



Places to live. Space to grow.

Safeguarding Children Policy

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1 Introduction: the purpose of this policy

- 1.1 We are committed to safeguarding and promoting the welfare of children throughout the areas where we operate and recognise that successful outcomes for children depend on strong partnership working. This policy has been written in line with guidance issued by the Kent and Medway Safeguarding partnerships.
- 1.2 The purpose of this policy is to demonstrate our commitment to safeguarding and promoting the welfare of children who we come into contact with. The policy ensures that all staff are aware of their responsibility to recognise a situation where they believe there is a child potentially at risk, and how to respond, report and refer their concern.

2 Policy Statement

- 2.1 We believe everyone has a responsibility to promote the welfare of all children and young people in our homes and communities, to keep them safe and to ensure that our practice is followed in a way that protects them.
- 2.2 We will give equal priority to keeping all children and young people in our homes and communities safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.
- 2.3 We recognise and will be sensitive to the fact that some children are additionally vulnerable because of the impact of discrimination, previous experiences, their level of dependency, communication needs or other issues.
- 2.4 Where a staff member, contractor or volunteer observes or has concerns about a child's welfare or receives a safeguarding disclosure form from a third party, the incident must be treated seriously with an immediate response, in accordance with our Safeguarding Adults and Children Procedure.
- 2.5 In line with our Vulnerability Policy, vulnerability is defined as circumstances where individuals are especially susceptible to physical or emotional harm or distress. Vulnerability can be influenced by a range of factors, including (but not limited to): age, disability, bereavement, mental health, domestic violence, or poverty.
- 2.6 Where a customer or household is identified as vulnerable, we will make every effort to provide reasonable adjustments to our services to accommodate additional needs.

3 Scope

- 3.1 This policy applies to work with all children, defined as anyone under the age of 18. We have an obligation to safeguard the welfare of children ensuring that they are:
 - Protected from maltreatment

- Not impaired in their health or development
- Growing up in circumstances that provide safe and effective care.

3.2 We recognise that different roles come with different responsibilities. Staff and volunteers who work directly with children, along with their supervisors, have additional duties in keeping children safe.

3.3 Everyone else at West Kent, including contractors, still has an important part to play. They should always support the wellbeing of children and young people, stay alert to any concerns, and report anything that doesn't feel right.

4 Responsibilities

4.1 All staff and volunteers, including contractors and partner agencies, are required to take shared responsibility for the welfare of children who are encountered in the course of our work. Some of our staff are in a direct position of trust, particularly those who support, guide or in any way interact with children and young people either in the West Kent workplace or in the community. Other staff working with adult service users who are parents, or working in family homes, should be mindful of child welfare and alert to any behaviour from service users which might impact on their children.

4.2 Concerns about the welfare of a child may be identified by a staff member or disclosed to us by another concerned adult (including members of the public) or the child themselves or another child, such as an older sibling. We are responsible for recording and responding to all concerns, however raised, in line with our procedures. This includes any reports of non-recent or historical abuse which may be made by or about an adult relating to incidents which took place when the alleged victim was under 18.

4.3 Where services are delivered under contract to a statutory body (like Local Authority, Police, or Health Authority) we have a statutory responsibility to ensure the welfare and safety of children under section 11 of the Children's Act 2004. In all other circumstances, we have a duty to be vigilant to safeguarding issues.

4.4 The Head of Support is our Designated Safeguarding Lead (DSL) and is the senior member of staff responsible for safeguarding adults and children. The DSL will be responsible for monitoring and reporting. They are supported by a Designated Safeguarding Officer (DSO) for children who is the Community Development Manager. The DSO will also provide guidance to staff or line managers on how to respond to safeguarding concerns.

4.5 There is also delegated responsibility to line managers in implementing this policy. Line Managers of front-line staff must:

- Attend training at the relevant level and ensure their staff also attend appropriate training.
- Act as the first source of advice for colleagues on Safeguarding and link with the DSL or DSO to discuss cases if they are being referred to social services.
- Respond to all concerns swiftly in line with policy and procedures.

- Ensure accurate recording of all safeguarding concerns.
- Keep up to date with local safeguarding arrangements in Medway and Kent.
- Make sure that any allegations of colleague conduct around Safeguarding are investigated in line with HR processes.
- Recognise that dealing with safeguarding situations can be distressing and support the well-being of colleagues dealing with reports.

4.6 The managerial responsibility for any programme or activity accessed by children rests with the individual who is directing or organising the activity. That person is expected to:

- Ensure that the activity is planned, organised and delivered in accordance with the Safeguarding Children Policy.
- Consider safeguarding issues when completing the health and safety risk assessment.
- Arrange the appropriate checking, training, induction and guidance for all staff and volunteers.
- Inform their line manager or the DSO/DSL and complete the appropriate documentation in case of any incident.

5 Safeguarding concerns

5.1 All staff and volunteers working closely with children must be alert to possibilities of abuse or maltreatment of a child, whether it is perpetrated by an adult or another child. West Kent staff must contact their line manager, the DSOs or DSL if they have any cause to believe a young person involved in any activity with West Kent is in any way at risk.

5.2 All issues must be reported in line with current Kent and Medway procedures and a case raised internally on our Cx system. If staff, in the course of their work, have a child safeguarding issue brought to their notice, this must be treated as a priority over other work. Guidance regarding a specific incident may be obtained from the line manager or the Designated Safeguarding Officer.

5.3 It is the duty of staff to inform only, not to investigate – this is the role of the Police and Social Services.

5.4 If you believe that a child is in immediate danger, you should **call 999 without delay**.

6 Categories of abuse

6.1 The following categories of abuse are based on those identified in Working Together to Safeguard Children and Keeping Children Safe in Education:

- Physical abuse
- Emotional abuse

- Sexual abuse
- Neglect or acts of omission.

6.2 Definitions of the categories can be found in our safeguarding procedure.

7 Establishing a caring environment

7.1 All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse. We recognise that some children may be additionally at risk because of their circumstances and experiences, including special educational needs, communication issues, a disability or care need. All staff delivering direct services to children are responsible for making West Kent a safe and caring environment for all.

7.2 A safe and caring environment is an environment:

- in which the health, safety and welfare of young people has been assessed and catered for.
- in which staff are alive to the possibility of abuse and take measures to prevent that possibility.
- where there is a sound and known reporting system for any incident.
- where staff take reasonable and practical precautions to avoid any suspicions of abuse being brought against them.
- where children and young people are listened to, respected, and actively involved in decisions that affect them. Staff are trained to listen attentively and respond appropriately, creating safe spaces where children feel comfortable sharing their views and experiences. Age-appropriate communication methods, including visual aids and interpreters, are used, where appropriate to support understanding. In all safeguarding matters, the child's perspective is considered alongside other relevant information to guide appropriate action.

8 Consent

8.1 When abuse is disclosed or suspected, information will be restricted to those who need to know, and we will adhere to the Data Protection Act 2018, its Data Protection and Retention Policy and confidentiality as set out in the Code of Conduct.

8.2 If we have concerns about the safety and wellbeing of a child/children, we will make a safeguarding referral even when consent is not given, but it should be noted that consent from the family or child should be sought where it's possible for us to do this

without increasing the risk to the child/children. We will not contact the family if this could indirectly put the child at risk.

9 Staff recruitment

- 9.1 Some staff are in a position of trust, particularly those staff who support, guide, or in any way interact with children and adults at risk and those that supervise them. Such staff must be aware of this and to always act accordingly and in line with the Staff code of conduct.
- 9.2 In the housing sector, being in a “position of trust” means that staff hold roles where tenants depend on them. Because staff are in people’s homes, handle sensitive information, and influence safety and wellbeing, they must adhere to strict safeguarding expectations, follow PiPoT (Person in Position of Trust) procedures, and be accountable for maintaining professional boundaries.
- 9.3 Staff are recruited in line with our Safer Recruitment Procedure. Staff who will be in regular or significant occasional contact with under 18s in the course of their work, and their direct supervisors, must hold satisfactory Disclosure and Barring Service (DBS) certificates. A ‘satisfactory’ check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. When staff obtain a valid DBS they must let HR see their valid copy.
- 9.4 The interview process for roles which will work specifically with children and young people will include questions to assess candidates’ understanding of safeguarding and address suitable personal behaviours for applicants to these roles. Once appointed, line managers will ensure staff are made familiar with this policy and procedures as part of their induction and are trained and competent to work safely with children and young people in line with these.
- 9.5 All staff or volunteers and contractors employed to work with children must report any subsequent criminal convictions to Head of Human Resources and the Designated Safeguarding Lead. Failure to do so may result in disciplinary action being taken.

10 Allegations of abuse or inappropriate behaviour involving staff

- 10.1 Allegations involving a member of staff, and a person under 18 will be dealt with in the strictest confidence and reported immediately to the Head of Human Resources and relevant Department Director. Consideration will be given as to whether the situation falls within the definition of safeguarding children. The situation will be dealt through our disciplinary procedure and/or reported to appropriate agencies. Where an allegation relates to a contractor this will be reported to through the relevant department Director.

11 Relationships with young people aged 16-18

- 11.1 It should be noted that whilst a young person can consent to sexual activity once they reach the age of 16, the Sexual Offences Act 2003 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under 18 where the adult is in a position of trust.

12 Reporting and monitoring

- 12.1 All reported suspicions or allegations of abuse will be recorded and monitored to ensure the procedures are followed, and so any patterns may be identified. Outcomes will be monitored to check we are meeting our aims relating to adult safeguarding.
- 12.2 Safeguarding case numbers and training information will be reported quarterly to the Executive team. A full safeguarding report will be produced every six months for the Communities and Housing Committee, where we will identify trends, risks and ongoing actions.
- 12.3 Safeguarding cases will also be reported in the health and safety report which is reported monthly to the Executive team and quarterly to the Communities and Housing Committee.

13 Training and awareness

- 13.1 We will ensure that all staff understand what action to take if they identify a child safeguarding issue, or have one reported to them. This will include how to handle a disclosure, how to report a concern, and the importance of confidentiality and consent through the process.
- 13.2 Dedicated safeguarding training is available and recommended to all staff, volunteers and partnering contractors.
- 13.3 The following levels of safeguarding training are provided for staff:
- Introduction and General Awareness - mandatory for all staff, volunteers and Board Members
 - Level 1 - For all staff who interact with customers on phones or whilst carrying out duties.
 - Level 2 - Increased Awareness for staff who visit customers and can make referrals to the local authority.
 - Youth workers will also complete KSCB training.
- 13.4 The level of training that is required for individual role profiles has been assessed depending on the level of contact with children and the responsibilities that are associated with the role.

- 13.5 Safeguarding will form part of induction training at all levels and must be repeated every three years. Training records will be maintained and monitored for compliance.
- 13.6 We will also offer training to specific contractors, so they understand the signs of abuse and what actions to take.
- 13.7 Where opportunities arise, we will also look to raise awareness of safeguarding with our staff and with our tenants, be that through internal communications, Neighbourhood News (our resident magazine), at events, or through other means.

14 Contractors

- 14.1 As described above, West Kent expects contractors to ensure that their staff are aware of safeguarding issues and have clear routes to raise these. Where applicable, safeguarding will be considered as part of the procurement process. Contractors will be expected to have appropriate DBS checks, to ensure staff are trained to understand safeguarding, recognise where abuse may be happening, and raise this appropriately.

15 Media relations

- 15.1 For any activity involving children or young people, parents or guardians must be given the opportunity to refuse permission for photographs, videos or other images to be made of them, their children and for the children to be interviewed by press, broadcasters or other media. The West Kent consent form can be found on Bettie, our intranet. If colleagues are unsure about what's required, they can contact the communications and marketing team for support.

16 Review

- 16.1 This policy and procedures will be regularly monitored and reviewed on an annual basis, in accordance with changes in guidance on the safeguarding of children, any changes within West Kent, or any issues or concerns raised about the safeguarding of children at risk within West Kent.
- 16.2 If any changes to safeguarding legislation, regulations or guidance occur, we will review this policy in a timely manner to ensure it remains compliant.

17 Regulation

- 17.1 The primary legislation regarding the safeguarding of children is:
- Children's Act 1989 and 2004
 - United Convention of the Rights of the Child 1992
 - Data Protection Act 2018
 - Sexual Offences Act 2003
 - Care Act 2014

- Children and Families Act 2014
- Working Together to Safeguard Children 2023
- Guidance issued by Kent and Medway Safeguarding Children multi agency partnerships
- The Equality Act 2010
- Children and Social Work Act 2017

18 Communication

18.1 This policy will be published on West Kent's intranet and website.

18.2 We will publish advice and guidance on our website for residents on what to do if they are concerned about the welfare of a child. We will signpost to external agencies and how to report a concern to us.

19 Consultation

19.1 This policy has been implemented following consultation with residents.