

Safeguarding Children Policy

Planning and Improvement

Version Control	Changes Made	Author
Version 1 – March 2026	Adaptation of NFCC Policy and Guidance for CFRS.	Planning and Improvement Resourcing and Talent.

Note: This document refers to signs of abuse, including sexual, physical, emotional abuse, and neglect. This is in section 5.

Please take care when reading this and contact your line manager, or Resourcing and Talent, if you need any support with this policy or need to talk after reading/reviewing it.

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1. Introduction

1.1 The aim of this policy is to provide a framework for all Cumbria Fire and Rescue Service (CFRS) personnel who may come into contact with children and young people when conducting their daily duties.

1.2 Where children or young people are experiencing abuse or neglect, potential abuse or appear to be in an abusive environment it is important all CFRS employees and volunteers are able to recognise and act appropriately.

1.3 Many of the services provided by CFRS involve children and/or young people, either directly or indirectly.

These include:

- Open days or community events which children / young people may attend, either accompanied or unaccompanied.
- Operational incidents or home visits at premises where children and young people may be present.
- Visits to educational establishment or other youth settings to provide fire safety/community safety advice and information.
- Service-run youth activities e.g. Fire Cadets.
- Service-run youth support programmes e.g. Children and Young People (CYP) Fire Intervention.

1.4 CFRS are fully committed to safeguarding the welfare of all children and young people and will take all reasonable steps to protect them from physical, emotional, sexual or on-line abuse and neglect. This applies to all the children and young people with whom we work.

1.5 As part of our commitment to safeguarding we have relevant policies and procedures including:

- Safeguarding Risk Assessment.
- Resourcing and Talent Policy
- Safer Recruitment, Right to Work, and DBS Policy
- CFRS Positive Disclosure Risk Assessment
- Code of Conduct
- Core Code of Ethics
- Complaints Policy
- Whistleblowing Policy
- Disciplinary Policy

1.6 Our policies can be accessed on our internet pages.

- 1.7 These policies, procedures, and Risk Assessments recognise the obligations and duty of care on our work with children and young people as identified in the Children Act 1989 and the Children Act 2004. These acts define children and young people as anyone up to the age of 18 years. CFRS recognise that similar responsibilities cover work with young people with learning disabilities until they are 25 years of age.
- 1.8 The Safeguarding Lead for CFRS is Mark Clement. The Deputy Safeguarding Lead for CFRS is Jennie Schamp.

2. Our Policy Statement

- 2.1 CFRS recognises that the welfare of children and young people are paramount and that we have a duty of care when they are in our charge or when we come into contact with them in our day-to-day activities.
- 2.2 We will do everything we can to provide a safe and caring environment whilst they attend our activities.

We will:

- Treat all children and young people with respect and promote their care and welfare.
- Be watchful for children and young people who are experiencing harm or neglect.
- Respond to disclosures, concerns and allegations quickly and appropriately.
- Adopt good practice with regard to safeguarding children and young people and ensure adherence to our policies and procedures.
- Ensure that safer recruitment and selection principles are followed.
- Ensure staff and volunteers are trained in accordance with their roles.
- Work in partnership with children, young people, parents/carers and other agencies.

3. Core Code of Ethics

- 3.1 [The Core Code of Ethics](#) helps promote good behaviours for all employees of Cumbria Fire and Rescue Service to ensure they act in the appropriate way within our service.
- 3.2 It helps CFRS challenge conduct that is inconsistent with the Core Code of Ethics.

3.3 We all make tough decisions every day. This may be while helping a distressed member of the public or managing a complex financial scenario. The Core Code of Ethics is a clear set of principles for CFRS staff to base their behaviours on.

3.4 Everyone in every FRS is expected to follow the Core Code. This includes those working with, or on behalf of, the FRS.

4. Scope

4.1 This policy applies to:

- all employees
- Volunteers or people on work experience
- Candidates seeking paid work or volunteering opportunities
- Externally Provided Workforce (EPWs) and contractors
- Elected Members and Independent Panel/Board Chairs and members

5. Different types of abuse

5.1 Recognising abuse is not easy and it is not staff and volunteer's responsibility to decide whether or not abuse has taken place.

5.2 You do, however, have responsibility to act if you have a concern or if you believe or are told that a child or young person is at risk of neglect or any form of abuse.

5.3 The main forms of abuse are identified as:

- **Physical:** Includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child/young person.
- **Emotional:** Involves the persistent emotional maltreatment of a child / young person such as to cause severe and persistent adverse effects on the child / young person's emotional development.
- **Sexual:** Forcing or enticing a child/young person to take part in contact or non-contact sexual activities, such as watching sexual images or activities, being encouraged to behave in sexually inappropriate ways, taking sexually explicit photographs or grooming a child/young person in preparation for abuse.
- **Neglect:** The persistent failure to meet a child/young person's basic physical or psychological needs, likely to result in the serious impairment of the child/young person's health or development.

6. Roles and Responsibilities

6.1 Staff and Volunteers

- 6.1.1 This policy applies to all employees of CFRS, volunteers, temporary staff, casual workers and agency workers that work on behalf of CFRS.
- 6.1.2 All inductions must include reference to this policy and line managers should ensure personnel have safeguarding training relevant to their role.
- 6.1.3 Staff and volunteers will, at all times, show respect and understanding for the rights, safety and welfare of all children and young people with whom we work and behave in an appropriate way.
- 6.1.4 Employees and volunteers will familiarise themselves with the [Core Code of Ethics](#) and [Code of Conduct](#).
- 6.1.5 All staff and volunteers who work on behalf of CFRS will act if they have a concern about a child or young person and will follow the **CFRS Safeguarding Reporting Process (Appendix A)**.
- 6.1.6 CFRS will ensure through safeguarding training that staff and volunteers know how to recognise and respond to suspicions/allegations of abuse or neglect regarding a child or young person

6.2 Line Managers

- 6.2.1 Line Managers must ensure that all personnel for whom they are responsible, are aware of and understand the importance of this policy and the process for reporting any concerns.
- 6.2.2 They must also ensure that the staff they are responsible for, have completed the appropriate Safeguarding Training.
- 6.2.3 CFRS will ensure additional targeted safeguarding training is available to the following roles:
- Fire Cadet Instructors.
 - Group Managers
 - Head of Prevention.
 - Prevention Manager.
 - Community Safety Team Leader
 - Community Safety Advisors
 - Community Safety Coordinator
 - Designated Safeguarding Lead
 - Deputy Designated Safeguarding Lead
 - Station Managers.

- People and Talent Management

6.3 Safeguarding Leads

6.3.1 The Safeguarding Lead and Deputy Safeguarding Lead have been appointed as the day-to-day contacts for safeguarding.

6.3.2 They are responsible for:

- Receiving, monitoring, and recording safeguarding concerns.
- Making referrals to Local Authorities.
- Notifying the Champion for Safeguarding of any issues or allegations.
- Consulting with other agencies.
- Keeping written records of concerns and allegations securely.
- The Prevention Team manage safeguarding concerns during working hours.

6.4 Principal Officers and Human Resources

6.4.1 Principal Officers, with support from Human Resources, are responsible for handling allegations against staff/volunteers (See Section 9).

6.4.2 Should an allegation be made about a member of staff who works with children or vulnerable adults the designated safeguarding lead must be informed and consideration given to informing the LADO.

6.5 LADO – Local Authority Designated Officers

6.5.1 For England, the [Working Together to Safeguard Children](#) requires each local authority to ensure that allegations against people who work with children and young people are not dealt with in isolation and, that any corresponding action to address the concerns relating to the child is coordinated without delay.

6.5.2 The LADO has management and oversight of the investigation process from beginning to end following an allegation against people in a position of trust who work with children and/or vulnerable adults.

6.5.3 The LADO is not the decision maker – this remains with the employer, but they will provide advice and guidance to employers and voluntary organisations, liaise with police and other agencies and monitor progress of cases to ensure they are dealt with as quickly as possible, consistent with a fair and thorough process.

6.5.4 The LADO process applies to everyone who works or volunteers with children or vulnerable adults

7. Staff and Volunteer Recruitment

- 7.1 All employees and volunteers whose roles involve direct work with children and/or young people will be recruited using safer recruitment principles and CFRS will ensure they are suitable to work with children/young people.
- 7.2 Those with supervisory responsibility for children and/or young people will be a minimum age of 18 years.
- 7.3 All who have unsupervised regular direct contact with children and young people are required to have a relevant satisfactory enhanced check through the Disclosure and Barring Service (DBS) before they can work unsupervised.
- 7.4 They will be rechecked every three years.
- 7.5 It is the Service's legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children and/or adults because they caused harm to children / adults at risk or posed a risk of causing harm.

8. Confidentiality and Information Sharing

- 8.1 In cases of disclosure of abuse or neglect, whether by children, young people, parents, carers or other adults, confidentiality cannot be promised.
- 8.2 CFRS are obliged to share the information with the Safeguarding Lead who may have to refer the concerns to Children's Services.
- 8.3 In all instances, any information which identifies or could identify a living individual, must only be processed in accordance with the Service's data protection policy.
- 8.4 This includes the collecting, using, amending, sharing, archiving, or deleting of all personal information.
- 8.5 Personal information must only be used if there is a lawful basis to do so, it must be kept up to date and secure at all times.
- 8.6 Any breaches e.g. if data is lost or stolen, sent to the wrong people, or deleted in error / deliberately, must be reported to Information Governance immediately upon discovery.
- 8.7 All staff have a duty to manage personal information responsibly and in line with **Service data protection policy**.

9. When a Safeguarding Allegation is made against an Employee or Volunteer

9.1 Safeguarding concerns or allegations made against an employee or volunteer will be addressed in line with the [NFCC Managing Allegations Guidance](#) and the Service's Disciplinary policy. Events should be addressed fairly, quickly, proportionately, and consistently.

9.2 This process will apply to concerns arising from an employee's or volunteer's conduct both within the workplace and externally within their personal lives.

9.3 The difference between an allegation and a complaint or concern

9.3.1 Initially, it might be difficult to clearly define whether an incident is an 'allegation' or a 'complaint or conduct concern'. For an event to be considered an allegation the alleged incident has to be sufficiently serious as to suggest that harm has or may have occurred, or that the alleged behaviour indicates the individual may pose a risk of harm or has otherwise behaved in a way that fits the following criteria:

- Behaved in a way that may have harmed a child or vulnerable adult or may harm a child or
- vulnerable adult
- Possibly committed a criminal offence against or related to a child or vulnerable adult
- Behaved towards a child or vulnerable adult in a way that indicates they may pose a risk of
- harm to children or vulnerable adults
- Behaved or may behave in a way that indicates they may not be suitable to work with children or vulnerable adults.

9.4 The Process

9.4.1 To determine whether the incident meets the threshold of constituting an allegation, the Safeguarding Lead (or appropriate person) should meet with a member of the HR team and any other relevant individuals, bearing in mind the strict confidentiality required, to discuss appropriate next steps.

9.4.2 A flow chart is provided at point 9.12

9.4.3 Where it is decided that the incident does meet the threshold of being an allegation, the Service will address the matter using the disciplinary policy, under which it is likely that a formal investigation will be initiated.

9.4.4 Where it is decided that the incident does not meet the threshold of harm/risk of harm, then the matter will be referred to the employee's/volunteer's line manager to address

any conduct or behaviour issues with the service's disciplinary policy and/or performance management policy where appropriate.

9.5 Process considerations:

9.5.1 The member of staff/volunteer who is subject of the allegation should:

- be treated fairly and honestly and helped to understand the concerns expressed and processes involved.
- be offered the appropriate wellbeing support measures identified such as signposting to trade union representation, welfare officer, or occupational health referral.
- kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process.
- if suspended, be kept up to date about relevant events in the workplace.

9.6 Police investigations

9.6.1 An internal process can be conducted whilst a police investigation is ongoing, however, advice should be sought from the HR team on best and consistent practice.

9.6.2 Any internal investigation must strike a balance with the police investigation.

9.6.3 Where appropriate, the HR team will consult with the Police and/or LADO/PIPOT and share information which will assist in the decision making as to whether to pause or progress internal investigations.

9.7 Resignations and “compromise agreements”

9.7.1 It is the duty for regulated activity providers to make a referral to DBS when they have dismissed an employee working in regulated activity, following harm to a child/vulnerable adult, or where there is a risk of harm.

9.7.2 Every effort should be made to reach a conclusion even if the individual refuses to cooperate or, in cases of resignation, it is not possible to apply or conclude any disciplinary actions if a person's period of notice expires before the process is complete.

9.7.3 A settlement or compromise agreement must not be used. The Service must be able to make a referral to the Disclosure and Barring Service when the criteria are met and failure to do would likely result in a criminal offence for failure to comply with the duty to refer.

9.8 Support

9.8.1 In managing any allegation there is a need to consider the support needs of individuals involved.

9.8.2 The support they require depends on the circumstances of the case and will have to be agreed on a case-by-case basis.

9.8.3 It may include support for the:

- person who raised the concern at the outset
- person who is the subject of the allegation
- the person who was subject to alleged harm

9.9 Confidentiality

9.9.1 Every effort must be made to maintain strict confidentiality and guard against any publicity while an allegation is being considered or investigated. Information should be restricted to only those that need to know.

9.10 Information Sharing

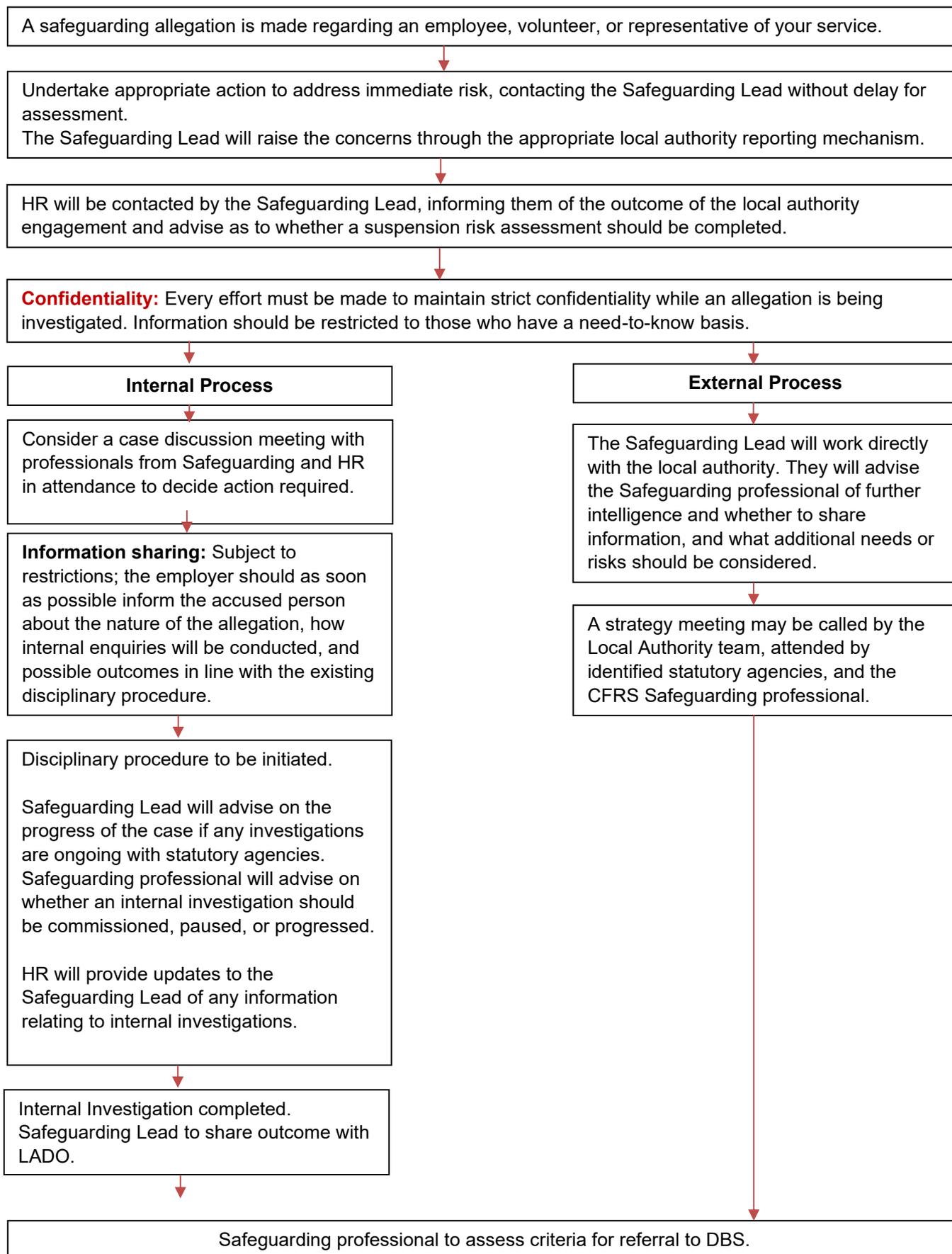
9.10.1 Information sharing should be justifiable and proportionate based on the potential for actual harm to adults or children at risk and the rationale for decision-making should always be recorded. There must be a legal basis for doing so (Children Act 1989 and Care Act 2004), information should be limited to what is relevant and necessary, specific, and timely and must be shared securely.

9.10.2 HMICFRS request notification of any allegations that have the potential to constitute staff gross misconduct. The CFRS Safeguarding Lead is responsible for undertaking this notification requirement. The HR team will undertake this where the Safeguarding Lead is absent.

9.11 Record Keeping

9.11.1 Employers should keep a clear and comprehensive summary of the case record on a person's confidential and personal file. The record should include details of how the allegation was followed up, the decisions reached, and the action taken. It should be kept in line with the services retention policy.

9.12 Flowchart of Process



10. Use of Technology

10.1 CFRS recognise that:

- Sharing photographs and films of our activities can help us celebrate the successes and achievements of our children and young people, provide a record of our activities and raise awareness of our organisation.
- The welfare of the children and young people taking part in our activities is paramount.
- Children, their parents, and carers have a right to decide whether their images are taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.
- Consent to take images of children is only meaningful when children, their parents and carers understand how the images will be used and stored and are fully aware of the potential risks associated with the use and distribution of these images.
- There are potential risks associated with sharing images of children online.

10.2 CFRS will seek to keep children and young people safe by:

- Always asking for written consent from a child and their parents or carers before taking and using a child's image
- always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of children
- making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published
- changing the names of children whose images are being used in our published material whenever possible (and only using first names if we do need to identify them)
- never publishing personal information about individual children and disguising any identifying information (for example the name of their school or a school uniform with a logo)

- making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information)
- reducing the risk of images being copied and used inappropriately by:
 - only using images of children in appropriate clothing (including safety wear if necessary)
- avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused
- using images that positively reflect young people's involvement in the activity. We will also develop a procedure for reporting the abuse or misuse of images of children as part of our child protection procedures.

10.3 We will ensure everyone involved in our organisation knows the procedures to follow to keep children safe.

10.4 **Photography and/or filming for personal use**

10.4.1 When children themselves, parents, carers or spectators are taking photographs or filming at our events and the images are for personal use, we will publish guidance about image sharing in the event programmes and/or announce details of our photography policy before the start of the event.

10.4.2 This includes

- reminding parents, carers, and children that they need to give consent for CFRS to take and use their images
- asking for photos taken during the event not to be shared on social media or asking people to gain permission from children, their parents and carers before sharing photographs and videos that include them
- recommending that people check the privacy settings of their social media account to understand who else will be able to view any images they share
- reminding children, parents and carers who they can talk to if they have any concerns about images being shared.

10.5 If we hire a photographer for one of our events, we will seek to keep children and young people safe by:

- providing the photographer with a clear brief about appropriate content and behaviour

- ensuring the photographer wears identification at all times
- informing children, their parents, and carers that a photographer will be at the event and ensuring they give written consent to images which feature their child being taken and shared
- not allowing the photographer to have unsupervised access to children
- not allowing the photographer to conduct sessions outside the event or at a child's home
- Reporting concerns regarding inappropriate or intrusive photography following our child protection procedures.

10.6 If people such as local journalists, professional photographers (not hired by CFRS) or students wish to record one of our events and share the images professionally or in the wider world, they should seek permission in advance.

They should provide:

- the name and address of the person using the camera
- the names of children they wish to take images of (if possible)
- the reason for taking the images and/or what the images will be used for

The service comms lead will identify veracity of the journalist and make further enquiries if required.

10.7 CFRS will verify these details and decide whether to grant permission for photographs/films to be taken.

10.8 CFRS will seek consent from the children who are the intended subjects of the images and their parents and inform the photographer of anyone who does not give consent.

10.9 At the event we will inform children, parents, and carers that an external photographer is present and ensure the photographer is easily identifiable, for example by issuing them with a coloured identification badge.

10.10 If CFRS is concerned that someone unknown to us is using their sessions for photography or filming purposes, we will ask them to leave and (depending on the nature of the concerns) follow our child protection procedures.

10.11 If consent to take photographs is not given If children, parents, and/or carers do not consent to photographs being taken, CFRS will respect their wishes. We will agree in

advance how they would like to be identified so the photographer knows not to take pictures of them and ensure this is done in a way that does not single out the child or make them feel isolated.

10.12 CFRS will never exclude a child from an activity because we do not have consent to take their photograph

10.13 **Storing images**

10.13.1 CFRS will store photographs and videos of children securely in line with data protection law.

10.13.2 CFRS will keep hard copies of images in a locked drawer and electronic images in a protected folder with restricted access.

10.13.3 Images will be stored for a period in line with our retention schedule.

10.13.4 CFRS will never store images of children on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

10.13.5 CFRS does not permit staff and volunteers to use any personal equipment to take photos and recordings of children. Only cameras or devices belonging to the CFRS should be used.

11. Training

11.1 All CFRS staff will have safeguarding training as part of the essential corporate learning framework, and this will be recorded on PDR Pro.

11.2 If volunteers are not able to access to PDR Pro, then their line manager must ensure that they have access to the e-learning training and that completion of this and refresher courses are recorded.

11.3 Staff will undertake the training every year.

11.4 The Safeguarding Lead will be responsible for the quality of the training and will ensure that it reflects current legislation and good practice by undertaking an annual review of training content.

12. Joint Working and Commissioning Services

12.1 This policy will be drawn to the attention of and made available to all organisations working with or commissioned by CFRS.

- 12.2 Where partnership working involves a Service Level Agreement (SLA) for another organisation to provide services on its behalf, the CFRS personnel responsible for the agreement will ensure that the partner organisation has appropriate safeguarding policies in place.
- 12.3 If a CFRS employee becomes aware of abuse or allegations of abuse relating to personnel from a partner organisation or commissioned service, then the CFRS employee should follow the **CFRS Safeguarding Reporting Process**, at **Appendix A**.
- 12.4 If a member of a partner organisation or commissioned service becomes aware of abuse or allegations of abuse relating to CFRS staff or their own staff then they should report this to the Safeguarding Lead.

13. GDPR and storage of information

- 13.1 CFRS will keep clear and comprehensive records of all allegations made against adults working or volunteering with children, including:
- what the allegations were
 - how the allegations were followed up
 - how things were resolved • any action taken
 - decisions reached about the person's suitability to work with children.
- 13.2 Keeping these records enables CFRS to give accurate information if ever asked for it. For example:
- in response to future requests for a reference
 - if a future employer asks for clarification about information disclosed as part of a vetting and barring check
 - if allegations resurface after a period of time
- 13.3 Records relating to concerns about an adult's behaviour will be kept in the person's confidential personnel file (not in a central 'concerns log') and a copy should be given to the individual.
- 13.4 **Retention periods: concerns about adults**
- 13.4.1 If concerns have been raised about an adult's behaviour around children, CFRS will keep the records in their personnel file in line with the services retention schedule.
- 13.4.2 This applies to volunteers and paid staff.
- 13.4.3 CFRS will keep records for the above amount of time regardless of whether the allegations were unfounded. However, if allegations are found to be malicious, CFRS will destroy the record immediately.
- 13.4.4 Information should be retained even if the person stops working or volunteering for the organisation. In exceptional circumstances, records should be kept for longer periods – please refer to Information Governance to check this.

13.5 **Criminal records checks**

13.5.1 CFRS does not store copies of criminal records check certificates.

13.5.2 Instead, a confidential record is kept of

- the date the check was completed
- the level and type of check (standard/enhanced/barred list check and the relevant workforce)
- the reference number of the certificate

13.6 Please refer to the Safer Recruitment, Right to Work, and DBS Procedure for further information about vetting checks.

Appendix A – CFRS Safeguarding Reporting Process

