



# **Safeguarding and Child Protection Policy**

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## 1. PURPOSE

The purpose of the policy:

- To ensure all NDH staff and Board members are aware of our requirements under the Safeguarding legislation
- To ensure all front line NDH staff are provided with training and guidance on what to do if they suspect a child or young person may be experiencing, or be at risk of, harm.
- To ensure all staff directly working with young people receive additional training appropriate to their role
- To ensure our contractors, visiting customer's homes receive training on what to do if they suspect a child or young person may be experiencing, or be at risk of, harm.

## 2. PRINCIPLES

We will:

- appoint a "Safeguarding Lead", with appropriate knowledge, experience and skills, to provide help and advice to staff, contractors and to act as lead on safeguarding issues
- ensure that staff, NDH Board members and volunteers are aware of the Safeguarding policy and procedure and understand their roles and responsibilities and required actions
- ensure that staff are appropriately trained, linked to their respective roles, including induction training for new members of staff
- ensure that managers know when they should alert the Police if they think a serious crime has been committed
- ensure that NDH contractors are aware of the NDH Safeguarding policy and procedures (including how to raise concerns) through the contractor Code of Conduct
- notify the Local Authority Safeguarding Team if abuse is identified or suspected
- support and where possible safeguard customers and staff by ensuring that all referrals to services have full information in relation to identified risk and vulnerability
- Appropriate level DBS check for employees that have access to or work with at risk adults or children. These will be reviewed on a 3 yearly basis.
- ensure that staff and customers have access to information through in-house publications and other media, and awareness raising initiatives
- conduct regular reviews of the Safeguarding policy / procedures and log.

### 3. REVIEW

The policy will be reviewed annually to ensure that it continues to operate within best practice, achieve measurable results, and achieve continuous service improvement.

We will monitor this policy and our working arrangements with other agencies / departments through an annual report to the Board to ensure this policy remains effective in highlighting any disincentives to reporting abuse.

The report to the Board will address:

- Number of Safeguarding referrals
- Review of Safeguarding - including monitoring implementation, interagency response, training record and review of policy and procedure
- Evaluation of investigated cases and alerts and lesson learnt.

Case Types captured and measured are:

- Safeguarding Adults
- Safeguarding Children
- Child in Need
- Child Protection
- Domestic Abuse
- Early Help
- Vulnerable Adult
- Vulnerable Child.

Alternatively, the policy and all associated procedures will be reviewed immediately following any relevant change to government policy, regulation or legislation, or in the event of a serious case review.

The Executive Team will approve this policy and delegate responsibility to the Head of Customer and Housing Services for ensuring that this policy is communicated and implemented.

### 4. RESPONSIBILITIES

North Devon Homes Executive team will approve this policy and delegate responsibility to the Head of Customer and Housing for ensuring that this policy is communicated and implemented.

The Head of Customer and Housing Services will ensure training for staff is provided to ensure that they fully understand the wider issues surrounding this policy and the procedure.

The overall Safeguarding Lead for North Devon Homes is the Director of Neighbourhoods. To contact them, call 01271 312500 or email [marc.rostock@ndh-ltd.co.uk](mailto:marc.rostock@ndh-ltd.co.uk)

The Safeguarding Adults Lead for North Devon Homes is the Community Services Manager. To contact them, call 01271 313351 or email [jennifer.westacott@ndh-ltd.co.uk](mailto:jennifer.westacott@ndh-ltd.co.uk).

The Safeguarding and Child Protection Lead for North Devon Homes is the Head of Customer and Housing Services. To contact them, call 01271 312507 or email [lindsey.eastman@ndh-ltd.co.uk](mailto:lindsey.eastman@ndh-ltd.co.uk)

The Executive Team are responsible for ensuring that this policy is communicated and implemented.

## 5. SCOPE

This policy applies to the NDH Group and must be adhered to by all employees, Board Members, involved customers, contractors (whether working in NDH offices or its homes), consultants and any other person working for or on behalf of NDH.

## 6. POLICY STATEMENT

The Children's Acts of 1989 and 2004 set out the duties of local authorities in safeguarding and promoting the welfare of all children and young people.

Under Section 11 of the Children's' Act 2004, local authority housing departments have a duty to ensure the safeguarding and welfare of children and young people

Local agencies, including the police and health services, also have a duty under section 11 of the Children Act 2004 to ensure that they consider the need to safeguard and promote the welfare of children when carrying out their functions.

Under section 10 of the same Act, a similar range of agencies are required to cooperate with local authorities to promote the well-being of children in each local authority area. This cooperation should exist and be effective at all levels of the organisation, from strategic level through to operational delivery.

Professionals working in agencies with these duties are responsible for ensuring that they fulfil their role and responsibilities in a manner consistent with the statutory duties of their employer.

## 7. CONSULTATION

The following have been consulted in developing the policy:

| Date | Consultation methodology | Challenge / impact / result |
|------|--------------------------|-----------------------------|
|      |                          |                             |
|      |                          |                             |

## 8. EQUALITY IMPACT ASSESSMENT (EIA)

### Section 1: Contact details

Please complete your details and contact information in the spaces provided:

|                  |                               |
|------------------|-------------------------------|
| EIA Author:      |                               |
| Job title:       | Community Services Manager    |
| Department:      | Customer and Housing Services |
| Submission date: | 16/07/2024                    |

### Section 2: About the policy

Please describe what you are impact assessing and who it applies to:

|                               |                                                                                                                                                                                               |                                               |                                                 |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|-------------------------------------------------|
| Title:                        | Safeguarding Children Policy                                                                                                                                                                  |                                               |                                                 |
| Aims / description / purpose: | The purpose of this policy is to provide a framework for ensuring a standard approach is taken to safeguarding concerns whilst clearly adhering to legislations and local authority guidance. |                                               |                                                 |
| People it applies to:         | <input checked="" type="checkbox"/> Staff                                                                                                                                                     | <input checked="" type="checkbox"/> Customers | <input checked="" type="checkbox"/> Contractors |

### Section 3: Gathering data and evidence

Have you identified relevant evidence (qualitative and quantitative) to establish whether this policy could potentially affect some equality groups more than others?

|                                                                                 |                              |                             |
|---------------------------------------------------------------------------------|------------------------------|-----------------------------|
| Have you analysed equality data for each of the groups identified in Section 2? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Have you identified / researched anecdotal or alternative evidence?             | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Have you attached the evidence to this impact assessment?                       | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

## Section 4: Assessing the impact

Based on your evidence, which equality groups might this policy affect more or less than others (if any)?

|                                           |                          |                                    |                          |
|-------------------------------------------|--------------------------|------------------------------------|--------------------------|
| Age                                       | X                        | Sexual orientation                 | <input type="checkbox"/> |
| Disability                                | X                        | Caring responsibilities            | X                        |
| Gender reassignment                       | <input type="checkbox"/> | Fuel and food poverty              | X                        |
| Marriage and civil partnership            | <input type="checkbox"/> | Young People who may be vulnerable | X                        |
| Pregnancy and maternity                   | <input type="checkbox"/> | Single parents                     | X                        |
| Race                                      | <input type="checkbox"/> | Drug and alcohol dependency        | X                        |
| Religion and belief (including no belief) | <input type="checkbox"/> | Homelessness                       | X                        |
| Gender / sex equality                     | <input type="checkbox"/> | Rural Isolation                    | X                        |

Using examples from the evidence you have collected, please describe the impact (positive, negative or neutral) on the equality groups you have identified above and highlight any different needs required for this protected characteristic.

**Note:** if you are reviewing a policy/ guidance please reflect on the scope, language used and its application - does it fully promote equality and inclusion?

## Section 5: Addressing any impact: action planning

Please describe any actions or mitigation required as a result of this assessment – include the timescale for each and who is responsible:

| Action / Mitigation | Timescale | Responsibility |
|---------------------|-----------|----------------|
|                     |           |                |
|                     |           |                |
|                     |           |                |
|                     |           |                |
|                     |           |                |

## Section 6: Involvement and Consultation

What involvement / consultation activity has been undertaken or is planned in relation to this policy?

| Involvement / consultation activity | Results / Feedback |
|-------------------------------------|--------------------|
| Community Services Manager          | No Changes         |
|                                     |                    |
|                                     |                    |

## Section 7: Approval and Publishing

Signature of EIA author:

Date:

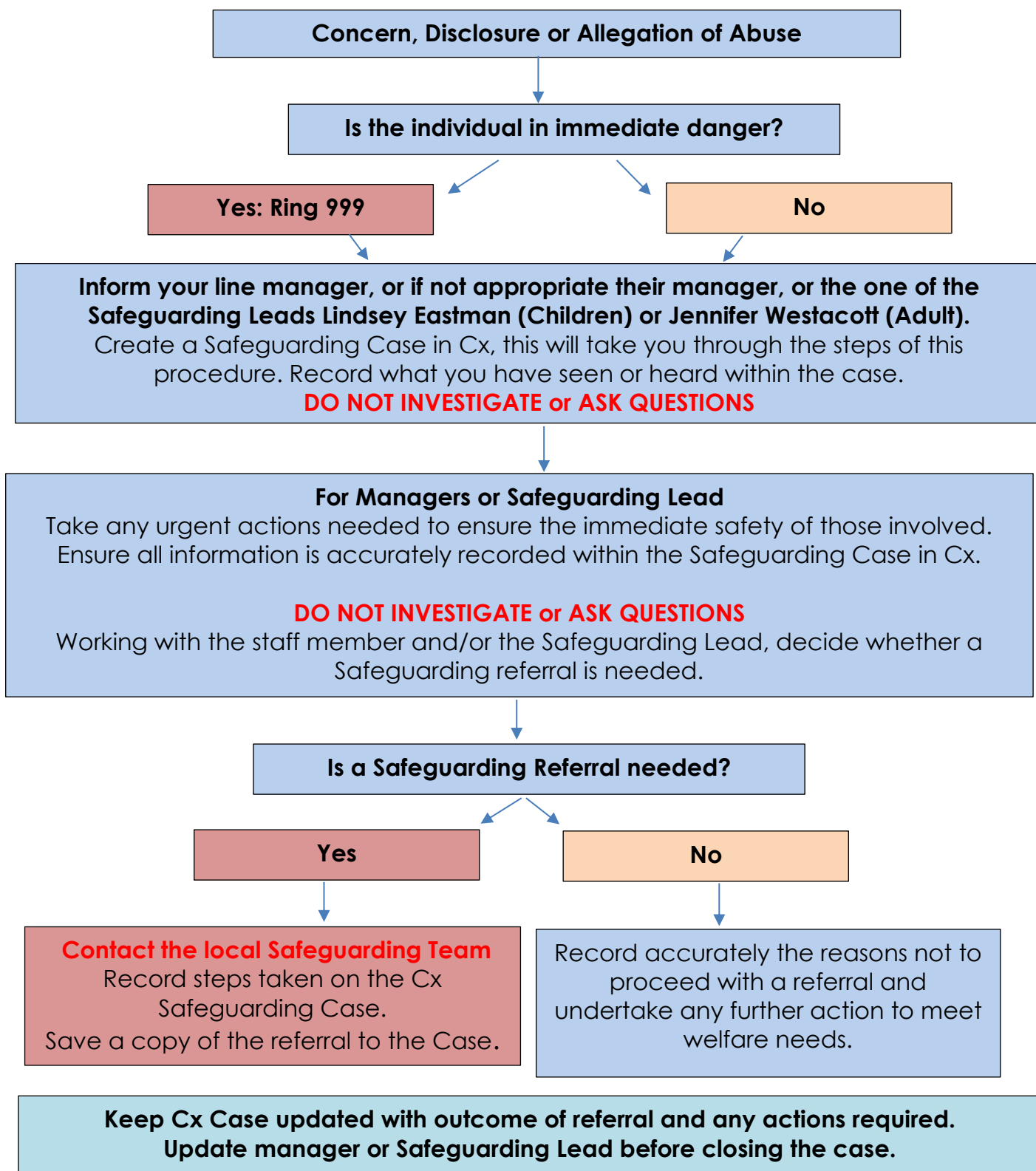
|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Next review date:</b>              | <b>Responsible Officer</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Annual<br>Next review date: July 2025 | Head of Customer and Housing Services                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Author</b>                         | <b>Related Documents</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Head of Customer and Housing Services | <p><b>HM Government March 2015:</b></p> <p>“Working together to safeguard children”<br/>A guide to inter-agency working to safeguard and promote the welfare of children –</p> <p><b>Housing Quality Network:</b></p> <p>It’s everyone’s responsibility<br/>Housing and Safeguarding October 2015</p> <p><b>NSPCC Safeguarding material:</b></p> <p><a href="http://www.nspcc.org.uk/services-and-resources/research-and-resources/safeguarding-children-shared-responsibility/">http://www.nspcc.org.uk/services-and-resources/research-and-resources/safeguarding-children-shared-responsibility/</a></p> <p>Appendix 1 – Flow Chart<br/>Appendix 2 – Information Sharing<br/>Appendix 3 – Forms of Abuse<br/>Appendix 4 – Principles of Safeguarding</p> |



## Appendix 1

### Overview of NDH Safeguarding Reporting and Recording Procedure

To be read in conjunction with the NDH Safeguarding Adults and Safeguarding Children Policies and procedures. These steps are for anyone who has cause for concern that an individual is at risk of abuse, neglect or exploitation.



If the allegation / suspicion of abuse is against a member of staff, inform your line manager.

If they are implicated, inform their line manager, the Senior Manager, Safeguarding Lead, or the Head of Service or Director as appropriate who will decide on immediate action and make a referral to the Local Authority as required.

Useful Links:

Cx Procedures

<S:\01 Digital Together Cx Procedures\Cases and Tasks>

Online Safeguarding Referral Form

[New Safeguarding Adult Concern Referral Form - Provider Engagement Network \(devon.gov.uk\)](New Safeguarding Adult Concern Referral Form - Provider Engagement Network (devon.gov.uk))

Safeguarding Adults Policy

[https://teamndh.sharepoint.com/:b:/s/AllStaff/EfZEtsssmxxNI\\_r3UKgXORcBmS575dtcZp-oJpKvIR62UA?e=vd9cN2](https://teamndh.sharepoint.com/:b:/s/AllStaff/EfZEtsssmxxNI_r3UKgXORcBmS575dtcZp-oJpKvIR62UA?e=vd9cN2)

Safeguarding Children Policy

<https://teamndh.sharepoint.com/:b:/s/AllStaff/ERNS6czGQx9OuS-U7x1lm1YBmzzfenEQCosMTbSwoOnZ9Q?e=wZdAFD>

Outside of the hours above or on bank holidays call the Emergency Duty Service on [0345 6000 388](tel:03456000388).

## Appendix 2

### Safeguarding Children: Information-Sharing

- ✓ Share with consent where possible and where appropriate
- ✓ However, where there are concerns that a child is, or may be, at risk of harm, **priority must be given to safeguarding the child and information must be shared**
- ✓ Ensure information is **necessary, proportionate, relevant, accurate, up to date, shared with the appropriate people, in a timely fashion and shared/stored securely**
- ✓ Record the reasons for sharing confidential information
- ✓ Often it is only when information from a number of sources is shared that it becomes clear that a child / young person is at risk or of suffering from harm.

### Response to a Disclosure of Child Abuse or Exploitation

| Do <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                         | Do not <input type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Listen and accept</li><li>• Try not to interrupt</li><li>• Reassure they have done the right thing by telling you</li><li>• Explain what you are going to do</li><li>• Make accurate notes ASAP using all child's own words and actions</li><li>• Inform your manager or the Safeguarding Lead</li><li>• Report the disclosure / your concern as soon as possible</li></ul> | <ul style="list-style-type: none"><li>• Promise confidentiality or secrecy</li><li>• Investigate</li><li>• Tell them everything will be all right</li><li>• Use leading questions. Instead use 'tell me' 'explain to me' 'describe to me' (TED)</li><li>• Ask the child to repeat the disclosure over and over</li><li>• Assume someone else has referred the case</li><li>• Don't attempt to contact an alleged abuser</li></ul> |

## Appendix 3

### Recognising Forms of Abuse experienced by Children and Young People

#### Physical Abuse

- may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child
- can happen in any family, but children may be more at risk if their parents have drug alcohol and or mental health issues or if they live in a home where domestic abuse happens. Babies and disabled children also at higher risk of suffering physical abuse
- It may also be caused when a parent or carer fabricates symptoms of, or induces illness in a child.

#### Emotional Abuse

is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development including exposure to domestic abuse, conveying they are worthless or unloved causing a child to feel scared or in danger. This may involve:

- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- interactions that are beyond the child's developmental capability (including exposure to inappropriate online content or images), as well as overprotection and limitation of exploration / learning, or preventing the child participating in normal social interaction.
- serious bullying (including online bullying), causing children frequently to feel
- the exploitation or corruption of children.

**Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.**

## Neglect

is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

This can include failure to provide adequate food or clothing, access to medical intervention, supervision by self or appropriate adults, ensuring educational needs are met.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

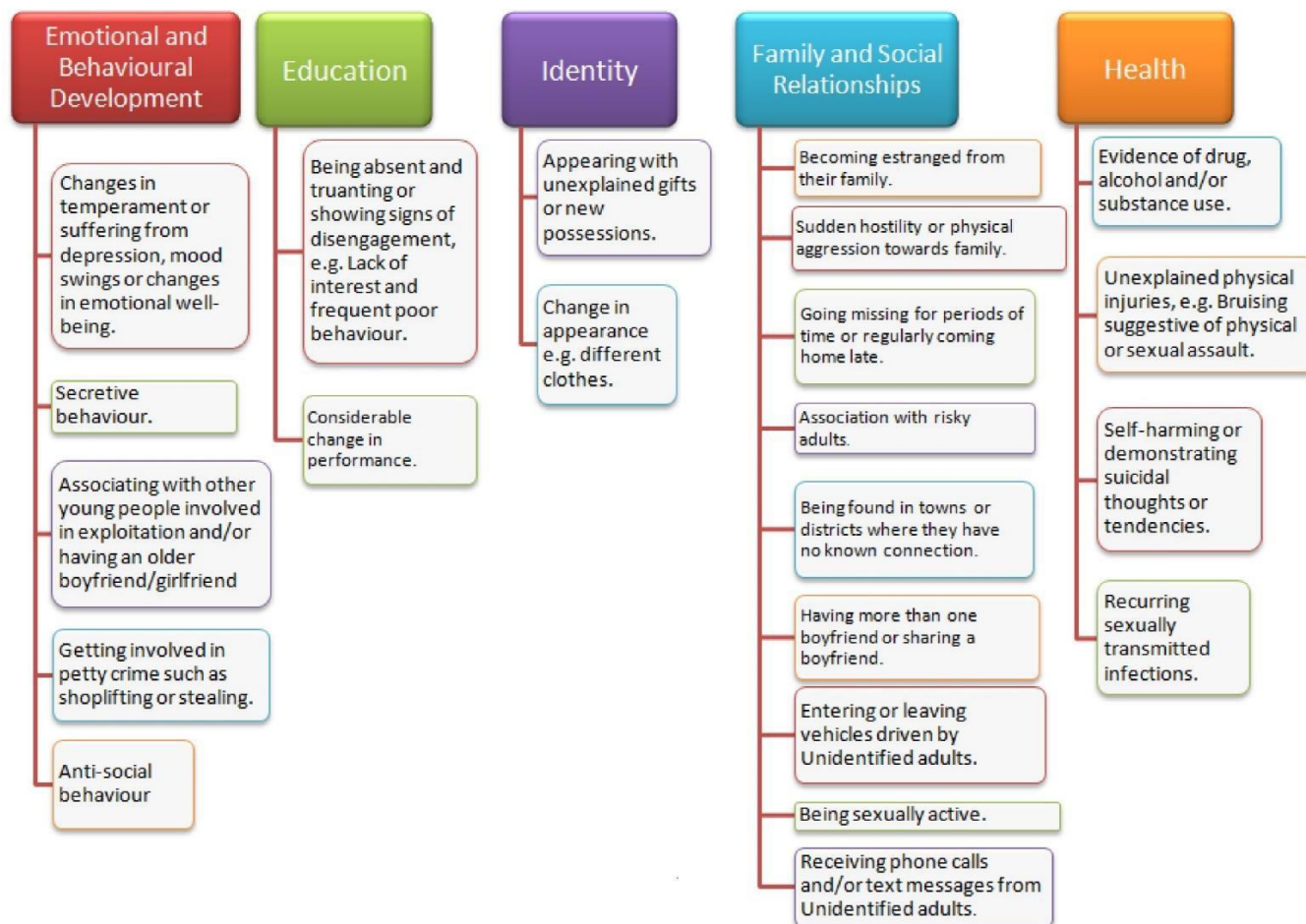
## Sexual Abuse and Child Sexual Exploitation

- sexual abuse involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not s/he is aware of what is happening. Sexual activities may also include non-contact activities, e.g. involving a child in looking at / production of abusive images, watching sexual activities or encouraging sexually inappropriate behaviours
- involves forcing, intimidating or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening.
- may include unwanted pressure from a young person's peers to have sex, sexual bullying (including cyber-bullying), and grooming for sexual activity
- may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- includes non-contact activities, such as involving children in looking at sexual images and activities, encouraging children to behave in sexually inappropriate ways such as engaging in sexual conversations online or via mobile phone, asking children to display sexualised behaviours or perform sexual acts that are recorded/ shared live via webcam, or grooming a child in preparation for abuse (e.g. via the internet, mobile phones and social networking sites)

- not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children and adolescents
- **Child Sexual Exploitation** can take many forms from the seemingly 'consensual' relationship where sex is exchanged for attention, affection, or gifts, to serious organised crime and child trafficking, where children are moved around the country for purposes of sexual exploitation.

Other types and aspects of abuse suffered by children and young people include Child Trafficking and Modern Slavery, Radicalisation, Domestic Abuse, Female Genital Mutilation (FGM) and Forced Marriage.

## Indicators of Child Sexual Exploitation



## Appendix 4

Principles of Safeguarding children (taken from the Safeguarding guidance provided by the government in March 2015)

### **Safeguarding is everyone's responsibility**

Everyone who works with children – including teachers, GPs, nurses, midwives, health visitors, early years professionals, youth workers, police, Accident and Emergency staff, pediatricians, voluntary and community workers and social workers – has a responsibility for keeping them safe.

No single professional 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.

In order that organisations and practitioners collaborate effectively, it is vital that every individual working with children and families is aware of the role that they have to play and the role of other professionals. In addition, effective safeguarding requires clear local arrangements for collaboration between professionals and agencies.

Any professionals with concerns about a child's welfare should make a referral to local authority children's social care. Professionals should follow up their concerns if they are not satisfied with the local authority children's social care response.

Effective safeguarding systems are those where:

- the child's needs are paramount, and the needs and wishes of each child, be they a baby or infant, or an older child, should be put first, so that every child receives the support they need before a problem escalates;
- all professionals who come into contact with children and families are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to children;
- all professionals share appropriate information in a timely way and can discuss any concerns about an individual child with colleagues and local authority children's social care;
- high quality professionals are able to use their expert judgement to put the child's needs at the heart of the safeguarding system so that the right solution can be found for each individual child;
- all professionals contribute to whatever actions are needed to safeguard and promote a child's welfare and take part in regularly reviewing the outcomes for the child against specific plans and outcomes;



- local areas innovate and changes are informed by evidence and examination of the data.

Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of the system, and by every individual and agency playing their full part, working together to meet the needs of our most at-risk children.