

Child Safeguarding Policy



Policy Reference:

HO052(C)

Approved by:

Board

Date approved:

27 November 2018

1. Scope and objectives

- 1.1. The purpose of this policy is to ensure that bpha meets its legal obligations in the management and reporting of safeguarding in relation to children.
- 1.2. This policy is organisational wide and applies to all bpha employees, board members, volunteers, contractors or managing agents providing services for or on behalf of bpha.
- 1.3. This policy is specifically for the safeguarding of children. bpha's approach to safeguarding adults is covered in the Adult Safeguarding policy.
- 1.4. A child for the purposes of this policy is anyone under the age of 18 years.

2. Policy Statement

2.1 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.

(Working Together to Safeguard Children 2015)

- 2.2. bpha takes its legal obligations in child safeguarding seriously and recognises the need to meet its legal obligations to ensure that, wherever possible, a proactive organisational wide approach to safeguarding is adopted.
- 2.3. There is a large legal framework in place in relation to the safeguarding of children and this is detailed in section 3 below. The government guidance 'Working Together to Safeguard Children 2018' comprehensively details organisational obligations to meet child safeguarding requirements.

- 2.4 Everyone who works with children has a responsibility for keeping them safe. Abuse is any behaviour towards a person that deliberately or unknowingly causes him/her harm, endangers life or violates their rights. Abuse can include neglect, physical abuse, sexual abuse, sexual exploitation, emotional abuse and inappropriate responses of carers. Employees working with children or vulnerable adults should ensure they are aware of signs of abuse and should report any suspicions using bpha's internal reporting procedures.
- 2.5 Housing providers have legal obligations in relation to child safeguarding, but this obligation, in the main rests with local authorities in the delivery of their housing functions.
- 2.6 In undertaking its role to report and manage child safeguarding, bpha 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.
 - 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.
- 2.7 All reporting to management and governance of the safeguarding process will be appropriately anonymised.

3. Role and Responsibilities

- 3.1 Whilst safeguarding responsibilities sit with all staff, the responsibility structure at bpha is as follows:

Board Lead

The organisation is not required by law to have a safeguarding lead at Board level, but it wants to ensure that safeguarding is given appropriate consideration at all levels in the organisation.

The Board lead is a Non-Executive Director to ensure that safeguarding is considered independently of operations.

The Board lead is responsible for:

Ensuring that safeguarding is appropriately considered by the Board during relevant meetings.

- Presenting an annual report to the Board on bpha's management of safeguarding during the year.
- Assisting the Strategic and Operational lead in learning lessons following Serious Case Reviews.

Strategic and Operational Lead

The Head of Housing Operations is bpha'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 bpha 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 bpha'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 bpha's performance in relation to child safeguarding.
- Promote safeguarding within the organisation.
- Work with external organisations as appropriate in relation to child safeguarding.

Operational Deputies

The Regional Managers in Home and the Retirement Living Manager are bpha's child safeguarding Operational Deputies.

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 bpha.
- Promote safeguarding within the organisation.

3.2. Recording and Reporting

All bpha staff have a duty to record and report child safeguarding concerns in accordance with the organisation's procedures and guidance. All concerns relating to safeguarding must be recorded.

3.3 Training

3.3.1 bpha 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 bpha's policy and relevant procedures.

3.3.2 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 bpha policy and procedures.

3.3.3. bpha will also provide training to Board members, volunteers and contractors as appropriate.

3.4 Staffing

3.4.1 bpha 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.

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

3.4.3 Where bpha 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.

3.5. Multi Agency Approach

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

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

3.5.3 bpha 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 bpha 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 bpha's policy and relevant contact details to enable information sharing to take place or to make a specific request that bpha attend a meeting.

3.6 **Information sharing**

3.6.1 bpha will ensure that it complies with relevant Data Protection legislation when it shares data with third party agencies. Decisions to share or withhold information should be recorded and advice should be taken from bpha's Data Protection Officer as appropriate. bpha's policy is that the balance of risk should be in favour of sharing data to protect children from harm and that concerns about data sharing should never prevent or delay the sharing of data when there is any risk of immediate harm to a child.

3.6.2 Information sharing agreements will be put in place and regularly reviewed to ensure that they are fit for purpose and legislatively compliant. bpha 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.

3.7. **Contractors**

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

3.7.2 bpha 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.

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

3.8. **Properties Managed by Others**

3.8.1. Where arrangements are in place for bpha 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.

3.8.2. This requirement will be included in all future leases and management agreements.

3.9. **Raising Awareness**

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

3.10 Perpetrators of Abuse

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

4. Regulatory and legal considerations

The following is the legal framework applicable to child safeguarding:

- Working together to Safeguard Children 2018
- Children Act 2004
- Children Act 1989
- Education Act 2002
- The Human Rights Act 1998
- 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

5. Monitoring, reviews and evaluation

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

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

6. Associated documents and procedures

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 procedure

Status	Version - 3
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Equality impact issues	
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