



Safeguarding Children Policy

1. Aim of policy

- 1.1 The purpose of this policy is to highlight that safeguarding children from neglect and abuse is everyone's responsibility and that VIVID has an important role to play. This policy also highlights VIVID's legal obligations in the management and reporting of safeguarding children.

2. Scope of policy

- 2.1 This policy is organisational wide and applies to all VIVID employees, board members, volunteers, contractors or managing agents providing services for or on behalf of VIVID.
- 2.2 This policy is specifically for the safeguarding of children. VIVID's approach to safeguarding adults is covered in the Adult Safeguarding policy.
- 2.3 A child for the purposes of this policy is anyone under the age of 18 years.

3. Policy statement

- 3.1 VIVID are in contact with children throughout their day to day activities and are required through law, their regulator and their organisational objectives to have clear policies and procedures on Safeguarding and working with local agencies.
- 3.2 Local authorities have overarching responsibility for safeguarding and promoting the welfare of all children and young people in their area. They have a number of statutory functions under the Children's Act 1989 as amended in 2004 which make this clear, including specific duties in relation to children in need and children suffering, or likely to suffer, significant harm, regardless of where they are found, under sections 17 and 47 of the Children Act 1989. The Director of Children's Services and Lead Member for Children's Services in local authorities are the key points of professional and political accountability, with responsibility for the effective delivery of these functions.
- 3.3 Local authorities have a statutory duty to run Local Safeguarding Children's Boards. They are the lead agencies with responsibility for co-ordinating safeguarding and conducting case management and reviews. They will have expertise in handling cases of abuse, providing support and counselling to victims and assisting the police with any criminal investigations.
- 3.4 Legal framework

Children Act 2004

This act created Local Safeguarding Children Boards and places duties on a range of statutory organisations. Although Registered Providers of Housing such as VIVID are not subject to this act, they are expected to mirror organisations that are, by:

- having a designated lead person for child safeguarding matters;

- sharing information with other professionals;
- having safe recruitment practices and whistleblowing procedures;
- training their staff on child safeguarding;
- having a clear child safeguarding policy; and
- having a procedure for responding to child protection concerns, including making referrals to local authorities or the police.

Working together to safeguard children (March 2015)

The statutory guidance, issued under the Children Act, on inter-agency working to safeguard and promote the welfare of children applies to statutory bodies such as the police, schools and local authorities. However, the guidance and expectations detailed in this guidance will be reflected by VIVID throughout this policy and the procedure.

Definitions

VIVID will adopt the following definitions (Working Together to Safeguard Children 2015):

Child safeguarding is defined as:

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

Children

A child is anyone who has not yet reached their 18th birthday and includes unborn children. Due to their immaturity and dependency on others, all children are at risk of abuse.

Parent

The term parent includes carers or guardians. It means, in usual circumstances, someone who is legally entitled to take decisions on behalf of the child.

Abuse and neglect

Abuse or neglect takes many forms and can be caused by single or repeated acts or a failure to act by any other person or persons, or in the case of self-neglect, the victim themselves. The circumstances of each individual case will be considered as to not limit what constitutes abuse or neglect. However VIVID will reference the Working Together definition for abuse:

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Guidance on the types of abuse and neglect is detailed in the Safeguarding procedure, VIVID will treat as a child safeguarding concern where a child is suspected to be involved in any of the following categories;

- physical abuse;
- sexual abuse;
- emotional or psychological abuse;
- neglect and acts of omission

Other categories or specific acts of abuse and neglect may be categorised differently by other organisations and VIVID will be aware that abuse may also include, but is not limited to, acts such as online abuse, child sexual exploitation, female genital mutilation, bullying and cyberbullying, domestic abuse, child trafficking, grooming and harmful sexual behaviour. Staff will receive training which covers the indicators of abuse and neglect, and these categories will be explored.

4. Responsibilities

Taking a child centred approach to prevention and empowerment

- 4.1 We will place a child's needs at the forefront. which means listening, being non-judgemental, and respecting their needs and views in how we respond to ensure that every child receives the support they need before a problem escalates.
- 4.2 We will ensure our customers are aware of how to report safeguarding concerns, and the support we can provide.
- 4.3 VIVID may include some work with ex-offenders, for example support services may be aimed at providing support to assist in ceasing or minimising offending behaviour, and there may be a history of either sex offences or child abuse. VIVID will seek to ensure that no children are resident within schemes where there may be residents with a known history of either a sex offence or physical child abuse
- 4.4 Allocations will be undertaken in line with the Allocations Policy.
- 4.5 Where a resident is proven to have committed a sexual offence or physical child abuse, VIVID will consider legal action where a breach of the terms and conditions of the tenancy has occurred or other appropriate action relevant to the circumstance.

Enabling our staff and take proportionate actions

- 4.6 We will ensure that safeguarding is the responsibility of everyone who works for us and works for our behalf and that staff who encounter children and families are alert to their needs and of any signs of abuse, including any risks abusers or potential abusers may pose to children. VIVID will expect that all their staff (and staff and contractors who work on behalf of VIVID will:
 - Ensure appropriate employees are aware of this policy and relevant procedures;
 - Ensure appropriate employees are aware of the signs and indicators of abuse;

- In the course of providing services to children, identify abuse where it is reasonable to do so;
- Alert the appropriate agency where there is a child safeguarding issue;
- Keep records of safeguarding concerns and appropriately supervise staff;
- Share information with other organisations in line with the Data Protection Act and General Data Protection Regulations using agreed protocols;
- Recruit staff appropriately;
- Set out clear professional boundaries when working with or coming into contact with children;
- Review safeguarding cases and learn from these reviews to ensure that safeguarding is managed within a culture of continuous improvement;
- Put in place performance measures;
- Raise awareness of safeguarding with customers

4.7 All reporting to management and governance of the safeguarding process will be appropriately anonymised;

- We will undertake relevant disclosure and barring checks on employees that have access to, or work with children. Anyone found to have been convicted of a sex offence or abuse of a child will not be permitted to work or volunteer in a position that provides access to children under the age of 18;
- Staff must comply with all policies that govern the appropriate use of IT. Access to chat rooms or news groups without expressed permission to do so is not permitted. Email must not be used to distribute pornographic material and the internet must not be used to access such material. Breaches of the policies in this respect will be regarded as gross misconduct and managed through the disciplinary procedures for staff. In the case of temporary staff or volunteers this may be regarded as a breach of contract

4.8 Whilst safeguarding responsibilities sit with all staff, the responsibility structure at VIVID is as follows:

- VIVID's Board has duties in the scrutiny and oversight of safeguarding matters. The Board has designated the Head of Neighbourhoods as the lead on safeguarding at VIVID.
- The Head of Neighbourhoods chairs a Safeguarding Group that meets quarterly and is made up of cross departmental managers/leads. The Group's responsibility includes ensuring that policies and procedures and infrastructure are fit for purpose and followed and reviewing a log of incidents, good practice and ensure lessons are learnt.
- All departmental managers are responsible for ensuring that safeguarding matters are reported to the Head of Neighbourhoods and that safeguarding is effectively managed within their area of responsibility. VIVID will ensure that the safeguarding group members are clear about their safeguarding responsibilities and their role in promoting the welfare of children.

- Where there is a case involving death or serious harm of a service user or vulnerable resident, a serious case review will be conducted to identify whether there were any failings on our part, and if so, establish what lessons could be learnt and any actions to rectify and failures. In these instances, the Board shall be informed and kept updated with regards to the outcomes of any reviews that take place. The safeguarding lead will report to the Board on an annual basis to highlight the general activities of the group in that year and highlight any concerns as and when appropriate.

4.9 Strategic and Operational Lead

The Head of Housing Operations is VIVID's strategic and operational child safeguarding lead.

The role of the strategic and operational lead is to:

- Ensure that any changes to legislation or good practice lead to corresponding policy and procedure updates;
- Ensure that VIVID provides appropriate resource each year to adequately train and supervise staff managing and/or reporting safeguarding concerns;
- Notify the board lead in the event of a serious case review and report to the board on an annual basis;
- Report to the Audit and Risk Committee on a regular basis;
- Review the child safeguarding policy on an annual basis and ensure that other policies have regard to child safeguarding as appropriate;
- Work with Learning and Development to ensure that processes are in place to ensure staff training is undertaken for new staff within 12 weeks of their start date and refreshed every two years or earlier if there are significant changes to legislation or good practice which result in changes to VIVID's policy and procedures;
- Review the content of the training to ensure that it is fit for purpose and delivered appropriately having regard for value for money;
- Lead internal quarterly review meetings and maintain appropriate records;
- Report to the Executive Leadership team at least quarterly in relation to the number of safeguarding cases and any issues of note;
- Ensure that systems are in place to accurately and appropriately record and monitor safeguarding cases;
- Set objectives in relation to child safeguarding;
- Measure VIVID's performance in relation to child safeguarding;
- Promote safeguarding within the organisation;
- Work with external organisations as appropriate in relation to child safeguarding

4.10 Operational Deputies

There will be four safeguarding deputies. These will be the: Tenancy Support Manager, The Customer Experience manager, The Tenancy Enforcement Manager and the Neighbourhoods Manager.

The role of the Operational Deputies is to:

- Write and review child safeguarding procedures and ensure other procedures have regard to child safeguarding as appropriate;
- Ensure that relevant staff record and report child safeguarding cases in accordance with procedures;
- Ensure that staff are appropriately supervised;
- Ensure that safeguarding is regularly discussed at team meetings and in one to one meetings;
- Set staff objectives in relation to child safeguarding;
- Attend quarterly safeguarding review meetings;
- Attend external multi agency meetings representing VIVID;
- Promote safeguarding within the organisation

All VIVID staff have a duty to record and report child safeguarding concerns in accordance with the organisations procedures and guidance. All concerns relating to safeguarding must be recorded.

4.11 Recording and Reporting

All VIVID staff have a duty to record and report child safeguarding concerns in accordance with the organisations procedures and guidance. All concerns relating to safeguarding must be recorded.

4.12 Training

4.12.1 VIVID will ensure that staff across the organisation receive training to give them an understanding of child safeguarding and enable them to fulfil the requirements of VIVID's policy and relevant procedures.

4.12.1 Training will be appropriate to individual roles and the requirements of these roles in relation to child safeguarding. Training will be refreshed every two years or earlier if there are significant changes to legislation or good practice which result in changes to VIVID policy and procedures.

4.12.2 VIVID will also provide training to board members, volunteers and contractors as appropriate.

4.13 Staffing

4.13.1 VIVID will ensure that staff are appropriately recruited to roles and will ensure relevant role recruitment procedures include a DBS check. This check will be repeated at three yearly intervals.

4.13.2 Support will be provided to staff dealing with safeguarding cases where necessary, including confidential counselling if appropriate.

4.13.3 Staff will be given guidance around professional boundaries when working with children, and this will be made clear within VIVID's safeguarding procedures.

4.13.4 Where VIVID receive an allegation about a member of staff that constitutes a child safeguarding issue, an investigation will be conducted in accordance with the disciplinary policy and procedure and a safeguarding referral made to the appropriate local authority. In most cases, when allegations of this nature are received the member of staff will be suspended pending the outcome of the investigation.

4.13.5 VIVID has a whistleblowing policy and this will be followed in relation to allegations made by concerned members of staff about the conduct of a member of staff, contractor or board member.

4.14 Multi Agency Approach

4.14.1 VIVID recognises its role in child safeguarding as one that supports the functions of statutory agencies, including local authorities and the police.

4.14.2 VIVID will ensure that records are kept of appropriate referral agencies. These records will be reviewed regularly to ensure they are up to date.

4.14.3 VIVID will attend multi agency meetings to review child safeguarding cases including the Multi Agency Safeguarding Hub (MASH). Due to the number of local authority areas that VIVID operates in it will not be possible or appropriate to send representation to all meetings across all areas of operation. Areas will be prioritised according to stock numbers. However, contact will be made to all local authority safeguarding boards across our areas of operation to ensure that they are aware VIVID's policy and relevant contact details to enable information sharing to take place or to make a specific request that VIVID attend a meeting.

4.14.4 We will co-operate and develop strong relationships with relevant safeguarding partners to investigate allegations of harm, abuse, and neglect to a child, and take actions to safeguard the child. This includes:

- appropriately referring our safeguarding and wellbeing concerns to the relevant local authority, and/or if necessary the police;
- supporting and contributing to enquiries and assessment as directed by our statutory partners after a referral is made;
- taking swift action to ensure the safety of the child and taking appropriate action against the perpetrators of abuse;
- participating in Local Safeguarding Children Boards;
- supporting and learning from serious case or child death reviews;
- keep accurate, confidential and secure records of all safeguarding concerns and associated actions;
- sharing information with relevant safeguarding partners

4.15 Information sharing

4.15.1 VIVID will share information with other agencies appropriately and in accordance with the Data Protection Act and the General Data Protection Regulation.

4.15.2 Information sharing agreements will be put in place and regularly reviewed to ensure that they are fit for purpose and legislatively compliant. VIVID will only share information without an information sharing agreement being in place where there is an immediate risk of harm or criminal activity is taking place.

4.16 Contractors

4.16.1 Contractors delivering services on behalf of VIVID will be obliged to report concerns about child safeguarding to VIVID in accordance with the contract of engagement

4.16.2 VIVID will provide appropriate training on an annual basis to our main contractors who have access to our customers' homes to enable them to spot the signs of abuse or neglect.

4.16.3 All contracts to deliver services in VIVID properties or other activities where there is contact with VIVID customers will contain clauses that oblige the contractor to adhere to this policy.

4.16.4 Where existing contracts do not contain these clauses, VIVID will look to vary the terms of the contract at the earliest opportunity.

4.17 Properties Managed by Others

4.17.1 Where arrangements are in place for VIVID owned properties to be managed by a third party for housing management, support, care or other services, the agent will be required to demonstrate how it manages safeguarding appropriately

4.17.2 This requirement will be included in all future leases and management agreements and existing agreements will be amended include these clauses at the earliest opportunity.

4.18 Raising awareness

4.18.1 VIVID will raise awareness of child safeguarding with customers in partnership with appropriate agencies.

4.19 Perpetrates Abuse

4.19.1 Where allegations are substantiated, VIVID will consider legal action and sanctions against perpetrators of abuse who are tenants. Abuse and neglect will not be tolerated.

4.19.2 Where appropriate, VIVID will refer perpetrators of abuse to the relevant support agencies.

5. Statutory requirements

5.1 VIVID recognise the vast amount of legislation regarding the safeguarding of children and VIVID will continue to monitor relevant legal guidance, and the list below reflects the existing legal framework:

- Working together to Safeguard Children 2015
- Children Act 2004 Child Safeguarding

- Children Act 1989
- Education Act 2002
- The Human Rights Act 1998
- The Modern Slavery Act 2015
- Disclosure and Barring Service
- Family Law Act 1996
- Sexual offences Act 2003
- Female Genital Mutilation Act
- Licensing Act 2003
- Homelessness Act 2002
- Data Protection Act 1998
- General Data Protection Regulation 2016
- Anti-Social Behaviour, Crime and Policing Act 2014

6. Related policies

6.1 The following policies and procedures are related to this policy:

- Child safeguarding procedure
- Adult safeguarding policy
- Antisocial behaviour policy
- Arrears prevention and management policy
- Domestic abuse policy
- Allocations policy
- Data protection policy
- Recruitment policy and procedures
- Whistleblowing policy
- Staff code of conduct
- Procurement policies and procedures
- Disciplinary policy and procedures

7. Monitor and review process

This success of this policy will be monitored in the following ways:

- Review of cases on a quarterly basis by VIVID's safeguarding group;
- Reporting to the Executive Leadership team and Audit and Risk Committee;
- Annual reporting to Board;
- Outcomes and recommendations following Serious Case Reviews.

Author	Owner	Date approved	Review date
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