Safeguarding Children Policy

1. Introduction

1.1 At Peabody we believe every child and young person has the right to live in safety, free from harm, abuse and neglect.

We work with a range of adults, children and young people who may be at risk of abuse or neglect and so it is essential that we have mechanisms in place to minimise the risks of harm and abuse occurring and, where concerns exist, to ensure that appropriate action is taken to address them.

Safeguarding children is about people and organisations working together to prevent and stop the risks and experience of abuse, neglect and exploitation. It is a comprehensive approach aimed at preventing harm to children, promoting their welfare, and responding effectively when concerns arise.

Legislation and statutory guidance such as Children's Act 2004, Working Together to Safeguard Children 2023 and Safeguarding Vulnerable Groups Act 2006 inform our approach to safeguarding children and young people across the business.

We remain strongly committed to safeguarding children and young people who use or come into contact with our services.

We develop and implement internal procedures for colleagues that establish clear lines of accountability, responsibility and processes for reporting safeguarding concerns. We are committed to maintaining safeguarding policies and procedures, implemented by knowledgeable and trained staff.

1.2 This policy has links with some of our other documents, and we've thought about these when developing the policy. This policy should be read in conjunction with the Safeguarding Adults Policy.

Other related documents:

- Whistleblowing Policy
- Mental Capacity Act Policy
- Domestic Abuse and Violence against women and girls (VAWG) Policy
- Code of Conduct
- Data Protection Policy
- Equality, Diversity and Inclusion Policy
- Care and Support Needs guidance note
- Recruitment and Selection Policy

2. Scope

2.1 The purpose of this Policy is to set out Peabody's approach to preventing and reducing the risk of harm, abuse, neglect and exploitation of children and young people.

2.2 This policy applies to all colleagues working within The Peabody Group and all its subsidiaries as well as agency support workers, volunteers and all committee and board members.

2.3 We expect suppliers, contractors (including subcontractors), and organisations working on our behalf or premises to have their own safeguarding procedures or follow ours, and to actively identify and report any concerns.

3. Our approach

3.1 The safeguarding of adults and children involves different legal frameworks, policies, and practices due to the unique vulnerabilities and needs associated with each group.

3.2 All Peabody Group colleagues have a duty to act upon and report actual, suspected or allegations of abuse in line with the Peabody Code of Conduct.

3.3 Our approach reflects the statutory guidance where we operate. It meets legislative and regulatory requirements, including those set out in (but not limited to):

- Children Act 1989 and 2004,
- Working Together to Safeguard Children 2023,
- Safeguarding Vulnerable Groups Act 2006,
- The Equality Act 2010.

3.4 This policy applies to children and young people including young people who are pregnant, leaving care or a secure youth establishment that live in our properties or use our services.

3.5 Peabody recognise that safeguarding is everyone's responsibility and that anyone can witness or become aware of a child or young person being at risk.

3.6 Our safeguarding children and young people work is underpinned by six guiding principles:

Child-Centred Approach: The best interests of the child should be the primary consideration in all actions and decisions.

Prevention and Early Intervention: Proactive measures should be taken to prevent harm and address concerns at an early stage.

Partnership and Collaboration: Collaboration among agencies and professionals is crucial to safeguarding children effectively.

Empowerment and Participation: Children should be empowered to express their views, and their participation should be actively encouraged.

Accountability and Responsibility: Individuals and organisations involved in child safeguarding are accountable for their actions and decisions.

Respect for Diversity and Equality: Safeguarding practices should respect and celebrate diversity, treating all children with dignity and respect.

3.7 We will be professionally curious in our approach, to ensure that we proactively seek out what is happening within a household or in a specific situation. This involves not making assumptions about a household or individual, or taking information at face value.

3.8 We recognise that housing conditions, including disrepair, damp, mould, overcrowding and unsafe environments, may contribute to harm or neglect and can be safeguarding concerns for children and young people.

3.9 We consider the impact of parental and household factors such as domestic abuse, mental health difficulties, and substance misuse on the safety and wellbeing of children and young people.

3.10 We apply a culturally competent approach to safeguarding, avoiding assumptions based on culture, religion, ethnicity, identity, or lifestyle. We recognise that inequality, discrimination, language barriers, immigration status, and social isolation may increase vulnerability and impact access to support. Cultural or personal factors must never be used to justify delay or inaction in responding to safeguarding concerns.

3.11 We recognise that children and young people may experience harm in a range of environments including the home, community, peer groups, and online spaces.

3.12 We take action against perpetrators of abuse, harassment and unlawful activity related antisocial behaviour wherever possible, through our antisocial behaviour policy and procedures.

3.13 We recognise the emotional impact on staff of recognising and reporting safeguarding concerns. Employee support will be available through line managers and in line with our Colleague Health and Wellbeing Offer or subsidiary equivalent.

4. Key terms and definitions

4.1 A Child

A child is defined as anyone who has not yet reached their 18th birthday as defined under the Children Act 1989, irrespective of circumstances and including unborn children.

4.2 Abuse and Neglect (within the context of safeguarding children and young people)

Abuse refers to any action or lack of action that causes harm, injury, or distress to a child or young person. This may be caused intentionally or unintentionally. Abuse can take various forms, including physical abuse, emotional or psychological abuse, sexual abuse, and neglect. Abuse may be a single incident or a pattern of behaviour over time.

4.3 Peabody commits to applying the latest definitions of abuse available. More information on the categories of abuse and types of harm can be found under ‘Appendix A’

4.4 Abuse cannot be excused for any cultural or religious reason and should always be reported.

4.5 Abuse may also include Violence Against Women and Girls which refers to crimes predominantly, but not exclusively, experienced by women and girls. A full definition is included in the VAWG guidance note.

5. Key responsibilities

5.1 Reporting and responding to safeguarding concerns

All Peabody Group colleagues have a duty to act upon and report actual, suspected or allegations of abuse in line with the Peabody Code of Conduct.

We respond to safeguarding concerns, incidents and allegations promptly in a considered and proportionate manner.

We understand and work in line with Local Safeguarding Children Board (LSCB) procedures, ensuring that safeguarding concerns are reported in line with local arrangements. For Care

Quality Commission (CQC) registered services, allegations or incidents of abuse or neglect will also be reported to the CQC.

We will notify CQC, Ofsted (Office for standards in Education) and DFE (Department for Education) when we have disclosure and reporting obligations within our commissioned services.

We do not assume that someone else will pass on information critical to keeping a child or young person safe and should share the information with relevant authorities when appropriate.

We will report any incidents of abuse that we suspect are a criminal offence to the Police. We will treat any disclosures of actual historical abuse in the same way as an allegation, disclosure or suspicion of current child abuse.

5.2 Partnership working

We work in partnership with lead agencies and relevant partners, to respond to suspicions or incidents of abuse or make safeguarding enquiries in accordance with statutory procedures. Where appropriate, Peabody colleagues will support and participate in Local Authority safeguarding investigations. Colleagues will also be supported to coordinate a lead response where appropriate.

We investigate reported incidents ensuring we do not compromise Police or Local Authority investigations.

We understand information sharing, joint working and communication are essential in keeping people safe and we work to build and maintain good professional relationships to support the safeguarding process.

Where appropriate we will provide or refer the child, or young person to additional support services.

We support colleagues to ask questions and challenge referral decisions or actions they do not agree with.

Where thresholds are not met or responses are not received, colleagues will escalate concerns in line with local safeguarding procedures.

5.3 Recording and sharing of information

We record incidents and allegations of abuse, harm or neglect, clearly, accurately and in a timely manner. We record and share information appropriately with other professionals and statutory agencies that safeguard children and young people.

Information sharing is permitted when it is necessary to protect a child, or young person from harm. This includes sharing information between relevant professionals, agencies and authorities involved in safeguarding. Peabody aim to strike the balance between respecting a child, or young person’s privacy and sharing information to ensure their safety. Where there is a

concern that a child or young person may be suffering or is at risk of abuse, neglect, or exploitation their safety must be the over-riding priority.

Where information is shared without consent, colleagues must clearly record the rationale, including the safeguarding concern and legal basis for sharing. This includes circumstances where sharing is necessary to protect a child from harm or where there is a risk of abuse or neglect.

We maintain accurate records of safeguarding activities to document actions taken to respond to actual, suspected or allegations of abuse, harm or neglect.

5.4 Children affected by domestic abuse

The Domestic Abuse Act 2021 defines domestic abuse as occurring where the victim and perpetrator are over 16 years of age. Abusive behaviour directed at a person under 16 years of age would be dealt with as child abuse rather than domestic abuse.

However, the Act defines a child as a victim of domestic abuse if:

- They see, hear, or experience the effects of domestic abuse,
- They are related to a person carrying out domestic abuse or the victim of domestic abuse.

The Act defines a child being related to a person if the:

- Person is a parent of, or has parental responsibility for, the child, or the
- Child and the person are relatives.

Domestic abuse will always be considered a safeguarding concern for children and young people where they are present in or affected by the household environment.

6. Prevent

6.1 The Government Prevent programme highlights that some children or young people may be vulnerable to radicalisation and involvement in terrorism. Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works with individuals and communities by using voluntary early intervention to encourage them to challenge extremist and terrorist ideology and behaviour.

6.2 Peabody recognises that it plays a key role in supporting children or young people connected to our homes and services who may be at risk of radicalisation. We believe that community engagement is essential, and we will work closely with local voluntary and community groups as well as Local Authorities and the Police to meet their duties under the Counter Terrorism and Security Act 2015 to prevent people from being drawn into terrorism.

7. Safeguarding Learning

7.1 Raising awareness is a key part of our approach to preventing abuse and neglect from occurring. Peabody utilise a range of approaches to raise awareness, amongst colleagues, residents and customers, with regards to safeguarding issues and action they should take if they have concerns. This includes awareness campaigns and communications through various channels, training and cascading good practice.

7.2 Robust mandatory training on safeguarding children and young people is provided to ensure colleagues are aware of indicators of abuse or neglect and how to raise and respond to safeguarding concerns. This is in place to ensure they have the skills and knowledge required to effectively safeguard children and young people at risk of harm, abuse or neglect.

7.3 Safeguarding training is mandatory for all colleagues working at Peabody. A layered approach is taken to ensure relevant and proportionate training is delivered to colleagues and managers across the organisation. This is based on the competencies required for each role.

7.4 Safeguarding is also included as part of inductions to target new colleagues as they join the organisation. The completion of mandatory safeguarding training is regularly monitored for compliance. Training is supported by Management.

7.5 Peabody is committed to learning from safeguarding incidents to continuously improve practice. Good practice, lessons learned, and safeguarding intelligence are shared across the organisation to inform improvements. We use safeguarding data and case information to identify patterns, repeat concerns, and themes such as neglect, domestic abuse, and exploitation to support earlier intervention and service improvement. A central register of concerns and multi-agency alerts is maintained and overseen by Designated Safeguarding Leads, with findings used to inform changes to systems, policies, and practice.

7.6 Regular reporting to the Board on Safeguarding activities takes place including analysis of patterns or trends leading to practice, policy and procedure review.

8. Equality, Diversity and Inclusion

8.1 Peabody recognises that, in some circumstances, children and young people who have protected characteristics may be at greater risk of abuse or neglect, or of experiencing barriers to being able to access the right support. Children and young people have the right to be protected from abuse, no matter what their background, circumstances or personal characteristics.

8.2 Our approach to safeguarding prevents discrimination and disadvantage by ensuring that a person's value, beliefs and culture are considered. This ensures no individual is discriminated against on the grounds of race, colour, nationality, ethnic origins, sex, disability, sexual orientation, gender reassignment, martial or civil partner status, pregnancy, unrelated criminal activities, illness or any other matter that may cause a person to be treated with prejudice.

8.3 We provide all residents and customers and other stakeholders with the information they require, in a format to meet their individual needs, using clear language which is easy to understand.

8.4 This policy impacts on our most vulnerable people connected to our homes and services, many who will have protected characteristics under the Equality Act 2010. Therefore, we have completed an Equality Impact Assessment to ensure that any action we take does not discriminate, is the least restrictive and enables the person as much choice and control over decisions as is possible.

9. Whistleblowing

9.1 Peabody have a robust Whistleblowing Policy in place for colleagues to use if they suspect a child or young person is being abused by a Peabody colleague, 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. There are clear lines of reporting for whistleblowing

concerns, including routes to use if colleagues feel unable to report directly to their line manager or if they are concerned that appropriate action has not been taken in relation to a concern already raised.

9.2 We will provide support and supervision for employees, creating a safe environment in which they feel able to report safeguarding issues, including where they have concerns about the behaviour of another Peabody employee in line with our Whistleblowing Policy.

9.3 Dealing with allegations against colleagues or volunteers.

If an allegation relates to the action or inaction of a Peabody colleague or volunteer, we respond in a way that is fair to the individual allegations have been made, but we prioritise the safety of the person at risk of abuse, harm or neglect. We meet our legal responsibilities as an employer, to refer any colleague or volunteer who poses a threat to adults at risk of harm or children or young people to the relevant authority.

9.4 We ensure that allegations regarding inappropriate conduct of colleagues, in or outside the workplace, are investigated thoroughly and with urgency, through the Disciplinary and Grievance policies and the policies of the Local Safeguarding Children's Board.

10. Safe Recruitment

10.1 We meet our responsibilities in the safe recruitment, selection and vetting of colleagues by using the Disclosure and Barring Service and undertake any other pre-employment screening checks as appropriate.

1. Legislation and Regulation

- Children Act 1989 and 2004
- Working Together to Safeguard Children 2023
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation Guidance
- Modern Slavery Act 2015
- Modern Slavery and Human Trafficking: National Referral Mechanism
- London Multi-Agency Adult Safeguarding Policy & Procedures
- Local Adult Safeguarding Board policies
- Data Protection Act and General Data Protection Regulation
- Domestic Abuse Act 2021
- Safeguarding Vulnerable Groups Act 2006

Approval

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Policy owner	Head of Safeguarding Centre of Excellence

Appendix A: Definitions

Child:
Anyone who has not yet reached their 18th birthday, as defined under the Children Act 1989, irrespective of circumstances and including unborn children.

Safeguarding Duty:
The local authority have a duty to promote and safeguard the welfare of children in their area. This involves identifying needs, assessing risks, providing services, forming safeguarding partnerships and generally taking appropriate actions to protect children from harm, abuse, and neglect.

Abuse and neglect:
Abuse is the intentional, or unintentional actions that cause harm, or put a child at risk of harm. Neglect involves the failure to meet a child's basic needs, affecting their health and development. This includes care, supervision, or basic needs, leading to a child's physical or emotional harm.

Physical Abuse:
Inflicting physical harm to a child including assault, hitting, slapping, pushing, hair-pulling, biting, misuse of medication (e.g over- sedation), unauthorised or unlawful restraint or inappropriate physical sanctions.

Sexual abuse:
Involvement of a child in sexual activities, exploitation, or exposure to inappropriate sexual behaviour. This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts.

Emotional (also known as Psychological) Abuse:
Any act or treatment which may diminish a child's sense of identity, dignity and self-worth. Includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, or isolation.

Domestic Abuse:
Exposure to violence or abusive behaviour within the family, affecting the child directly or indirectly. Children can witness domestic abuse in a variety of ways and this can have many negative physical and emotional effects. The Domestic Abuse Act 2021 states that children are a victim of domestic abuse if they witness, hear or have an awareness of domestic abuse happening.

Digital and Online Abuse:
Harassment, bullying, threatening or exploitation occurring through online platforms, including social media and other digital communication.

Discrimination:
Unfair treatment based on factors such as race, ethnicity, religion, gender, or disability, negatively impacting a child's self-esteem and development.

Exploitation:
Taking advantage of a child for personal gain, including forced labour, child trafficking, or involvement in criminal activities.

Contextual Safeguarding:

Other definitions

Section 47: LA's duty to investigate
The local authority duty to investigate when there is reasonable cause to suspect that a child in their area is suffering, or likely to suffer, significant harm due to abuse or neglect.

Section 17: Provision of services
The local authority duty to provide a range of services to children in need, including those at risk of abuse, or neglect. This emphasises the importance of preventing the need for intervention through support services.

Child in Need:
A child who needs additional support and intervention to ensure their health and development or to protect them from harm. Local authorities have a duty to assess and provide appropriate services for children in need, collaborating with parents and other agencies. Usually connected to a Section 17.

Child Protection:
Child protection measures are invoked when there are significant concerns about the child's safety and well-being, necessitating more robust interventions to prevent harm. Involves thorough assessment of the risks and a child protection plan is put in place to address concerns and ensure the child's safety. Usually connected to a Section 47, 31.

Think Family:
Think Family recognises and promotes the importance of a whole-family approach with services working with both adults and children to take into account family circumstances and responsibilities. Look beyond the immediate person that concerns relate to take the wider family dynamic into consideration.

County Lines:
Criminal exploitation and drug trafficking involving exploitation of vulnerable adults, children and young people who are coerced and manipulated into criminal activities involving the movement of illegal drugs.

Self-harm:
Self-harm is when a person hurts themselves intentionally. This is often a way of coping with difficult feelings or situations, painful memories or trauma. Self-harm can present in many forms including cutting, pinching, burning, hitting or punching oneself and hair pulling (not an exhaustive list). Excessive use of alcohol and/or drugs and people putting themselves into harmful situations, where they may be subjected to physical or sexual abuse, can also be considered a type of self-harm.

Suicide:
Suicide involves a person intentionally ending their own life. Suicidal feelings can range from a person having fleeting or general thoughts of ending their own life, right through thinking of or planning ways to end their own life.

Female Genital Mutilation (FGM):

This involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act 2003 makes it illegal to practice FGM in the UK, or to take girls who are British Nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in another country. UK communities at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. Those from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.