



Safeguarding Children Policy

Policy No: 10

Policy Reviewed on: 27th November 2025

Next Review Date: November 2027

Signed: Head of Housing & Property Services

*Policy to be read in conjunction with LRHS Health & Safety Policy

1. Policy Statement

This policy is relevant to Littlehampton & Rustington Housing Society Ltd Property Management Services and the staff within the Estates Team.

1.1. LRHS is committed to safeguarding children. We have a duty of care to protect children and young people from abuse or neglect.

1.2. Whilst we recognise “Working Together to Safeguard Children” doesn’t place statutory duties on housing associations, our housing colleagues and partnering contractors have a really important role in relation to safeguarding and under its guidance we will:

- Follow the child centred approach.
- Have policies in place to safeguard and protect children from harm.
- Work and cooperate with safeguarding partners in a local area.
- Provide training for colleagues to be aware of their responsibilities for safeguarding and protecting children from harm, how they should respond to child protection concerns and how to make a referral to local authority children’s social care or the police, if necessary.

2. Purpose of Policy

2.1. This Policy is to make sure we comply with all statutory and regulatory requirements and best practice; promote a culture of professional curiosity; deliver effective safeguarding practice; and the safe, timely reporting of neglect and abuse.

3. Policy objectives

3.1. The objectives of this Policy are to make sure we:

- Provide information and support in accessible ways to help colleagues and tenants understand the different types of abuse, how to stay safe and what to do to raise a concern about wellbeing or safety.
- Define the action we’ll take on suspecting, witnessing, or discovering abuse or inappropriate conduct.
- Recognise and respect cultural and ethnic diversity.
- Work in partnership with multi agency partners around safeguarding.
- Work in line with our safeguarding partners’ policies and procedures.

4. Legal / Regulatory Framework

- Children Acts 1989 and 2004
- Equality Act 2010
- Domestic Abuse Act 2021
- Data Protection Act 2018 •
UK General Data Protection Regulation (UK GDPR)
- Working Together to Safeguard Children (statutory guidance 2023)

The Domestic Abuse Act 2021, section 38 recognises that a child is a victim of domestic abuse in their own right if they see, hear, or experience the effects of domestic abuse, and are related to either victim or perpetrator of the abuse, or either the victim or perpetrator of the abuse has parental responsibility for that child.

5. Definitions

5.1. A child is anyone who has not reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or is in custody does not change their 3 status or entitlement to services or protection under the Children Act 1989.

5.2. Child safeguarding is defined by statutory guidance: “Working together to safeguard children”, in the most recent version December 2023, the guidance covers “safeguarding and promoting the welfare of children”, which is defined very broadly and includes:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment.
- Preventing impairment of children’s mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework.

5.3. What can constitute abuse and neglect can take many forms. Somebody may harm 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 a stranger – for example via the internet. They may be abused by an adult or adults, or another child or children. There are four types of abuse and often one or more types will occur at the same time. They are neglect, physical abuse, sexual abuse, and emotional abuse.

5.4. Patterns of abuse may also vary. Incidents of abuse may be one-off or multiple and affect one person or more. Colleagues and others should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of concern may be an indication of more serious problems. To see these patterns, it is important that information is recorded and appropriately shared.

5.5. Contextual safeguarding is defined as follows:

5.5.1. “As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school, from within peer groups, or more widely from within the local community. These threats can take a variety of different forms from online safety, exploitation, sexual, by criminal gangs and organised crime groups to the influences of extremism leading to radicalisation and trafficking. Assessments of children in such cases should consider whether wider environmental factors are present in a child’s life and are a threat to their safety and/or welfare. Interventions should focus on addressing these wider environmental factors, which are likely to be a threat to the safety and/or welfare of a number of different children and young people who may or may not be known to local authority children’s social care”. Working together to safeguard children.

5.6. Appendix A provides a guide as to the sort of behaviour which could give rise to a safeguarding concern. This is not an exhaustive list. The circumstances of the individual case should always be considered.

5.7. Adverse Childhood Experiences (ACEs) are potentially traumatic events that occur before a child reaches 18. ACEs can include abuse, neglect, violence, or living in a 4 household with mental health or substance abuse problems. ACEs can interfere with a person's mental health, opportunities or stability throughout his or her lifetime and increase the risk of certain health conditions or behaviours in adulthood.

6. Roles and responsibilities

6.1. While safeguarding responsibility sits with all colleagues, there are individual and team responsibilities.

6.2. All colleagues, contractors and Board members are responsible for understanding the different types of abuse and reporting concerns or suspected abuse.

6.3. The Head of Housing & Property Services is responsible for ensuring safeguarding matters are reported and safeguarding is effectively managed within their areas of responsibility.

6.4. Safeguarding Leads have a role to raise awareness of safeguarding, promote a safe reporting environment, train colleagues, monitor the implementation of policy and procedures.

7. Reporting Concerns

7.1. We will raise awareness of how to report safeguarding concerns and anyone raising a concern, should be reassured we'll listen, and take them seriously.

7.2. If any person is concerned about a child at risk living in one of our homes, they can contact us directly to inform us and for support and guidance.

7.3. Children living within our homes may self-disclose to professionals visiting or working in their homes. Tenants may raise concerns to us about a member of their household or community by speaking with our estate team, by phone, email or requesting a home visit

7.4. Any other party / person can raise safeguarding concerns by also contacting our estate team by phone, email or visiting our office.

7.5. Internally, colleagues can raise safeguarding concerns by speaking with the Head of Housing & Property Services

7.6. All safeguarding reports relating to our children living in our homes will be recorded on our property software database.

7.7. We report safeguarding concerns to the relevant local authority by initiating a referral. The local authority must investigate if they have good reason to suspect that a child who lives, or is found, in their area is suffering (or is likely to suffer) significant harm. Within one working day of a concern being reported, a social worker should decide what sort of investigation is needed. Unless there is absolutely no real cause for concern, they will decide to carry out one of two different sorts of investigations to see if the child is either: a child in need. This is known as a section 17 investigation, or a child at risk of significant harm. This is known as a section 47 investigation. These investigations must be carried out within 45 working days from when the concern was reported. Depending on the circumstances, the investigation may need to be done

more quickly. Our role is to report concerns to the local authority where, in our professional opinion, a child is at risk.

7.8. We will address any allegations of, or suspected abuse, by our employees through formal statutory investigative procedures and our own internal disciplinary procedures.

7.9. Any allegation we receive relating to a contractor or person working on our behalf may result in their immediate suspension from our contract. The suspension will remain in place pending the outcome of any investigation. We reserve the right to permanently exclude the operative or agent from our contract following the outcome of the investigation.

7.10. We will protect the anonymity of people who report concerns of abuse. If the concern relates to significant harm or a criminal act, we may need to share the details of the witness or person reporting their concerns with appropriate professionals. We will work sensitively with any person reporting concerns to support them throughout the investigation process.

8. Gaining consent

8.1. Before we refer a safeguarding case to the local authority, we will discuss with the adult with parental responsibility for the child where this will not cause further harm.

8.2. However, you do not always need consent to report a safeguarding concern, for example for sharing information where there is a risk of serious harm, or by asking for consent we would be putting the child at risk. We define 'risk' to be where a person's life is in danger and/or they're a victim of abuse of power, or abuse causing a deterioration of mental or physical health. See also section 9 on 'Information Sharing'.

9. Information sharing

9.1. We will work openly and cooperatively with partners, and when sharing information about tenants, we will comply with data protection legislation and our Data Protection and Data Sharing policies. We are permitted to share information with an appropriate agency where there are overriding and serious concerns about the risk to an individual's health or personal safety. The law also provides Registered Providers with the power to disclose information to, and request information from, relevant authorities where it will work towards reducing crime and anti-social behaviour.

9.2. We will be open and honest and respect the wishes of the person at risk in relation to what information should be shared, and with whom, where possible. Our colleagues will always respect confidentiality and not share any information given in confidence unless justified by the assessed risk to the person or required by law.

9.3. In all cases, we will ensure that the information shared is necessary for the purpose for which it is being shared, is shared only those who need it, is accurate and up to date and is shared in a timely and secure way.

9.4. Where there is any concern or doubt about whether information should be shared, the Data Protection Officer will be consulted for support and advice.

9.5. In all cases, decisions about sharing or not sharing information and the reasons for the decision will be recorded within the safeguarding case file, alongside details of what has been shared, with whom and for what purpose.

11. Safe recruitment and training

11.1. Our DBS Policy sets out the requirements of Disclosure & Barring Service (DBS) checks within LRHS. It outlines the process should any convictions/cautions or relevant information be disclosed either prior to the recruitment process or during a colleagues' employment. We ensure DBS checks are carried out responsibly ensuring they are proportionate and relevant to the role.

11.2. We are committed to colleague training and reflective practice. All colleagues, volunteers, and Board members are required to complete mandatory safeguarding e-learning training as part of their induction. This will be repeated at intervals appropriate for their role.

11.3. We provide further opportunities for training on safeguarding and vulnerable tenants. Tenant facing colleagues are expected to attend these mandatory training sessions as appropriate to their role.

11.4. We recognise the emotional impact on colleagues working with vulnerabilities and having to recognise and deal with safeguarding concerns. Colleagues have access to support services provided through our Bupa Employee Assistance Programme (EAP).

12. Contractors and people working on our behalf

12.1. Contractors and service providers for frontline services on our behalf need to make sure their colleagues are suitable to provide front line services (i.e. compliance with DBS regulations). They must comply with our contractual requirements and be aware of who to contact with any safeguarding concerns.

12.2. Contractors must notify us of any safeguarding concerns and fully co-operate with any investigations into received allegations.

13. Statutory Reviews and Inquests

13.1. Where LRHS may be identified as an interested party in any child safeguarding practice reviews, domestic homicide review or coroner inquest, we will appoint a lead to comply accordingly.

13.2. We will notify our CEO and record within our safeguarding risk reports Housing Committee.

13.3. Lesson learnt exercises will be conducted internally to review and consider any changes to current practice.

14. Escalating concerns

14.1. We will consider contacting the Team Manager for the respective local authorities where we have concerns about the response to a referral we may make.

14.2. Incidents of significant abuse or harm that could lead to reputational, regulatory, or financial risk will be shared with the CEO and/or Board as deemed appropriate.

15. Key controls and reporting

15.1. All reports going to Board will be anonymised to hide the identities of those involved.

16. Equality and Diversity

16.1. Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

16.2. LRHS recognise that different people and communities may have specific needs which may require flexible approaches. We also appreciate that some groups or individuals may experience discrimination and disadvantage. This may be due to their protected characteristics under the Equality Act 2010. 17.3. All children have an equal right to be safeguarded from harm and abuse regardless of their characteristics. An Equality Impact Assessment has been carried out on this policy and shows no negative impact for any group.

Appendix A: Types of Abuse (not an exhausted list)

Guidance from Working Together to Safeguard Children" specifically refers to and defines:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

These should not be seen as the only forms of child abuse. For example, the guidance also refers to:

- Child criminal exploitation and county lines
- Extremism
- Financial exploitation
- "The impact on children of all forms of domestic abuse – including where they hear, see or witness its effects.

" Some children are identified as being more at risk than others. This is due to either characteristics or circumstances that make them more vulnerable and include:

- Children Leaving care.
- Homeless children
- Children living in families where there is substance misuse, domestic violence and/or chronic parental mental ill health.
- Disabled children
- Children affected by gang activity.
- Children suffering complex (organised or multiple) abuse.
- Children experiencing female genital mutilation. • Children experiencing forced marriage or 'honour-based' violence.
- Children suffering abuse linked to belief in spirit possession.
- Child victims of trafficking
- Children who are subjected to child sexual exploitation/and or criminal exploitation such as county lines.

Definitions from "Working Together to Safeguard Children" glossary of terms:

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional

or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Child criminal exploitation - As set out in the Serious Violence Strategy, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Child sexual exploitation - Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Controlling or coercive behaviour - Also known as coercive control, controlling or coercive behaviour is a form of domestic abuse. In 2015, the offence of controlling or coercive behaviour was introduced under Section 76 of the Serious Crime Act as a criminal offence. Controlling or coercive behaviour is included in the definition of domestic abuse in section 1(3)(c) of the Domestic Abuse Act 2021. Controlling or coercive behaviour is a pattern of abuse (on two or more occasions) that involves multiple behaviours and tactics used by a perpetrator to (but not limited to) hurt, humiliate, intimidate, exploit, isolate, and dominate the victim. It is an intentional pattern of behaviour used to exert power, control, or coercion over another person. Controlling or coercive behaviour is often committed in conjunction with other forms of abuse and is often part of a wider pattern of abuse, including violent, sexual, or economic abuse.

Children can be used to control or coerce the victim, for example, by frustrating child contact and/or child arrangements, telling the children to call the victim derogatory names or to hit the victim, or by threatening to abduct the children.

County lines - As set out in the Serious Violence Strategy²³⁴ published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons. This activity can happen locally as well as across the UK; no specified distance of travel is required.

Domestic abuse - The Domestic Abuse Act 2021²³⁶ introduced the first ever statutory definition of domestic abuse (section 1 of the Act). The statutory definition is clear that domestic abuse may be a single incident or a course of conduct which can encompass a wide range of abusive behaviours, including a) physical or sexual abuse; b) violent or threatening behaviour; c) controlling or coercive behaviour; d) economic abuse; and e) psychological, emotional, or other abuse. Under the statutory definition, both the person who is carrying out the behaviour and the

person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the Domestic Abuse Act 2021). The definition ensures that different types of relationships are captured, including ex-partners and family members. All children can experience and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members, including where those being abusive do not live with the child. Experiencing domestic abuse can have a significant impact on children. Section 3 of the Domestic Abuse Act 2021 recognises the impact of domestic abuse on children (0 to 18), as victims in their own right, if they see, hear or experience the effects of abuse. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Emotional abuse - The persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. Extremism –

Extremism is defined in the Prevent strategy as the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces.

Financial exploitation - Financial exploitation can take many forms. In this context, we use the term to describe exploitation which takes place for the purpose of money laundering. This is when criminals target children and adults and take advantage of an imbalance of power to coerce, control, manipulate or deceive them into facilitating the movement of illicit funds. This can include physical cash and/or payments through financial products, such as bank and cryptocurrency accounts.

Maltreatment - All forms of physical and/or emotional ill-treatment, sexual abuse, neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Neglect - The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical abuse - A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual abuse - Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.