

Safeguarding (Children) Policy

Contents

1. Our purpose
2. Introduction
3. Scope of Policy and Exclusions
4. Definitions
5. Roles and Responsibilities
6. Our Policy
7. Monitoring and Reporting
8. Assurance
9. Equality Impact Assessment
10. Training and Competency
11. Communication and Implementation
12. Legal and regulatory framework
13. Information Sharing and Confidentiality

1. Our purpose

We're proud to be able to support tens of thousands of people across England by providing affordable housing and care to help people live independently.

Everything starts at home, and we are privileged to be able to do work which makes a real difference to the lives of people in our communities. Everything we do is about people – whether that's providing a good quality, safe home or providing care which helps someone to live an independent life.

We live and breathe this social purpose.

2. Introduction

The protection and safety of children is everyone's responsibility.

A child-centred approach is fundamental to safeguarding and promoting the welfare of every child. The Children Acts 1989 and 2004. Acts make clear that the welfare of children is paramount and that they are best looked after within their families, with their parents playing a full part in their lives, unless compulsory intervention in family life is necessary

It is also recognised that inter-agency cooperation is essential if children are to be protected.

This policy sets out our approach towards safeguarding children at risk from harm and abuse.

GreenSquareAccord (GSA) provides housing, care and support to a range of and customers, many of whom will have children or access to children. We also provide some specialist services that by their nature may be specifically impacted. It is a fact that some of the children who enter our services having already been identified as being at risk.

All of GreenSquareAccord employees must recognise this and must report any concerns for the well-being of children. This policy, and associated procedure, establishes the roles and responsibilities of management and colleagues in relation to the protection of children.

Failure to comply with this policy may result in a risk to the wellbeing of children as well as a negative reputational and financial impact to the organisation.

3. Scope of Policy and Exclusions

This policy refers to all children, as defined below.

4. Definitions

Child	Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.
Parent	The term includes carers or guardians. It means, in usual circumstances, someone who is legally entitled to take decisions on behalf of the child.

Abuse and Neglect	Abuse or neglect takes many forms and can be caused by single or repeated acts or a failure to act by any other person or persons, or in the case of self-neglect, the victim themselves. The circumstances of each individual case will be considered as to not limit what constitutes abuse or neglect. However, we will reference the <i>Working Together to Safeguard Children</i> definition for abuse: <i>“A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet).</i> <i>They may be abused by an adult or adults, or another child or children.”</i> Guidance on the types of abuse and neglect is detailed in the Safeguarding Children procedure.
Promoting Welfare	Safeguarding forms part of the requirement of statutory authorities to promote the overall welfare of a child by: □ protecting children from maltreatment. □ preventing 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 all children to have the best life chances.
Early Help	Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising. All colleagues and volunteers should understand the importance of intervening early, before problems become entrenched, and know how to access additional support for children, young people and families through the Early Help initiatives which may vary depending upon the local authority.

Significant Harm	The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Section 47(1) of the Children Act 1989 states that: <i>'Where a local authority... have reasonable cause to suspect that a child who lives, or is found, in the area and is suffering, or is likely to suffer, Significant Harm, the authority shall make, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare... the enquiries shall be commenced as soon as practicable and, in any event, within 48 hours of the authority receiving the information.'</i>
-------------------------	---

5. Roles and Responsibilities

5.1. The **Executive Board** has overall strategic responsibility for safeguarding across GSA. They are responsible for ensuring clear and effective safeguarding policies and procedures are in place and that monitoring information on safeguarding is appropriately scrutinised.

5.2. **Directors** are responsible for:

- Ensuring their teams are aware, and work within the framework of safeguarding children.
- Instilling cultures that support identification, action and learning in relation to safeguarding.

5.3. The **Heads of Service** are responsible for:

- Ensuring safeguarding practices are known and embedded within service areas and that identified leads represent their service areas within GSA safeguarding groups and structures.
- Instilling cultures of professional curiosity where colleagues join the dots and liaise appropriately with other agencies to maximise customer safety and well-being.

5.4. **Departmental Managers** are responsible for:

- Overseeing safeguarding activity and ensuring appropriate reporting and monitoring of safeguarding concerns. This includes appropriate inter- agency working and information sharing.
- Ensuring colleagues undertake safeguarding training relevant to their role and that reflective practice is used to embed a culture of learning from safeguarding incidents.

5.5. **Contract Managers** are responsible for ensuring that Contractors who visit our homes and services have the required safeguarding arrangements in place.

5.6. **Contractors** are responsible for:

- Ensuring that colleagues are suitable for the capacity employed, including relevant background checks.
- Ensuring that colleagues receive suitable training on how to deal with residents, including how to report any concerns they have.
- Cooperate fully with any arrangements put in place by GSA for Contractors to report safeguarding concerns in GSA properties and services
- Co-operating with GSA and their statutory partners regarding any concerns and allegations received.

Agency managed services will be expected to have their own equivalent safeguarding policies in place. Their responsibilities in this regard will be managed through our contractual relationship with them. Agencies are required to report safeguarding concerns to the police and any other regulators relevant to the service type.

5.7. **Operational Colleagues** are responsible for:

- Working in line with GSA policies, procedures and training provided, to ensure the timely identification and reporting of safeguarding concerns.
- Raising any areas of concern, liaising with other agencies as relevant to ensure cases are appropriately reported.

5.8. The **Safeguarding Lead Officers Group** is a delegated sub-committee of Executive Board. It supports the Executive Board in discharging its responsibilities relating to safeguarding. The purpose of the GSA Safeguarding Lead Officers Group is:

- To lead on the development and review of safeguarding policies and practices across GreenSquareAccord providing an effective interface between organisationwide teams and departments.
- To ensure safeguarding awareness is embedded across the organisation through effective, appropriate and timely communication and updates to DSO's and colleagues and creating a culture where safeguarding is recognised as everybody's business.
- To embrace and promote an active learning culture where we learn from adverse events and take steps to prevent recurrence.
- To use data to monitor and manage risk, escalating any areas of concern to Executive Board.
- To produce an annual report of safeguarding activity. This is reviewed by the GSA Board as part of assurance that safeguarding is being effectively managed.

5.9. The **Director of Quality and Compliance** is the Chair of the Safeguarding Lead Officer's Group and is responsible for escalating any issues or concerns to Executive Board. They act as the overall lead officer for safeguarding across GSA.

5.10. **Designated Safeguarding Officers (DSO's)** are identified leads in operational teams who provide additional support, expertise and guidance to operational colleagues. DSO's meet in a safeguarding sub-group to:

- Review how safeguarding practices are being implemented
- Share good practice
- Work together to resolve any system or process issue that may impact on the delivery of effective safeguarding practice

In any **specialist children services**, designated Managers act as designated safeguarding leads for their service areas.

5.11. All Colleagues:

- have a moral obligation to report safeguarding concerns. Wherever colleagues, including operatives / engineers, have a concern that something may not be right, they should discuss it with their line Manager, relevant safeguarding lead or DSO. **See something. Say something. Do something.**
- will also be made aware of whistleblowing procedures should they need to report any concerns through these processes. We encourage a culture of speaking up wherever a colleague has a concern.

6. Policy

6.1. Policy Statement

We aim to protect and maintain a child's safety and wellbeing through our approach to Safeguarding Children and Young People. We will achieve this by:

- Taking a child centred approach to prevention and empowerment, placing a child's needs at the forefront
- Enabling our colleagues and taking proportionate actions
- Working with others
- Ensuring effective reporting and recording
- Being accountable and transparent

6.2. Policy Outline

We will work alongside our local authority partners in following the 'Right Help, Right Time' approach.

This recognises that there is a continuum of need and, wherever possible there should be a focus on early intervention with children and families.

The levels of need are identified below:

Level 1. Universal: yours, mine, every child

Children and young people making good overall progress in all areas of their development and receiving appropriate universal services such as health and education.

Level 2. Single Agency Early Help

Children, young people and their families are experiencing emerging problems, or have additional needs that require some targeted support. They are likely to require early help for a time limited period, to help them move back to Universal (level 1) and reduce the likelihood of needing level 3 more targeted support.

Level 3. Partnership Early Help

Children, young people and families with identified vulnerabilities who are experiencing multiple and complex needs and are likely to need a more targeted, multi-agency coordinated approach. They are likely to require longer term help.

Level 4. Statutory Support – In need of protection, likelihood of significant harm

Children, young people and their families who are experiencing very serious or complex needs that are having a major impact on their expected outcomes or there is serious concern for their safety. These acute needs may require statutory intensive support for children and young people for protection. This may be as children in need - CIN (Section 17 of the Children Act 1989) or as children in need of protection- CP (under section 47 of the Children Act 1989).

Children, young people and families receiving intervention for level 4 need are helped, where possible, in reducing the seriousness and complexity of need and are then enabled to access Early Help or Universal services as appropriate.

While all local authorities will follow the same broad approach, local authorities will have differing arrangements for referring concerns and ensuring cases are appropriately assessed.

GSA colleagues should refer to the relevant local authority's website for details of access to children services, including services focused on early-help for children and families.

If a professional considers that the level of need of a child or young person is such that they are at risk of significant harm (Level 4) then a referral to Children's Social Care must be made, without delay. In many local authorities, this is via the completion of a multi-agency referral form (MARF). Please refer to the safeguarding children procedure for more details.

6.3. Policy Requirements

The GSA Safeguarding Policy is aligned to statutory guidance as defined by the Children's Act 1989 and the Working Together guidance 2018/ 2023.

7. Monitoring and Reporting

7.1. Data Recording

- Operational teams are responsible for reporting referrals to the relevant external organisations and reporting this through designated internal routes as documented in the safeguarding children procedure.
- Case management records should be appropriately updated to include actions taken and case outcomes.

7.2. KPIs

- GSA Safeguarding referrals are monitored quarterly via the Safeguarding Lead Officer's group with a summary report provided to the Executive Board.

7.3. Monitoring Effectiveness

- The effectiveness of safeguarding practice is monitored both through the safeguarding lead officers' group, and at more operational level through the SubGroup meetings of Designated Safeguarding Officers, and Care and Support meeting structures.
- The Annual Safeguarding report to Board is the formal means by which the effectiveness of our safeguarding policy is monitored.

7.4. Reporting Fora and Frequency

- In addition to the KPI reporting described, an Annual Safeguarding Report is produced for the GSA Board who retain overall responsibility for safeguarding policy and practice within GSA.

8. Assurance

8.1. Internal Audit Programme

- GSA have an internal audit programme delivered by KPMG. At periodic intervals, this will include an audit of safeguarding.

8.2. Internal Quality Assurance Processes

- Within Care and Support services, regular service-based audits will include reviews of safeguarding activity and practice on an ongoing basis. Senior Managers and Quality Leads will also oversee cases and monitor that any learning outcomes are addressed.
- Across Operations, the Operations Quality Team will conduct periodic reviews of the effectiveness of safeguarding arrangements and make recommendations for improvement

- Compliance with colleagues training in relation to safeguarding across GSA will be monitored through the Audit, Risk and Finance Committee.

8.3. External Audit / Validation

- For services in care and support, external validation and audit of safeguarding policy and practice is also undertaken by regulators and commissioners as part of wider service monitoring.

8.4. Service Standards

- All colleagues identified as in scope for a DBS check (taking into account DBS guidance and their work role) will have a DBS check that will be renewed every 3 years.
- All colleagues in GSA will undertake mandatory safeguarding training.
- An Annual Report on Safeguarding will be produced for the GSA Board.
- The GSA Safeguarding Policy will be reviewed as a minimum every 2 years.

9. Equality Impact Assessment

We acknowledge that children may have had difficult experiences, and those experiences have increased their vulnerability. Some types of abuse may be specific to genders, e.g., Female Genital Mutilation (FGM) or may be more prevalent in particular cultures. Children with a disability may be more prevalent to some types of abuse because of their dependency on others. Transgender children may be more at risk of abuse where their gender identity conflicts with cultural, religious, faith interpretations of traditional gender roles. LGBTQ+ children may also be at additional risk.

We aim to create safe and inclusive communities; however, some communities may be more visible than others and more willing to seek outside assistance.

‘Working together 2023’ identifies that professionals should be particularly alert to the potential need for early help for a child who:

- is disabled
- has special educational needs (whether or not they have a statutory education, health and care (EHC) plan)
- is a young carer
- is bereaved
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised

- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- is suffering from mental ill health
- has returned home to their family from care
- is a privately fostered child
- has a parent or carer in custody
- is missing education, or persistently absent from school, or not in receipt of fulltime education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded

10. Data Protection Considerations

Consideration has been given to data protection by ensuring this policy adheres to data protection principles, including confidentiality, fairness, transparency and data minimisation.

Before making a referral, parents/carers should be asked to give consent to the referral being made. Consent must always be obtained for Section 17 (Children in Need) referrals, but it not necessarily required for Section 47 (Child Protection referrals). The procedure provides more detail on Section 17 and Section 47 referrals.

There are circumstances when it may appropriate to dispense with the requirement to obtain consent to share information; this includes when:

- Discussion with the parents/ carers could place the child or other family members at risk.
- The child is in immediate danger (e.g. requires medical attention)
- Discussion with parents / carers may place you or another member of colleagues at risk

In relation to sharing special category personal data, the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent:

- If it is not possible to gain consent.
- It cannot be reasonably expected that a practitioner gains consent, or.
- If to gain consent would place a child at risk.

In cases where consent is not given, colleagues should consider how the needs of the child might be met. If at any time it is considered that the child may be a child in need, as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral must be made immediately to local authority children's social care. This referral can be made by any practitioner/ colleague.

11. Training and Competency

- Safeguarding training is mandatory for all roles within the organisation. The level, type and refresher frequency of this training will depend on the role undertaken.
- The Director of Quality and Compliance (as GSA Safeguarding Lead) has overall responsibility for ensuring that the safeguarding training programme is appropriate to individual roles and is being delivered.
- Safeguarding children training will be undertaken by colleagues who have a specific role in working with children.

12. Communication and Implementation

- This policy will be communicated through internal communication processes. Communications will be used to revisit key messages and to update colleagues of any policy and procedure changes.
- Any learning from cases will be effectively disseminated via meeting structures, including Locality Board meetings, DSO sub-group meetings and operational meetings across the business.

13. Legal and Regulatory Framework

The Children Act 2004

This act created Local Safeguarding Children's Boards and places duties on a range of statutory organisations. Although Registered Providers of Housing such as GSA are not subject to this act, we are expected to mirror organisations that are, by:

- having a designated lead person for child safeguarding matters.
- sharing information with other professionals.
- having safe recruitment practices and whistleblowing procedures. □ training our colleagues on child safeguarding.
- having a clear child safeguarding policy; and
- having a procedure for responding to child protection concerns, including making referrals to local authorities or the police.

Working together to safeguard children 2018/ 2023

The 2023 edition replaces Working together to safeguard children 2018, which underwent a limited factual update in 2020. The guidance outlines what organisations and agencies must and should do to help, protect and promote the welfare of all children and young people under the age of 18 in England.

14. Information Sharing and Confidentiality

We will provide information as required in line with relevant law and regulation.

We collect information (personal data) to enable us to:

- ☐ manage and support our relationship with customers to comply with legal obligations
- ☐ improve our services
- ☐ achieve our legitimate business aims

We are committed to complying with data protection legislation when handling data.

Customers have rights including access to their data and to object to the way it is processed. For more information on how and why we process customer data and how customers can exercise their rights please view our full Privacy Policy on our website at [Privacy notice – GreenSquareAccord](#).