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| **Version Control** | | |
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| V3 | Ella  Mansfield | 06.12.2021 Updated format |
| V4 | Ella  Mansfield | 13.12.2021 Justified all text |
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**1**

| We have in place a safeguarding lead Chief Officer Mary Clarke and a deputy safeguarding lead Head of Business Support Danny Atwere. The lead is the person responsible for reporting concerns of abuse and neglect to the relevant authority. In their absence the deputy safeguarding lead will take this action.  In addition a member of our trustee board, Chair Susan Hills is assigned the responsibility of overseeing safeguarding for our organisation including reporting serious concerns to the Charity Commission and making decisions on safeguarding |
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| concerns about our staff and volunteers or children and adults at risk in their care.  The following Safeguarding Procedures are appended to this policy:: ●Appendix 1: If You Identify a Safeguarding Concern About Someone ● Appendix 2: Safeguarding Concern Form  ● Appendix 3: Safeguarding Behaviours for Working with Children |
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**How should the policy be used?**

This policy must be followed by all staff and volunteers, including senior managers and trustees. It also applies to anyone working on behalf of our organisation.

This policy focuses on safeguarding concerns that stem from interactions with clients and other people who access our service; however the legal duties and principles outlined in this document apply to people who are children that aren’t our clients. For example the child of a client, anyone who is under the age of 18 who is volunteering, beneficiaries or other connections who meet our definition of children in relation to this safeguarding policy.

No one should ignore allegations or suspicions of abuse or neglect.

**Why do we have a policy?**

We have a policy to:

● protect children and young people who access our services. This **2**

includes children in contact with adults who use our services

● detail what we will do to keep children safe and how we will deal with any concerns we have regarding a child's safety

● provide staff and volunteers with the overarching principles that guide our approach to children’s safeguarding and child protection

It’s important we have a policy because in the course of our day-to-day work, staff and volunteers may come into contact with children. In some instances this will be incidental contact, for example when an adult client brings their child along to an appointment.

There may also be situations when staff and volunteers provide advice or services to clients who are children.

We aim to keep children safe and prevent them from harm. We are committed to:

● having sound recruitment practices

● ensuring all staff and volunteers have an understanding and awareness of children’s safeguarding

● ensuring all staff and volunteers know how to raise safeguarding concerns and feel confident doing so

**Our legal and membership duties**

It is a requirement of Citizens Advice membership that we act within the relevant laws and regulations to safeguard people who come into contact with our service from harm and abuse.

Protecting people and safeguarding responsibilities are a governance priority for our organisation. It is a fundamental part of how we operate as a charity for the public benefit. Safeguarding is the responsibility of everyone at our organisation.

The Children Act 2004 places a statutory duty on agencies to co-operate to safeguard and promote the welfare of children.

It is unusual that we come into contact with children in the day to day delivery of our service, but when we do or if we choose to provide a service that is targeted at children, we follow the NSPCC Safeguarding and Child Protection Standards.

Government guidance ‘Working together to safeguard children states that ‘*Everyone who works with children - including teachers, GPs, nurses, midwives, health visitors, early years professionals, youth workers, police, Accident and Emergency staff, paediatricians, voluntary and community workers and social workers - has a responsibility for keeping them safe*’.

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We will take these duties into account in our work with children who come into contact with our service and support local authorities to fulfil their statutory duties where possible.

This includes:

● protecting children from abuse and maltreatment

● preventing harm to children’s health or development

● ensuring children grow up with the provision of safe and effective care

● take action to enable all children and young people to have the best outcomes

Who is protected by this policy?

Safeguarding and child protection applies to all children and young people under the age of 18. This includes our clients and children in contact with our clients.

We recognise that:

● the welfare of the child is paramount as enshrined in the Children Act 2004

● all children regardless of age, race, disability, gender reassignment, marriage/civil partnership status, pregnancy, maternity, religion or belief, sex and sexual orientation have a right to equal protection from all types of harm and abuse

● some children are especially vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues

**What do we mean by safeguarding?**

‘Safeguarding’ typically relates to children (defined as individuals under 18) and adults at risk (also known as vulnerable adults), for which specific legislation and regulatory requirements apply. However our regulator, the Charity Commission has adopted a broader definition of safeguarding.

In its guidance it describes safeguarding as ‘*the range of measures in place to protect people in a charity, or those it comes into contact with, from abuse and maltreatment of any kind*’. This is therefore our definition.

**What is child abuse?**

We follow guidance on child safeguarding and child protection set out by the NSPCC, who are a leading child safety charity. The NSPCC has extensive information on child abuse, the different types of abuse and signs and symptoms of child abuse.

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The indicators provided below are not an exhaustive list of signs and symptoms of a child suffering abuse and neglect, but are a summary of the main types of child abuse. Further information on signs and symptoms of abuse can be found on the NSPCC website.

| Type of Abuse Detail of abuse |
| --- |
| Neglect Neglect is the ongoing failure to meet a child's basic needs and the most  common form of child abuse. A child  might be left hungry or dirty, or without  proper clothing, shelter, supervision or  health care. |

**Domestic abuse**

● Can apply to different types of abuse that occur either in a relationship or between family members

● Can also occur in teenage relationships

● If children witness domestic abuse this is considered child abuse

Emotional/Psychological abuse Involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child.

| Sexual abuse When a child is sexually abused, they're forced or tricked into sexual activities.  They might not understand that what's  happening is abuse or that it's wrong.  And they might be afraid to tell  someone. Sexual abuse can happen  anywhere – and it can happen in person  or online. |
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Child sexual exploitation ● a type of sexual abuse. When a child or young person is exploited

they're given

things, like gifts, drugs, money, status

and affection, in exchange for

performing sexual activities.

| Online abuse  ● Online abuse is any type of abuse  that happens on the internet. It  can happen  across any device that's connected  to the web, like computers, tablets  and mobile  phones. And it can happen anywhere  online, including social media, text  messages and messaging apps, emails,  Physical abuse  online chats, online gaming and  Female genital mutilation  live-streaming sites.  ● Where a child is hurt or injured deliberately  (FGM) Bullying and  ● The ritual removal of some or all of  the female genitalia for  cyberbullying  non-medical reasons  Belongings getting 'lost' or damaged,  physical injuries, being afraid to go to school,  not doing as well at school, asking for, or  stealing, money being nervous, low  confidence, distressed and  withdrawn, problems with eating or  sleeping and bullying others. |
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| Child trafficking Where children are tricked, forced or persuaded to leave their homes and are  moved or transported and then exploited,  forced to work or sold. |
| Organisational abuse ● Can occur in various settings such as a hospital or care home  ● This type of abuse can be one-off  incidents as well as ongoing patterns of  abuse |
| Grooming ● Can occur online and through social media as well as in real life  ● Abusers can be strangers or  someone known to the child  ● The abuser works to gain the child's  trust so that they can abuse or exploit  them sexually |
| **Modern slavery**:  These could include the following:  This type of abuse |

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| encompasses slavery,  ● signs of physical or emotional abuse  ● appearing to be malnourished,  human trafficking, forced  labour and domestic  unkempt or withdrawn  servitude  ● isolation from the community,  seeming under the control or  influence of others  ● living in dirty, cramped or  overcrowded accommodation  and/or living and working at the  same address  ● lack of personal effects or  identification documents  ● always wearing the same clothes  ● avoidance of eye contact, appearing  frightened or hesitant to talk to strangers |
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The NSPCC and World Health Organisation identifies several situations of increased risk of harm:

● if a child has a disability or issues around physical or mental health

● being raised by a single parent or by very young parents without the support of an extended family

● household overcrowding

● a lack of income to meet the family’s needs

● the presence of other violent relationships in the home

**Radicalisation and safeguarding**

If we are concerned about a child becoming radicalised, we follow the stages in our safeguarding procedure.

We also take guidance from the government counter terrorism ‘Prevent Strategy’. One of the aims of which is supporting ‘vulnerable people’ to prevent them being drawn into terrorism.

Our staff and volunteers will be mindful of radicalisation and report any concerns using our safeguarding adult and children policies.

**Confidentiality and safeguarding**

Confidentiality is one of the founding principles of Citizens Advice. It is important that our clients can trust us and know that the information they disclose is treated in confidence.

If a person aged under 18 is our client then the details of the advice given **7**

to them should remain confidential, even if their parent asks.

However, if we have suspicions or information has been disclosed in relation to abuse, we have a responsibility to take action. Our principles do not override the need to protect children from abuse.

Where a member of staff or volunteer has a suspicion that a child is being abused or has information disclosed to them alleging abuse, they should follow the steps in the safeguarding procedure.

In accordance with the principle of empowerment, the decision on whether to report a safeguarding concern should normally be discussed with the person the concern is about; however getting permission from a child in order to report a safeguarding concern may not always be possible or appropriate.

It is not necessary to discuss a safeguarding concern with a child before breaching confidentiality and reporting to a local authority if doing so is in the child’s best interests. However in situations where a child has ability/capacity to make decisions for themselves we will aim to discuss the concern with them. We will also make it clear to them during this discussion that even if permission to report the concern is not given, we may still need to report it under our statutory obligations as a charity.

There will be situations when confidentiality between ourselves and a client needs to be breached without their permission. This includes situations where the child we’re concerned about is in serious and immediate danger and there’s no time to get permission, it’s not possible to get permission or the child is not able to give permission (for example when the abuser is always present). Also we would not try to get permission if there’s a chance it would put the child we’re concerned about in more danger.

In these situations the wellbeing of the child takes precedence over our principle of confidentiality. Our safeguarding procedure details the process for breaching confidentiality and raising a safeguarding concern.

**Screening of staff and volunteers**

We ensure that all staff and volunteers who work in roles which are legally entitled to get a Disclosure and Barring Service (DBS) check are screened, we will also ask for appropriate references as part of our screening process and reserve the right to await the results of DBS checks and references before allowing an person to start in that role. If a role is not entitled to a standard or enhanced check, our chief officer may choose to ask some staff or volunteers to undergo a basic check.

If a DBS check reveals an unspent conviction for a sexual offence against a child or vulnerable adult, the individual is not suitable for that role and will not be taken on. Any other convictions will be considered on an individual basis. We are legally required to report any incidents where a member of staff or a

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volunteer is disciplined or dismissed for inappropriate behaviour with or against a child to the Charity Commission and DBS.

Further information can be found in our DBS and ex-offenders policies.

**Supervision, training and safeguarding**

Thorough induction training will be provided to ensure that staff and volunteers are aware of good safeguarding practice alongside the service’s core values and confidentiality.

Staff and volunteers will be given regular supervision and have their training needs assessed.

Regular case checking will take place and any unusual or excessive contact with a child will be investigated.

Appropriate safeguarding training is available to all staff and volunteers. This may be in the form of:

● policy awareness sessions delivered internally

● briefing sessions by a local authority or other relevant authority ● attendance at training arranged through partner agencies

If a staff member or volunteer is removed from their role

If a staff member or volunteer is moved or dismissed from their role because of safeguarding concerns arising from their actions or inactions we have a responsibility as a regulated activity provider to inform the Disclosure and Barring Service. We will follow the guidance set out by the Disclosure and Barring Service in these situations.

**Developing new services**

Any new services in development will take account of the need to safeguard children. This may be achieved by:

● risk assessment of proposed activities

● agreeing safeguarding measures with partner organisations including information sharing protocol

● seeking specialist advice, for example from the local safeguarding children board

**Working with local statutory agencies**

Safeguarding Boards may carry out reviews or investigations and may require us to supply information. The boards are made up of representatives from

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local authorities and other statutory bodies and partner agencies.

We will supply information requested by a safeguarding board under the following circumstances:

● the information must be requested for the purpose of enabling the board to perform its functions

● the person or body requested to supply the information must have functions or engage in activities such that the board considers it likely to have information relevant to a function of the board

In general, there is no bar to us taking part in a safeguarding review, a criminal investigation or a Serious Case Review if required to. This is in the context of our policy on client confidentiality, and the confidentiality process will be used.

**Working with local authority commissioners**

Commissioners at local authority level sometimes want to see their own safeguarding protocols reflected in the local Citizens Advice policy. Some key actions we will consider taking are:

● before commissioning, ensuring that we are aware of the local authority designated safeguarding lead and the functions of their team, and the local Safeguarding Adults Board (England) or area-based Safeguarding Board (Wales)

● where possible before commissioning, participating in local authority safeguarding training or briefings before commissioning or early in commissioning, reviewing local authority safeguarding protocols to make sure our policy reflects local arrangements

● if local authority policies appear to be in conflict with Citizens Advice policies or principles, contacting our Relationship Manager to discuss ways forward

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**Appendix 1: Safeguarding Procedure: If you identify a safeguarding concern about someone**

If you have a safeguarding concern about the safety or wellbeing of a client or someone else associated with them, you should tell your safeguarding lead or deputy lead.

A safeguarding issue might be the result of:

● a direct allegation of abuse made by a child or an adult

● an allegation by a third party

● a staff member or volunteer seeing or hearing something that prompts a concern

You should consider reporting a safeguarding concern if it’s about the safety or wellbeing of an adult at risk. An adult at risk is someone who's all of the following:

● has care and support needs

● experiencing, or is at risk of, abuse or neglect

● unable to protect themselves because of their care and support needs Please use the CENCA Adult Safeguarding Policy if you believe an adult is at risk.

You can also find out more about safeguarding children on the NSPCC website.

You can check your local adult and child safeguarding policies for more information about what situations might be a safeguarding concern.

When you first identify or find out about a concern, you can take notes to help when you report the concern.

If you haven’t had any safeguarding training, speak to your safeguarding lead about what training is available.

**If there’s a serious or immediate risk to someone’s safety**

You need to follow the immediate risk process.

**Confidentiality considerations shouldn't stop you taking immediate action when it's needed.**

**If you think anyone is in serious and immediate risk, call 999 immediately.**

For example, it would be a serious risk if a client on the phone says they’re going to harm themselves or someone is becoming violent in the waiting room. Once the immediate risk is reduced, you should still consider if there’s a safeguarding

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concern that needs to be dealt with.

If you don’t have the client’s location, you should tell the client to call the emergency services themselves. For example, someone on web chat has told you anonymously about an immediate risk scenario.

If you need to call the police, tell everyone in the local office so they have the opportunity to leave before the police arrive.

**Reporting a concern**

If your concern wasn’t an immediate risk, or you still have a safeguarding concern after the emergency, you should:

1. Try to get permission from the person you’re concerned about to get them help

2. Complete the safeguarding concerns form

3. Contact the safeguarding lead in your local office

**1. Try to get permission from the client**

If the safeguarding concern is about an adult client, you should try and get permission from them before you take any action, unless it could put them at more risk. Consider what the client wants to happen.

If you have a safeguarding concern about a child, it might not be appropriate to ask for permission from the child or their parent, guardian or carer. Consider the child’s safety when you’re deciding whether to ask for permission. When you ask for permission to help the client, you should try and get their name and address to be able to report the concern correctly.

If the client doesn’t provide a name and address you might not be able to take action. If they continue to get advice and give personal information that could identify them, tell them you might still report the concern even if they don't want you to. This is because of your safeguarding responsibilities.

If you can’t get any permission from the person you’re concerned about, or it’s not appropriate to ask for it, you should still speak to the safeguarding lead or deputy lead. They might still report the concern to the local authority.

**2. Complete the safeguarding concerns form**

Make a copy of the safeguarding concerns form to record the information. In the template, go to File > Make a copy to create a version you can use for your local office.

If you haven’t been able to fill in the form, you can use your written notes to explain the situation to the safeguarding lead or deputy lead.

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If you use notes to explain the situation, you should complete a form after to keep in your records.

**3. Contact the safeguarding lead or deputy safeguarding lead**

Tell the safeguarding lead or deputy all of the information you have. You should speak to them in person or by phone as soon as it’s appropriate and you have the information you need.

They will make a decision whether to report the safeguarding concern to the relevant authority.

**If you make notes about a concern**

When you become aware of a safeguarding concern, you should make notes about what you’re told by the client at the time, or as soon as possible afterwards. These are called ‘contemporaneous notes’.

For example, if a client says something during an appointment that feels like it could be a safeguarding concern, you should try to write down:

● what they said

● what you’re concerned about

● any key phrases or quotes you think could help justify why you’re concerned

● the date and time of the event or conversation

You shouldn’t act as an investigator. Only record the information the client tells you and don’t ask leading questions.

You must take notes on paper - they can’t be digital. Making notes will help you report the concern and can also be used as evidence if the case goes to court.

Store the notes with the safeguarding concerns form.

If the safeguarding concern isn’t about the client and there’s no case record, you should store the safeguarding concerns form in a secure place in the office. For example, if the concern is about a child in the care of a client.

**If you have a concern about a colleague or a child or adult at risk in their care**

If the individual is a employee, contact your relationship manager for advice.

If the individual is a volunteer, email the volunteering team for advice at volunteeringteam@citizensadvice.org.uk.

**If you need emotional support**

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Dealing with safeguarding concerns can be distressing and when you’re making decisions on what actions to take about an adult at risk or child, it’s natural for these to play on your mind.

At Citizens Advice we care about our clients and want to help them, so witnessing situations where they’re at risk of harm may not be something that’s easy to process.

If you need support after dealing with a safeguarding concern, you should speak to your line manager.

It’s important to make sure that everyone involved has the support they need to talk about what’s happened and how they feel, in their own time.

It can also be difficult to not hear back from the local authority after raising a concern. It may help to follow up to find out what’s been done, but in some situations be aware you may not get to know what’s happened.

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**Appendix 2 Safeguarding Procedure:**

**Central and East Northamptonshire Citizens Advice Safeguarding Concern form**

| **Completed by: Date completed:** | |
| --- | --- |
| **Channel:** | |
| Face to face ❒ | Email ❒ Web chat ❒ Phone ❒ |
| Other ❒ : \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | |
| **Individual at risk is:** | |
| ❒ Adult at risk ❒ Child | |

Relationship to client:

| **Client name:** |
| --- |
| (If concern not about client) name of individual you have concerns about: |

DOB:

First language:

**Contact details:** Additional needs or disabilities:

| Parent/Carer  name/Social  worker/Advocate/  Representative name: | Contact details: Additional needs or disabilities: |
| --- | --- |

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| First language: |  |
| --- | --- |

| **Date/time and location of the**  **disclosure/observation:** |
| --- |
| **Who raised the concern?** |
| **What are the concerns**  **specifically? What was seen?**  **What was heard?**  Please list the facts. |

|  |
| --- |
| **Types of abuse (tick all that apply):**  Sexual abuse ❒  Unwanted sexual act or activity, including rape, sexual assault,sexual harassment, sexual exploitation. |

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| Physical abuse ❒  Physical abuse is any intentional act causing injury or trauma to  another person by way of bodily contact.  Psychological / emotional abuse ❒  A person subjecting or exposing another person to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.  Self neglect ❒  When a person is unwilling or unable to do necessary self-care.For example, not eating enough food to the point of malnourishment, wearing clothes that are filthy, torn, or not suited for the weather, living in filthy, unsanitary, or hazardous conditions, not getting needed medical care. |
| --- |
| Financial / material abuse ❒  Theft, fraud, internet scamming, coercion in relation to a person’s financial affairs or arrangements, in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. |
| Discriminatory abuse ❒  Abuse motivated by discrimination and oppressive attitudes towards people on the grounds of disability, gender and gender identity and reassignment, age, race, religion or belief, sexual orientation, and political beliefs. |
| Domestic violence ❒  Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. Includes, female genital mutilation (FGM), honour based violence and forced marriage. |
| Neglect and acts of omission ❒  Includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, and the withholding of the necessities of life. such as medication, adequate nutrition and heating. |

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| Organisational abuse ❒  Mainstream of a person brought about by poor or inadequate care or support, or systematic poor practice that affects the whole care setting. When a person’s wishes and needs are sacrificed for the smooth running of a group, service or organisation. |
| --- |
| Modern slavery ❒  Recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of  exploitation. |
| **Was it appropriate to ask permission to report safeguarding concern?**  ❒ Yes, but permission was not given  ❒ Yes permission given  ❒ No due to the safety of the individual at risk  ❒ No because it’s not possible to ask |
| Safeguarding lead - If permission is not given, why should concern be reported? Safeguarding lead - **Action taken and outcome (if known):** |
| Other notes: |

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**Appendix 3: Safeguarding Behaviours for Working with Children**

Staff and volunteers at Central and East Northamptonshire Citizens Advice will demonstrate their understanding and awareness of safeguarding by exhibiting the following behaviours and standards:

This awareness of safeguarding and child protection will be demonstrated through the following behaviour and actions:

● Staff will not look after children out of the sight of a parent or carer who is seeking advice.

● Staff will be aware that a person under the age of 18 is legally a child, even if they look and express themselves like an adult.

● Where possible, activities that involve a child working with an adult will take place in a room which can be easily observed by others. This needs to be balanced with client confidentiality.

● An adviser will always make their Advice Session Supervisor aware when a child is being interviewed alone.

● An adviser will never visit a child in their home unaccompanied. The adviser will ensure that a parent or guardian is present.

● Staff and volunteers will never transport a child in their car unless prior arrangements have been made or in exceptional circumstances such as a medical emergency, where this is appropriate.

● Central and East Northamptonshire Citizens Advice will employ sound recruitment practices which aim to prevent anyone considered to be a risk to children from working within the service.

● Staff and volunteers will comply with the requirements of Citizens Advice DBS policy, and the appropriate level of DBS check will be completed for staff and volunteers where it is required.

● Staff and volunteers will take care not to make any comments which may be interpreted as sexual in nature, to a child.

● A child will never be allowed into a staff member’s home.

● Staff and volunteers will not engage in any physical games with a child – apart from structured sports activities which may be part of a community event etc.

● Staff and volunteers will not engage in sexually provocative games. ● Staff and volunteers will not allow children to use inappropriate language unchallenged.

● If a child is distressed, comfort will be offered with words rather than by touching them.

● The content of conversations will be professional and pertinent to the advice giving process.

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● Staff and volunteers will not let allegations that a child makes go unchallenged or unrecorded.

● Staff and volunteers will not do things of a personal nature for children that they can do themselves.

● Staff and volunteers will not take photographs of children. **20**