

## Safeguarding Children

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## 1.0 Introduction and scope

This Safeguarding Children Policy has been developed in line with Wandle's values, which are:

- Think customer
- Build relationships
- Work together
- Aim high
- Own it

It will ensure that actions we undertake will be underpinned by our vision of:

*"Homes to be proud of and services you can trust"*

### Scope

This policy applies to all staff (including temporary staff), volunteers, contractors and agents who work for Wandle.

This policy concerns anyone who is under 18 years old, which may include an unborn child.

Our safeguarding responsibilities for anyone over 18 years old are outlined in our Safeguarding Adults Policy.

## 2.0 Related Documents and Guidance

### [HCA Regulatory Framework](#)

[Working together to safeguard children](#): A guide to inter-agency working to safeguard and promote the welfare of children

[Child sexual exploitation](#): Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation

[What to do if you're worried a child is being abused](#): Advice for practitioners

## 3.0 Internal Related Documents

Key Strategy	Customer Involvement
Policies	<a href="#">Adult Safeguarding</a> <a href="#">Data Protection</a> <a href="#">Whistleblowing</a> <a href="#">Recruitment and Selection</a>

## 4.0 Legal Framework

There is no single piece of legislation that covers 'child protection' or 'safeguarding' in the UK but a number of laws that are continually being amended, updated or revoked.

Key Legislation	Main powers and relevance to <i>policy subject</i>
The Children Act 1989	<p>Provides a comprehensive framework for the care and protection of children. It centers on the welfare of children up to their 18th birthday. It defines parental responsibility and encourages partnership working with parents. Interagency co-operation is encouraged.</p> <p>It reinforced the message that all organisations working with children have a duty in helping safeguard and promote the welfare of children.</p>
Sexual Offences Act 2003	<p>Specifically the following sections:</p> <ul style="list-style-type: none"><li>• S.5-8 Rape and other sexual offences against children under 13</li><li>• S.14 Arranging or facilitating commission of a child sex offence</li><li>• S.15 Meeting a child following sexual grooming</li><li>• S.47 Paying for sexual services of a child</li><li>• S.48 Causing or inciting sexual exploitation of a child</li><li>• S.49 Controlling a child in relation to sexual exploitation</li></ul>

### Other relevant legislation:

- Data Protection Act 1998 and GDPR
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)

## 5.0 Definitions

### What is safeguarding?

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing the impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable children in need to have optimum life chances.

For Wandle, it is also about safeguarding policies and procedures that embed safeguarding principles in our organisation. This includes safer recruitment practices, a code of conduct for all members of staff, and whistleblowing procedures.

### **What is child protection?**

Child protection is an important part of safeguarding. It refers to specific actions to protect individual children who are suffering, or are at risk of suffering, significant harm.

### **What is 'significant harm'?**

The Children Act 1989 introduced 'significant harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. Harm is defined as the ill treatment or impairment of health and development. It includes impairment suffered from seeing or hearing the ill treatment of another person.

There are no absolute criteria on which to rely when judging what constitutes significant harm. When assessing whether harm suffered by a child is significant, we must consider their health or development compared to what is reasonably expected of a similar child.

### **What is child abuse?**

'Forms of maltreatment of a child.' (*Safeguarding Children Board*)

There are many different types of abuse. Child abuse can happen in any family or caring relationship, regardless of class or cultural background. It includes familial violence, 'honour' based violence and harmful cultural practices, such as forced marriage or female genital mutilation. We will be sensitive and informed when assessing a child's needs but will never accept abuse for religious or cultural reasons: all children have an absolute right to be protected from harm.

Not all abusive behaviours are violent and include neglect and emotional abuse, which can both cause severe and persistent effects on the child's emotional and physical development.

### **What is 'child sexual exploitation'?**

A form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (Department for Education, 2017).

### **What is Female Genital Mutilation?**

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting.

Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM.

## 6.0 Abbreviations

LSCB	Local Safeguarding Children's Board's
DBS	Disclosure and Barring Service
EIA	Equality Impact Assessment
FGM	Female Genital Mutilation

## 7.0 Policy Statement

### 7.1 Introduction

Every child has the right to be safe from abuse and fear. We all have a responsibility to prevent, recognise and act on abuse and neglect quickly to keep children safe from harm in the neighbourhoods and communities where we work.

Anyone raising a safeguarding alert or concern will always be listened to, believed, and assured that we will act on their concern.

We observe each Local Safeguarding Children's Board's (LSCB) Child Protection Procedures and the requirements of any Commissioning Body. We will report instances of suspected or known abuse or neglect to them in accordance with their procedures and timescales.

We are committed to Equality, Diversity and Inclusion. This policy forms part of our suite of documents and resources reflecting our actions to embed these values into every area of work and all parts of our business.

### 7.2 Roles and Responsibilities

We have a statutory duty to safeguard and promote the welfare of children and we will comply with all relevant legislation.

It **is** our responsibility to: respond promptly and appropriately to concerns; pass information to Children's Social Care and the Police; and co-operate with statutory child protection procedures and criminal enquiries.

It is **not** our responsibility to decide whether children are suffering or are likely to suffer abuse or significant harm – this is the responsibility of local authorities.

#### **Staff Responsibilities**

All staff who visit customers' homes must read and understand this policy and complete any mandatory e-learning training on Safeguarding Children. They should monitor for any signs or signals of child abuse or harm and report any concerns they have that a child is suffering, or is likely to suffer, abuse or significant harm.

## **Managers**

Managers will take responsibility for the quality of safeguarding in their teams and encourage staff to raise alerts appropriately. They should act immediately when an alert is raised, take the concern seriously and support staff to take the appropriate steps.

## **Contractors**

Contractors who visit our customers' homes are expected to comply with our Safeguarding Children policy by ensuring that their employees are able to report child safeguarding concerns. Contractors must inform us when such concerns involve our customers.

## **Contractor Managers**

To make sure their staff are regularly trained and know how to refer, where to refer, and when to call the police and or Ambulance services.

## **Senior Community Investment Manager**

The Senior Community Investment Manager is the safeguarding lead and has overall responsibility for safeguarding children at Wandle. The lead will ensure that all reported safeguarding children cases are monitored and logged appropriately in a protected case log. They will also ensure that child safeguarding procedures are reviewed on an annual basis.

## **7.3 Training**

Wandle will deliver an online training course to all staff that visit customers' homes, including managers and front line staff from our contractors. This would be a mandatory e-learning objective monitored by the HR department.

## **7.4 Our Commitments**

### **Awareness**

We will ensure that **all** staff, volunteers, contractors, agents and any third party working on our behalf, who visit customers' homes, understand this policy, are aware of the signs of abuse and know what to do if they have reason to believe that child abuse is taking place. We will empower our customers with information with what constitutes abuse and how to report it.

## Learning

We will learn from previous situations and continually improve how we manage our safeguarding children concerns.

We will cooperate with any safeguarding audit or serious case review commissioned by an LSCB.

## Partnership working

We recognise that local authorities (Children's Social Care) are the lead agency when coordinating safeguarding investigations.

We are committed to working swiftly and productively with all relevant agencies to take action to protect a child who may be experiencing or is likely to experience significant harm. We have an important role to play with local authorities and the police in the prevention, detection and reporting of concerns and will always support them with their investigations in the best way possible.

We will co-operate by sharing information with the local authority and/or Police, attending child protection conferences and core groups, as well as attending court to give evidence when requested.

## Referral

We have a duty to refer the concern to the given local authority's Children Social Services Department within 24 hours if there are reasonable grounds to suspect that a child at risk is:

- Experiencing or may have already experienced abuse or neglect
- Likely to suffer significant harm in the future.
- We can refer the matter to the Police or Social Services immediately if we feel the person is at high risk or the situation is urgent.

### 7.5 How to Refer

Any member of staff who may have a safeguarding concern regarding our customers can refer this to their line manager. This can be done via email or by using a "Concern Card" (either physical, an attachment to PDA, or via email). The manager must then forward this concern to Wandle's Safeguarding Lead who will record the case.

### 7.6 Recording Cases

Clear and detailed procedures will outline to process for recording child safeguarding cases.

### 7.7 Freedom to Speak, Duty to Act

We will support any member of staff or volunteer who reports their concerns about the welfare of a child in good faith. **It is better to report a suspicion and be wrong than not to report it at all.** The procedures set out clearly and comprehensively how staff can report concerns.



## 7.8 Allegations against staff

There will be occasions when allegations are made that staff have been guilty of abuse against children. If the staff member is subject to a criminal investigation, consideration will need to be given to the timing of any Safeguarding Children Review (SCR).

The individual commissioned to undertake the SCR should be independent of the department or organisation involved. This will be decided by the Senior Community Investment Manager.

## 7.9 Prevention

Prevention strategies might include:

- Identifying children at risk of abuse;
- Public awareness;
- Information, advice and advocacy;
- Inter-agency cooperation;
- Training and education;
- Integrated policies and procedures;
- Integrated quality and safeguarding strategies;
- Community links and community support;
- Regulation and legislation;
- Proactive approach to Prevent

## 7.10 Support

### **Staff**

Being a witness to, hearing about, or supporting a child through abuse can be very distressing. We will support all staff involved in a safeguarding children case at every stage of the process through regular supervision meetings and any other relevant support mechanisms.

### **Customers**

We will provide the relevant support for customers, which may include referrals to appropriate external agencies. We will work in partnership with all relevant statutory and voluntary bodies to achieve this.

### **Safer Recruitment**

We follow rigorous procedures throughout the recruitment and selection of staff and volunteers.

Disclosure and Barring Service (DBS) checks are completed on all relevant persons when recruiting staff and volunteers to work in a 'regulated' activity. These are reviewed every three years.

## 7.11 Confidentiality and Sharing Information

The needs of the child at risk must come first and any actions we take reflect this.

Where possible we will comply with the principles of the Data Protection Act and our Data Protection policy to maintain confidentiality. However, the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information is shared in a lawful way.

Where possible, professionals working directly with children and their families should seek to discuss their concerns with the child and/or their parents and seek their agreement to making a referral to Children's Social Care. However, if such a discussion would place the child at an increased risk of significant harm (for example, the parent is the alleged perpetrator) then this discussion should not take place.

We reserve the right to make the referral to Children's Social Care or the Police without the permission of the child or parent where the situation and the provisions of the Data Protection Act (and any other relevant legislation) justify it. This includes where there is reason to believe that a child is suffering, or at risk of suffering, significant harm, or to prevent or detect a criminal offence.

## 8.0 Equality, Diversity and Inclusion

Equality & Diversity is central to our business; promoting fairness and opportunity for customers and staff; helping provide the best services shaped by and for customers; and right for recruiting and developing our staff.

We are committed to celebrating diversity. To ensure equal access to our services is available, Wandle will comply with the Equality Act 2010 and all other legislative requirements relating to equality. We will work to avoid exclusions or restrictions that are not appropriate to the housing and support needs of our tenants and that may lead to discrimination. We will endeavour to ensure that all tenants receive a consistent level of quality service.

All children have the absolute right to be protected from abuse, regardless of age, gender, disability, pregnancy and maternity, class, race, religion, sexual orientation, gender identity, location, marital status, criminal behaviour or immigration status.

We recognise that there may be additional communication barriers for children who are disabled or for children whose first language is not English. We are committed to helping them overcome these barriers and will work jointly with external parties to in these cases.

### Equality Consideration

Under the *Equality Act 2010* Wandle must consider whether our policies adversely affect our customers and/or staff.

The following table identifies whether this policy disproportionately impacts upon any individuals in regard to the key protected characteristics, as identified in the Act:

Special Characteristic	Disproportionate impact? (Yes or No)
age	No

disability	No
gender reassignment	No
marriage and civil partnership	No
pregnancy and maternity	No
race	No
religion or belief	No
sex	No
sexual orientation	No

We do not consider this policy to disproportionately impact any individuals in regard to these characteristics. However due to the nature of the policy it was agreed upon during staff consultation (via workshop) that an EIA should still be completed.

## 9.0 Performance Monitoring

Performance Indicator	Performance target
Contact made to victim	Log within one working day
Contact made to Social Services	Log within one working day
Contact made to Police	Log within one working day
Action plan agreed and sent	Log within one working day
Case reviews	Complete within one working week and each week thereafter.