

Review of Safeguarding Systems in Essex Fire and Rescue Service –  
Final Report

Executive Summary

This report reviews Essex Fire and Rescue Service's (EFRS') current approach to safeguarding vulnerable adults and children from abuse and neglect.

It makes recommendations for the future which have borne in mind EFRS' strategic direction and the need to provide an effective, yet proportionate response to safeguarding issues.

**Overall safeguarding in EFRS is being well managed. It is fulfilling all legal requirements and generally managing potential areas of risk well. However there is one staffing issue of significant risk which needs to be addressed immediately:**

***EFRS is at risk of being unable to effectively manage safeguarding referrals if the resilience issues for the 'Safeguarding Manager' role are not addressed in the short and medium term.***

Options for managing this risk are contained within the report.

Throughout the review, firefighters, managers and community safety staff showed an eagerness to address the needs of vulnerable members of the community and cooperated fully with the work. I am very grateful for their comments which were used to develop these recommendations.

*Phil Picton*

May 2016

This report considers the effectiveness of Essex Fire and Rescue Service (EFRS) at safeguarding children and vulnerable adults against neglect and abuse including self-neglect and self-harm. The report is provided to inform the Chief Fire Officer of the current state of safeguarding and the steps that can be taken to ensure an effective and proportionate response to safeguarding risks in the foreseeable future.

*(Within the report the term 'Safeguarding Manager' is used to describe the manager responsible for providing specialist advice and support to EFRS at all levels. It is recognised that this is not the current 'title' of the post-holder but is the term used by the majority of interviewees to describe the function. The role is discussed in more detail in this report).*

### **Principles Underpinning Effective Safeguarding in EFRS**

To be effective at safeguarding, an organisation such as EFRS needs to fulfil three requirements:

1. **Legal compliance** with safeguarding legislation - for children, vulnerable adults and those at risk of becoming involved in terrorism.
2. **A risk based approach** at both the operational and organisational level. This approach needs to recognise that safeguarding risks cannot be completely eliminated but need to be appropriately managed in a way which is proportionate to the resources, role and strategic direction of the organisation.
3. **A safeguarding culture which is based upon learning and development** combined with a willingness to share information and where appropriate challenge behaviour and decision-making, both inside and outside the organisation.

The following pages consider EFRS against those principles.

#### **1. Legal Compliance**

The requirements specifically put upon Fire and Rescue Services by 'safeguarding' legislation are very low. Statutory guidelines [Working Together (WT), Care and Support Statutory Guidelines (CSSG) and Counter-Terrorism and Security Act guidance (CTSA)] mention **Fire Services** as being potentially **useful players in multi-agency partnerships but do not perceive them as key agencies at the heart of safeguarding. As a result they are not included as organisations bound by the Children Act 2004, Section 11 standards which are for 'statutory partners'** (see further discussion below). WT (Chapter 2) has extended the standards to apply to organisations commissioned by those partners, the voluntary sector and private sector, but without specific reference to Fire and Rescue Services. Guidelines also make broad statements about general responsibilities for 'everyone' regarding their commitment to safeguarding.

**EFRS' current approach fulfils its legal obligations to safeguard from abuse and neglect. Opportunities identified in this review potentially rationalise that approach whilst still complying with the legal requirements.**

## **2. Management of Safeguarding Risks**

### **A. The General Operational Safeguarding Risk**

In carrying out their responsibilities, EFRS staff come into contact with a wide range of individuals and situations. Sometimes they become aware or suspicious that a child or vulnerable person is at risk of abuse or neglect. If there is a safeguarding risk of harm through fire or significant accident (such as in a hoarding or fire-setting situations) EFRS staff will need to continue to work with the individual, their family or community. This is normally in partnership with other agencies who hold a role of addressing other aspects of the situation or longer term issues for the individual (such as housing, mental health or social care). **In situations without a risk of fire or accident, EFRS' role is to refer the circumstances to another agency for the safeguarding issues to be addressed. If there is immediate risk of harm then the police are contacted to take responsibility.**

**Operational EFRS staff spoken to within this Review had a realistic and sensitive awareness of these risk situations.** They generally had a suitable understanding of the signs and symptoms of abuse/neglect and were very well aware of how to seek advice or to refer cases within EFRS. This knowledge appears to be a consequence of the training given to staff as EFRS' community safety agenda has grown. In particular, the training of 120 firefighters as Firebreak instructors has led to many operational watches having at least one member who has attended a 'Level Two' safeguarding course.

**Within EFRS, the general operational awareness of safeguarding is good and the general safeguarding risk is well managed**

### **B. The Safeguarding Risk in 'Community Safety' work**

With its strategic aim of embracing community engagement as a route to reducing the risks of fire and accident, individual members of staff are increasingly targeting members of the vulnerable population. This leads to contact with young people and adults with specific safeguarding needs or who have been subject to sexual or physical abuse or neglect and who may experience ongoing safeguarding risks. These include:

- People and families at risk from behaviour which may lead to harm from fire or accident – such as hoarders and fire-setters.
- People with emotional or mental health needs which may lead to repeated false calls.
- Individuals who are vulnerable because of their health, disability or other circumstances. This includes students on Firebreak courses, victims of domestic abuse who need improved fire protection in their homes and individuals or groups engaged with under the EFRS 'Delivering a Difference in Neighbourhoods' initiative (DDIN).

EFRS needs to proactively manage the inherent safeguarding risk that comes from working with these groups. The challenge is to ensure that staff working with the vulnerable have awareness of the 'signs and symptoms' in its various forms, understand vulnerability and are sensitive to the individuals' needs. They will sometimes be taken into confidence about abuse or neglect and occasionally receive disclosures or information which they will need to report to other agencies. To do this effectively, staff need more development in their understanding of safeguarding than is normally necessary for firefighters.

The Safeguarding Manager has been very thorough in ensuring that such development has been mandatory before staff lead courses, such as Firebreak. All Firebreak instructors spoken to during this Review had been trained to 'Level Two' in safeguarding and other staff working less intensively with vulnerable groups had been trained at Level One.

Formal training is only a first step in building competency in safeguarding. It is important that those working with the vulnerable have an opportunity to share their safeguarding experiences. A recent briefing for a staff in the community safety department gave people an opportunity to build on others experience and this should become a regular feature of the EFRS approach to safeguarding

### ***Delivering Difference in Neighbourhoods (DDIN):***

During the review, several people raised the issue of how to manage safeguarding risks within the DDIN initiative. Many staff on operational watches have only received safeguarding awareness training in their induction into EFRS. Watch members and managers spoken to in the review were generally very enthusiastic about the potential for these initiatives and they clearly have a benefit of increasing job satisfaction.

The following is suggested as an approach for effectively managing safeguarding in DDIN projects in future:

- Wherever possible, DDIN work should be structured to assist a partner agency rather than working directly with individual members of the community or ad hoc

**groups** – for example, a Watch working with a school to support the school staff. In most cases, such partner agencies will have their own safeguarding systems and designated safeguarding professional (DSP) who monitors standards and training appropriate to its clients. Such an approach fits well with EFRS' stated aim of working "*with partner agencies in meeting the social needs of vulnerable people.*" (EFRS 2020 Consultation Document)

- **That partner's DSP should formally be made aware of the level of experience and training of the EFRS members in working with vulnerable people and asked to provide any additional awareness for them.** This awareness 'training' is likely to be achievable by a briefing by that DSP.
- **In this arrangement, primary responsibility for safeguarding remains with the partner agency.** If watch members become aware of neglect or abuse issues, they should initially refer them to that DSP for the agency they are assisting. If safeguarding issues appear to be institutionalised or from inappropriate behaviour by the partner's DSP, EFRS staff should seek the advice of the EFRS Safeguarding Manager before taking further action.
- **In the event that a DDIN project does not involve a partner agency, an assessment of safeguarding risks and their likelihood should be carried out before the project starts. This risk assessment should be formally noted but it should not be overly bureaucratic.**
- **Watch members involved in DDIN work should receive refresher basic safeguarding training** and the Watch Officer should have the responsibility to seek advice from the EFRS Safeguarding Manager about risks and issues if they occur.

There is potential conflict between achieving formal targets on initiatives, such as Firebreak Courses and the opportunity for local DDIN projects if they both work with the same groups. It is important that safeguarding issues are not used to justify one or the other approach. Both Firebreak and DDIN can fulfil the requirements of good safeguarding if risks are appropriately managed.

**Safeguarding risks in Community Safety work are currently well managed. Delivering Difference in Neighbourhoods work (DDIN) carries a lower level of risk if it is focussed on supporting partners rather than being carried out in isolation. This should be adopted as the normal approach to DDIN projects**

### **C. The Risk of Actual or Alleged Inappropriate Behaviour by EFRS Staff.**

It is important that staff dealing with vulnerable people maintain a professional approach to contact at all times. Some vulnerable individuals, such as those with learning disabilities or who have suffered sexual abuse, may not be able to judge

personal situations well. This can lead to compromising situations or inappropriate contact if EFRS personnel are unaware of this aspect of their vulnerability.

However cautious EFRS is on its recruitment and training, allegations or incidents of inappropriate behaviour are likely to occasionally happen and it is important that they are well managed. When this happens, advice should be sought from the Local Authority Designated Officer (LADO) as set out in the current EFRS safeguarding policies.

The Service needs to ensure that it clearly states and reinforces that engagement with the community is a professional service being provided by EFRS rather than being provided by staff on a personal level. Ensuring appropriate checks are carried out when staff join EFRS mitigates the risk of inappropriate behaviour. Management of safe recruitment and DBS policy should be maintained as a core responsibility of EFRS Human Resources Department. Pragmatic methods to reduce the risk of inappropriate contact, such as congratulating by shaking hands rather than embracing, chaperoning if a person is upset etc., should routinely be included in induction and refresher training.

**The risk of inappropriate behaviour and allegations needs to be proactively managed although it is not high in the type of work carried out by EFRS.**

**Approaching community safety arrangements by supporting other agencies to deliver their purpose reduces the likelihood that EFRS staff will regularly work unsupervised with children, act inappropriately through ignorance or become eligible for DBS checks.**

**Human Resources Department should lead on 'safer staffing' policies to ensure appropriate checks of recruits and involve the Local Authority's Designated Officer (LADO) if allegations against staff are received.**

#### **D. Strategic and Organisational Risk**

There is increasing public and political expectation that publicly funded agencies will ensure children and vulnerable adults are always well safeguarded when they come into contact with that organisation. The consequences are very evident even when an organisation's core business is not about safeguarding people from abuse and neglect e.g. BBC and Savile enquiry. Management of such organisational risks is achieved through governance structures, roles with a particular remit for safeguarding, partnership work and a general commitment to improving standards of safeguarding.

**EFRS has managed strategic and organisational safeguarding risks effectively as it has expanded its role into working more with vulnerable people.**

However, with its new strategy and the future context of reducing budgets, there is a need to agree a revised organisational approach to safeguarding which is proportional to its strategic direction and resources.

### **Essex Fire Authority Involvement in Safeguarding:**

Fire Authority members should be better sighted on safeguarding issues with an opportunity to support and where appropriate challenge EFRS on its approach and impact. Elected members who sit on other authorities give EFRS an opportunity to influence partner organisations on their own responses to safeguarding issues identified in EFRS work. The Authority has received significant information on safeguarding through a very readable Community Development and Safeguarding Evaluation Report for 2013/14-2014/15. Child safeguarding is discussed in the report (pages 39-40) giving assurance that EFRS is aware and addressing individual cases. Adult safeguarding was not included. The report showed that the vast majority of cases (17 out of 18 in 2014/15) were within Essex County Council area.

That concise report should summarise safeguarding activity during the past year, indicating any trends or changing emphasis. Most importantly it should also highlight to members any ongoing challenges or risks for EFRS in managing safeguarding cases or achieving an appropriate response from partners to safeguarding referrals.

### **The Fire Authority should receive an annual concise report on safeguarding from abuse and neglect in EFRS.**

One member of the Authority has a particular responsibility for community safety however during this review, interviewees were uncertain how that role is carried out and whether this includes a remit for safeguarding issues. A more structured approach to the Authority's awareness of safeguarding should be built into its work.

### **One member of the Fire Authority should have a specific remit to understand in more detail the safeguarding issues which EFRS engages with.**

This member should not be party to information about individual cases. The role could be incorporated into other responsibilities regarding community safety.

### **Dedicated Safeguarding Roles in EFRS**

#### ***Strategic Officer Involvement in Safeguarding:***

EFRS has ensured that an Assistant Chief Officer has overall responsibility for safeguarding. In EFRS policies, this role is described as the 'Designated Person' for safeguarding. This is confusing. In the safeguarding community, Designated



Safeguarding Professionals (DSPs) are the source of advice and guidance on safeguarding for organisations. They monitor referrals, oversee and deliver training and ensure that policies and procedures are up to date, disseminated and applied.

This is not the role of the ACFO but sits with a Safeguarding Manager (see below discussion). The ACFO should be the 'strategic lead' for safeguarding – liaising with their peers in other agencies when necessary, ensuring that the EFRS approach is appropriately resourced and promoted and providing the route for issues to be raised by the Safeguarding Manager with chief officers and vice versa. The strategic lead responsibility may require some specific 'training' or e-learning, however much understanding can be achieved by meeting with Board Chairs and other strategic leaders and discussing issues with the Safeguarding Manager.

The strategic lead should meet with the EFRS Safeguarding Manager at least quarterly, to discuss safeguarding issues including trends in referrals and the evolving nature of partners' involvement. Notes of decision and actions from these meetings should be kept. In addition to these meetings, it is important that the Safeguarding Manager has ready access to the ACFO, so that individual safeguarding cases can be discussed, particularly when there is a need to escalate unresolved issues to higher levels in partner agencies.

### ***The Safeguarding Manager and Community Development Team.***

EFRS has recognised that a manager with a functional responsibility for safeguarding is an essential role. The initial role of the EFRS Safeguarding Manager has evolved into the current post described as 'Children, Young People and Safeguarding Manager' in a job description which includes wider community safety development responsibilities. The job description makes little reference to adult safeguarding. (Currently in EFRS safeguarding policies this post is referred to as 'Community Development and Safeguarding Manager' and therefore throughout this document, for ease of reference the term 'Safeguarding Manager' has been used). This manager is in effect the DSP for EFRS.

During this review, it was clear that the current Safeguarding Manager is very involved with the extension of Firebreak courses and other community safety arrangements. With the on-going targets for Firebreak and its franchising outside Essex, this appears to be a significant commitment which has coincided with the growth in safeguarding referrals.

Trained staff (e.g. Firebreak instructors) should be able to refer cases directly to Social Services without involving a manager. However, in practice referrals are rarely straightforward and funnelling them through the Safeguarding Manager allows for referrals to be monitored and quality assured. It also increases the likelihood that Social Services or other partners respond appropriately.



Although policies sometimes refer to the 'safeguarding team', there appears to be no such team in practice nor a clear deputy to the Safeguarding Manager who can advise on potential referrals. As a result the manager is 'on-call' to give advice on safeguarding at all times and is under significant pressure from the competing demands.

**EFRS is at risk of being unable to effectively manage safeguarding referrals if the resilience issues for the Safeguarding Manager role are not addressed.**

In the short term, EFRS can mitigate this risk by seconding a member of staff to work with the Safeguarding Manager and deputise for her on safeguarding issues. This should include giving advice on referrals to operational staff and delivering training etc. This person should be or become qualified at 'Level Two' safeguarding. The person may need some additional development, but this should initially involve 'on-the-job' induction and meeting with other partners rather than extensive training.

In the medium term, a number of other members of the community safety team should be expected to develop sufficient knowledge to be able to give advice on safeguarding referrals. As some of this team have operational firefighting or control room experience, they are likely to be able to liaise very effectively with operational staff. Some interviewees perceived safeguarding as a specialist function aside from normal operations rather than an aspect of everyday work. Involving staff with operational experience should help to embed a culture of safeguarding as 'business as usual' supported by a team of experts.

During interviews it was suggested that within the Community Safety team there should be 'champions' for different safeguarding topics, such as CSE or Domestic Abuse. The role of champions suggests the need for a significant commitment of time. Bearing in mind that in most cases EFRS' responsibility is to identify possible neglect and abuse and refer on, the use of 'champions' is likely to be disproportionate. However, members of community development teams should be encouraged to take an interest in a particular theme, such as domestic abuse or dementia, as a personal objective.

**However the short term risk is managed, the Safeguarding Manager's job description should be reviewed to ensure that it fully represents both the adult and children's agenda and is clear about the expected commitment to other work in Community Safety.**

Safeguarding and community development work is by definition a 'bottomless pit' where there is always more that can be done. It is important that staff working in these roles have regular performance appraisals to ensure that their own priorities compliment EFRS' strategic needs and any developmental initiatives are balanced with core responsibilities.

**The EFRS appraisal system needs to be reinvigorated by leaders and managers within the Community Safety Department. This will help staff keep future safeguarding commitments proportionate to the needs of EFRS.**

### **The EFRS Role in Safeguarding Boards**

EFRS participation in safeguarding boards' work, whilst not a legal obligation, provides senior managers with an opportunity to influence partners' approaches to safeguarding and to develop their own understanding. It also provides a platform for developing good working relationships which may benefit EFRS' long term aims in community safety and other areas. Being a proactive committed board member also builds a positive image of EFRS.

However, membership brings with it expectations of contribution in time and resource. Attendance at strategic boards is a responsibility for strategic leaders. To delegate it sends a message about the importance EFRS places on safeguarding and reduces its impact on the board's work. It is, therefore, necessary to balance the benefits for EFRS of membership of each board against the 'costs' with the aim of achieving a proportionate commitment.

The 'landscape' of safeguarding boards in Greater Essex is complex with six boards - 3 adult (SABs) and 3 children (LSCBs). EFRS is a member of all six. These have developed some common approaches. For example, they (SET) have identical policies and procedures for children and for adults and use a common approach for self-assessment against safeguarding standards. However, they have overlapping but different priorities and separate Board meetings. Nationally, LSCBs have led the development of safeguarding partnership work and understandably, EFRS has been more influenced by children's safeguarding as it has evolved its own approaches.

It is relatively unusual for Fire and Rescue Services (FRS) to be members of LSCBs. Published LSCB Annual Reports for the Eastern region in 2015 show that EFRS is the only Service to be a member of its local LSCBs. However, FRS are members of over half of Eastern Region Adult Boards.

Not surprisingly with a small senior management team, EFRS involvement in the Boards is inconsistent. Some Boards rarely see an EFRS representative and others have varying levels of representation. Full Safeguarding Boards generally meet 4 or 5 times a year, with formal sub-group meetings addressing particular functions or topics. To be properly represented as full members across all six Boards in Greater Essex, a strategic member of EFRS would need to attend at least 25 half-day Board meetings per year, often with similar topics being discussed in the different meetings.

The vast majority of 'referrals' to social services from EFRS are adults rather than children (in 2015-16 174 adults compared with 21 children) and adult referrals have grown much quicker than those of children during the past three years (up six-fold whilst children's referrals have doubled). It has not been possible to analyse the geographical spread of these referrals in this review but the Community Development Evaluation Report showed a heavy slant towards Essex CC area for children referrals. When compared to the child/adult split in Hampshire, and against Greater Essex populations, this data appears to be a good proxy indicator of where EFRS staff most frequently encounter safeguarding risks.

With the above issues in mind, the following is suggested as a proportionate approach for involvement in safeguarding boards.

- **EFRS should prioritise involvement in at least one adult safeguarding board (SAB) with a chief officer routinely attending Board meetings.**
- The officer should represent the Service on strategic issues, making decisions as appropriate about EFRS involvement in the Board's work and supporting or challenging other agencies' commitment to safeguarding as appropriate.
- **Chief Officers should discuss with the Chairs of the other five Boards a flexible involvement with their work.**
- This could include EFRS receiving agendas and papers but not routinely attending meetings unless there is a specific issue to address. It might also involve some management commitment to a LSCB/SAB sub-group on a topic in which EFRS has particular expertise or operational involvement.
- **Where SABs and LSCBs have local groups which build networks and share safeguarding information, such as Essex Stay Safe groups, Community Safety staff should continue to participate.**

### **Self-assessment against Safeguarding Standards (including Section 11)**

Section 11 of the Children Act 2004 places duties on a range of statutory partners to ensure that they conform to safeguarding standards and apply them to other organisations when they contract out services. LSCBs have a legal obligation to assess whether those standards are being met. Fire Services are not statutory partners for these purposes.

However, the standards are generally considered to be good practice for public bodies and have been used as the foundation for guiding all types of organisations about good practice. They have been used by CFOA to frame its current national guidance to fire services on safeguarding children. Within the child (and to some extent adult) safeguarding world, 'compliance with Section 11 standards' is used almost as accreditation that an organisation has good safeguarding governance and

seeks to improve its safeguarding practice. This statement is used by EFRS staff marketing Firebreak to other agencies.

LSCBs have adopted a model of asking partners to regularly carry out self-assessment against the standards, sharing their findings and action plans for improvement with partners. In Greater Essex, the three LSCBs together commission an electronic self-assessment tool which they have asked partners to complete and share annually. The Greater Essex SABs have adopted a similar approach using non-statutory standards developed to suit adult safeguarding.

This approach to self-assessment is very thorough but relatively intensive compared with other LSCBs and SABs which ask partners to self-assess every two or three years rather than annually. Currently the Essex LSCB and SAB are considering moving to this approach. However it is unclear whether Southend and Thurrock are likely to follow suit. While the Boards are coordinating their approach to the self-assessment tool, the Boards are less coordinated on reporting back to partners and discussing issues putting different expectations on EFRS. As members of all 6 Boards, EFRS is currently expected by their Boards to service these different requirements.

There is clearly a need for strategic leaders in EFRS and its Authority to be satisfied that appropriate standards of safeguarding are met and where necessary improved upon. The Section 11 approach provides an opportunity to formally do this. However, EFRS has the opportunity to negotiate with the Board and Chair how it does this. As a governance approach for self-assessment the following is suggested:

**In negotiating membership or contribution to Greater Essex SABs and LSCBs, EFRS should set out how it intends to carry out self-assessment against standards, reassuring both its own Authority and Board partners of its competence and any direction for improvement.**

It is proportionate for EFRS to self-assess against standards every two years and in alternate years carry out a check against the last full report to review any improvement plans. The self-assessment or annual review should be used to inform the concise annual report on safeguarding to the Fire Authority. The results of the self-assessment should be shared with partners through a Safeguarding Board.

## **Policies and Procedures**

EFRS has separate policies for safeguarding children and safeguarding adults. Neither policy is up-to-date – the Adult's policy makes no reference to the Care Act 2014 (the primary legislation for Safeguarding Adults) and the Children's policy does not mention new safeguarding issues such as Child Sexual Exploitation (CSE) or

radicalisation. Having been written at different times and drawing on different sources, the policies do not complement each other, for example advice on physical contact differs in the way it is set out although the underlying principles appear to be similar. The lack of current information is not critical to operational staff as both policies start with similar overarching 'safeguarding protocols' and a fundamental procedure in a simple diagram which is a useful reference point for staff.

However, the lack of current information will become an increasing issue and the absence of an up-to-date policy suggests that EFRS is not 'on top' of safeguarding more generally. As EFRS' role is generally not to take responsibility for cases of abuse and neglect in the long term, it does not need very detailed separate procedures on for children and adults. Therefore, EFRS should take the opportunity to merge the policies into one combined policy.

**The EFRS policies for Safeguarding Children and Safeguarding Adults should be updated taking the opportunity to merge the policy into one concise document, a 'Safeguarding Children and Vulnerable Adults Policy'.**

In developing policy, EFRS could look to CFOA for guidance. However, the CFOA guidance on safeguarding is not up to date, is couched in the general responsibilities of a Fire and Rescue Service (based on the Section 11 standards) and does not cover vulnerable adults. CFOA is aware that its own guidance needs updating and EFRS personnel have been involved in meetings on this issue.

### **3. EFRS Learning and Development in Safeguarding**

In order to manage safeguarding risks effectively, operational personnel need to be aware of the 'signs and symptoms' of neglect and abuse in its various forms. They do not need high levels of expertise. They need to have confidence in referral processes so that the 'handover' of cases to other agencies is effective. Some staff, working with fire setters and hoarders, need an understanding of the constraints and opportunities which apply to other partners approaches.

A great deal of this knowledge and understanding can be achieved by giving staff an opportunity to reflect on others' experience both inside and outside EFRS. Rather than formal training courses this can be achieved through briefings, bulletins and discussions in the workplace. There are many ways to develop such approaches but the following would strengthen EFRS confidence in safeguarding:

- A group of community safety and operational staff should regularly come together to discuss safeguarding cases, issues and topics for development in a relatively informal 'safeguarding forum' led by the Safeguarding Manager.

Members should be expected to share any learning with colleagues in their own teams.

- At senior level, performance data about referrals and information on significant cases should be included in meetings and briefings for senior staff so that they can build a picture of the EFRS commitment to safeguarding.

**The Community Safety Department should develop a more flexible approach to sharing safeguarding experience. This should gradually increase the awareness of all staff on the signs and symptoms of neglect and abuse and inform senior managers about safeguarding issues and challenges.**