



Safeguarding Children and Young Person's Policy

1.0 Purpose and scope

This policy outlines how we safeguard children and young person, who may be in need of additional support or at risk of harm. This policy applies to all children and young person we come into contact with, including visitors to a resident's property.

This policy is relevant to all NHG staff. For the purpose of this policy, this includes permanent and contractual staff, volunteers and anyone working on behalf on Notting Hill Genesis (NHG), including contractors, sub-contractors and grantees. Everyone shares responsibility for safeguarding and promoting the welfare of children and young person irrespective of individual roles. We all have a responsibility to safeguard and promote the welfare of children and young person and should know what to do if we have concerns about them.

This policy should be read in conjunction with Safeguarding Children and Young Person's Procedure, Domestic Abuse Policy, Safeguarding Adults Policy, ASB Policy, Modern Slavery Statement and Young People at Work Policy.

2.0 Definitions

Alerter: The person who raises a concern that a child is being, has been, or is at risk of being abused or neglected. This could be anyone, including a member of the family, a carer, a friend, a neighbour, member of staff or the child themselves.

Child: Defined in the Children Act 1989 as anyone under the age of 18 years up until their 18th birthday. For the purpose of this policy this includes unborn children.

Child Abuse: When someone, whether through action or failing to act, causes injury, death, emotional harm, or risk of serious harm to a child.

Child Protection: The activity which is undertaken as part of the safeguarding process to protect specific children who are suffering, or at risk of suffering, significant harm.

Extra Familial Abuse: These concepts refer to harm that occurs to children outside of their family system, often during the adolescent years because at this

age their social networks widen. These networks can have a significant influence over a young person's understanding of social norms.

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.

Statutory Agencies: Police, Children Services and the NHS are three key statutory agencies for leading the safeguarding process.

Young Person: refers to a person between the age of 15 to 18 years of age

3.0 Policy principles

We commit to:

- Establishing safeguarding of children as “everyone's responsibility” and protecting children and young person, including unborn children, from abuse, neglect, and extra familial harm
- Making sure that staff recognise and know how to respond when children may be at risk of harm
- Creating a culture where children are valued and their right to safety and respect is upheld
- Working in collaboration with other authorities to ensure children are protected from harm, neglect, abuse, and exploitation
- Ensuring a clear reporting and escalation route for staff to report a safeguarding concern
- Ensuring a continuous learning program is in place to raise awareness, around safeguarding children
- Implementing policy, procedures, good practice, so staff understand their safeguarding duties
- Offering children who we come into contact with a safe and supportive environment to report historical or ongoing abuse or harm
- Ensuring our grantees, contractors and sub-contractors have policy in place or subscribe to the NHG policy and procedure.

4.0 Safeguarding duties

Safeguarding is everyone's responsibility. As a social landlord we are fully committed to upholding the right of all children and young people to be protected from harm or abuse and to achieve the best outcomes in line with Children Act 1989, Working Together to Safeguard Children, 2018.

We take child abuse and suspected abuse of children are extremely serious and are committed to reporting and addressing every instance where we suspect or identify that abuse is taking place.

We recognise level of contact we have with families, children, and young person across all tenures and programmes. We are well placed to identify children who may be experiencing abuse, neglect, and extra familial harm. Additionally, when we engage with young person through our wide-ranging community programme and grant programme, we have duty to safeguard them and ensure they are not exposed to a risk.

Section 11 of the Children Act 2004 places duties on us as a social housing provider, our staff and anyone who works for us to ensure our functions, and any services that we contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

Furthermore, in England, Domestic Abuse Act 2021 recognises children as victims of domestic abuse if they “see, hear or otherwise experience the effects of abuse”. It places duties on us to share information with children services where there are concerns, disclosures and incidents of domestic violence and abuse within a family setting.

5.0 Roles and responsibilities

As a responsible social housing provider, we offer children across all tenures and programme a safe and supportive environment that allows them to report non-recent or ongoing abuse or harm.

Any report, allegation, or suspicion of child abuse will be listened to, investigated, and reported. Children safety is important for us, and we want to ensure we respond proportionately and appropriately to all concerns of abuse, allegation, and disclosures this include reporting about children of NHG staff.

We all have a role to play in recognising, reporting, and responding to concerns. This includes being aware of the impact a child and young person’s environment could have on their mental and/or physical health or their development, for example where domestic abuse occurs or where there is alcohol and substance misuse.

This also includes being alert to the indicators of child sexual exploitation and since the Serious Crime Act 2015 came into effect, if female genital mutilation, forced marriage is disclosed by a child or young person, a family member, neighbours or third party, we must report this incident to the police.

At NHG we acknowledge that staff members and others may have had personal adverse childhood experiences, and managing safeguarding cases related to children may affect their emotional wellbeing. NHG employees are able to access support through the Employee Assistance Program. Those who are not eligible for EAP are able to access support from National Association for People Abused in Childhood (NAPCA).

6.0 Child centred approach

Understanding child centred approach is fundamental to safeguarding children and young person and promotes the welfare of every child. We work in in partnership with statutory agencies and ensure all safeguarding decisions that are made puts the child at the centre. This includes:

- Seeing, observing, and listening to the voice of the children and what they have to say. Where possible keeping children updated on the safeguarding processes
- Reporting and recording observations of the parents' interaction and being alert to parents and carers who prevent access to their children
- Placing the interests and needs of children ahead of adults.

7.0 Consent

If a child or young person is suffering or is at risk of suffering abuse, we share information with appropriate agencies or professionals even in the absence of the child's or their parent's consent.

We will seek consent from children or young person if the situation allows and doing so would not put the child or the alerter at risk of harm. Regardless of their expressed view, it still remains our responsibility to take whatever action is required to ensure their safety.

8.0 Preventing the risk of abuse

Every interaction or observation presents a crucial opportunity for protection. NHG staff are expected to recognise signs of vulnerabilities and potential or actual risk of harm and to demonstrate professional curiosity, capacity and communication skill to explore and understand what is happening within a family rather than making assumptions or accepting things at face value. This includes:

- **Spotting Signs:** Understanding and responding to behavioural indicators of abuse, harm, and exploitation both within family and extra familial setting, e.g., county line activities, gang violence or sexual exploitation within our estates.
- **Early Intervention:** Discussing concerns and sharing information with children services to get early help to the child or family.
- **Recognise Young Carers:** Young carers undertake a wide range of caring roles and responsibilities, including emotional support, personal care, housework, and household budgeting. With the implementation of the Care Act 2014 and the Children and Families Act 2014, there is now a need for local authorities to identify and assess the support needs of young carers, regardless of the type of support they provide and ensure they are not disadvantaged by their caring responsibilities.

8.1 Employing Young People

As directed by the Protection of Young Person (Employment) Act 1996 and Management of Health and Safety at Work Regulations 1999 NHG ensures that reasonably practicable arrangements are in place to protect young people from harm who are employed or volunteering for NHG.

8.2 Managing allegation of abuse by staff

We take allegations of abuse by staff extremely seriously. Where an accusation is made, we take decisive action to mitigate any potential further risk to children.

We will:

- Alert the Local Authority and children social services
- Alert the police for investigation of a possible criminal offence
- Consider disciplinary action (including consideration of suspension).

We take guidance from the LADO to initiate our own internal investigations and disciplinary processes related to abuse of a child by staff as safeguarding partners. We share information and fully participate and cooperate with inquiries.

Furthermore, in instances where we are the landlord or business partner, and the service provider or grantee who do not have a clear safeguarding children's approach, NHG Safeguarding Children and Young Person's Policy and Procedure should be followed to manage any allegations against their staff.

9.0 Recording, Reporting and Sharing Information

To keep children safe, information needs to be recorded and shared, enabling early identification of need, assessment, and appropriate service provision. If a concern of significant harm is identified or reported, we share information internally and externally with the relevant authorities. For more information on safe practice in relation to data sharing, refer to our Data Protection Policy.

In an event where a NHG employee or anyone who are contracted suspects or discloses abuse, we report concerns to agencies depending on the risk level. We have a duty to report these concerns to the following agencies, who are able to use their statutory child protection powers to act immediately to secure the safety of the child:

- **Police:** A report to the police must be made if harm is taking place and the child requires immediate protection.
- **Local Children Services:** after making protection arrangement with the police, a safeguarding report should be made with the children services. Where there is no immediate risk, a safeguarding report will suffice.

Staff who are uncertain on action to take but have a concern, should seek advice from **NSPCC**, who provide expert advice and take action to protect the child as appropriate.

9.1 Necessary and proportionate

The provision within Children Act 1989 and indication of any potential harm against a child overrides GDPR and hesitancy due to not understanding this can be detrimental to a child. Effective sharing of information with statutory agencies is essential for early identification of need, assessments, and service provision to keep children and young person safe.

We are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children. This applies

both when problems are first emerging, and where a child is already known to local authority children's social services. We keep records of all information that is shared.

When making decisions about what information to share, we give consideration to what and how much information we need to share the impact of disclosing information on the information subject and any third parties. Information must be proportionate to level of risk, as understood at the time of reporting.

9.2 Communication guidance

Sensitivity of sharing any information relating to children and ensuring welfare of children is paramount and outweighs all other consideration including a potential for a strong media attention or fundraising story.

When sharing stories about children, their parents/guardians must be consulted and consented, and due consideration must be given to political, social, and cultural ramifications of any reportage. Publishing story, image of a child must follow strict protocol and assessment must be made to assess the risk to siblings, peers, even when their identities are changed, obscured, or not used.

When managing allegation of abuse by staff, careful consideration of issues relating to wider reputational damage also need to be considered.

10.0 Coordinated Approach

Working Together to Safeguard Children 2018 recognises that “no single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.”

We will work in collaboration with the Local Authority, Police and Home Office to support in protecting, investigating, and deterring abuse and exploitation of children.

Ultimately the Local Authority and Children Social Work team have specific roles and responsibilities to lead the statutory assessment of children in need (section 17, Children Act 1989) and to lead child protection enquiries (section 47, Children Act 1989), we have a duty to cooperate with these enquiries.

11.0 Monitoring, Evaluation and Learning

Safeguarding training is mandatory for staff. Awareness resources are also available to promote understanding of safeguarding children and young people, spotting signs of abuse, and what steps to take to prevent and protect children from significant harm.

We have established a safeguarding committee who have oversight of our safeguarding practice and processes, ensuring that they are in line with the legislation and best practice.

We closely observe reports of child abuse and review anonymised cases as part of shared learning. In addition, the Safeguarding Lead provides regular updates on the safeguarding programme, risks, and trends to the Safeguarding Committee, EB and the board.

For quality assurance purposes and to gain insight into our safeguarding culture and good practice, we conduct regular audits, surveys and publish findings in annual reports. These processes help us identify strengths and gaps and allows us to focus our attention and resources where they are required.

12.0 Our approach

In writing this policy we have carried out assessments to ensure that we are considering:

- Equality, diversity, and inclusion
- Privacy and data protection.

We also carry out consultation with our staff, residents, and the wider community. If you would like more information about this work, please contact us at policy@nhg.org.uk

13.0 Reference

Further legislation that underpins safeguarding practices and development of this policy are as follows:

- The Children Act 1989
- The Children and Social Work Act 2017
- Working Together to Safeguard Children, 2018
- The United Nations convention on the Rights of the Child 1992
- Domestic Abuse Act 2021
- The Children and Families Act 2014
- The Human Rights Act 1998
- Data Protection Act 2018
- Modern Slavery Act 2015.
- Code of Ethics, The Code of Ethics for Social Work, Author: The Policy, Ethics and Human Rights Committee, First published: January 2012, Updated: October 2014 <https://www.basw.co.uk/about-basw/code-ethics>
- The Counterterrorism and Security Act (2015) <http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted>
- Channel Duty Guidance (2015) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf

- Court of Protection – <https://www.gov.uk/courts-tribunals/court-of-protection>
- Forced Marriage Unit – <https://www.gov.uk/guidance/forced-marriage>
- Information sharing- [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

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