



Safeguarding children policy

1.0 Purpose and scope

This policy outlines how we safeguard children who might need additional support or who are at risk of harm. It applies to all children with whom we come into contact while carrying out work for Notting Hill Genesis (NHG), including visitors to a resident's property.

This policy applies to all permanent and temporary staff, consultants, contractors, sub-contractors, partners, volunteers, subsidiaries, executive and non-executive board members, and anyone working on behalf of Notting Hill Genesis. In instances where we are the landlord or business partner, and the service provider may not have a clear safeguarding approach, our safeguarding policy should be followed.

This policy should be read in conjunction with our safeguarding children and young person's procedure, domestic abuse policy, safeguarding adults policy, anti-social behaviour policy, modern slavery statement and young workers policy.

2.0 Definitions

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 undertaken as part of the safeguarding process to protect specific children who are suffering, or at risk of suffering, significant harm.

Extra-familial abuse: This refers 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. Physical, sexual or emotional abuse as well as neglect are all categories of significant harm.

Statutory agencies: Police, children's services and the NHS are three key statutory agencies for leading the safeguarding process.

Local authority designated officer (LADO): The person responsible for managing allegations against adults who work with children, who oversees investigations of these allegations and directs them to ensure thoroughness, timeliness and fairness.

3.0 Safeguarding duties

We recognise the level of contact we have with families and children across all tenures and programmes means that we are well placed to identify children who may be experiencing abuse, neglect, and extra-familial harm. As a social landlord, we are fully committed to upholding the right of all children to be protected from harm or abuse and to achieve the best outcomes in line with the Children Act 1989 and Working Together to Safeguard Children 2023.

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

Section 11 of the Children Act 2004 places duties on us, 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, the Domestic Abuse Act 2021 recognises children as victims of domestic abuse if they “see, hear or otherwise experience the effects of abuse”. This places duties on us to share information with children’s services where there are concerns, disclosures and incidents of domestic abuse within a family setting.

4.0 Child-centred approach

We work in partnership with statutory agencies and ensure all safeguarding decisions that are made put the child at the centre. This includes:

- Seeing, observing, and listening to children and what they have to say, where possible, keeping children updated on the safeguarding processes.
- If we observe parents’ interactions with their children or parents preventing access to their children causes concern, we will report and record these concerns.
- Placing the interests and needs of children ahead of adults.

If a child's behaviour is causing anti-social behaviour issues to occur, we will evaluate the case and determine whether this also a safeguarding case. Where there are safeguarding concerns for a child, related to ASB, we will prioritise the wellbeing of the child.

5.0 Recognising abuse

As a responsible social housing provider, any report, allegation, or suspicion of child abuse will be listened to, investigated, and reported. Children's safety is important to us, and we want to ensure that we respond proportionately and appropriately to all concerns of abuse, allegation, and disclosures.

Every interaction presents a crucial opportunity to protect children. Our local officers are expected to recognise signs of potential or actual risk of harm and to demonstrate professional curiosity, by having the capacity and communication skills to explore and understand what is happening within a family rather than making assumptions about cultural norms or accepting things at face value.

In order to recognise abuse, we encourage and empower staff to:

- **Spot Signs** by understanding and responding to behavioural indicators of abuse, harm, and exploitation both within family and extra-familial setting – for example, county line activities, gang violence or sexual exploitation within our estates. More detail can be found in our internal procedure.
- **Intervene early** by discussing concerns and sharing information with children's services to get early help to the child or family.

Neglect is one of the most common types of child abuse, so we also consider the impact a child's environment could have on their mental and/or physical health or their development, as well as more typical signs of abuse.

6.0 Responding to a report

All customer facing staff can receive reports of safeguarding concerns. Staff will treat all reports seriously and listen empathetically, so witnesses and individuals experiencing safeguarding issues feel supported and believed. Reports can be made by a child experiencing abuse or external parties such as a concerned neighbour, a relative, a contractor or support agencies. Due to data protection, we may not always be able to keep people updated on the management of issues that they report.

Staff are expected to report any safeguarding concerns or suspicions as soon as they arise on our internal systems to minimise the risk of harm to children at risk. Once we receive a report or suspect abuse, staff will do some initial fact-finding to assess if a referral is required. This will never involve asking a child to discuss the concerns or repeat a disclosure or allegation that has been made.

All concerns are recorded and if we decide a referral is required, it will be submitted by staff to the local authority's children's services via their referral process within 24 hours. Where we decide a referral is not required, we will record this decision and the reasoning behind it.

7.0 Multi-agency working

Where we suspect or disclose 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 we believe that harm is taking place and the child requires immediate protection.
- **Local children's services:** after making protection arrangement with the police, a safeguarding report should be made with children's services. Where we do not believe there is an immediate risk, a safeguarding report will suffice.

Agencies may request information from us while completing statutory assessments of children in need or leading child protection enquiries. We will provide information when requested and attend meetings where required to ensure the child's safety and aid investigation. We will also respond to and act in accordance with recommendations made as part of child protection plans to ensure the safety and wellbeing of the child.

8.0 Recording, reporting and sharing information

To keep children safe, we will maintain clear records on each safeguarding case. All decisions and consequent actions will be recorded, as well as any relevant contact with other agencies regarding these decisions.

Where appropriate, we aim to get consent to make a referral from children that we work to protect. If a child is at risk of suffering abuse, we will share information with appropriate agencies or professionals even in the absence of consent being provided.

9.0 Confidentiality

The provision within the Children Act 1989 and the indication of any potential harm against a child overrides GDPR. Effective information sharing with statutory agencies is essential for early identification of need, assessments, and service provision to keep children safe.

When making decisions about what information to share, we consider how much information we need to share as well as 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.

10.0 Preventing risk in the workplace

10.1 Employing young people

As directed by the [Protection of Young Person \(Employment\) Act 1996](#) and [Management of Health and Safety at Work Regulations 1999](#), we ensure that reasonably practicable arrangements are in place to protect young people from harm who are employed or volunteering for us. Please see our **young workers and work experience policies** for further information.

10.2 Managing allegation of child abuse by staff

We take allegations of abuse by staff extremely seriously. Staff should report suspected child abuse by anyone who works for us or by Notting Hill Genesis as an organisation using the process outlined in our [whistleblowing policy](#). Where an accusation is made, regardless of the nature or seriousness of the allegation, we mitigate any potential further risk to children by:

- Reporting to both the local authority and children social services
- Reporting to the police for investigation of a possible criminal offence

- Working in line with our **disciplinary policy** (including investigation and potential suspension)

We take guidance from the local authority designated officer on how and when to initiate our own internal disciplinary investigations and processes related to abuse of a child by staff as safeguarding partners. We share information and fully participate and co-operate with inquiries.

In instances where we are the landlord or business partner and the service provider does not have a clear safeguarding children's approach, we will follow our own safeguarding children policy and procedure to manage any allegations against their staff.

11.0 Monitoring, evaluation and learning

Safeguarding training is mandatory for some specific roles e.g. housing officer, and will be provided to all staff in these identified roles. Additionally, awareness resources are available on our intranet for all staff to promote understanding of safeguarding children, spot signs of abuse, and what steps to take to prevent and protect children from significant harm.

We are committed to ensuring our practice and processes align with legislation and best practice and we have established a safeguarding steering group who have oversight and scrutinise our practice. We closely observe reports of child abuse and review anonymised cases as part of shared learning. As part of this process, the safeguarding steering group and our executive board receive regular updates from the tenancy sustainment and safeguarding team leader on the safeguarding programme, risks, and trends in cases.

For quality assurance purposes and to gain insight into our safeguarding culture and good practice, we regularly conduct audits. 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

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 2023](#)
- [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](#)
- [The Code of Ethics for Social Work](#)
- [The Counterterrorism and Security Act 2015](#)
- [Channel Duty Guidance 2015](#)
- [Forced Marriage Unit](#)
- [Information sharing](#)

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