

Safeguarding Children Policy

1. Policy statement

- 1.1. This policy sets out Stonewater's approach towards safeguarding children at risk from harm and abuse. It is supported by safeguarding procedures and training, and related policies, for example, Stonewater's safeguarding adults' policies and procedures and Safer Recruitment policy.

2. Policy scope and objectives

- 2.1. The Safeguarding Children policy and procedures will:

2.1.1. Define Stonewater's organisational and management responsibilities, including the roles and responsibilities of contractors working on behalf of Stonewater.

2.1.2. Detail the potential signs of abuse and neglect to children and guidance in identifying signs of abuse.

2.1.3. Detail the processes staff will follow, including how Stonewater will ensure a multi-agency approach to reporting and dealing with safeguarding concerns and incidents.

2.1.4. This Policy is associated with other Stonewater Policies such as:

- Safeguarding Adults Policy
- Confidentiality Policy
- Data Protection Policy
- Health and Safety Policy
- Domestic Abuse Policy
- Whistleblowing Policy
- Vulnerable Customers Policy
- Anti-Social Behaviour Policy

2.2. This policy applies to all Stonewater Customers and children living within Stonewater homes, colleagues, contractors, suppliers and agents working on behalf of Stonewater and any person who accesses Stonewater services. This will include non-customers of Stonewater, for example attendees at estate open days or visitors to Stonewater properties.

2.3. Due to the nature of our work, Stonewater staff are in contact with children throughout their day-to-day activities. Stonewater is required through law, their regulator and their organisational objectives to have clear policies and procedures on Safeguarding and working with local agencies. These requirements are detailed in *Appendix A: Legal and Regulatory Provisions*.

- 2.4. 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 1989 and 2004 Children Acts 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.
- 2.5. Local authorities have a statutory duty to run Local Safeguarding Children's Boards. They are the lead agencies with responsibility for coordinating 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. Policy definitions

3.1. Stonewater will adopt the following definitions:

3.1.1. **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.

3.1.2. **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.

3.1.3. **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, Stonewater 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. Stonewater will treat as a child safeguarding concern where a child is suspected to be involved in either of the following categories:

- physical abuse

- sexual abuse
- emotional or psychological abuse, or
- neglect and acts of omission

Other categories or specific acts of abuse and neglect may be categorised differently by other organisations and Stonewater 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.

3.1.4. **Child exploitation**

We use the recognised definition for child exploitation which is:

‘An individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child, young person (under the age of 18), or adult and exploits them:

- Through violence or the threat of violence, and/or
- For the financial or other advantage of the perpetrator or facilitator and/or
- In exchange for something the victim needs or wants. The victim may have been exploited even if the activity appears consensual.

Exploitation does not always involve physical contact; it can also occur through the use of technology.’

3.1.5. **Safeguarding children**

Safeguarding children in regard to Stonewater means protecting children’s right to live safely, free from abuse and neglect through Stonewater working with our partners and other organisations to prevent and stop both the risks, and the experience of, abuse or neglect, whilst at the same time making sure children’s wellbeing is promoted and their preferences taken into account.

3.1.6. **Promoting welfare**

Safeguarding forms part of the requirement of statutory authorities to promote the overall welfare of a child by:

- protecting children from maltreatment
- preventing impairment of children’s health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best life chances.
- Keeping children safe online

- Preventing Self-Harm

3.1.7. This means that local authorities may need to take significant decisions in the best interests of a child, for example, removal from their current housing situation.

3.1.8. Children affected by Exploitation and Trafficking (including gangs):
We recognise that children and Young People are at particular risk of exploitation and trafficking. Our Safeguarding Children's procedures set out steps colleagues can take if they have concerns about Children or young people affected by exploitation and trafficking. It is important to understand the types of exploitation Children and Young people are at risk of:

- Trafficking
- Child Sexual Exploitation
- Child Slavery
- Child Criminal Exploitation:
- Street Gangs
- Peer Groups
- Organised Crime Groups
- County Lines
- Cuckooing

4. Safeguarding principles and commitments

4.1. Stonewater commits to safeguarding children by working with partners and applying the following policy standards:

4.1.1. Child-Centred Approach to Prevention and Empowerment:

- Prioritise children's needs, listen to and respect their views, and provide support early to prevent escalation.
- Ensure customers know how to report safeguarding concerns and access support.
- Stonewater will avoid housing children in schemes where there are known sex offenders or those with a history of child abuse, considering this at the lettings stage.
- Action, including legal measures, will be taken if a customer is proven to have committed child abuse or a sexual offence while residing in a Stonewater property.

4.1.2. Enabling Colleagues and Proportionate Actions:

- Safeguarding is a shared responsibility. All staff, volunteers, and contractors must be alert to signs of abuse and neglect, report concerns, and follow appropriate behaviour guidelines.
- Staff will undergo safeguarding training, be vigilant of risks, and comply with policies related to appropriate conduct.

- Disclosure and barring checks will be conducted on staff with access to children; those convicted of child abuse or sexual offences will be barred from working with children.
- Breaches of policies will be treated as gross misconduct.

4.1.3. Working with Partners:

Stonewater will collaborate with safeguarding partners to address child abuse and neglect, including:

- Referring concerns to relevant authorities and supporting investigations.
- Participating in Local Safeguarding Children Boards and sharing information.
- Escalating concerns when response is inadequate.

4.1.4. Accountability and Transparency:

- A 'Safeguarding Lead' will oversee policy implementation, ensuring it is up-to-date, effective, and communicated across Stonewater.
- Safeguarding leads will provide strategic direction and annual reports to the Board.
- Safeguarding data will be analysed to identify trends, improve practices, and raise awareness.
- Staff will receive ongoing training and support, with lessons learned from incidents incorporated into policies and practices.

5. Key responsibilities of all colleagues

5.1. Stonewater is committed to creating a culture where safeguarding is embedded throughout the organisation. Safeguarding is everyone's responsibility, and all colleagues must understand their role in protecting adults at risk. The following outlines specific responsibilities across the organisation to ensure a joined-up, transparent, and effective safeguarding approach. All colleagues and contractors will be required to:

- Read and understand this policy and associated procedures.
- Be aware of the signs of abuse, neglect, and exploitation.
- Know how to raise safeguarding concerns promptly and appropriately.
- Attend required safeguarding training and refreshers.
- Understand this policy and associated procedures.

6. Service standards

6.1. Record Keeping

6.1.1. Full details on recording and reporting allegations of abuse are provided in Stonewater's Safeguarding Children Procedure.

6.1.2. The lead worker will be responsible, along with their manager for monitoring the progress of safeguarding referrals made to the Local Authority.

6.1.3. Case Management reviews between colleagues and their manager will look at case progress and handling and ensure quality assurance in how we manage safeguarding cases.

6.2. Agency Managed Properties

6.2.1 Agencies providing support services will be expected to have their own equivalent safeguarding policies in place. Their responsibilities in this regard will be managed through Stonewater's contractual relationship with them. Agencies are required to report safeguarding concerns to the Local Authority, their service regulator (e.g. Care Quality Commission) and to Stonewater.

6.3. Contractors and agents

6.3.1. Contractors working on behalf of Stonewater and visiting homes may encounter evidence of abuse and neglect within the property. Customers may also choose to disclose incidents directly to contractors, so awareness in sensitively preserving or taking evidence and handling reports will be necessary. Contractor organisations will be expected to ensure that they comply with Stonewater's Code of Conduct for Maintenance Contractors, including:

- Ensuring that staff are suitable for the capacity employed and have relevant DBS checks in place.
- Ensuring that staff receive suitable training on how to deal with customers, including how to report any concerns they have.
- Ensure that colleagues are aware of and utilise reporting tools and procedures as specified by Stonewater.
- Co-operating with Stonewater and their statutory partners regarding any concerns and allegations received.
- Having systems in place that enable disciplinary action to be taken where appropriate.

6.3.2. Contractors should ensure that their employees are able to raise concerns where they see that a child has suffered, is suffering or potentially could suffer harm. Stonewater will support all contractors that report a concern in good faith, where there is the belief that a child has been abused, is at risk of abuse, or believe that a colleague may pose a risk to children.

6.3.3. When procuring relevant services / personnel safeguarding questions will be included as part of the procurement exercise where safeguarding risks may exist.

6.3.4. Contractors are to not knowingly enter a property alone where the sole occupant(s) is, or appears to be, under 18 years of age. Unless there has been a prior arrangement, where an appointment has been made and lone child/children is/are present, contractors are to withdraw from the premises and advise Stonewater immediately. An appointment will be rearranged at a time where an appropriate adult is present.

6.3.5. Stonewater will monitor the performance of their contractors, compliance with Stonewater's Code of Conduct for Maintenance Contractors and compliance with this policy through monthly Contract Meetings.

6.4. Whistleblowing and allegations against colleagues / contractors

6.4.1. If a colleague suspects that children are being abused by another member of Stonewater's staff, they should immediately speak to their Designated Safeguarding Officer, the Head of Service / Performance Delivery Manager or the Human Resources Department. Where there is a failure to respond appropriately to allegations of abuse, or where staff have concerns that a colleague or superior is responsible for the abuse, staff must follow Stonewater's Whistleblowing Policy.

6.5. Confidentiality and information sharing

6.5.1. Stonewater's Confidentiality Policy and Document Retention Schedule should be referred to.

6.5.2. We will respect confidentiality at all times and will not share any information given in confidence unless justified by the assessed risk to the child as required by law.

6.5.3. We will discuss our approach to confidentiality with the customer where there are safeguarding concerns. We will be honest and explain that information might need to be shared with other organisations in order to respond or resolve a safeguarding issue.

6.5.4. Decisions about what information is shared and with whom will be taken on a case by case basis. Whether information is shared with or without the parents'/child consent, the information shared should be:

- Necessary for the purpose it is being shared.
- Shared only with those who have a need for it.
- Accurate and up to date.
- Shared in a timely fashion.
- Shared accurately.
- Shared securely.

6.6. Complaints

6.6.1. Customers that do not feel satisfied with our service in relation to Safeguarding may wish to make a formal complaint. Stonewater has a *Complaints Policy* providing information about how to complain about our services. Alternatively, a customer may also wish to contact the relevant Local Authority Safeguarding Children Board if they feel that Stonewater have not provided an adequate service.

7.0 Equality, diversity and inclusion

- 7.1 In ensuring our work is child-centred, in line with guidance from Working Together to Safeguard Children, the Equality Act 2010 puts a responsibility on us to have due regard to the need to eliminate discrimination and promote equality of opportunity. No child(ren) should be treated any less favourably than others in being able to access effective services and support to meet their needs.
- 7.2 Responses provided should be appropriate to the child at risk and not discriminate based on any of the protected characteristics under the Equality Act 2010.
- 7.3 All children, regardless of age, disability, sex, race, religious belief, sexual orientation or identity, pregnancy/maternity status have a right to equal protection from all types of harm or abuse.
- 7.4 Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs (e.g. non-verbal, deaf) or other issues.
- 7.5 There are some factors that can increase the vulnerability that a child or young person will be exploited by others. This can include:
 - **Child/ Individual:** Looked after, learning disabilities, substance misuse, mental health problem, low self-esteem, recent loss or bereavement, social isolation, young carer, financially unsupported.
 - **Home/family:** Adverse Childhood Experiences.
 - **Peers:** Exposed to other young people known to be exploited, exposed to or experienced peer on peer abuse.
 - **Schools/college:** Exclusion from school or college and not in education/training or employment, exposed of experience violent crime.
 - **Neighbourhoods:** unsuitable accommodation (hostel / B&B), exposed to violent crime, gangs and deprivation.
- 7.6 Stonewater will ensure that we address barriers to disclosure for those with protected characteristics. This will include ensuring that information on safeguarding children is available in a range of child-friendly formats in services where this is relevant e.g. Refuges, Foyers, providing bespoke support dependent on the child's needs throughout a safeguarding process, this could be an advocate or an interpreter, for example.

8.0 Quality assurance and monitoring

- 8.1 We will ensure that all safeguarding cases are subject to a case management review and not dealt with in isolation.
- 8.2 Colleagues who require safeguarding training will be required to do this on a three yearly basis.
- 8.3 The Safeguarding Lead will produce an Annual Safeguarding report for the Board which will provide an overview of safeguarding activity in the year.
- 8.4 We will use feedback from customers to better shape our responses around safeguarding and handling of safeguarding cases.
- 8.5 We regularly monitor and review our safeguarding practice to ensure effectiveness and continuous improvement. Key measures include:
- 8.6 We will undertake regular case reviews of safeguarding cases.
- 8.7 Training participation rates will be monitored to ensure staff are equipped with up-to-date safeguarding knowledge.
- 8.8 We will review timeliness of referrals made to Local Authorities, the speed and appropriateness of responses to safeguarding concerns and undertake quarterly analysis of referral rates to identify trends and areas for focus.

Last issued: 29.8.2025

Next review date: 29.8.2028

Appendix 1 – Other legislation and regulations

Sex Offences Act 2003

This act strengthened measures to protect the public from sexual offending.

Part 1 of the act:

- sets out that any sexual activity involving children under the age of 16 is unlawful, even with consent - this includes exploitation; and
- Provides specific protection from abusive sexual activity for those adults with an 'arrested or incomplete development of mind, psychiatric disorder and any other disability of the mind'.

Safeguarding Vulnerable Groups Act 2006

This act sets out the responsibility we have for vetting and barring people working with children and vulnerable adults.

Children and Young Persons Act 2008

This act sets out the statutory framework for children in care in England and Wales and to ensure that such young people receive high quality care and services that are focused on and tailored to their needs.

Working Together to Safeguard Children (updated December 2023)

This is a guide to inter-agency working to safeguard and promote the welfare of children. It states that 'children are best protected when professionals are clear about what is required of them individually, and how they need to work together.'

This encourages Registered Providers to:

- Put the child's needs at the heart of their safeguarding approach.
- Be alert to the risks of harm that individual abusers, or potential abusers, may pose to children.
- Make a referral to local authority children's social care or the police if necessary.
- Share appropriate information in a timely way and discuss any concerns about an individual child with colleagues and local authority children's social care; and
- Contribute to whatever actions are needed to safeguard and promote a child's welfare

Children Act 1989

Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare.

Section 47 of this act requires local authorities to undertake assessments of the needs of individual children to determine what services to provide and action to take. The police, health professionals, teachers and other relevant professionals (such as Registered Providers) should help the local authority in undertaking its enquiries.

Data Protection Act 2018

The Act controls how your personal information is used by organisations, businesses or the government. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- Used fairly, lawfully and transparently.
- Used for specified, explicit purposes.
- Used in a way that is adequate, relevant and limited to only what is necessary.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary.

- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

Protection of Freedoms Act 2012

Part 5 of this act created the current disclosure, vetting and barring scheme, which applies to people working with or has access to children and vulnerable adults.

The Disclosure and Barring Service is now responsible for assisting employers, such as Registered Providers, in England and Wales make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups.

Gillick Competency and Fraser Guidelines

Gillick competency and Fraser guidelines refer to a legal case which looked specifically at whether doctors should be able to give contraceptive advice or treatment to under 16-year-olds without parental consent. However, since this case, they have been more widely used to help assess whether a child has the maturity to make their own decisions and to understand the implications of those decisions.

NSPCC guidance on this can be found here:

<https://learning.nspcc.org.uk/media/1541/gillick-competency-factsheet.pdf>

Stonewater staff would not be expected to make decisions around a child's decision making, and should always focus on child protection and wellbeing, however this guidance is useful for Stonewater staff to be aware of if they are attending Child Protection meetings or Child In Need meetings.

Domestic Abuse Act 2021

The 2021 act defines domestic abuse and mitigates for children as victims of Domestic Abuse when witnessing domestic Abuse. Further guidance available in Stonewater Domestic Abuse Policy.

Prevent Strategy 2011, and Revised Prevent duty guidance for England, 2021

This guidance talks about specific organisations having due regard to the need to prevent people from being drawn into terrorism. Research demonstrates that children and young people are at heightened risk of being drawn into terrorism / being radicalised and so an awareness on Stonewater's part is essential.

Supported Accommodation (England) Regulations 2023

The regulations set out the Quality Standards which supported accommodation providers are required to achieve, as well as the underpinning requirements that providers must meet in order to achieve them, for everyone providing supported accommodation for looked after children and care leavers aged 16 and 17 for whom the local authority has a duty to accommodate or arrange accommodation.