

Safeguarding Children/Young People Procedure	
Approved by Executive Leadership Team	Issue number & Version number (if any): 2
Approved date: January 2026	Review date: January 2028
	Executive Sponsor Executive Director of Care & Supported Housing
Previous Version: 1	Responsible Officer: Head of Homelessness & Mental Health

1.	Introduction
	At Hightown Housing Association, the safety and wellbeing of all Children/Young People who come into contact with our services is of paramount importance. This procedure applies across Care & Supported Housing (C&SH), General Needs (GEN) housing, and all corporate/head office functions. In C&SH schemes, safeguarding issues often arise through direct work with young people in our care. In GEN housing, concerns may arise during tenancy management, rent arrears discussions, property inspections, ASB investigations, repairs visits, or contact with neighbours and the wider community. Corporate and head office staff may also encounter safeguarding issues, for example through complaints handling, HR processes, finance or IT work, procurement and contractor management, customer services calls, or communications and marketing activity. In all cases, safeguarding is everyone's responsibility. We recognise our responsibility to protect children/young people from harm under the Children Act 2004 and The Working Together to Safeguard Children 2023 legislation, ensuring their rights are upheld, and create an environment where they can thrive and develop to their fullest potential. Please read this procedure in conjunction with the Safeguarding Children and Young People Policy. Safeguarding Children and Young People is everyone's responsibility.
2.	Aims & Objectives
	The main objective of this procedure is to provide clear guidance to all staff members on their responsibilities and the steps to be taken when safeguarding concerns arise. This ensures Children and Young People can be kept safe from abuse or neglect and that both immediate and long-term action is taken where required. It outlines the roles and responsibilities of individuals involved in safeguarding, including frontline staff, corporate/head office staff, managers, and the Designated

	Safeguarding Lead(s) (DSL). It also emphasises the importance of effective communication, information sharing, and collaboration to ensure a holistic approach to safeguarding Children and Young People across all areas of Hightown's work.
3.	Scope and Definitions <u>Scope</u> This document sets out the procedure for preventing, identifying, and responding to any concerns related to child abuse or neglect. Our procedure is guided by national legislation, including the Children Act 1989 and 2004, Working Together to Safeguard Children (2023), and staff should also refer to relevant local safeguarding arrangements. It aligns with best practice and is regularly reviewed and updated to reflect emerging risks, changes in legislation, and lessons learned from serious incidents. This procedure applies to all members of Hightown staff: Trustees, Board Members, and all individuals and organisations who have a working relationship with Hightown, including volunteers, students, trainees, contractors, temporary workers, and those working on a bank or agency contract. This includes staff working in Care & Supported Housing, staff working in General Needs housing (such as Housing Officers, Tenancy Sustainment staff, ASB Officers, Repairs and Estate Services staff), and corporate/head office staff in functions such as HR, Finance, IT, Governance, Communications, Development, Asset Management, and Customer Services. For ease of reference, all employees and workers who fall under these groups will be uniformly referred to as "staff" in this procedure. <u>Definitions</u> This procedure recognises the following definitions under the Working Together to Safeguarding Children 2023 legislation: • Child - defined in this document as anyone who has not reached their 18th birthday. Children' therefore means 'Children and Young People' throughout • Safeguarding – defined for the purposes of this document as: ○ 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. ○ Taking action to enable all children to have the best outcomes. • Child Protection - Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. • Staff - For the purposes of this policy, "staff" includes Trustees, Board Members, all employees, volunteers, students, trainees, contractors, temporary workers, bank staff, and agency workers. This includes staff working in both Care & Supported Housing and General Needs housing, such as Housing Officers, Tenancy Sustainment staff, ASB Officers, Repairs and Estate Services staff.

	• Position of Trust - People in a Position of Trust' (PoT) are defined as '<i>those who work with children, young people or vulnerable adults, whether on a paid or a voluntary basis</i>'. Therefore, all staff working for Hightown are people in a PoT and staff should be aware that a breach of their position of trust could lead to disciplinary action and, in some instances, to criminal prosecution. • Designated Safeguarding Lead (DSL) - Hightown will ensure that there is a Designated Safeguarding Lead that will act as a source of advice to all staff at Hightown on all safeguarding matters. The current Designated Safeguarding Leads are ○ Spiros Georgiou, Head of Homelessness & Mental Health ○ Francis Zvoma, Head of Regulated Services ○ Laura Duff – Head of Learning Disabilities ○ Shetal Jagatia-Patel – Head of Housing Please see Section 15 for contact details for DSL's.
4.	Concerns and Disclosures
	Concerns may be raised due to: • An active disclosure of abuse by a Child/Young Person, where they tell a member of staff that they are experiencing abuse and/or neglect. • A passive disclosure of abuse where someone has noticed signs of abuse or neglect, for example staff who notice unexplained injuries. • An allegation of abuse by a third party, for example a family/friend or neighbour who has observed abuse or neglect or have been told of it by the Child/Young Person. • A complaint or concern raised by a Child/Young Person or a third party who doesn't perceive that it is abuse or neglect. • A concern raised by staff or volunteers, others using the service, a carer, or a member of the public. • An observation of the behaviour of the Child/Young Person at risk. • An observation of the behaviour of another. • Patterns of concerns or risks that emerge through reviews, audits and complaints, regulatory inspections, or monitoring visits. • Observation, disclosure, or suspicion that a child is witnessing or living in a household where domestic abuse is taking place. Under the Domestic Abuse Act 2021, this must be treated as a safeguarding concern, as children in these circumstances are recognised as victims in their own right. • Concerns that a Child/Young Person is at risk of radicalisation or being drawn into extremist activity. In line with the Prevent Duty Guidance 2023, such concerns must be escalated to a manager or DSL without delay and may require a referral to the local authority Prevent team or the Channel programme.

- A Child/Young Person is observed in unsafe living conditions during a property inspection.
- Neighbours or tenants raise concerns about possible neglect or abuse.
- A disclosure is made during routine tenancy management contact.
- Contractors or estate staff witness concerning behaviour in a household.
- A disclosure or concern received through corporate functions, such as customer services calls, written complaints, emails, HR processes, finance or IT work, or social media and communications channels
- Information emerging during corporate reviews, audits, data analysis, or whistleblowing processes that indicates a safeguarding risk.

Please see Appendix 1 – Recognising signs of abuse.

If a disclosure is made to you, staff should:

Step	Action
1.	Stay calm and take every disclosure seriously.
2.	Listen carefully and note exactly what is being said.
3.	Avoid leading questions and do not try and investigate, only seek to clarify what has been said if necessary. Staff should allow the Child/Young Person to share information at their own pace. Staff must not ask for details of multiple incidents or attempt to explore a pattern of abuse. Any further investigation must be carried out by Children's Services or the Police.
4.	Do not promise to keep the disclosure a secret
5.	Reassure the person that they are doing the right thing, and they are not to blame for what they share.
6.	Let them know that you will need to discuss with a manager so they can help.
7.	Tell the Child/Young Person making the disclosure what you are going to do next.
8.	Ask the Child/Young Person what they would like to happen. Ask them if they need any immediate help (in an extreme situation you may have to evaluate how to protect a Child/Young Person from further abuse at that point in time).
9.	Share the information immediately with a manager. At this stage, the manager may seek advice from the Designated Safeguarding Lead.
10.	Record in full all the information on the electronic Accidents & Incidents Form selecting 'Safeguarding' as the event category. If you do not have access, a manager should undertake this task.
11.	The manager will then follow Step 4 of Section 5 - Child Protection Referral Process.

Staff should consider the person's mental capacity to make decisions and whether they are able to understand the safeguarding process as this may inform the approach to a future enquiry. Please refer to Section 10

5. Safeguarding Children Procedure & Referral Process

When a member of staff observes signs of abuse, witnesses, or hears something that raises concerns, it is essential to take immediate and appropriate action.

This includes staff receiving information from any individual who suspects or alleges neglect or abuse.

It also includes where a staff member is concerned about the welfare of a Child/Young Person.

Step	Action	Timeframe
1.	If you have concerns that a Child/Young Person is at immediate risk of serious harm, you should contact 999 and report your concerns to the Police. If possible and safe to do so, keep your eye on the Child/Young Person until statutory services arrive. . If no immediate physical danger is apparent, proceed to step 2.	Immediately
2.	Consult with a manager about any safeguarding concerns. For C&SH Schemes where staff work outside of office hours, the On-Call Manager should be notified if the matter is serious and requires an urgent/immediate response. In General Needs housing, Housing Officers can consult with a manager during working hours however consultation is not necessary to progress with next steps. The full facts and circumstances of the situation together with all available options and courses of action should be identified and discussed	Immediately
3.	C&SH staff should complete an Accident & Incident Form on the A&I log– accessible via Hightown's Intranet. The category of 'Safeguarding' should be selected on the report. If the electronic form is not available, (e.g., system is down) the report should be written down on paper/hard copy form. All other staff should make a written record of the safeguarding matter and submit to their manager. Managers are responsible for ensuring records are appropriately stored in the relevant departments 0 drive folder and kept confidential.	Immediately
4.	If there is a suspicion of abuse or clear evidence of it, a Safeguarding Referral to Children Services should be made by phone or through an approved/secure referral mechanism (e.g., email/safeguarding referral website) without delay.	

	Staff should familiarise themselves with their local authority safeguarding procedure – details on how to raise a safeguarding for geographical areas can be found in Section 15. Any member of staff may make a safeguarding referral if they believe a Child/Young Person is at risk and that delay may place them at further harm. Staff must inform their manager as soon as possible. Where available and practical, managers should have oversight of the referral submission; however, this must not delay a referral where there is an immediate or emerging risk. Gather as much information as possible to make the referral, including: • full names • date of birth • child's full address • family members • school/professional involvement e.g., social workers details • doctors' surgery address • ethnicity • child's current location • emotional/physical condition • whether the Child/Young Person's needs immediate protection • details of concerns • who else may be involved • the Child/Young Person's wishes • any other relevant information Some information may not be available at the time of making the referral. This should not cause any delay in referring, as this may place the child at risk of further harm. It is good practice to discuss concerns with the parents of the child if it is safe to do so. However, where a Child/Young Person is a 16/17-year-old living in our supported accommodation, it is not usually appropriate to contact their parents, as they may have been referred to Hightown due to a relationship breakdown). Always consult with a manager if there is doubt. The manager may also decide to consult with any relevant professional in children services.	
5.	The manager, or a person delegated by the appropriate manager, is responsible for receiving/facilitating/ implementing advice/guidance provided by the relevant Children Services Team. This includes escalating concerns to this team in a timely manner where a response has not been received. The manager and the relevant staff members involved are responsible for sharing any new information divulged that may be	

		related to the concern after a referral has been submitted. This includes when there is a change in risk and/or support needs of the individual concerned.	
	If staff have concerns about the safety or welfare of a Child/Young person and feel these concerns are not being acted on by the relevant manager, staff have a responsibility to take action. The staff member should, in this case inform a Designated Safeguarding Lead (DSL) – refer to section 15. If the threshold for statutory intervention is not met, managers (or a person delegated by the appropriate manager) and DSL's must consider and document an Early Help referral and support plan, in line with local threshold guidance. Guidance can be sought from a DSL on this at any time.		
6.	Reporting Requirements		
	The following is required in terms of reporting: • Staff should make an accurate written record of the incident as soon as possible after the disclosure/incident/concern and immediate response. • Staff are required to contact their manager as soon as possible about any safeguarding concerns/incidents. Staff who need to report concerns out of office hours (normally for serious and urgent matters) should do so by contacting the on-call duty manager. • Where uncertainty exists regarding the need for a safeguarding referral, staff should proceed with reporting to avoid the risk of harm being overlooked. • In C&SH, staff need to create an Accident and Incident Log record, categorising the incident as a 'Safeguarding'. • If previous concerns have been raised with the local authority, then direct contact with a relevant case worker may be more appropriate than a new alert. <u>Care & Support Schemes</u> • The Scheme/Service Manager (or in their absence, the operations manager) is responsible for ensuring whether other relevant persons should be notified, such as the police, youth offending service, health professionals, whether a referral is required under the 'Prevent Programme' etc. <u>Ofsted Regulated Schemes</u> For Ofsted Regulated schemes, the Registered Manager must notify Ofsted of any safeguarding incidents that are likely to be considered serious affecting the welfare of a Child/Young Person including: ○ a Child/Young Person being the victim or perpetrator of a serious assault ○ a serious illness or accident ○ a serious incident of self-harm ○ or serious concerns over a young person's missing behaviour, particularly where the young person is considered to be at grave risk due to age or		

vulnerability where they have been missing for a considerable period of time and their whereabouts is unknown

An event is serious if it has a significant and direct adverse impact on the protection, safeguarding or welfare of children and/or adults, or entails significant damage to property.

The registered manager must notify Ofsted if there is any other incident relating to a child/young person which the registered person considers having a direct adverse impact on the welfare of the child, children or adults. Ofsted would not need to be notified in the event of all incidents of injury, the registered person should use their professional judgement as to whether an incident is serious enough to need reporting.

The Ofsted Registered Manager is responsible for keeping the Nominated Individual (NI) updated on serious cases.

CQC Registered

Where Hightown delivers a service that is registered with the Care Quality Commission (CQC), the Registered Manager is responsible for ensuring that statutory notifications are submitted to CQC without delay, in line with CQC regulations and guidance.

CQC must be notified of safeguarding incidents involving Children/Young People where:

- a safeguarding concern has resulted in, or is suspected to have resulted in, abuse or neglect
- the local authority has opened a safeguarding enquiry
- a serious injury, serious incident, or significant harm has occurred or may have occurred
- there is an allegation of abuse involving staff or others providing care
- police involvement has been required

Notifications must include sufficient detail to demonstrate the actions taken to protect the Child/Young Person, the steps taken to reduce further risk, and how learning will be captured and applied.

Where an incident meets the threshold for Duty of Candour, the Registered Manager must ensure that this is applied in line with Regulation 20, including open and honest communication with the Child/Young Person and/or their representative, where appropriate.

The Registered Manager is responsible for ensuring that CQC notifications are recorded, monitored, and reviewed as part of Hightown's safeguarding governance and quality assurance arrangements, and that learning from incidents is shared appropriately across services.

Commissioning authorities

C&SH Scheme, C&SH Operations and C&SH Contract Managers are responsible for checking whether the matter is reportable under the relevant care/support contract to the appropriate commissioning authority.

See Section 15 for local authority reporting details.

7.	Reviewing Action Taken
	Staff leading on safeguarding action should: • Clarify that the Child/Young Person at risk is safe, that their views have been clearly sought and recorded and that they are aware of the action that will be taken. • Consider whether the Child/Young Person is living in a household affected by domestic abuse. In line with the Domestic Abuse Act 2021, children in this situation must be safeguarded as victims of abuse in their own right, not only as witnesses. • Check that issues of consent and mental capacity have been addressed. • In the event that a person's wishes are being overridden, check that this is appropriate, and that the Child/Young Person understands why if they have capacity to understand. • Contact the Children Services to discuss the case and receive updates. • Make sure action is taken to safeguard other people. • If a criminal offence has occurred or may occur, contact the relevant Police force if not already involved. • Record the information received and all actions and decisions. • Where it is suspected that either the victim or perpetrator may be a vulnerable Child/Young Person from a general need's property or other Hightown property (excluding C&SH properties), this information will be referred to the relevant Housing Officer / Housing Area Team Manager. They will examine, monitor, and review the case ensuring that the needs of any Child/Young Person at risk are met in relation to the case management. • Where there is professional disagreement about risk or action, staff must speak to their line manager about escalation and, if needed, a senior manager can challenge decisions with safeguarding partners in line with local protocols.
8.	Allegations Against Staff
	• If a Child/Young Person makes an allegation about abuse by a member of staff, staff should write down the statement in the same way as a disclosure. • For C&SH, the 'Confidential' button should then be selected on the A&I form so that it is visible only to management. The manager will discuss with the relevant Designated Safeguarding Lead(s) and also Employee Relations. • If the allegation is concerning the manager, the staff member should escalate the concern to higher levels of management or directly to a Designated Safeguarding Lead(s) or to the Employment Relations Team. • Staff should refer to the Confidential Reporting (Whistleblowing policy) if they are concerned that malpractice may not be appropriately addressed if raised through normal channels or may lead to reprisals against them/or victimisation. • A senior manager will ensure that the Local Authority Designated Officer (LADO) is informed of any allegation against staff as well as the relevant contract commissioning team. • Where a member of staff is accused or suspected of abuse or neglect, they could be subject to Hightown's Suspension Procedure. The allegation will be investigated under Hightown's Disciplinary Procedure and may be subject to a criminal investigation. • When a complaint or allegation has been made against a member of staff, they will be made aware of their rights under employment legislation and the internal procedures of Hightown. Staff may be suspended or undergo alternative working arrangements whilst the investigation is ongoing however this is not to be interpreted

	as an indication of guilt but rather as a precautionary measure to protect both the individual being suspended and others involved while an investigation takes place. Hightown recognises its legal duty to refer to the Disclosure and Barring Service when someone is removed from a role providing regulated activity following a safeguarding incident by being either dismissed or redeployed to a non-regulated activity, or the staff member leaves their role (resignation or retirement) to avoid a disciplinary hearing and Hightown feels they would have dismissed the person based on the information they hold.
9.	Allegations Against Other Children/Young People
	- If a Child/Young person makes an allegation about abuse by another Child/Young person, write down the statement in the same way as a disclosure. Discuss the allegation with the manager who will see other witnesses and ask for written statements. - The manager will collate the statements and will discuss with the social worker/relevant Children's Services Team. A decision on further action will be taken with the Children's Service Team. - The manager will discuss the case with the relevant Children's Services Team. The ensuing discussion will decide on the way in which the information is to be handled, how it is to be recorded and what action is to be taken. - Where there are concerns regarding the wellbeing of the alleged perpetrator, it should be recognised that the alleged perpetrator may themselves be a Child/Young person at risk. Where this is the case, a joint working approach must be considered with Children's Services on how best to support the individual.
10.	The Enquiry
	The Local Authority has a legal duty (Section 47 of the Children Act 1989) to make, or direct others to make, the necessary enquiries to decide whether action should be taken. The degree of involvement of the Local Authority will vary from case-to-case, but at a minimum must involve decision-making about how the enquiry will be carried out, oversight of the enquiry, decision-making at the conclusion of the enquiry about what actions are required, ensuring data collection is carried out, and quality assurance of the enquiry undertaken. Police investigations should be coordinated with the Local Authority who may support actions but will be police led. An enquiry may be anything from a simple conversation with the Child/Young person at risk to full investigation of an adverse incident. Staff must cooperate when asked to undertake or contribute to enquiries and may seek advice and support from Hightown's Safeguarding Lead. When a member of staff, or Hightown itself, is required to make an enquiry, the Local Authority retains overall responsibility and will take an active part in agreeing any terms of reference, and for decision-making about what actions should be taken, and by whom, as a result of the outcome. Allegations of possible or actual abuse should not be investigated by Hightown staff without an agreement with the local authority and the police where relevant. Hightown is committed to a Making Safeguarding Personal approach and will work with the local authority and other agencies involved to ensure that a Child/Young Person is involved at every step as far as they can be and wish to be. The Child/Young Person or their representative will always be asked if they wish to attend meetings and other conversations taking place.

11.	The Safeguarding Plan
	In C&SH schemes, when further action is needed because the Child/Young Person is deemed to be at continuing risk of harm, work will continue with them to develop strategies to reduce or manage the risks they are facing. A safeguarding plan or actions will be agreed and reviewed with them and timescales for future review and monitoring will also be agreed. If actions have been agreed as an outcome of an enquiry, it will be the responsibility of the relevant agencies to implement these. The plan could set out: • The steps to be taken to ensure the Child/Young Person safety in future. • The provision of any support, treatment or therapy including ongoing advocacy. • Modifications needed in the way services are provided. • Action to be taken in relation to the person or organisation that is responsible for the abuse or neglect. • How best to support the Child/Young Person in any action they take to seek justice or redress. • Ongoing risk management.
12.	Mental Capacity Act (MCA)
	The Mental Capacity Act (MCA) 2005, in force since 2007, is applicable in England and Wales, extending to Children/Young People over 16 and adults. The MCA aims to establish a legal framework promoting and safeguarding decision-making. All individuals working with or caring for Children/Young People over 16 who might lack capacity must adhere to the Act. Within the Mental Capacity Act's Code of Practice, 'Children' refers to people aged below 16. 'Young people' refers to people aged 16-17. This differs from the Children Act 1989 and the law more generally; where the term 'Child' is used to refer to people aged under 18. <u>Core Principles of the MCA</u> • Assumption of capacity: Every Young Person from age 16 has the right to make decisions if they possess the capacity to do so. Practitioners and carers should presume capacity exists unless proven otherwise. • Supportive decision-Making: Young People should be supported in their decision-making process. An assumption of incapacity should not be made until all efforts to assist them have been exhausted. • Acceptance of unwise Decisions: Young people have the right to make decisions deemed unwise by others without being immediately labelled as lacking capacity. • Best interests: Decisions and actions on behalf of a Young Person lacking capacity must be taken in their best interests. • Least restrictive option: Decisions and actions should consider whether less restrictive alternatives can achieve the same purpose while preserving the Young Person's rights and freedom. Section 3 of the Mental Capacity Act says that a Young Person (from the age of 16) is able to make their own decision if they can do all of the following four things: • Understand information given to them. • Retain that information long enough to be able to make the decision. • Weigh up the information available to make the decision; and

	• Communicate their decision. The lack of capacity to make a decision is caused by an impairment or disturbance that affects how the mind or brain works and is specific to time and decision specific. The impairment or disturbance may be temporary or permanent. A lack of capacity cannot be determined solely by a person's age or appearance, condition, or an aspect of their behaviour, which might lead others to make unjustified assumptions about the person's capacity. Someone who has Mental Capacity is able to make their own decision at the time when that decision needs to be made. <u>Indicators</u> • A Child/Young Person may lack capacity due to various conditions such as, learning disabilities, brain injuries, mental health conditions, unconsciousness, etc. • Lack of capacity arises from an impairment or disturbance in mental functioning, being decision and time specific. • Mental capacity assessment is necessary when indicators suggest inability to make decisions, and an impairment/disturbance in mind or brain is present. <u>Mental Capacity Assessment</u> • Capacity assessment is a two-stage process: determining if an impairment exists, followed by evaluating whether it affects decision-making. • Factors affecting assessment include the Child/Young Person's needs, the decision's nature, and urgency. <i>For children under 16, staff should consider Gillick competence (and Fraser guidelines in sexual-health contexts) when assessing a child's ability to understand and consent. This does not prevent information-sharing where there is a risk of significant harm.</i> Staff should refer to Hightown's Mental Capacity Policy and Procedure.
13.	Closing Cases At the point of considering a case closure, all relevant information should have been gathered and evaluated to support or discount the concern and to prevent future abuse where possible. The local authority can close the Section 47 enquiry once parties are satisfied that a safeguarding plan is in place, and it is in line with the desired outcomes of the Child/Young Person. The enquiry needs to have been thoroughly completed including identifying the category of suspected abuse. In C&SH, once the relevant manager receives confirmation that an enquiry is being closed this should be updated on Hightown's Accident and Incident Log with the relevant outcomes. Lessons learnt from the safeguarding case that are relevant to Hightown need to be considered and recorded. Where the learning has implications for other services the relevant manager needs to raise this so that it can be shared via the appropriate platforms.

14.	Appropriate Adults
	Staff should not volunteer to be an Appropriate Adult when requested by the police, as they may have not received the necessary training to fulfil this role effectively. In C&SH, staff members could accompany a Child/Young Person when required, to provide them with necessary support outside of the Appropriate Adult role. Any request to do so must be approved by a manager.
15.	Useful Contacts
	Hightown's Designated Safeguarding Leads (DSL) The designated safeguarding leads are responsible for providing support and guidance to all staff members at Hightown. Name: Francis Zvoma Position: Head of Care & Supported Housing (Registered Care) Email: francis.zvoma@hightownha.org.uk Telephone: 01442 292514 Name: Spiros Georgiou Position: Head of Care & Supported Housing (Homelessness & Mental Health) Email: spiros.georgiou@hightownha.org.uk Telephone: 01442 292349 Name: Laura Duff Position: Head of Care & Supported Housing (Learning Disabilities) Email: Laura.duff@hightownha.org.uk Telephone: 07393466773 Name: Shetal Jagatia-Patel Position: Head of Housing Email: Shetal.jagatia-patel@hightownha.org.uk Telephone: DDI: 01442 292 559 Local authority safeguarding referral routes <u>Hertfordshire Safeguarding Children Partnership</u> Safeguarding Referral – Children's Services Telephone: 0300 123 4043 Website: www.hertfordshire.gov.uk This number should be used to report safeguarding concerns about a Child or Young Person to Hertfordshire Children's Services, including the Multi-Agency Safeguarding Hub (MASH). Out-of-hours safeguarding concerns are routed via the Emergency Duty Team through the same contact number. <u>Buckinghamshire Safeguarding Children Partnership</u> Safeguarding Referral – Children's Services (First Response Team) Telephone: 01296 383962 Out of hours: 0800 999 7677 Website: www.buckssafeguarding.org.uk

	These numbers should be used to report safeguarding concerns about a Child or Young Person to Buckinghamshire Children's Services. <u>Berkshire West Safeguarding Children Partnership</u> <i>(Covering West Berkshire, Reading and Wokingham)</i> Safeguarding Referral – Children's Services West Berkshire: Telephone: 01635 503090 Wokingham: Telephone: 0118 908 8002 Out of hours (all Berkshire West areas): Telephone: 01344 351999 Website: www.berkshirewestsafeguardingchildrenpartnership.org.uk These numbers should be used to report safeguarding concerns about a Child or Young Person to the relevant Berkshire West Children's Services team. <u>Central Bedfordshire Safeguarding Children Partnership</u> Safeguarding Referral – Children's Services (Access and Referral Team) Telephone: 0300 300 8585 Website: www.safeguardingbedfordshire.org.uk This number should be used to report safeguarding concerns about a Child or Young Person to Central Bedfordshire Children's Services. <i>Safeguarding referrals must be made to the relevant local authority Children's Services team. Safeguarding Children Partnerships provide strategic oversight and do not receive individual referrals.</i> Other helpful safeguarding agencies can be found in Appendix 2.
16.	Policy/document References
	This policy should be read in conjunction with: • Safeguarding Children Policy • Safeguarding Children against Radicalisation and Violent Extremism • Mental Capacity Policy and Procedure • Deprivation of Liberty • Professional Boundaries • Positive Risk-Taking Policy • Disclosure and Barring Service • Recruitment and Selection • Learning and Development • Confidential Reporting/Whistleblowing Policy • Complaints Policy/Procedure • Equality & Diversity Policy • Health & Safety Policy • Anti-Social Behaviour Procedure • Data Protection & Privacy policy • Whistleblowing Policy/Procedure All of these are available on My Town.

17.	Communication of policy/procedure
	Managers must ensure that all staff are made aware of their role and responsibilities under this policy. The policy/procedure will be communicated to employees through local induction, team meetings, supervisions, job descriptions and Hightown's intranet. Managers will ensure all staff have access to associated procedures and reporting forms.
18.	GDPR / Data Protection / Confidentiality
	Staff have a duty to share information lawfully and proportionately when there are safeguarding concerns. The Information Commissioner's Office (ICO) <i>Information Sharing in Safeguarding – 2023</i> guidance confirms that the UK GDPR and Data Protection Act 2018 are not barriers to sharing information. Where a child or young person is at risk of significant harm, staff must share information with managers, DSLs, or statutory safeguarding partners without delay. In line with ICO 2023 guidance, staff must ensure that: • The information shared is necessary, proportionate, relevant, accurate, timely, and secure. • Concerns and disclosures are recorded clearly, including what information was shared, with whom, and for what purpose. • Decisions to share (or not share) information are documented, with reasons. All service users should be made aware that Hightown operates an information- sharing policy with external partner agencies and that concerns may be passed onto to relevant agencies, even if they do not warrant a full child safeguarding referral. Staff should refer to Hightown's Data Protection & Privacy policy.
19.	Equality and Diversity
	All Children/Young people will have the same protection, regardless of age, disability, gender, gender reassignment, race, religion or belief, sexual orientation, or identity. Hightown is committed to anti-discriminatory practice and recognises that some of our service users may have additional needs and communication barriers. An Equality Impact Assessment has been considered for the Safeguarding Children's Policy.
20.	Procedure review
	This procedure will be reviewed every two years and in accordance with relevant guidance/legislation, as well as taking into account feedback from staff and service users. Any changes to the policy will need the authorisation of the Senior Management Team. Until such authorisation is given the existing policy/procedure will continue to apply unless the existing policy/procedure contradicts any new legal requirements or responsibilities.

Appendix 1 - Recognising signs of abuse

It is essential for all staff members at Hightown Housing Association to be vigilant and proactive in identifying potential signs of abuse or neglect in children and young people. By recognising these signs early on, we can take prompt and appropriate action to safeguard their well-being.

Every child/young person is unique, and it is difficult to predict how their behaviours will change as a result of their experience of abuse.

The presence of the below signs does not necessarily confirm abuse or neglect however they should be taken seriously and serve as indicators that further investigation and action may be required.

The following categories outline the key types of abuse and their associated signs:

Physical Abuse	Emotional Abuse
• Unexplained or recurrent injuries such as bruises, burns, fractures, or welts in various stages of healing. • Inconsistent or unconvincing explanations provided for injuries. • Frequent visits to healthcare professionals for treatment but with little or no explanation of the cause. • Fearful or anxious behaviour, particularly when approached by adults. • Wearing clothing that is inappropriate for the weather to cover up potential injuries.	• Persistent emotional or psychological maltreatment, including humiliation, threats, and intimidation. • Frequent belittling, scapegoating, or rejection of the child. • Developmental delays or regressive behaviours. • Withdrawn behaviour, low self-esteem, or excessive fearfulness. • Sudden changes in behaviour, such as becoming aggressive or excessively compliant. • Unexplained or chronic somatic complaints, such as headaches or stomach aches.
Sexual Abuse	Neglect
• Disclosure or hints of sexual activity or inappropriate knowledge for the child's age. • Frequent and unexplained genital infections or sexually transmitted infections (STIs). • Difficulty walking or sitting, pain or discomfort in the genital area. • Excessive or inappropriate sexual behaviour or knowledge. • Self-harm or attempts at suicide. • Withdrawn behaviour, sudden changes in behaviour, or fear of being left alone with specific individuals.	• Consistently poor personal hygiene, unkempt appearance, or inappropriate clothing for the weather. • Failure to thrive or meet developmental milestones. • Constant hunger or stealing food. • Frequent unexplained absences from school or irregular attendance. • Inadequate supervision or being left alone for extended periods. • Living in an environment that is unclean, unsafe, or not suitable for children.

Bullying and Cyberbullying	Child sexual exploitation
• belongings getting 'lost' or damaged • physical injuries, such as unexplained bruises • being afraid to go to school, being mysteriously 'ill' each morning, or skipping school • not doing as well at school • asking for, or stealing, money (to give to whoever's bullying them) • being nervous, losing confidence, or becoming distressed and withdrawn • problems with eating or sleeping • bullying others	• Unhealthy or inappropriate sexual behaviour. • Being frightened of some people, places or situations. • Bring secretive. • Sharp changes in mood or character. • Having money or things they can't or won't explain. • Physical signs of abuse, like bruises or bleeding in their genital or anal area. • Alcohol or drug misuse. • Sexually transmitted infections. • Pregnancy.
Child Trafficking	Child criminal exploitation, county lines, gangs
• spend a lot of time doing household chores • rarely leave their house or have no time for playing • be orphaned or living apart from their family • live in low-standard accommodation • be unsure which country, city or town they're in • can't or are reluctant to share personal information or where they live • not be registered with a school or a GP practice • have no access to their parents or guardians • be seen in inappropriate places like brothels or factories • have money or things you wouldn't expect them to • have injuries from workplace accidents • give a prepared story which is similar to stories given by other children.	• being subject to threats, blackmail and violence • being exploited and forced to commit crimes • being arrested, including for crimes committed by the gang that they have not directly committed under the law of joint enterprise • not being able to leave or cut off ties with the gang • having their safety or the safety of friends and family threatened • risk of physical harm, rape and sexual abuse • risk of emotional abuse • risk of severe injury or being killed • abusing drugs, alcohol and other substances • long term impact on education and employment options.

Domestic Abuse	Female Genital Mutilation
• aggression or bullying • anti-social behaviour, like vandalism • anxiety, depression or suicidal thoughts • attention seeking • bed-wetting, nightmares or insomnia • constant or regular sickness, like colds, headaches and mouth ulcers • drug or alcohol use • eating disorders • problems in school or trouble learning • tantrums • withdrawal.	<u>Signs FGM might happen:</u> • A relative or someone known as a 'cutter' visiting from abroad. • A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'. • A female relative, like a mother, sister or aunt has undergone FGM. • A family arranges a long holiday overseas or visits a family abroad during the summer holidays. • A girl has an unexpected or long absence from school. • A girl struggles to keep up in school. • A girl runs away – or plans to run away - from home. <u>Signs FGM might have taken place:</u> Having difficulty walking, standing or sitting. • Spending longer in the bathroom or toilet. • Appearing quiet, anxious or depressed. • Acting differently after an absence from school or college. • Reluctance to go to the doctors or have routine medical examinations. • Asking for help – though they might not be explicit about the problem because they're scared or embarrassed.
Grooming	Online abuse
• being very secretive about how they're spending their time, including when online • having an older boyfriend or girlfriend • having money or new things like clothes and mobile phones that they can't or won't explain • underage drinking or drug taking • spending more or less time online or on their devices • being upset, withdrawn or distressed • sexualised behaviour, language or an understanding of sex that's not appropriate for their age • spending more time away from home or going missing for periods of time	• spend a lot more or a lot less time than usual online, texting, gaming or using social media. • seem distant, upset or angry after using the internet or texting. • be secretive about who they're talking to and what they're doing online or on their mobile phone • have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

Financial Abuse	Organisational Abuse
• Unexplained money loss • Lack of money to pay for essentials such as rent, bills and food • Inability to access or check bank accounts and bank balance • Changes or deterioration in standards of living e.g. not having items or things they would usually have • Unusual or inappropriate purchases in bank statements • Isolation and withdrawal from friends and family • Lack of things you'd expect someone to be able to afford e.g. TV, grooming items, clothing	• An unsafe, unhygienic or overcrowded environment. • A strict or inflexible routine. • Lack of privacy, dignity, and respect for people as individuals. • Withdrawing people from community or family contacts. • No choice offered with food, drink, dress or activities. • No respect or provisions for religion, belief, or cultural backgrounds.
Modern Slavery	Forced Marriage
• The person looks uneasy, unkempt, or malnourished. They may also have untreated injuries. • The person does not speak for themselves, and someone else pays for all their travel and food. • Have you noticed someone picked up and dropped off from work or another location at odd times?	• running away from home • self-harming or attempted suicide • depression, or becoming worried or withdrawn • poor performance at work, school or college or unexplained absence • a surprise engagement to a stranger you've not heard of before • a sudden holiday (some people are tricked into going abroad for a holiday or to see relatives) • no control over their own money • not returning from a visit to another country

Appendix 2 – Other helpful safeguarding agencies

NSPCC

Website: www.nspcc.org.uk

Telephone: 0808 800 5000 (Child Protection Helpline)

Available Monday to Friday 9am – 6pm and 9am – 4pm at weekends.

Provides advice to professionals and members of the public where there are concerns about a Child or Young Person.

Stop It Now! – Helping Prevent Child Sexual Abuse

Website: www.stopitnow.org.uk

Telephone: 0808 1000 900

Anonymous and confidential helpline for professionals, parents, and carers concerned about sexual abuse or harmful sexual behaviour.

National Domestic Abuse Helpline (Refuge)

Website: www.nationaldahelpline.org.uk

Telephone: 0808 2000 247 (24 hours)

Provides advice and support where children may be living in households affected by domestic abuse. Children in these circumstances are recognised as victims in their own right.

Childline

Website: www.childline.org.uk

Telephone: 0800 1111 (24 hours)

A free, confidential service for children and young people up to the age of 19. Staff may signpost children and young people to Childline where appropriate.

Contacting any of the above agencies does not replace the requirement to make a safeguarding referral to the relevant local authority Children's Services where there are concerns about abuse or neglect.