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### **Safeguarding children policy**

#### **1. Scope**

- 1.1 This policy is applicable to all employees (including temporary employees), volunteers, contractors and Board Members.
- 1.2 This policy applies to anyone under 18 years old, which may include an unborn child.
- 1.3 Registered Providers like Sutton Housing Society are expected to have appropriate arrangements in place to provide for safeguarding children and young people. This is set out in the Children Act 1989 and the Children Act 2004.
- 1.4 Our safeguarding responsibilities for 18 years and above are outlined in our Safeguarding Adults policy.

#### **2 Policy statement**

- 2.1 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.
- 2.2 Anyone raising a safeguarding alert or concern will always be listened to, believed, and assured that we will act on their concern.
- 2.3 We observe the London Borough of Sutton's (LBS) Safeguarding Children's Board's (LSCB) Child Protection procedures and support the LBS's Multi-Agency Safeguarding Children Policy and Procedure.
- 2.4 Sutton Housing Society (SHS) will report instances of suspected or known abuse or neglect to them in accordance with LBS's procedures.
- 2.5 All employees that are in contact with children must recognise their responsibility and will receive training and support on how to respond to safeguarding incidents or situations; this includes sharing information appropriately.
- 2.6 SHS promotes a culture which values good practice and encourages employees to draw attention to bad practice by having a policy on whistle blowing in the workplace.
- 2.7 SHS is committed to the safe recruitment, selection and vetting for employees who are likely to be in contact with children.

**3. How to report a concern: respond, record, and report**

3.1 When an employee has a concern there are steps to be taken to respond, record and report the concern. Further details of these steps are covered in our Safeguarding Children procedures.

**3.2 When do safeguarding duties apply?**

We have a duty to refer the matter within 24 hours (or sooner in emergency situations) to Children's Social Care where the child is normally resident if there are reasonable grounds to suspect that any child is:

- experiencing or may have already experienced significant harm
- likely to suffer significant harm in the future.

3.3 We can refer the matter immediately to Children's Social Care or the Police if we feel the child is at high risk or the situation is urgent. Where there is an immediate and high risk of a serious criminal offence to a child (for example, abduction, murder) then the Police should be notified at once.

**4. Legal framework**

4.1 We have a statutory duty to safeguard and promote the welfare of children and we will comply with all relevant legislation. This is outlined for employees in our Safeguarding Children procedures.

4.2 It is our responsibility to:

- respond promptly and appropriately to concerns
- pass information to Children's Social Care and the Police
- Co-operate with statutory child protection procedures and criminal enquiries

4.3 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 authority
- investigate any allegations or concerns; these must be referred to the local authority and/or police who have the duty to investigate allegations of significant harm and a criminal offence respectively

**5. Definitions**

**5.1 What does 'safeguarding children' mean?**

In *Working Together to Safeguard Children 2015*, 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 all children to have the best life chances

**5.2 What is child protection?**

Child protection is an important part of safeguarding and promoting welfare. It refers to activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**5.3 What is 'significant harm'?**

5.3.1 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.

5.3.2 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.

**5.4 What is abuse?**

5.4.1 Child abuse is any action by another person – adult or child – that causes significant harm to a child. There are different types of abuse, such as physical, sexual or emotional, but it can just as often be about a lack of love, care and attention. Neglect can be just as damaging to a child as physical abuse.

5.4.2 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.

5.4.3 Whilst we must be sensitive and informed when assessing a child's needs we will never accept any abuse that is carried out for religious or cultural reasons: all children have an absolute right to be protected from harm.

5.5 The Safeguarding Procedures provides more information about different types of significant harm and abuse.

**6. Our safeguarding principles**

**6.1 Everyone's responsibility**

6.1.1 Everyone has a responsibility for keeping children safe.

6.1.2 To support employees to carry out their responsibilities, we will ensure we have a fair and open culture of safeguarding awareness to allow any concerned person to raise concerns without fear. We will ensure that employees:

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- understand this policy and procedure
  - are aware of the signs of abuse
  - are strongly encouraged to complete the Safeguarding Children e-learning module and any additional training to help them carry out their duties
  - know what to do if they have reason to believe that abuse is taking place
  - have an awareness of the MASH information.
- 6.1.3 We will inform our residents by providing them with information about what constitutes abuse and neglect and how to report it.
- 6.2 **A child-centred approach**
- We are committed to a child-centred approach to safeguarding. We will ensure that the child is at the centre of our safeguarding process: we will speak to the child, listen to what they say, take their views seriously and work with them in the process.
- 6.3 **Partnership working**
- 6.3.1 We recognise that local authorities (Children's Social Care) are the lead agency when coordinating safeguarding investigations.
- 6.3.2 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.
- 6.3.3 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.
- 6.3.4 We will cooperate with any safeguarding audit or serious case review commissioned by a Local Safeguarding Children Board (LSCB).
- 7 **Employee responsibilities**
- 7.1 **All employees**
- All employees, at every level of the organisation, must:
- Understand that they have a *duty to act* promptly on any concern or suspicion that a child is suffering abuse or significant harm, and also if they have concerns that a child is likely to suffer abuse or significant harm
  - Be aware of the different types and signs of abuse and neglect that can occur
  - Monitor for any signs or signals of child abuse or harm

- Familiarise themselves with the different types of significant harm and abuse that can occur
- Inform their line manager of any abuse or neglect concerns and do so in accordance with the reporting timescales
- Make clear factual records of their concerns and actions taken
- Retain documentation in accordance with the Document Retention policy and schedule
- Understand this policy and procedure and complete mandatory Safeguarding Children awareness training
- Contribute to a fair and open organisational culture that allows people to raise any safeguarding concerns
- All employees and volunteers must follow this policy. Failure to comply will be subject to further investigation and may result in disciplinary action or the termination of a volunteer placement

## **7.2 Managers**

Managers have an important operational responsibility for safeguarding. This means they must:

- listen respectfully and confidentially to employees who bring concerns to them
- take responsibility for the quality of safeguarding in their teams and encourage employees to raise alerts appropriately
- act immediately when an alert is raised, take the concern seriously and support employees to take the appropriate steps
- support employees who are required to refer concerns to a local authority
- ensure that employees receive management supervision and that they are given the opportunity to reflect on their practice and the impact of their actions on others
- monitor the ongoing progress of alerts through to case closure, record outcomes and ensure that any learning is applied
- foster a fair and open culture of safeguarding awareness.
- we will follow rigorous procedures for the recruitment and selection of employees and volunteers. Disclosure Barring Service (DBS) checks will be completed when recruiting employees and volunteers to work in a 'regulated' activity
- we are committed to ensuring safe working practices after the recruitment stage by reviewing checks every three years

7.3 The Operations Director has overall strategic responsibility for ensuring that all employees are aware of what safeguarding is, are aware of their safeguarding responsibilities and that this policy and its supporting procedures are implemented.

7.4 The Housing Services Manager (HSM) has responsibility for day to day monitoring of our safeguarding work and ensuring that appropriate actions are taken.

7.5 **Contractors**

Contractors are expected to comply with this policy by ensuring that their employees report concerns either to their line manager or direct to SHS.

**8 Whistleblowing**

8.1 A “whistleblower” is a person who reveals information with the intention of calling attention to bad practice, which may include abuse or negligence in the workplace. Employees who work with children and vulnerable adults have an individual responsibility to raise concerns about bad practice and a right to know that they will be supported by their employer if they are acting in good faith.

8.2 SHS promotes a culture which values good practice and encourages whistleblowing; employees have easy access to the whistleblowing policy on the internal employee “intranet”.

8.3 Our Whistleblowing policy for employees provides a confidential route for employees to raise serious concerns relating to suspected wrongdoing or dangers within the organisation. If an employee or volunteer asks for their identity to be protected, anonymity will be maintained wherever possible.

8.4 We are committed to listening to any suspicion and acting upon the information we receive. However, if an employee or volunteer feels that Sutton Housing Society is not taking their safeguarding concerns seriously, they have the right to explain their concerns to the police or the local authority. Alternatively, they can contact Public Concern at Work, which is an independent charity who can advise individuals on whistleblowing at work.

8.5 **Resident concerns**

In some cases, a resident or neighbour may contact us regarding their concern. If so, we can support them to contact social services or in some cases, make the referral ourselves.

**9. Confidentiality and sharing information**

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

9.2 Where possible we will comply with the principles of the Data Protection Act 2018 and our Data Protection policy to maintain confidentiality. However, the

Data Protection Act 2018 is not a barrier to sharing information but provides a framework to ensure that personal information is shared in a lawful way.

- 9.3 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 2018 (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.

## **10 Equality, diversity and Inclusion**

- 10.1 SHS is committed to ensuring fair and equal treatment to all residents and people living in our homes. We are committed to the following objectives:

- ensuring that the opportunities we provide for learning, personal development and employment are made available on a non-discriminatory basis
- providing a safe, supportive and welcoming environment for employees, residents and visitors

- 10.2 We seek to be a genuinely inclusive organisation and our aim is to integrate diversity and inclusion in all aspects of our day-to-day activity.

## **11 Review of this Policy**

- 11.1 SHS will review the Safeguarding Policy every three years or sooner if required by statutory, regulatory or best practice requirements.

## **Appendix 1: Legislation**

Children Acts 1989 and 2004

Local Government Act 2000

Homelessness Act 2002

Human Rights Act 1998

Data Protection Act 1998

Crime and Disorder Act 1998

Protection of Children Act 1999 (POCA)

Sexual Offenders Act 1997

Criminal Justice Act 2000

Criminal Justice and Court Services Act 2000

International Law (ratified) – Article 19 of the UN Convention on the Rights of the Child

SI's: Rehabilitation of Offenders (Exceptions) Order

Sexual Offences Act 2003

Working Together to Safeguard Children 2015

Police Act 1997

Equality Act 2010

Protection of Freedoms Act 2012