



# Safeguarding & Child Protection Policy

**NB: this policy should be read alongside the Safeguarding & Child Protection Procedures**

Status	Live
Policy Owner	Head of Safeguarding & Quality Practice
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Approved by	Trustees
How policy will be disseminated	Stored on SharePoint – Staff to be updated at Development Days
Does policy require training for implementation – if so describe training plan	Yes - training at dedicated training sessions and development day.
Linked/related policies & procedures	<ul style="list-style-type: none"><li>• Child Protection &amp; Safeguarding Procedures</li><li>• Managing Allegations Against Staff &amp; Volunteers Policy</li><li>• Information Sharing Policy</li><li>• Case Recording and Records Retention Policy</li><li>• Conduct Code</li><li>• Managing Feedback and Complaints Policy</li><li>• Whistleblowing Policy</li><li>• Acceptable Use of Social Media policy</li><li>• Adult Safeguarding Policy and Procedures</li><li>• Lone Working Policy</li><li>• Death of a Service User Policy</li><li>• Child Safeguarding &amp; Domestic Homicide Reviews Policy</li><li>• Need to Know Protocol</li><li>• Professional Boundaries Policy</li></ul>
Document control	A controlled version of this document is available in the Policies and Procedures folder in the Governance Library on SharePoint. Any printed versions or versions saved elsewhere are classified as uncontrolled.

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## **COVID 19 Statement**

Since March 2020 the world has been impacted by a coronavirus pandemic which can lead to infection with COVID-19.

The global response to this virus, and more specifically the response of the UK government and the London Councils, has impacted the way Safer London works, its policies and procedures.

The principles underlying the Safeguarding Adults policy and procedures remain unchanged although meetings and conversations are likely to take place virtually rather than face to face because of restrictions around face to face contact that may be in place at any time.

The limits on face to face contact with service users, their families and other stakeholders may mean that critical non-verbal information and cues are missed as these are often less obvious on remote and virtual platforms, and easier for people to disguise or minimize. Staff therefore need to be especially vigilant to ensure that they are not overlooking signals during virtual conversations and sessions, whether by videoconferencing or telephone, which they might pick up in a face to face meeting.

Staff should also be conscious that the responses to the pandemic – including the restrictions on movement and contact with others, things like wearing masks and holding conversations by phone or videoconference - may impact on service users and, indeed, on themselves, in ways that may affect how they relate to each other, and work on their awareness of whether and how this might be the case. These measures may also impact on, and exacerbate or indeed disguise, the issues that service users are dealing with.

## Policy Statement

- (i) Safer London is committed to safeguarding and promoting the welfare of children and young people and expects all employees and volunteers to share this commitment.
- (ii) Safer London works to prevent and address the impact of violence and exploitation on young people and their families. We believe every young person should be able to enjoy a life where they feel safe and free from harm or the threat of harm. We believe that making London safer for young people makes it safer for everyone.
- (iii) Safer London believes that:
  - children and young people should never experience abuse or maltreatment of any kind;
  - it has a responsibility to promote the welfare of all children and young people to keep them safe and to work in a way that protects them.
- (iii) Safer London recognises that:
  - the welfare of the child is paramount;
  - all children have an equal right to protection from all types of harm or abuse, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation;
  - some children can be considered to be more at risk due to the impact of previous experiences, their level of dependency, communication needs or other issues, including being a member of a minority ethnic group, having a disability, being very young (infants are at higher risk) or a young carer (since this group is often isolated as well as protective of those they are caring for);
  - working in partnership with children and their parents or carers, as well as other agencies, is essential in promoting their welfare.
- (iv) Safer London will seek to keep children safe by:
  - valuing, listening to and respecting them;
  - appointing a Designated Safeguarding Lead (DSL), a deputy DSL and a Lead Trustee for Safeguarding;
  - adopting child protection and safeguarding best practice through our policies and procedures for employees and volunteers;
  - providing effective management of employees and volunteers through supervision, support, training and quality assurance measures;
  - recruiting employees and volunteers safely, ensuring all necessary checks are made;
  - recording and storing information professionally and securely;
  - sharing information about safeguarding and good practice with children, their families, employees and volunteers via one-to-one discussions, group work, leaflets and other channels;
  - using our child protection procedures to share concerns and relevant information with agencies who need to know and involving children, parents/carers and families appropriately;

- using our procedures to manage any safeguarding allegations against employees and volunteers appropriately;
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise;
- ensuring that we have effective complaints and whistleblowing measures in place;
- ensuring that we provide a safe physical environment for the children we work with, our employees and volunteers by applying health and safety measures in accordance with the law and regulatory guidance;
- ensuring our work is anti-discriminatory and anti-oppressive and recognises the possibility of unconscious bias.

**It is a key requirement of this policy that ALL safeguarding concerns MUST be reported to the relevant line manager as soon as they arise, and a Safeguarding Concern form completed, signed off by the relevant line manager and added to the child's case record. The Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead MUST be contacted for any concerns which meet the Need to Know criteria summarised in Appendix 1.**

## 1. Overview and introduction

### 1.1. Safer London provides:

- support for children affected by violence or exploitation;
- support for parents/carers whose children are affected by violence or exploitation and/or who are affected by this themselves via their children;
- support for those seeking to escape domestic violence or abuse;
- support in a variety of settings including schools;
- training and awareness-raising for professionals in order to increase their understanding and knowledge of the issues affecting the children who use our services.

### 1.2. This work requires Safer London's safeguarding arrangements to be robust and comprehensive.

### 1.3. Safeguarding is the process of promoting the welfare of children and protecting them from harm, whether caused by deliberate abuse, neglect or accidents. It also includes considering issues such as bullying, prejudice or failures to enable them to take part in activities open to most children.

### 1.4. Safeguarding means:

- protecting children from abuse and maltreatment;
- preventing harm to children's health or development;
- ensuring children grow up with the provision of safe and effective care;
- taking actions which enable all children to achieve the best possible outcomes.

- 1.5. Child protection is part of the safeguarding process and focuses on protecting individual children who are identified as suffering or likely to suffer significant harm. Safer London's Safeguarding & Child Protection Procedures set out how to respond to any concerns an employee or volunteer may have about a child.

## 2. Scope

- 2.1. This policy applies to anyone working for or on behalf of Safer London including paid employees, volunteers – including Trustees -, secondees, agency staff and students. It also applies to our sub-contractors and where applicable our suppliers. Wherever this policy refers to staff or employees this should be taken to mean all of the above unless specifically stated otherwise.
- 2.2. This policy applies to all work with children aged up to 18. For those aged 18 and over please refer to Safer London's Adult Safeguarding Policy.
- 2.3. This policy does not form part of Safer London's contract of employment and the organisation reserves the right to change the policy at any time when considered necessary. However, failure to comply with this policy may result in action being taken against the non-compliant employee and may lead to dismissal.

## 3. Roles and responsibilities

- 3.1. **Safer London** is fully committed to safeguarding and child protection, and all those who work for Safer London in any capacity have a duty to safeguard and promote the welfare of children, regardless of whether their role involves direct contact with children.
- 3.2. It is the responsibility of **all employees** to ensure that they read and understand this policy.
- 3.3. **The Senior Leadership Team (SLT)** is responsible for ensuring that it is adhered to and to take appropriate action where an employee is found to have acted in a way that is contrary to this policy.
- 3.4. **The Chief Executive Officer** has overall accountability for all matters concerning safeguarding and child protection.
- 3.5. **The Head of Safeguarding and Quality Practice** is the Designated Safeguarding Lead (DSL), responsible for safeguarding and promoting children's welfare. This role oversees safeguarding arrangements which includes: ensuring relevant policies and procedures are in place, reviewed and updated; supporting employees with concerns in consultation with line managers as needed; supporting managers if need be around when to refer to social care; dealing with any escalations within local authorities if needed due to lack of response or an inappropriate response; analyzing performance around safeguarding referrals; developing and delivering training to promote

safe practice; and reviewing and sharing the outcomes of Serious Case Reviews and internal safeguarding reviews. The DSL also prepares a Section 11 self-audit annually to monitor Safer London's safeguarding arrangements and identifies actions for improvement.

- 3.6. The DSL is supported in this role by the Deputy DSL and by the designated Lead Trustee for Safeguarding.

#### **4. Legal framework**

- 4.1. This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England as well as guidance which applies specifically to organisations working in London, where appropriate.

- 4.2. Key legislation includes:

- [The Children Act, 1989](#), specifically Section 17 - provision of services for children in need – and Section 47 - local authority duty to investigate;
- [The Children Act, 2004](#) - creation of Local Safeguarding Children Boards, Working Together and information sharing
- [Keeping Children Safe in Education 2019](#) – **NB: this is required reading for any staff working in schools, including those meeting young people for one to one sessions.**
- [What to do if you're worried a child is being abused](#) 2006
- [Disabled Children United Nations Convention on The Rights of the Child](#) – Voice of the child
- [The Sexual Offences Act, 2003](#)
- [The Pan-London Safeguarding Children Procedures](#)
- [Working Together to Safeguard Children 2018](#), statutory guidance
- [Domestic Abuse Bill 2019](#)
- [The Data Protection Act, 2018](#)
- [The General Data Protection Regulations 2018](#)
- [UN Convention on the Rights of the Child \(1989\)](#), specifically Article 12 – right to express and have their views taken into account on all matters that affect them and Article 19 – right to live free from all forms of violence

- 4.3. Legislation against the practice of 'Upskirting' is also applicable where this activity involves a child as either the victim or perpetrator of this activity.

#### **5. Recruitment of employees and volunteers**

- 5.1. Safer London's Safer Recruitment Policy sets out the use of safer recruitment practices, and our selection and vetting procedures include checks into the eligibility and suitability of all employees who have direct or indirect (e.g. helpline, e-mail) contact with children. Because of their position within the charity, Safer London will always obtain DBS clearance for anyone serving as or seeking to become a Trustee.

- 5.2. Safer London has a Complaints Policy and Procedure and a Managing Allegations Policy which set out how adults and children can voice concerns

about unacceptable and/or abusive behaviour towards children by Safer London employees.

## **6. Supervision, support and training for employees and volunteers**

- 6.1. Safer London ensures that all employees working with children are monitored and supervised and that they have opportunities to learn about safeguarding and child protection in accordance with their roles and responsibilities.
- 6.2. Safer London ensures that all of its employees are equipped to embed safeguarding within their professional practice. They are supported in this through training which is tailored to their roles and duties and in accordance with their levels of contact with and responsibility for children and or parents/carers. This ranges from those who in their work have limited or no contact with children and their parents/carers to those who have the highest levels of responsibilities for them, including at a strategic level.
- 6.3. Safeguarding induction training is mandatory for all employees, and those who work directly with children, their families and/or carers receive additional training designed to achieve the required levels of competency in regards to safeguarding children as described in [LSCB Competence Still Matters](#).
- 6.4. The training content is continually updated to include emerging issues such as e-Safety, domestic violence, forced marriage, female genital mutilation, children who live away from home or go missing, child sexual exploitation, race and racism and extremism.
- 6.5. **All employees** must complete the online course Safeguarding Children Level 1 (Virtual College) within the first two weeks of commencing employment.
- 6.6. **All employees in contact with children at risk** must also complete the online course [Suicide Let's Talk training](#) (Zero Suicide Alliance) during their induction.
- 6.7. Within six months of commencing employment these employees must also attend the *Safeguarding Induction* face-to-face course delivered by Safer London's own trainer. They must then attend the *Update Refresher* training, also delivered by the Safer London trainer, at least every three years.
- 6.8. **All managers who have any contact with children who may be at risk, or who manage employees** that do so must also complete appropriate safeguarding training
- 6.9. Within six months of starting employment, they must also attend the *Safeguarding Induction* face-to-face course delivered by the Safer London trainer. They must then attend the *Update Refresher* training delivered by the Safer London trainer, at least every three years.
- 6.10. **Volunteers and students who will come into contact with children at risk** must complete the same online courses as employees.



- 6.11. They must also attend the *Safeguarding Induction* face-to-face course within six months of their start date. They must then attend the *Update Refresher* training delivered by the Safer London trainer at least every three years.
- 6.12. Additional, bespoke training will also be provided to the Trustees, Designated Safeguarding Lead and their Deputy and senior managers.
- 6.13. Safeguarding and child protection training is part of a wider Workforce Development Plan; this includes additional relevant training according to needs identified through supervision, annual appraisals and case work.
- 6.14. Training is not limited to formal events and can include a wide range of learning and development activities such as sharing expertise, e-learning, shadowing and presentations. Safer London has systems to evaluate the quality and effectiveness of training provided and its impact on the delivery of services to children and their families.
- 6.15. Management support contributes to the effectiveness of learning and development, and Safer London managers support the employees they manage to attend training and transfer their learning into practice by ensuring they have enough time, resources and opportunities to use their new skills. Learning and development is a standing item on our supervision template and one-to-one sessions always include a discussion on learning from any recent courses/events.
- 6.16. The framework used to evaluate the quality of training and to capture evidence of its impact covers three aspects: Evaluation, Targeted Interviews and Auditing.

Self-Evaluation: Employees attending Safer London training will be asked to complete a set of three self-evaluations to help benchmark existing learning, evaluate the quality of training from the perspective of the trainee and capture evidence of how training has influenced their individual practice. It is acknowledged that this process needs to be proportionate and take into account the busy day jobs of front-line operational employees. It is, however, expected that all training participants comply with Safer London requests for this information.

Pre-evaluation: As part of the course application process applicants are asked for details of any previous relevant safeguarding training so that the participant's knowledge can be logged and evaluated before acceptance onto the course. The results from this are treated as the baseline for each participant's level of knowledge and made available to the training facilitator to ensure that training is delivered at an appropriate level.

End of course evaluation: A self-evaluation questionnaire is given to each participant at the end of each course to establish what the participant has learned over the duration of the course. This is used to evidence whether the course was pitched appropriately for the audience, met its objectives and what

the participant has learned from the training session.

Post-course evaluation: Acknowledging that follow-up questionnaires often result in a low return rate, the approach by Safer London takes the form of a simple on-line Survey Monkey questionnaire

Targeted Interviews: On occasions further targeted interviews post training will take place.

Auditing: Case auditing by Safer London line-managers also provides a specific focus on whether there is any evidence that training has influenced practice and impacted on the outcomes for young Londoners and families. The audit process establishes the level of safeguarding training received by the employees involved and their account of how any related learning has been used in their casework. The auditor will form a professional judgement as to the impact of this training on the quality of practice and associated outcomes.

- 6.17. Training feedback is used to improve course content and delivery in the current year and also to inform planning for future training programmes. This feedback also provides assurance to the Board by evidencing impact of training on frontline employees.

## **7. Equity statement**

- 7.1. Safer London is committed to ensuring that everyone it works with is treated fairly and equitably. If necessary, particularly in situations where diversity issues may be a factor, an Equality Impact Assessment (EIA) may need to be carried out to ensure that these are fully considered and that the process is not impacted by conscious or unconscious bias on the part of any participant.

## **8. Data protection**

- 8.1. Safer London processes personal data collected as part of its work in accordance with its Data Protection policy.
- 8.2. Specifically, any data collected during and in relation to any process under this policy, including any HR process arising from non-compliance, is held securely and accessed by, and disclosed to, only to those individuals who genuinely need access to this data.
- 8.3. Inappropriate access or disclosure of personal data constitutes a data breach and should be reported in accordance with Safer London's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the organisation's disciplinary procedure.

## **9. Related policies and procedures**

9.1. This policy should be read alongside the following relevant Safer London policies and procedures which can be found [here](#) on SharePoint:

- Child Protection & Safeguarding Procedures
- Managing Allegations Against Staff & Volunteers Policy
- Information Sharing Policy
- Case Recording and Records Retention Policy
- Conduct Code
- Managing Feedback and Complaints Policy
- Whistleblowing Policy
- Acceptable Use of Social Media policy
- Adult Safeguarding Policy and Procedures
- Lone Working Policy
- Death of a Service User Policy
- Child Safeguarding & Domestic Homicide Reviews Policy
- Need to Know Protocol
- Professional Boundaries Policy

## **10. Review**

10.1. Safer London is committed to reviewing its Safeguarding policy and practice annually or earlier if:

- it is invoked and use suggests that amendments are needed; or
- changes in legislation relevant to this policy require it to be amended in order to reflect these changes; or
- organisational restructures lead to changes in reporting lines or other processes.

10.2. The designated policy owner is responsible for ensuring that the policy and procedures are reviewed and updated as needed, including when there are changes to any of the individuals or roles mentioned in the policy or procedures. Appendix 5 provides a list of the key individuals/roles mentioned in the policy and procedures.

## Appendix 1 - Need to Know Protocol summary

All employees must ensure that the Designated Safeguarding Lead<sup>1</sup> is informed as soon as possible of the occurrence of any of the situations set out below. The Designated Safeguarding Lead will then keep the Chief Executive informed with regular updates. The Designated Safeguarding Lead will also include details in reports to the Trustee Board.

If you are not certain whether an incident or situation falls within this protocol let the DSL know and they will make that assessment.

NB: this is a summarized version of the [Need to Know Protocol](#).

1	The death of a person who uses or has used our services
2	Death by suicide or attempt to take their own life by a person who is using or has used our services
3	Any known incident of child abduction
4	Any incidents of alleged serious abuse of a child or perpetrated by a child
5	Serious incidents in the community, including where a person who is using our services or who has done so in the past: <ul style="list-style-type: none"> <li>• is charged with murder, attempted murder, manslaughter, rape, torture, kidnapping, false imprisonment or firearms offences</li> <li>• is the victim of any of these offences</li> </ul>
6	Death in service of and employee or volunteer
7	When any employee or volunteer is the subject of criminal proceedings
8	Fire or other occurrence which causes major damage or closure to a building occupied by Safer London employees
9	Serious injury to any person while on our premises or engaged in an activity organised by Safer London
10	Accidents on trips / activities organised for people who use our services
11	Any other serious incidents involving people who use our services that could lead to further significant harm
12	Any concern raised in or as part of a referral into a Safer London service that could lead to a serious incident or issue arising during our work with the young Londoner or family referred
13	Osman warning has been issued by Police to a person who uses our services
14	Any matter or incident arising that may bring Safer London into the public eye or attract adverse media attention
15	Serious data breach that may result in sensitive or confidential data becoming available to unauthorised persons
16	Visits by OFSTED, Department for Education or other government agencies to a workplace where Safer London staff are located/ co-located
17	Proposed visit to a workplace where Safer London staff are located/ co-located by a Government Minister, MP or local Councillor