Andover Town Council

Safeguarding Policy

Document control

Item	Detail
Document	Safeguarding Policy (children and adults at risk)
Version	2.0 (26) DRAFT for Policy and Resources Committee
Supersedes	Safeguarding Policy 2026 v1.0, approved Full Council 8 October 2026 (C 234/10/26)
Policy owner	Town Clerk (Designated Safeguarding Lead)
Recommended by	Policy and Resources Committee, 2 Dec 2026 and minute to be added
Approved by	Full Council, date and minute to be added
Review	Annually, and immediately when the duty to report child sexual abuse commences or statutory guidance changes

DRAFT

1. Purpose and policy statement

1.1 Andover Town Council ("the Council") runs events, services and activities that can bring staff, councillors, volunteers and contractors into contact with children and adults at risk. Everyone has the right to be safe from abuse, neglect and exploitation, whatever their age, disability, gender, race, religion or belief, sex or sexual orientation.

1.2 The Council will:

- promote the welfare of children and adults at risk in everything it does;
- make sure everyone covered by this policy knows how to recognise and report a concern;
- recruit safely and check suitability where the law allows;
- respond promptly to concerns and allegations, and work with the statutory agencies; and
- keep safeguarding records securely and share information lawfully.

1.3 The Council is not a safeguarding agency. Its role is to recognise, record and report concerns, not to investigate them. Investigation is for Hampshire County Council and the Police.

2. Legal and guidance framework

2.1 This policy reflects the law and guidance in force on 26 November 2026.

Source	Relevance to the Council
Children Act 1989 and Children Act 2004	Definition of a child; duties of local authorities and safeguarding partners. Section 16LA (information sharing duty) in force from 30 September 2026
Children and Social Work Act 2017	Local safeguarding partner arrangements: the Hampshire Safeguarding Children Partnership (HSCP)

Source	Relevance to the Council
Children's Wellbeing and Schools Act 2026	Inserted the information sharing duty into the Children Act 2004, supported by statutory guidance published September 2026
Working Together to Safeguard Children 2026 (March 2026)	Statutory guidance on multi-agency safeguarding. Replaces the 2023 edition. Allegations must reach the LADO within one working day
Information sharing to safeguard children: statutory guidance (September 2026)	When and how practitioners should share information
Care Act 2014 and statutory guidance	Definition of an adult at risk, types of abuse and the six safeguarding principles; Hampshire Safeguarding Adults Board (HSAB) multi-agency procedures
Safeguarding Vulnerable Groups Act 2006, as amended by the Crime and Policing Act 2026	Regulated activity, barring and the duty to refer to the DBS. The supervision exemption for regulated activity with children was removed on 1 September 2026
Crime and Policing Act 2026 (Royal Assent 29 April 2026)	Duty to report child sexual abuse (section 85) and offence of preventing or deterring a report (section 92). Not yet in force: see section 7
Domestic Abuse Act 2021	Statutory definition of domestic abuse, including children as victims in their own right
Mental Capacity Act 2005	Capacity to consent to referral and information sharing
Modern Slavery Act 2015 and Online Safety Act 2023	Exploitation and online harm
UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025	Lawful handling and sharing of safeguarding information

3. Scope and definitions

3.1 This policy applies to all employees, councillors (elected and co-opted), volunteers and working group members. Contractors, hirers and partner organisations running activities for or with the Council must have their own safeguarding arrangements, as set out in section 12.

Term	Meaning
Child	Anyone who has not reached their 18th birthday
Adult at risk	An adult (18 or over) who has needs for care and support, is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves (Care Act 2014, section 42)

DRAFT

Term	Meaning
Regulated activity with children	Teaching, training, instructing, caring for or supervising children, or providing advice or guidance on wellbeing, more than three days in any 30, or overnight between 2am and 6am. Since 1 September 2026 this applies whether or not the person is supervised
DSL	Designated Safeguarding Lead
LADO	Local Authority Designated Officer, who manages allegations against people who work with children

4. Roles and responsibilities

Role	Responsibilities
Full Council	Approves this policy; makes sure safeguarding is resourced
Policy and Resources Committee	Reviews this policy annually; receives the DSL's annual safeguarding report (anonymised)
HR Sub-Committee	Handles allegations about the Town Clerk; is informed of allegations involving staff
Town Clerk (Designated Safeguarding Lead)	Receives and records concerns; makes or supports referrals; liaises with the LADO, Children's Services, Adults' Health and Care and the Police; keeps safeguarding records and the training record; reports annually to Policy and Resources
Deputy Town Clerk (Deputy DSL)	Acts as DSL when the Town Clerk is absent or conflicted
All staff, councillors and volunteers	Follow this policy; report any concern to the DSL the same day; complete required training
Event leads	Brief volunteers; check safeguarding arrangements of hirers and partners; display safeguarding notices at events

4.1 The DSL's contact details are displayed in the Council office and given to all staff and volunteers at induction. Concerns about the Town Clerk go to the Chair of the HR Sub-Committee.

5. Recognising abuse and neglect

5.1 **Children.** The four categories of abuse are physical, emotional, sexual and neglect. Children can also be harmed outside the family, including through:

- child sexual and criminal exploitation, including county lines;
- online abuse, including grooming and image-based abuse, which often links to harm in person;
- abuse by other children;
- domestic abuse, which harms children who see, hear or experience it; and
- radicalisation, female genital mutilation, forced marriage and trafficking.

DRAFT

5.2 **Adults at risk.** The Care Act 2014 recognises physical, domestic, sexual, psychological, financial or material, modern slavery, discriminatory and organisational abuse, neglect and acts of omission, and self-neglect.

5.3 **Possible signs** include unexplained injuries, changes in behaviour or mood, fear of a particular person, poor hygiene or unmet basic needs, unexplained money or gifts, and a person seeming controlled by someone else. One sign alone may not mean abuse, but it should always be reported to the DSL.

5.4 **Six principles for adults.** The Council follows the Care Act principles: empowerment, prevention, proportionality, protection, partnership and accountability. Adults are involved in decisions about them wherever possible.

6. Reporting a concern

1. **Immediate danger:** call the Police on 999, then tell the DSL.
2. **Tell the DSL the same day.** Do not investigate, and do not confront or contact the person alleged to be causing harm.
3. **The DSL decides on referral.** For a child, the DSL refers to Hampshire Children's Services. For an adult at risk, the DSL refers to Hampshire Adults' Health and Care. Referrals are made within one working day of the concern, and confirmed in writing within 48 hours.
4. **If the DSL and deputy cannot be reached**, or you disagree with the DSL's decision, contact Children's Services or Adults' Health and Care directly. Do not wait.
5. **Record** the concern on the Appendix A form within 24 hours, even if no referral is made.

6.1 **Consent.** Seek an adult's consent to a referral where practicable and respect their wishes. Information may be shared without consent if the adult lacks capacity, other people are at risk, a serious crime may be committed or prevented, or the adult is subject to coercion or undue influence. Consent is not needed to refer concerns about a child.

7. Duty to report child sexual abuse

7.1 The Crime and Policing Act 2026 creates a legal duty for people aged 18 or over in regulated activity with children, and certain other roles, to report child sexual abuse to the Police or the local authority as soon as reasonably practicable. The duty applies when:

- a child tells them they have been sexually abused;
- a perpetrator tells them they have sexually abused a child; or
- they witness child sexual abuse.

7.2 The duty is not yet in force. The government has said it will commence no earlier than 12 months after Royal Assent, so not before late April 2027, and will publish statutory guidance first.

7.3 **The Council adopts the duty now as its minimum standard.** Anyone covered by this policy who becomes aware of child sexual abuse in any of the ways above must tell the DSL immediately, and the DSL will report it to the Police or Children's Services the same day. A person who has told the DSL and confirmed the DSL has reported it has met the duty.

7.4 Once in force:

- failure to report will not be a criminal offence, but can lead to referral to the DBS and barring;
- a report may be delayed for up to seven days only where needed to manage a risk to a child's life; and

DRAFT

- it will be a criminal offence for anyone to prevent or deter a person from reporting, with a maximum penalty of seven years' imprisonment. Any attempt to discourage a report will also be treated as gross misconduct or a serious Code of Conduct matter.

8. Allegations against staff, councillors or volunteers

8.1 An allegation is where someone working for the Council may have harmed a child or adult at risk, committed a criminal offence against them, or behaved in a way that shows they may pose a risk.

1. Report it to the DSL immediately. Allegations about the Town Clerk go to the Chair of the HR Sub-Committee, who acts as DSL for that matter.
2. **Children:** the DSL contacts the LADO within one working day, before any internal investigation, and follows the LADO's advice, including on suspension.
3. **Adults at risk:** the DSL follows HSAB procedures and contacts Adults' Health and Care.
4. The Town Clerk informs the HR Sub-Committee and takes HR advice. Councillor matters that may breach the Code of Conduct are also referred to the Monitoring Officer at Test Valley Borough Council.
5. The person concerned is treated fairly, given support and kept informed as far as the agencies allow.

8.2 **If the DSL cannot be reached.** If neither the DSL nor the Deputy DSL (or, for an allegation about the Town Clerk, the Chair of the HR Sub-Committee) can be reached in time to meet the one working day deadline, the person who received the allegation must contact the LADO directly for a child, or Adults' Health and Care for an adult at risk, using the contacts in Appendix B. They must then tell the DSL as soon as possible. Making the referral yourself in these circumstances is never a breach of this policy.

8.3 **Duty to refer to the DBS.** If someone in regulated activity is removed, or would have been removed had they not left, because they harmed or posed a risk of harm to a child or adult at risk, the Council must refer them to the DBS. Since 1 September 2026 this includes supervised roles with children.

9. Safer recruitment and DBS checks

9.1 For roles involving children or adults at risk, the Council:

- states its safeguarding commitment in recruitment documents;
- uses application forms, not CVs, and explores gaps in employment history;
- verifies identity and right to work;
- takes at least one reference from a previous employer, asking about any safeguarding concerns; and
- carries out a DBS check at the level the role is eligible for, under the DBS Policy.

9.2 **Removal of the supervision exemption.** Since 1 September 2026, staff and volunteers who work with children often enough (more than three days in 30, or overnight) are in regulated activity even when supervised, and are eligible for an enhanced check with a children's barred list check. The Town Clerk will review all Council staff and volunteer roles against this test and record the outcome. It is an offence for the Council knowingly to place a barred person in regulated activity. Occasional helpers at one-off events are not affected.

9.3 **Councillors.** A councillor needs a DBS check only where they personally deliver a Council service, run solely by the Council, that involves regulated activity with children or adults at risk. Councillors who volunteer with other organisations are covered by those organisations' arrangements.

DRAFT

10. Safe working practice

10.1 Everyone covered by this policy must:

- treat children and adults at risk with respect;
- make sure, wherever possible, that another adult is present or within sight or hearing;
- remember that physical contact and words can be misinterpreted;
- challenge unacceptable behaviour; and
- report every allegation or suspicion to the DSL.

10.2 They must not:

- have inappropriate physical or verbal contact, or make sexually suggestive or derogatory remarks;
- show favouritism;
- give personal contact details to, or communicate privately online with, a child or adult at risk met through Council activities;
- transport a child or adult at risk alone, except in an emergency or with parental or carer consent and the DSL's knowledge;
- take them to their own home; or
- meet them outside Council activities without the knowledge of their parent or carer and the Town Clerk.

11. Responding to a disclosure

1. Listen, take it seriously, and reassure the person they have done the right thing.
2. Do not probe, ask leading questions or promise secrecy.
3. Explain that you must share the information with the DSL.
4. Record what was said, in the person's own words, as soon as possible.
5. Report to the DSL the same day, or immediately if it involves child sexual abuse (section 7).

11.1 Disclosures by email, text or social media are passed to the DSL immediately and acknowledged within 24 hours.

12. Events, hirers and partner organisations

12.1 **Unaccompanied children.** Parents and carers remain responsible for their children at Council events, and notices will say so. If a young child appears to be alone:

- do not stay alone with the child; ask a colleague to join you;
- establish whether the child is allowed to come and go alone, considering their age, understanding and the journey;
- do not let a child under 10 leave alone unless you know the parent or carer allows it;
- if in doubt, keep the child in a safe, visible place and try to contact the parent or carer; and
- if the parent or carer cannot be reached, contact the Police or Children's Services.

12.2 **Hirers and partners.** Organisations that hire Council assets or run activities for children or adults at risk at Council events must confirm they have their own safeguarding policy, DSL and appropriate checks. The event lead keeps this confirmation on file.

12.3 **Photography.** Images of identifiable children are used in Council publicity only with written parental consent, in line with the Data Protection Policy.

DRAFT

13. Training

Who	Training	Frequency
All staff and regular volunteers	Safeguarding awareness, including how to report and section 7	At induction, then at least every three years
DSL and Deputy DSL	Designated safeguarding lead training	Every two years, plus a briefing on the duty to report child sexual abuse when statutory guidance is published
Councillors	Safeguarding awareness	At induction, and whole-Council training in 2027
Event volunteers	Safeguarding briefing as part of the event safety briefing	On the day

13.1 Training is arranged under the Training and Development Policy and recorded in the Training Register kept by the Town Clerk.

14. Information sharing, records and data protection

14.1 Fear of breaching data protection law must never prevent a safeguarding referral.

14.2 The Council shares safeguarding information under UK GDPR on the bases of legal obligation, public task or vital interests, and, for special category data, the safeguarding conditions in Schedule 1 to the Data Protection Act 2018 (paragraphs 18 and 19). Where an organisation subject to the information sharing duty in section 16LA of the Children Act 2004 asks the Council for information to safeguard a child, the Council will co-operate promptly.

14.3 Safeguarding records contain special category data. They are kept securely, accessible only to the DSL, Deputy DSL and those who need to know, and handled under the Data Protection Policy. Until the Records Retention Scheme is amended, the Council keeps:

- records of concerns about a child until the child's 25th birthday, or six years after the last entry if later; records about adults six years after the last entry; and
- records of allegations against staff, councillors or volunteers until the person's normal retirement age or for ten years from the allegation, whichever is longer.

15. Monitoring and review

15.1 The DSL reports to the Policy and Resources Committee each year on the number and type of concerns and referrals (anonymised), allegations, training completed and lessons learned.

15.2 This policy is reviewed annually, and immediately when the duty to report child sexual abuse commences or statutory guidance changes. The DSL checks the contacts in Appendix B at every review.

15.3 Related policies: DBS Policy; Volunteer Policy; Training and Development Policy; Lone Working Policy; Data Protection Policy; Data Breach and Disposal Incident Procedure; Records Retention Scheme; Complaints Procedure and Policy; Disciplinary Policy; Whistleblowing Policy; Code of Conduct; Health and Safety Policy.

DRAFT

Appendix A. Safeguarding concern record

Complete within 24 hours and give to the DSL. Do not keep a copy.

Field	Details
Your name, role and contact details	
Date and time of concern or disclosure	
Name, address and date of birth (or approximate age) of the child or adult at risk	
Parent or carer details, if known	
What you saw, heard or were told, in the person's own words	
Any injuries or other observations	
Names of anyone else present	
Action taken: who you told, when, any referral made and advice received	
Signature and date	
DSL use: decision, referral reference, date closed	

Appendix B. Key contacts

Service	Contact
Police (emergency / non-emergency)	999 / 101
Hampshire Children's Services	0300 555 1384 (Monday to Thursday 8.30am to 5pm, Friday 8.30am to 4.30pm)
Hampshire Adults' Health and Care	0300 555 1386 (office hours)
Out of hours (children and adults)	0300 555 1373

DRAFT

Andover Town Council

Safeguarding Policy

Service	Contact
LADO	Online referral via Hampshire County Council (hants.gov.uk, "Allegations against people in the children's workforce")
Hampshire Safeguarding Children Partnership	hampshirescp.org.uk
Hampshire Safeguarding Adults Board	hampshiresab.org.uk
NSPCC Helpline	0808 800 5000
Childline	0800 1111
Hourglass (abuse of older people)	0808 808 8141

Version history

Version	Date	Minute	Approved by	Summary
1.0	8 October 2026	C 234/10/26	Full Council (on the recommendation of Policy and Resources, PR 037/10/26)	Safeguarding Policy 2026
2.0 (26)	2 Dec 2026 (PR)	To be added	Policy and Resources, then Full Council	Updated for Working Together 2026; supervision exemption removal (1 September 2026); information sharing duty (30 September 2026); commencement status of the duty to report child sexual abuse; councillor DBS position; review cycle set to annual; retention periods added; hirers and partners section added; direct LADO referral where the DSL cannot be reached; Lone Working Policy cross-referenced

DRAFT