

# Safeguarding Children Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	May 2021
Review date:	May 2022

1	Introduction
1.1	The scope of this Policy sets out One Vision Housing’s (OVH) responsibilities to comply with the relevant legislation and regulations in safeguarding children (Children defined as anyone who has not reached their 18 <sup>th</sup> birthday – Children Act 2004 and Working Together to Safeguard Children Guidance 2018).
1.2	This Policy applies to all OVH staff regardless of their role or work location when they are on OVH contracts in all areas of operations.
1.3	If you believe a child is suffering harm or at risk of harm then you have a responsibility to report your concerns in line with the flowchart at 4.2 in this Policy and contacting the Designated Officers for advice as appropriate. If you believe a child is in immediate danger then you should contact the police directly.
1.4	OVH will define safeguarding and promoting the welfare of children activity as: <ul style="list-style-type: none"> <li>• Protecting children from maltreatment</li> <li>• Preventing impairment of children’s health or development</li> <li>• Protecting children to exposure to domestic abuse</li> <li>• Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care</li> <li>• Undertaking that role so as to enable those children to have optimum life chances and enter adulthood successfully</li> </ul>
1.5	In operating this Policy, OVH will comply with all relevant legislation that impacts on children’s safeguarding issues including those that define forms of abuse as a crime, those concerned with the provision of health and social care services and any other relevant statutes and statutory instruments.
1.6	The application of this Policy assists OVH to meet the outcomes of the Regulatory Framework for Social Housing in England adopted by the Regulator of Social Housing, as outlined below: <ul style="list-style-type: none"> <li>• <b>Neighbourhood management</b> Registered providers shall keep the neighbourhood and communal areas associated with the homes that they own clean and safe. They shall work in partnership with their tenants and other providers and public bodies where it is effective to do so</li> </ul>

- **Local area co-operation**

Registered providers shall co-operate with relevant partners to help promote social, environmental and economic wellbeing in the areas where they own properties

1.7 **Access and Communication**

1.7.1 OVH is committed to ensuring that its services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.

1.8 **Equality, Diversity and Human Rights**

1.8.1 OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Marital Status, Pregnancy and Maternity, Religion and /or Belief.

1.8.2 OVH also recognise that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

1.8.3 OVH will ensure that all services and actions are delivered within the context of current Human Rights legislation. OVH will endeavour to ensure its staff and others with whom it works, will adhere to the central principles of the Human Rights Act (1998).

1.9 The Policy should be read in conjunction with the following:

- OVH Recruitment and Selection Policy
- OVH Confidential Reporting (Whistleblowing) Policy
- OVH Data Protection Policy
- OVH Work Placement Policy
- OVH Maintaining Professional Boundaries Policy
- OVH Domestic Abuse Policy

**2 Statement of Intent**

2.1 OVH will comply with all relevant legislation, regulations and contractual obligations in all areas of work in regard to safeguarding and promoting the welfare of children.

2.2 The OVH Board (under delegated authority) and senior management teams will demonstrate a clear commitment to the importance of safeguarding children and promoting their welfare by approving this Policy and ensuring its effective operation.

2.3 OVH will ensure there is a Designated Person (and Deputies) within the organisation that will take the lead role for, providing support to staff members and liaising with the relevant external agencies, where appropriate, if a child is assessed as a child in need and/or subject to a child protection plan.

2.4 Staff wishing to contact the Designated Person with safeguarding concerns will receive priority over any other business.

<p>2.5</p> <p>2.6</p> <p>2.7</p> <p>2.8</p> <p>2.9</p> <p>2.10</p> <p>2.11</p> <p>2.12</p>	<p>OVH have in place clearly understood and widely accessible procedures for staff to report safeguarding children concerns that will be consistently applied.</p> <p>OVH will provide staff with comprehensive guidance on identifying safeguarding children concerns and training will be provided as part of the induction process for all new starters. For all staff with front line duties, refresher training will be provided on a rolling three year basis. Staff will be trained to the level identified as required for their role and responsibilities.</p> <p>OVH will provide additional support services and make referrals to external agencies as necessary where concerns are raised that on investigation by the relevant safeguarding body are found to have no ongoing safeguarding implications but highlight other support needs for the individuals concerned.</p> <p>Through training, OVH staff will be encouraged to develop ‘professional curiosity’ (staff to avoid making assumptions and to look beyond face value information) to include recognising the ‘voice of the child’ in their understanding of a situation and ensure any safeguarding alerts they raise capture the child’s lived experience and environment.</p> <p>OVH will have in place recruitment and selection Policies that identify which positions are likely to involve ‘regulated activity’ and will ensure appropriate security checks and clearances are obtained before employees commence work with the organisation. Regulated activities are defined by the Protection of Freedoms Act 2012 as:</p> <ul style="list-style-type: none"> <li>• Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children;</li> <li>• Work for a limited range of establishments (‘specified places’), with opportunity for contact: for example, schools, children’s homes, childcare premises. Not work by supervised volunteers</li> <li>• The full definitions of regulated activities can be found at <a href="https://www.gov.uk/government/organisations/disclosure-and-barring-service/about">https://www.gov.uk/government/organisations/disclosure-and-barring-service/about</a></li> </ul> <p>OVH has clear procedures in place for dealing with allegations made against staff members where safeguarding children concerns are raised, that adhere to the procedures outlined in the National Statutory Guidance, ‘Working Together to Safeguard Children 2018’. In the event of any such allegations, OVH will work in close liaison with the Local Authority Designated Officer.</p> <p>The procedures include scope for precautionary suspension of the staff member whilst any investigation into allegations raised is carried out by the appropriate authority. If found to be guilty and in line with its zero tolerance stance to all forms of neglect, abusive or exploitative behaviour, subsequent disciplinary action will result. There are also clear procedures in place for dealing with malicious or unfounded allegations.</p> <p>OVH will work closely with partner agencies in responding to safeguarding children concerns and will adhere to the Safeguarding procedures established by the Local Multi agency safeguarding arrangements in the area of its operations, including local authority partners to address child exploitation / child sexual exploitation issues.</p>
<p><b>3</b></p>	<p><b>Policy</b></p>
<p>3.1</p>	<p>OVH recognises its responsibilities in safeguarding children and will take all reasonable measures to prevent or minimise the potential for abuse occurring in the areas of its service delivery where:</p>

- Children are known to live
- Children may live
- Children may visit or;
- Children neither live or visit, but customers may have access to children

3.2 For the purposes of this Policy, OVH will use the definition of 'abuse' adopted by the Home Office (with effect from 31<sup>st</sup> March 2013) as outlined below, in addition to the definitions outlined in the Working Together to Safeguard Children 2018 guidance:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

3.3 OVH will also use the definition of domestic abuse as defined by the Home Office 2013, as follows:

'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:

- psychological
- physical
- sexual
- financial
- emotional

'Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

3.4 OVH will adhere to strict procedures for recording and sharing safeguarding children information that ensures client confidentiality and Data Protection responsibilities are met and will have appropriate systems in place to ensure the information held is systematically reviewed (including UK General Data Protection Regulation and UK Data Protection Act 2018 requirements).

3.5 In taking decisions to share information with external agencies the 'best interests of the child' about whom safeguarding concerns are raised will always be the overriding consideration. OVH may also share information where:

- There is a public interest of sufficient force
- The child about whom safeguarding concerns are raised consents, or
- Where there is clear risk of significant harm to a child

3.6 OVH will also share information using the Early Help Assessment Tool when there are concerns that a child will not progress towards the Every Child Matters Outcomes of:

- Staying safe

- Being healthy
- Enjoying and achieving
- Making a positive contribution
- Achieving economic wellbeing

3.7 OVH will also comply with the information sharing protocols required under Section 17 of the Children Act 1989 when there are concerns that a child is classed as being 'In Need'. The critical factors in deciding whether a child is in need are:

- What will happen to a child's health or development without services being provided, and
- The likely effect the services will have on a child's standard of health and development

3.8 OVH will ensure training is provided to all staff who have 'regular contact' with children and young people as part of their day-to-day duties on a rolling three year basis.

3.9 The Independent Living Manager and Independent Living Team Leaders acting as the Designated Persons with lead responsibility for dealing with safeguarding children issues will also receive additional training, to Level 2, that will enable them to:

- Work effectively as part of multi-agency and multi-disciplinary teams
- Be clear about their roles and responsibilities during assessment, planning, intervention and reviewing processes for children in need, including those requiring safeguarding and
- Understand the statutory requirements governing consent, confidentiality and information sharing and how to apply these in relation to children or young people about whom concerns are raised

3.10 Where concerns are raised by staff members, the Designated Officers will ensure follow up referrals are in line with the 'Level of Need Guidance' or 'Thresholds' - (produced by local authorities).

3.11 OVH will comply with the duty (effective from 1st December 2012) to refer information on any member of staff (after appropriate investigation process) to the Disclosure and Barring Service (DBS) where an employee has :

- Been cautioned or convicted for a relevant offence; or
- Engaged in relevant conduct in relation to children and / or vulnerable adults (i.e. an action or inaction [neglect] that has harmed a child or vulnerable adult or put them at risk of harm); or
- Satisfied the harm test in relation to children and / or vulnerable adults. (i.e. there has been no relevant conduct [i.e. no action or inaction] but a risk of harm to a child or vulnerable adult still exists)

3.12 Through staff training and regular one-to-one supervision sessions with line-managers, all OVH staff that are likely to have to deal with safeguarding children concerns will be informed of their responsibilities and good practice in maintaining professional boundaries and appropriate behaviour.

3.13 This will include adopting high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

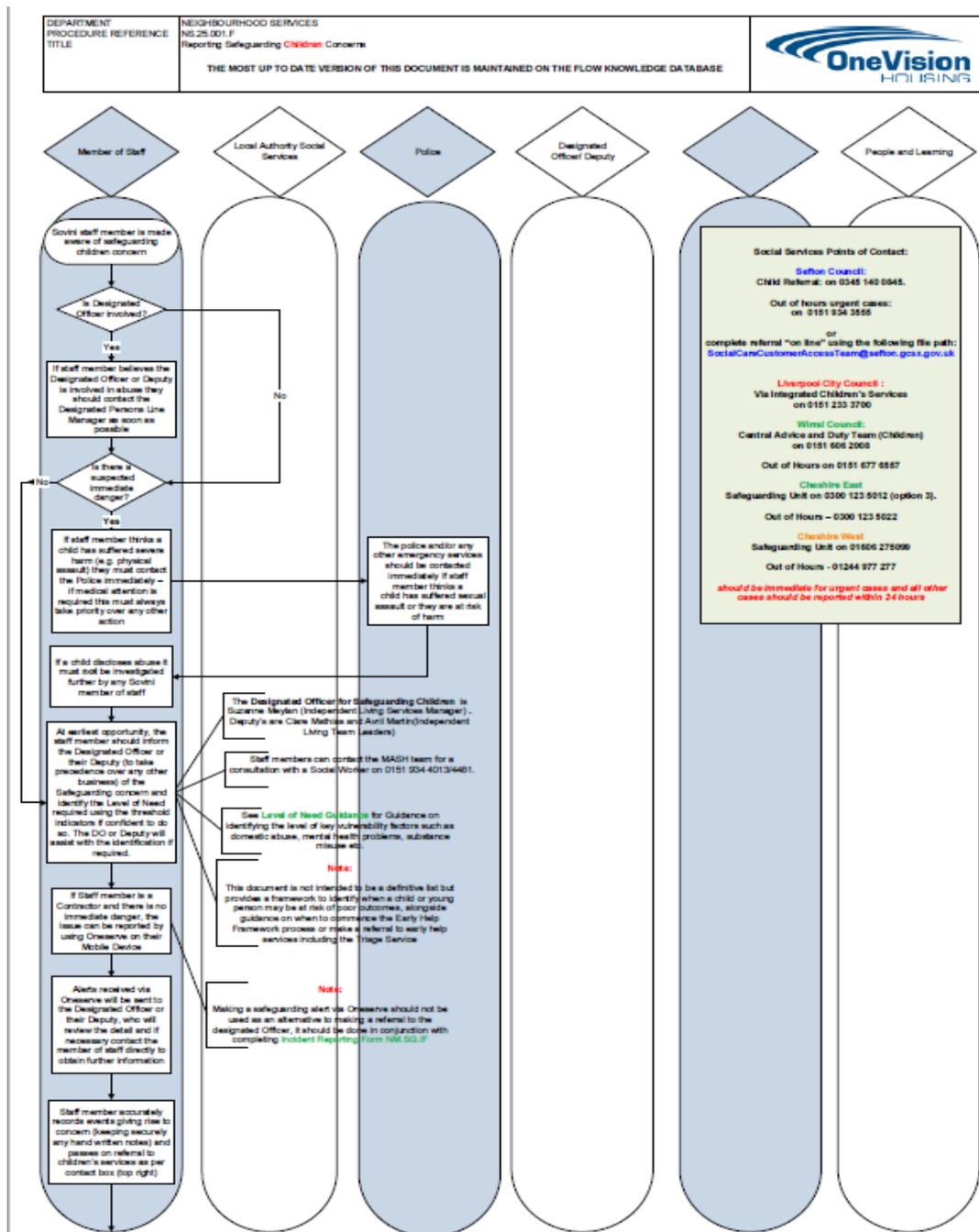
3.14 In line with OVH's Confidential Reporting (Whistleblowing) Policy, all staff will be made aware of how to access confidential and independent advice via the Public Concern at Work Agency for any concerns about fellow staff members or reporting safeguarding children concerns direct to the relevant safeguarding body.

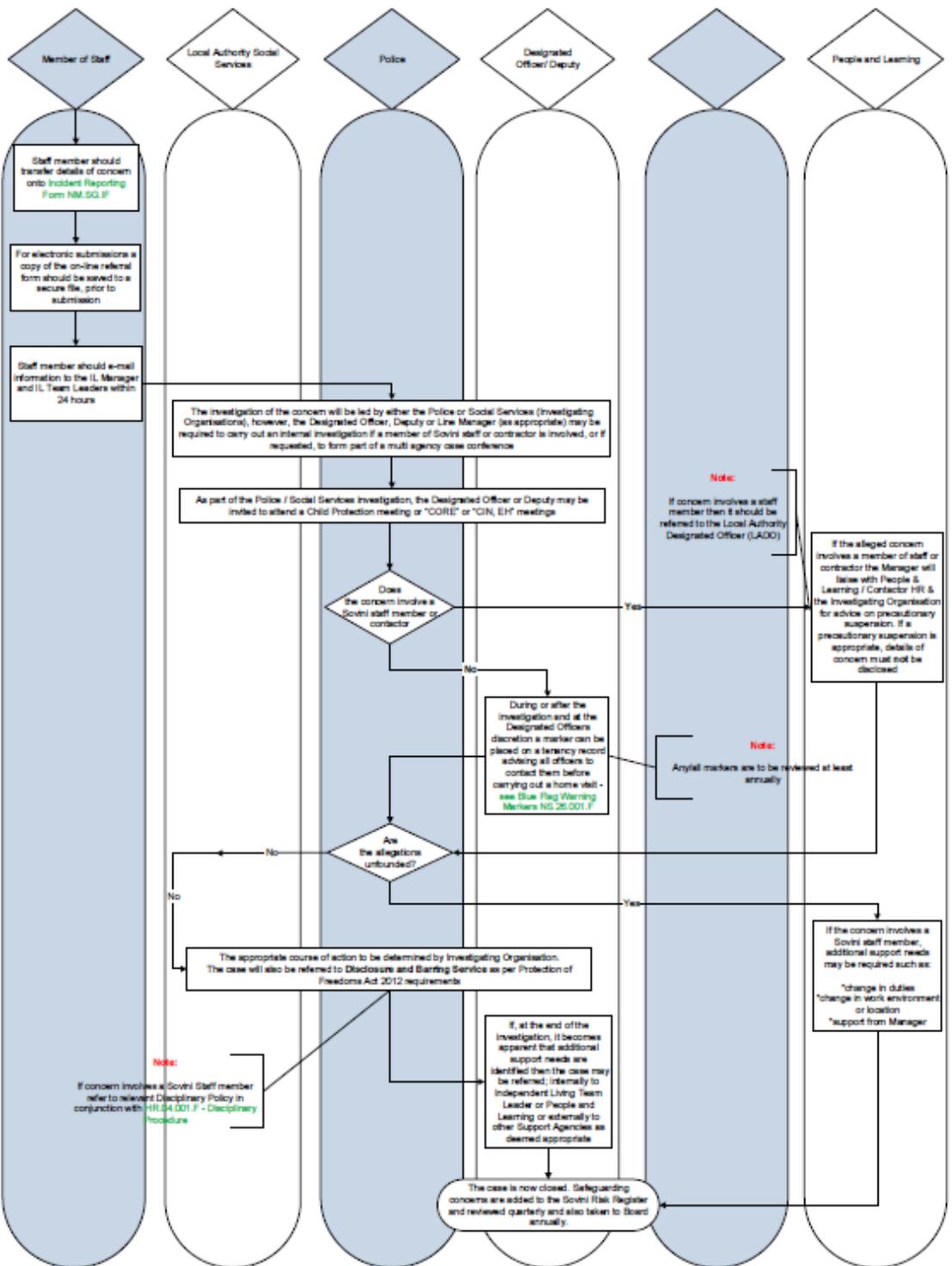
3.15 The Confidential Reporting Policy is compliant with the Public Interest Disclosure Act 1998 and staff that raise 'whistle-blowing' concerns will receive appropriate support and guidance.

## 4 Implementation

4.1 The OVH Safeguarding Children Policy applies to all staff and there is a collective responsibility to prevent or minimise the potential for safeguarding concerns occurring. If staff become aware that there are problems with effective services operation of the Policy or the procedures that support it, they should complete a 'change request' within the OVH document management system and these will be incorporated into the Policy / procedural review process.

4.2 As stated in 1.2 this Policy applies to OVH staff working on OVH contracts only. If an OVH staff member becomes aware of a safeguarding concern whilst working on an OVH contract they should follow the reporting procedure outlined below:





4.3 If OVH staff become aware of a safeguarding concern whilst working on non OVH contacts they should follow local reporting requirements, as advised by commissioning companies.

4.4 OVH will provide up-to-date contact details for the designated persons and local safeguarding agencies in the areas they may be operating in.

<b>5</b>	<b>Performance</b>	
5.1	The Board of OVH will receive an annual assurance report on all safeguarding provisions including the number of cases referred to relevant investigation agencies.	
5.2	Safeguarding provisions are also included on the OVH risk register which is reviewed quarterly by the Business Assurance Committee.	
5.3	On an annual basis OVH will undertake an audit of all referrals made in regard to safeguarding alerts raised, the results of which will feed into the policy and procedural review mechanisms outlined below in section 7.	
<b>6</b>	<b>Consultation</b>	
6.1	The Safeguarding Boards in OVH's areas of operation have been consulted in the development of this Policy. All OVH Staff have been consulted in development of this Policy.	
6.2	The Policy meets the requirements of the Liverpool Safeguarding Children Board Guidance document.	
<b>7</b>	<b>Review</b>	
7.1	The Policy and supporting procedures will be reviewed annually (from the date of Executive Management Team (EMT) approval) with input from the local Safeguarding Boards.	
7.2	The review process will ensure continuing suitability, adequacy and effectiveness of the Policy and may be prompted by the introduction of new legislation or regulation or in the light of continual assessment of procedural effectiveness.	
7.3	The Policy and procedural review will show the impact of stakeholder and other agency feedback and involvement. The Policy and procedural review will seek to identify and address any disincentives that may exist to reporting concerns.	
<b>8</b>	<b>Equality Impact Assessment</b>	
8.1	<b>Was a full Equality Impact Assessment (EIA) required?</b>	No
8.2	<b>When was EIA conducted and by who?</b>	An Equality Impact Assessment was conducted by the Supported Housing Manager and the Policy and Strategy Officer on 24-04-13 and is still relevant for this revision of the Policy.
8.3	<b>Results of EIA</b>	No differential or adverse impacts were identified for any group with protected characteristics as a result of the operation of this Policy. It was noted that as the area of operation of the business grows, note would need to be taken of the local reporting procedures for safeguarding concerns.

9 Scheme of Delegation		
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	Executive Management Team
9.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Operations Director-Support Services
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operations Director-Support Services

10 Amendment Log			
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
29 January 2019	Policy reviewed in line with annual audit of referral cases	See Section 6	<ul style="list-style-type: none"> <li>Shortened form of wording at 1.5 in regard to relevant legislation</li> <li>Inclusion of reference to General Data Protection Regulation and Data Protection Act 2018 at 3.3</li> </ul>
4 <sup>th</sup> February 2020	In line with the review schedule	See Section 6	<ul style="list-style-type: none"> <li>Additional information included at Sections 5.2 and 5.3 in regard to performance</li> <li>Procedure has been updated to reflect operational practice</li> </ul>
18 <sup>th</sup> May 2021	In line with the review schedule	See Section 6	<ul style="list-style-type: none"> <li>New clause added at 2.8 in regard to professional curiosity</li> <li>Revised definitions of 'abuse' included at 3.2</li> <li>Reference to 'Early Help Assessment Tool' included at 3.5 in place of 'Common Assessment Framework'</li> <li>Revised procedure included at 4.2 to reflect operational practice</li> </ul>