sharing concerns with parents/carers

The Council's policy is that the welfare of children is the paramount concern. In this respect any disclosure from a child must be believed and similarly any concern of an employee or Member of the Council must be acted upon by referral to Derbyshire County Council. The County Council are the lead body for investigating referrals and they have formal procedures and guidelines for involving parents/guardians or carers in those investigations.

Whilst the District Council will co-operate with the County Council in any investigation and in furtherance of their procedures where appropriate, officers and members should not be discussing their concerns in the first instance with parents/guardians or carers for the following reasons:

- To do so may place the child at even greater risk, particularly where it is suspected that the parent/guardian or carer may be responsible for the abuse
- To do so may compromise the investigation by DCC or a criminal investigation
- To do so may put the employee at risk

It is, however, appropriate for officers to make note of the behaviour or any comments made by parents/guardians or carers (without actively engaging with them) and to make a written record of those observations on the referral form. If in doubt speak to the Safeguarding Officer (or substitute). If you believe the child is at immediate risk please call 999.

3.4. Safeguarding Vulnerable Adults, sharing concerns with relatives/carers or friends

The Council's Policy is that the welfare of vulnerable adults is the paramount concern. In this respect any disclosure from a vulnerable adult must be believed and similarly any concern of an employee or Member of the Council must be acted upon by referral to Derbyshire County Council.

It should not automatically be assumed that a vulnerable adult will have a carer or responsible parent/guardian. Vulnerable adults, whatever their circumstances, are 'Adult' and will therefore have a right to privacy and equality. The role of protecting any adult from risk could conflict with their individual rights to make decisions for themselves, even when those decisions carry the risk of eventual harm. There is a balance to strike between protection and autonomy.

Whilst staff may recognise signs and signals which might indicate that someone is being abused, many incidents will come to light because the person discloses this themselves. Any conversation should always be directly with the vulnerable adult and should not involve relatives/carers or friends for the same reasons as set out in 3.3 above.

It is important to seek consent from the vulnerable adult to share the disclosed information and further explain the reason for doing so and the process that will follow. However, do not promise 'not to share' information. In some circumstances a vulnerable adult may not consent to information sharing and, whilst it is important wherever possible to respect those wishes, Safeguarding legislation and guidance does support information sharing if there is sufficient need, examples of which are:

- The adult lacks capacity to consent (MCA 2005)
- For the Prevention and Investigation of Crime (CDA 1998)
- There is a risk to other people
- There is a risk to children (CA 1989)
- The adult is under duress or coercion
- There is evidence of Domestic Abuse which meets MARAC criteria
- The alleged Abuser is in need of care and support
- Staff or Elected Members are implicated

Some adults may be at risk from their own self-neglect but fall outside the definition of 'Vulnerable Adult'. Although this is a serious issue which must be addressed, Derbyshire County Council has determined that it is not a matter to be dealt with through Safeguarding Policy' but should instead be referred to Adult Social Services to initiate an assessment.

Vulnerable Adults Risk Management (VARM)

This is a formal process for assessing, recording and planning the management of risk in situations where a vulnerable and capacitated adult requires support but will not engage with agencies.

If a person is vulnerable and is at risk of significant harm then safeguarding procedures should be followed in the first instance, but if they do not meet the threshold for safeguarding, or multi agency support in managing that person if required, a VARM can be called by agency to try and help support and manage the individual's needs.

The VARM process should be considered in the following circumstances:

- Where the person is perceived to have the capacity to make the decision(s) that is /are creating significant concern about their safety (risk of significant harm).
- Where there is no perpetrator and the risk arises from the capacitated individual's refusal to engage with services and/or self-neglect in one or more areas of their life
- Where there is an alleged perpetrator and the person refuses to engage with risk management
- Where existing care management and health and social care involvement has failed to resolve the issues/risks identified which are causing concern

3.5. Reporting Procedure

If you believe a child or vulnerable adult to be at immediate risk call 999.

If you believe there is a safeguarding issue make a referral to Call Derbyshire (01629 533190) and immediately notify the Council's Safeguarding Officer or appointed substitute. Details of the Council's designated Safeguarding Officer and substitute are given in (Appendix K). If you are unable to contact either, then the Chief Executive should be notified as soon as possible and within the same working day.

Employees and Elected Members responding to a suspicion of abuse or poor practice should complete an SIRF (Appendix C). In doing so, please note:

- your report may be required later as part of a legal action or disciplinary procedure
- the time and date
- the name of the place and a description of the scene
- the names of people involved
- separate out factual information from your own opinions
- the report should be dated and signed and passed to the Safeguarding Officer without delay and during the same working day
- retain any original documentation (this may be required as evidence at a later date if there is a criminal investigation or prosecution)
- if you are dealing with a recent assault, which may be a potentially criminal matter, or where violence is ongoing, you should call emergency support e.g. the police or ambulance

The form should be sent to the Safeguarding Officer via email and a phone call should be made to make them aware. The Safeguarding Officer will be responsible for retaining all documentation in accordance with the principles of GDPR.

The Safeguarding Officer should:

- Ensure the report is comprehensive
- Ensure that the parents of the child or vulnerable adult are informed of the incident and provided with a copy of the report, providing it is deemed safe to do so and does not place anyone in a position of greater risk
- Arrange a follow-up meeting to discuss the incident with the employee/Member within 24 hours of the referral if possible and address any support needs or further actions identified
- Write up the meeting with the employee and obtain the employees signature to the accuracy of the discussion notes
- Keep all records of the incident in a secure locked cabinet
- Consider further training or revisions to operational procedures to reduce the risk of this type of incident recurring. Training could include preventative measures and strategies

3.6 Action to be taken if there are concerns about a member of staff

Any concerns about the welfare of a child or vulnerable adult arising from abuse or harassment by an employee or Elected Member of the Council must be acted upon immediately. It can often be difficult to report a fellow employee or Elected Member, but the Council assures all employees that it will fully support and protect anyone who, without malicious intent reports their concerns about colleagues practice or the possibility that a child or vulnerable adult may be being abused or harassed

Employees and Members should familiarise themselves with the Council's '**Whistle Blowing**' Policy. If the concern or allegation is clearly regarding poor practice then the line manager and appropriate senior manager (usually Head of Service) should deal with it as a misconduct issue and follow the Council's Disciplinary Procedure.

However, if you believe there is a safeguarding issue follow the procedure outlined in section 3.5 above and immediately notify the Safeguarding officer, who will:

- In instances involving an employee, inform the relevant Head of Service and HR Manager, who will follow the Council's disciplinary procedure
- In instances involving an Elected Member, inform the Head of Corporate Services and Chief Executive.

Independent of any investigation by Police, Children's Social Care or Adult Care, the Council may, in following that procedure, suspend the individual accused of abuse, pending further investigation.

The Council will assess all individual cases under its disciplinary procedure to reach a decision in relation to the allegations and the person's employment on the available information. Employment decisions can be taken before and independently of the outcome of any legal investigation.

3.7 Malicious Allegations

The Council takes any allegation seriously and will refer immediately to DCC all Safeguarding incidents. However, it is also recognised that it is possible for an employee to become victim to false or malicious allegations. Employees are

encouraged to protect themselves from false accusations by adopting 'Good Practice' at all times.

Good Practice guidelines for employees

Examples of how to create a positive environment when working with children and vulnerable adults:

- Work in an open environment, avoid private or unobserved situations
- Treat all children and vulnerable adults with equal dignity and respect
- Put the welfare, success and achievement of each child first, before the winning or achieving of goals
- Make activities enjoyable and promote fair play
- Maintain a safe and appropriate distance with children and vulnerable adults
- If physical contact is necessary for demonstrating skills etc., explain and discuss these actions with the person first
- Recognise that caution is required especially when dealing with sensitive moments e.g. when dealing with bullying, bereavement or abuse
- Keep up to date with technical skills, qualifications and insurance requirements
- Be an excellent role model, this includes not drinking alcohol or smoking in the company of children and vulnerable adults in any work related environment
- Give constructive feedback rather than negative criticism
- Recognise the development needs of the children and vulnerable adults and avoid excessive training or competition.

Things to avoid

You should **NEVER** allow or take part in any of the following:

- Engage in rough physical or sexually provocative games
- Engage in or allow any form of inappropriate touching
- Allow children and vulnerable adults to use inappropriate language unchallenged
- Make sexually suggestive comments to a child, even in fun
- Reduce a child or vulnerable adult to tears, as a form of control
- Allow allegations made by a person to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature for a child or vulnerable adult that they can do for themselves including things like applying sun cream
- Transport or take children or vulnerable adults to their home unsupervised

- Administer medication unless specifically trained and approved by the person's parents to do so.
- Take a child or vulnerable adult to the toilet unsupervised

Whenever communicating with children or vulnerable adult online:

- Always use age-appropriate language in your communications and make sure all your communications are relevant to the work or the project you're involved in
- Use your allocated Council accounts to communicate with children and young people via email or social media, never personal accounts
- Use your allocated mobile or tablet to communicate with young people
- Understand how different social media platforms work and what their age limits are

3.8. Confidentiality and Sharing Information

Sharing information is essential in working to safeguard children and vulnerable adults. It is also essential to enable early intervention to help children, vulnerable adults and their families who need additional services to achieve positive outcomes. A key factor in many serious case reviews has been a failure to share information.

Derby and Derbyshire each have a Sharing of Information Protocol which can be located on the [Safer Derbyshire website](#) to ensure that effective communication is made across all organisations.

Personal information held by the Council is subject to a legal duty of confidence and will normally only be disclosed to third parties with the consent of the subject of the information. In some circumstances, however, the safety and welfare of a child or vulnerable adult dictates that information must be shared, without seeking consent, or where consent has not been given.

Sharing information as part of preventative services:

- Obtaining consent should be the first consideration
- Where this is not possible the key factor on deciding whether to share confidential information without consent is proportionality i.e. whether the proposed sharing is a proportionate response to the need to protect the public interest in question

- In making the decision you must weigh up what might happen if the information is shared against what might happen if it is not, make a decision based on reasonable judgement and record it

Sharing confidential information without consent in the public interest is normally justified:

- Where, in the interest of the child or vulnerable adult, reasonable concerns identify that their health or development will be impaired without the provision of services
- Where there is evidence that a child or vulnerable adult is suffering or is at risk of suffering significant harm
- Where there is reasonable cause to believe that an individual may be suffering or at risk of suffering significant harm
- To prevent significant harm arising to children and vulnerable adults or serious harm to adults, including through the prevention, detection and prosecution of serious crime
- If it is believed that an individual is showing extreme view or radicalised behaviours

Every effort should be made to maintain confidentiality, and information should be handled on a need to know basis. This includes the following:

- Members of the team undertaking an internal investigation, co-ordinated through the Safeguarding Officer
- The Adult who is alleged to have been abused
- The person making the allegation
- Child/Adult Care Services
- Police

Any information should be stored in a secure place with limited access and in-line with data protection laws.

3.9. Expert advice

If you are not sure what to do, but believe that there may be a Safeguarding issue, please contact the Safeguarding Officer (or substitute), if these are not available then contact Call Derbyshire on 01629 533190. The staff will give you guidance and support through the process. Please ensure you inform the Safeguarding Officer if you have

sought the advice of Call Derbyshire, so a full log of Safeguarding cases can be recorded.

3.10 Handling of difficult situations

There may be situations when individuals pose an immediate risk to others, property or themselves. There are two types of simple control methods can be used:

- Simple physical presence as control. This involves no contact e.g. standing in front of an exit.
- Holding or touching to persuade a child or vulnerable adult to comply with verbal requests e.g. holding a person's hand or using the shoulders to steer a person away from a situation.

Wherever possible, steps should be taken in advance to avoid the need for these control methods through dialogue and diversion. If a situation is approaching the point where these methods will not or do not work or if the person is threatening or using violence then the police should be contacted immediately. If other adults are present in the area they should, if possible, be moved away from the situation.

If a situation is approaching the point where these methods will not or do not work or if the person is threatening or using violence then the Police should be contacted immediately.

4. RECRUITMENT AND EMPLOYMENT

Derbyshire Dales District Council will take all reasonable steps to prevent unsuitable people from working with children and vulnerable adults. Few posts require a DBS check as the District Council does not directly provide social or personal care services. In particular, it will:

- Ensure all staff with responsibility for recruitment and selection are trained
- Evaluate the need for Disclosure & Barring Service (DBS) check, for all vacancies/new posts
- As appropriate, identify requirement in job advertisement/candidate profile
- As appropriate, ensure previous experience of working with children and vulnerable adults (and also any apparent gaps in employment history) is covered at interview

- Confirm identity of prospective appointee
- Take up two references (one from current or most recent employer) and, as appropriate, Disclosure & Barring Service (DBS), prior to offering the successful candidate the appointment

5. LEARNING AND DEVELOPMENT

The Council has a responsibility to ensure all new staff undertake an induction programme which includes both corporate and service induction. As part of this induction programme, the Council will ensure staff are made aware of and understand their responsibilities in respect of the Safeguarding Policy. Elected Members are required to undertake Safeguarding training as part of their induction.

The Council will also provide on-going learning and development to ensure employees are confident and competent in carrying out their responsibilities and that they are aware of how to recognise and respond to safeguarding concerns.

All new appointments undergo the Council's formal induction, in which line managers will go through this Safeguarding Policy. Employees will be required to sign to acknowledge their understanding of the policy and procedures and that they will abide by them. There are also two training models on LOLA (the e-learning system) for Safeguarding Children and Vulnerable adults.

5.1 Work Experience Placements

Work Experience placements for anyone under 18 or for a vulnerable person should be managed in line with the Council's policy for work experience. Any such placements should be first discussed with the HR Manager and a risk assessment carried out prior to the placement. In most cases an assessment will also be carried out by the school, college or County Council.

Guidance for Work Experience Placements are covered in Appendix E of this document.

6. HEALTH & SAFETY

Under health and safety law, the Council has the same legal and moral responsibilities for the health, safety and welfare of children and vulnerable adults, as its employees.

Protecting the health and safety of children and vulnerable adults should comply with the Council's legal responsibilities but at the same time not restrict the child's or vulnerable person's right to autonomy, privacy or dignity.

We should also take into account that children or vulnerable adults may be

- Inexperienced;
- Have not been trained; and
- May not pay enough attention to health and safety

Risk assessments will be carried out for all activities involving children and vulnerable adults before they start in employment, on work-experience, or participate in supervised Council activities. The risk assessment will determine the level of supervision the child or vulnerable adult requires.

All children and vulnerable adults will be inducted before they start in employment and work-experience, or participate in supervised Council activities. The risk assessment will determine the level of supervision the child or vulnerable adult requires.

An accident, incident or a near miss to a child or vulnerable adult should be reported to your line manager, in accordance with Health and Safety reporting.

7. GUIDELINES FOR PHOTOGRAPHY AND FILMING AT COUNCIL MANAGED FACILITIES AND EVENTS

Anyone wishing to use photographic/film/video equipment at the Council's facilities and/or events may do so only with the permission of the Council. Permission will only be granted once a photographer has signed to say he or she will abide by the conditions for use of photographic and filming equipment.

These conditions are:

- Any image taken will be used only for the purposes stated on the Photography and Filming Request Form
- Any images are taken with the permission of the subjects (examples of which are given in Appendix D). When the data subject happens to be a minor (under 16 years old), parental consent must be obtained.
- Proof of identity may be required in order to grant permission to use the photographic filming equipment
- The Council reserves the right to withdraw permission to use photographic filming equipment immediately without prior warning. Failure to stop photography when asked may result in the photographer being asked to leave or reporting the incident to the police
- The photographer should take steps to make themselves easily recognisable to members of the public (e.g.: the use of a badge, banner, vest etc.)
- The photographer should be sensitive to other users/participants and as far as reasonably possible restrict the images taken to those of the subject(s).
- If at any time another user in the area where the photographs are being taken complains about the activity then the photography or filming must stop immediately
- In the case of dance shows, productions and private hiring of Council facilities it is the responsibility of the organisers/hirers to inform parents/carers of the individuals attending the event that photographs will be taken
- It is the responsibility of any commercial photographer taking images at Council facilities to obtain written permission of any subjects included in their photographs to use the images before publication
- Images may only be taken in the areas shown on the date indicated on the Photography and Filming Permission Request form
- If for any reason the details shown on the permission request change, the form should be returned to the Council for alteration. If, when challenged, a discrepancy is found between the Photographer and Council copies for the permission request, permission to use photographic and filming equipment will be withdrawn.

7.1 Photography and filming during external hire of facilities

The control of the use of photographic/film/video equipment by external hirers of Council facilities is the responsibility of the hirer. This responsibility extends from who is allowed

to use photographic/film/video equipment, to where and where not equipment is used and what images are and are not allowed to be taken.

It is the hirer's responsibility to ensure that all participants and their parents/guardians/carers if under 18 are aware that photographic/filming/video equipment is going to be used. Where appropriate they may be required to get written permission from participants or their parents/guardians/carers to use the photographs in publicity, promotional or media material.

7.2 Guidelines for taking photographs of children and vulnerable adults

There will be occasions when photographs are taken for the purposes of gathering evidence for enforcement action or contractual compliance, and the following precautions will be taken:

- If a photograph is used, avoid naming individuals
- Before the images are taken the written permission of the individual's parents should be sought
- Only use images of individuals in suitable dress to reduce the risk of inappropriate use
- There are some activities e.g. swimming, gymnastics and athletics where the risk of potential misuse is much greater. With these sports the photographs should focus on the activity not a particular subject and should avoid full face and body shots. For example photographs of children and vulnerable adults in a pool would be appropriate or if on poolside from the waist or shoulder up.

7.3 Guidelines for CCTV

The CCTV cameras are operated according to a Framework Code of Practice. This has been reviewed and amended to include Subject Access Information, Statements from Control Operators and Public Requests for Service.

7.4 Vigilance by the general public

No matter what arrangements are put in place to prevent the misuse of cameras, videos or mobile phones with digital image recording, the nature of "peeping tom" type activity make it very difficult to police. In recognition of this, the Council asks users of their facilities to be alert to any suspicious activity, particularly where children and vulnerable adults may be involved and encourages them to report any such incidents or concerns at the earliest opportunity to a Council employee.