



## Safeguarding Children Policy and Procedure

### 1.0 Introduction

1.1 Pivotal is not a statutory partner. However, it recognises its legal obligations and takes child safeguarding seriously. As a Registered Provider it will, as required by law and regulation and in alignment with its mission, vision and values, adopt clear safeguarding policies and procedures and work with local agencies to ensure the safeguarding of children at all times in all aspects of its operations and practices and in collaboration with:

- Bournemouth, Dorset, Christchurch and Poole pan-Dorset Multi-agency Safeguarding Children Service.
- Cornwall and Isles of Scilly Safeguarding Children Partnership.
- Gloucestershire Multi-Agency Safeguard Children Team.

### 2.0 Scope

2.1 This policy is specific to the safeguarding of children. Pivotal Safeguarding Vulnerable Adults policy addresses the safeguarding of adults.

2.2 This policy applies to Pivotal Board members, all Pivotal employees, bank workers, contractors, volunteers and all those managing or providing services for or on behalf of Pivotal.

### 3.0 Definition of Terms

*A child* For the purposes of this policy a child is anyone under the age of 18 years and includes unborn children. All children are at risk due to their inherent vulnerability and dependency on others.

*Abuse or neglect* This can take many forms. The Working Together to Safeguard Children Guidance (updates 2020) definition of abuse is “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”. Children may be abused by an adult or adults, or another child or children.

*Safeguarding* A safeguarding concern constitutes any circumstance where a child is suspected of being involved in abuse or neglect and may include, but is not limited to, physical, emotional, psychological or domestic abuse, or acts of omission, sexual exploitation, female genital mutilation, bullying/cyberbullying, domestic abuse, trafficking, grooming and harmful sexual behaviour.

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Agreed by	Senior Leadership Team
Version	2.0
Issue date	June 2021
Review date	June 2022

## Types and indicators of abuse:

Category	Type of abuse
<b>Physical</b>	Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable (e.g. opening a window and removing blankets), involuntary isolation or confinement, misuse of medication (e.g. over-sedation), forcible feeding or withholding food, unauthorised restraint, restricting movement (e.g. tying someone to a chair), domestic violence or abuse.
<b>Sexual</b>	Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing of sexual acts, indecent exposure.
<b>Psychological or emotional</b>	Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying
<b>Financial or material</b>	Theft of money or possessions, fraud, scamming, preventing a person from accessing their own money, benefits or assets, employees taking a loan from a person using the service, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care home. Misuse of benefits or direct payments in a family home, someone moving into a person's home and living rent free without agreement or under duress, false representation, using another person's bank account, cards or documents, exploitation of a person's money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy, appointee-ship or other legal authority, rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.
<b>Domestic</b>	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.
<b>Modern slavery</b>	Human trafficking, forced labour, domestic servitude, sexual exploitation e.g. escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to.
<b>Discriminatory</b>	Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010), verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic, denying access to communication aids, not allowing access to an interpreter, signer or lip-

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	reader, harassment or deliberate exclusion on the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic, substandard service provision relating to a protected characteristic.
<b>Neglect or acts of omission</b>	Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure to administer medication as prescribed, refusal of access to visitors, not taking account of individuals' cultural, religious or ethnic needs, not taking account of educational, social and recreational needs, ignoring or isolating the person, preventing the person from making their own decisions, preventing access to glasses, hearing aids, dentures etc., failure to ensure privacy and dignity.
<b>Self-neglect</b>	Lack of self-care to an extent that it threatens personal health and safety, neglecting to care for one's personal hygiene, health or surroundings, inability to avoid self-harm, failure to seek help or access services to meet health and social care needs, inability or unwillingness to manage one's personal affairs.
<b>Organisational or institutional</b>	Discouraging visits or the involvement of relatives or friends, run-down or overcrowded establishment, authoritarian management or rigid regimes, lack of leadership and supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or assistance with eating, not offering choice or promoting independence, misuse of medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence or communication, failure to respond to complaints.

#### 4.0 Legislation and Regulation

4.1 The Children Act 2004 created Local Safeguarding Children Boards and places duties on a range of statutory organisations. Local authorities and their partner organisations and agencies, have specific duties to safeguard and promote the welfare of all children in their area.

4.2 The Children Acts of 1989 and 2004 set out specific duties. Section 17 of the Children Act 1989 puts a duty on the local authority to provide services to children in need in their area, regardless of where they are found. Section 47 of the same Act requires local authorities to undertake enquiries if they believe a child has suffered or is likely to suffer significant harm.

4.3 The Director of Children's Services and Lead Member for Children's Services in local authorities are the key points of professional and political accountability, with responsibility for the effective delivery of child safeguarding operations. Pivotal acknowledges their expertise in handling cases of child abuse, providing counselling to victims and assisting police investigations

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## 5.0 Policy Statement

5.1 Pivotal accepts that it has a responsibility to raise any issues of concern encountered relating to the welfare of children. Pivotal acknowledges that its board members, employees, bank workers, contractors, volunteers and those managing or providing services for or on behalf of Pivotal may encounter situations concerning the welfare of children as they carry out their day-to-day respective roles.

5.2 Pivotal will have clear policies and procedures in place for the safeguarding of children and reporting suspected abuse or neglect.

5.3 In accordance with the Working Together to Safeguard Children Guidance (2020) on inter-agency working to safeguard and promote the welfare of children Pivotal will respond to any child protection concerns made known to them. It will make referrals to the relevant local authorities or the police and adopt an inter-agency co-operation approach to safeguarding and promoting the welfare of children.

5.4 Pivotal will provide training to ensure everyone who works for us, and works on our behalf, is alert and knows how to note any signs of child abuse they may come across, including any risks abusers or potential abusers may pose to children, and that our customers and staff are informed on how to report safeguarding concerns.

5.5 Where Pivotal houses ex-offenders with a known history of sex offences or child abuse we will always ensure that a risk assessment is undertaken in respect of the appropriateness of any offer of accommodation and, in so far as it is possible, that any risk to children is minimised.

5.6 In circumstances where it is proven that an existing resident has committed sexual, physical, emotional or psychological child abuse Pivotal will take appropriate action relevant to the circumstances in conjunction with other statutory agencies.

5.7 As part of its safeguarding reporting and recording process Pivotal will ensure robust reporting and recording procedures are in place, that any child safeguarding issues are included as part of the process and that all data is managed in accordance with Data Protection requirements.

5.8 Pivotal will work with local agencies to ensure the safeguarding of vulnerable children and adults (see the Pivotal Safeguarding Vulnerable Adults Policy) at all times in all aspects of its operations and practices and to ensure compliance will:

- Appoint a safeguarding lead for the organisation. The safeguarding lead will be the Director of Operations.
- Ensure Pivotal has in place safeguarding policies and procedures.
- Ensure robust recruitment practices and training include safeguarding considerations.

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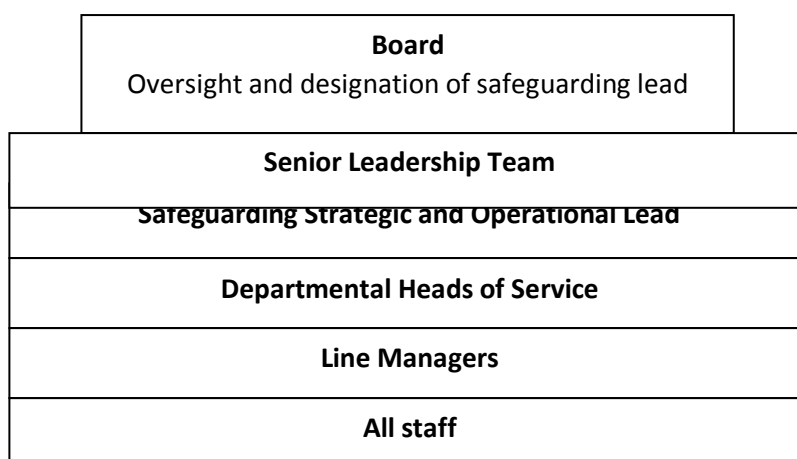
- Maintain clear and accurate records of all children and adult safeguarding allegations including the responses made and actions taken, sharing the information as appropriate when this is in the best interests of a child or vulnerable adult.
- Attend Local Safeguarding Children’s Boards (SCBs) if necessary. Although this is not a legal requirement we will provide information to them and participate in relevant safeguarding child and adult reviews as requested.
- Co-operate with local authority enquiries where suspected child safeguarding concerns are raised.
- Review all safeguarding incidents and adopt a lessons learned approach to inform future practice.

5.9 Pivotal will ensure staff are compliant with the employee handbook requirements relating to information transmitted or accessed via email or the Internet and adhere to this at all times.

5.10 Pivotal will recruit staff appropriately, ensuring that DBS checks are completed for every staff member and reviewed every three years (see DBS Policy and Procedure).

## 6.0 Roles and responsibilities

6.1 The responsibility for all safeguarding rests with every member of Pivotal staff and staff are encouraged to report any safeguarding concerns to their Line Manager immediately. As with the Pivotal Safeguarding Vulnerable Adults Policy, the structure below applies.



6.2 Notwithstanding the above structure, where child safeguarding concerns arise staff, others working with or for Pivotal, and Pivotal customers are also encouraged to raise any issues directly with the police and/or children’s services at the local authority.

6.3 The role of the Safeguarding Strategic and Operational Lead is to:

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- Monitor any changes to legislation or good practice and advise Directors of corresponding updates required to Pivotal policy and procedures.
- Work with Directors/Senior Leadership Team to review the safeguarding children policy on an annual basis and ensure that other policies have regard to safeguarding as appropriate.
- With regard to VfM ensure adequate resources are in place to provide adequate and up to date training and supervision of staff in respect of managing and/or reporting safeguarding concerns with appropriate induction and update training programmes in place.
- Report to Boards annually and, in the event of a serious case review, inform them of this.
- Report quarterly to the Senior Leadership Team on the number of safeguarding cases and any issues of note.
- Lead internal quarterly review meetings with Heads of Department and maintain records of this.
- Ensure robust systems are in place for the accurate and appropriate recording and monitoring of all safeguarding issues.
- Promote and raise awareness and understanding of safeguarding across the Pivotal Homes Group.
- Work with external organisations as appropriate in relation to child safeguarding and ensure statutory agencies including local authorities and the police and safeguarding boards in its areas of operation are aware of this.
- If institutional abuse is suspected this should be taken directly to the local authority.
- Write and review child safeguarding policy and procedures and ensure other procedures have regard to child safeguarding as appropriate.
- Oversee safeguarding cases to ensure that all safeguarding cases are recorded and reported in accordance with procedures.

#### 6.4 Heads of Service will:

- Promote safeguarding within and across all Pivotal operations and ensure team managers are properly reporting, recording and reviewing safeguarding cases.
- Ensure that managers oversee and implement safeguarding and it is regularly discussed at team meetings and as part of one to one meetings.
- Ensure the appropriate supervision of staff as part of the Line Management process.
- Set staff objectives in relation to safeguarding as part of the supervision process.
- Attend quarterly safeguarding review meetings held by the Pivotal Strategic and Operational Lead for safeguarding.
- Conduct regular audits of safeguarding referrals.
- Attend external multi agency meetings representing Pivotal as required.

#### 6.5 Managers and all staff

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Safeguarding responsibilities lie with all staff and everyone has a duty to report all safeguarding incidents to the Local Authority. Staff must:

- Report concerns promptly in line with the safeguarding procedure.
- Maintain a record of all referrals.
- Be alert to signs and symptoms of abuse.
- Cooperate with any Local Authority enquiries.
- Support any protection plans put in place.
- If institutional abuse is suspected, report directly to the local authority.

## **7.0 Learning Lessons**

7.1 Where there is a case of child abuse or neglect raised at Pivotal the organisation will fully comply with, and seek to learn lessons from, any identified failings on the part of Pivotal. Appropriate actions will be taken to rectify areas of failure and, in such instances, Pivotal Boards shall be informed and updated on any service changes required.

## **8.0 Information Sharing**

8.1 Pivotal staff must, at all times, comply with the employee handbook and Pivotal's Data Protection and Information and Communications Technology (ICT) Policy requirements relating to information shared, transmitted or accessed via email or the Internet.

8.2 Pivotal will share information with other agencies appropriately and in accordance with the Data Protection Act and the General Data Protection Regulation. Information sharing agreements may be put in place.

8.3 Pivotal will only share information without an information sharing agreement where there is an immediate risk of harm or criminal activity is taking place.

8.4 Pivotal may have to disclose unconfirmed third party information and/or reports of the potential abuse of a child and/or vulnerable adult, in circumstances where it could be considered organisationally negligent not to do so.

## **9.0 Recording and Reporting**

9.1 All concerns relating to safeguarding must be recorded on the safeguarding register. All Pivotal employees have a duty to record and report any safeguarding concerns.

## **10.0 Safeguarding and Human Resources**

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10.1 The Pivotal Director of People will ensure the appropriate recruitment of staff to new roles and will ensure relevant role recruitment procedures are adhered to including DBS checks. DBS checks will be repeated every three years (see DBS Policy and Procedure).

10.2 The HR team will provide support to any staff dealing with safeguarding cases as necessary. This will include providing access to confidential counselling.

10.3 If an allegation about a member of staff is received, and it constitutes a child safeguarding issue, investigations will be conducted in accordance the Pivotal disciplinary policy and procedure. A safeguarding referral will be made to the appropriate local authority. In cases where an allegation of this nature is received the staff member may be suspended pending the outcome of the investigation.

10.4 In cases where an allegation against a member of staff is proven Pivotal will update LA safeguarding teams, inform the police and make a referral to the DBS.

10.5 In respect of child safeguarding allegations made by concerned staff members about the conduct of a staff member, contractor or board member the Pivotal Whistleblowing Policy will be followed.

#### **11.0 Contractors and Partnerships**

11.1 Contractors operating on behalf of Pivotal and partners working with Pivotal will be obliged to adhere to Pivotal safeguarding policies in respect of vulnerable adults and children as part of their contractual agreement.

11.2 Contractors will be obliged to report concerns about child safeguarding to Pivotal but should also report these directly to social care.

11.3 Pivotal main contractors who have access to Pivotal customers' homes will be responsible for ensuring that their staff are trained in safeguarding and are appropriately DBS checked as per Pivotal DBS policy.

11.4 Where Pivotal properties are managed by others under third party arrangements for housing management, support, care or other services, the agent of Pivotal will be required to demonstrate its commitment to managing safeguarding appropriately and how it does this. All future agreements will require this and existing agreements will be amended to ensure it is met at the earliest practical opportunity.

11.5 Where Pivotal works in partnership with others or under third party arrangements for housing management, support, care or other services, the agent of Pivotal will be required to demonstrate its commitment to managing safeguarding appropriately and how it does this.

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## 12.0 Perpetrators of Abuse

12.1 Abuse and neglect will not be tolerated. Where allegations of abuse are substantiated, Pivotal will consider legal courses of action and sanctions against perpetrators of abuse who are Pivotal customers.

12.2 Perpetrators of abuse and neglect will be referred to appropriate support agencies as and when this is deemed relevant to a situation.

## 13.0 Raising Awareness of Safeguarding

13.1 Pivotal is committed to ensuring it raises awareness of safeguarding with customers and will work in partnership with other appropriate agencies to ensure this is achieved.

## 14.0 Procedure for Responding to Child Protection Concerns

14.1 It is the responsibility of every board member, all Pivotal employees, bank workers, contractors, volunteers and all those managing or providing services for or on behalf of Pivotal to report any issues of concern about child abuse or neglect.

14.2 An employee who becomes aware that a child safeguarding issue has arisen has a duty to inform the local safeguarding teams of that concern. Ideally it would be best practice to discuss this referral with your line manager before making a referral, but it is recognised that this is not always possible.

14.3 Any employee can raise a child safeguarding alert and must do so either on the appropriate form stored in the safeguarding area of the P Drive or using the direct access form on the Local Authority website. A copy of the form must be given to the relevant Line Manager & Senior Manager and the Quality and Compliance team. Night staff must include the relevant day staff managers. In an out of hours' situation an employee may need to contact the out of hours on call manager.

14.4 Where a Local Authority database has been used to complete a referral, a copy of that referral should be taken and emailed out to the relevant Line Manager, Senior Manager and Quality and Compliance Team. If it is not possible to take copy of the referral then a separate internal form should be completed and emailed out in the same way. The safeguarding form should be stored at the agreed location in the safeguarding area of the P drive once the referral has been completed.

14.5 If a Local Authority triage team have been contacted to discuss a safeguarding concern and a decision has been taken by the Local Authority not to progress the referral, a pivotal safeguarding

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form should be completed recording the decision to end the concern at that point. The form should then be emailed to the relevant managers and the Q&C Team.

14.6 Where staff are aware that a child has an allocated safeguarding practitioner, the practice of notification will remain the same. The allocated safeguarding practitioner (if known) must also be notified in writing.

14.7 Within 24 hours of a child safeguarding referral being e mailed to the local authority, a follow up phone call must be made to the relevant authority to ensure the referral has been logged. If an issue arises where the referral has not been logged, the referral must be re-sent and followed up with an immediate telephone call to the local authority to establish receipt. Follow up calls should be recorded on Pivotal's safeguarding register.

14.8 The manager/supervisor of the area, upon being notified of the safeguarding concern:

1. If required, will attend the property where the safeguarding concern has occurred to ensure the safety of customers and staff.
2. Where required, ensure that any additional statutory organisations are notified of the safeguarding concern, and will ensure that any actions required as a result of the referral are completed in a timely manner.
3. The manager or supervisor of the are must, on being notified of the safeguarding concern update the central register and ensure any actions outlined in the report have been completed.

14.9 The safeguarding case is considered closed when notified by the local authority, that the case is closed.

14.10 When a safeguarding concern is highlighted which includes allegations against a Pivotal colleague, the Whistleblowing Policy should be adhered to. The Safeguarding Lead should be made aware (unless the concern raised is about the Safeguarding Lead, in which case the Director of People should be made aware) and they will nominate a Manager to raise the safeguarding concern with the relevant Local Authority.

14.11 The safeguarding referral should be password protected and the password should be shared with the Heads of Operations, the Safeguarding Lead and the Quality and Compliance Team. Entries on the central register should maintain the confidentiality and anonymity of the colleague subject to the allegation.

## 15.0 Training

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15.1 Pivotal will ensure all staff across the organisation receive safeguarding training, providing them with an understanding of safeguarding and enabling them to fulfil the requirements of Pivotal policy and procedures.

15.2 Training will be tailored and appropriate to individual roles and the requirements of these in respect of safeguarding.

15.3 Refresher training will be provided at least annually and sooner if any significant changes to legislation or good practice affecting Pivotal policy and procedures arises.

15.4 Board members will be provided with safeguarding training as part of the Board induction process with refresher training at least bi-annually, and will be advised of any legislative and regulatory changes by the Safeguarding Strategic and Operational Lead as they arise.

15.5 Pivotal volunteers and contractors will be provided with safeguarding training as appropriate.

15.6 As part of their safeguarding training staff will be made aware of child safeguarding issues to enable them to identify these if any should come to their attention during the course of carrying out their role with Pivotal.

15.7 Staff will be provided with guidance and training on professional boundaries.

## **16.0 Monitoring and Review**

16.1 This policy will be monitored by the Board nominated Safeguarding Strategic and Operational Lead who will review cases with Heads of Department on a quarterly basis and report to the Senior Leadership Team and Pivotal Boards.

16.2 The Pivotal Boards will have oversight of any required amendments following lessons learnt and legislative or regulatory changes.

16.3 Following Serious Case Reviews, outcomes, lessons learnt and recommendations accepted for changes to ensure continuous improvement and best practice will be agreed with Heads of Service and implemented by the Safeguarding Strategic Operational Lead and Heads of Service.

16.4 The Quality and Compliance Team will audit safeguarding referrals on a monthly basis and report to the Heads of Service and Safeguarding Lead.

## **17.0 Referral to the Local Authority**

17.1 All alerts for child protection issues must be referred to the local authority relevant to the area where a concern is raised or a child safeguarding incident or concern has allegedly occurred.

## **Legislation, Regulation and Guidance informing this policy and procedure**

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Pivotal acknowledges the considerable amount of legislation regarding the safeguarding of children and will continue to monitor legislation and guidance in respect of this.

From the existing legal framework the following has informed this policy:

Anti-Social Behaviour, Crime and Policing Act 2014  
Children Act 1989  
Children Act 2004  
Data Protection Act 1998  
Disclosure and Barring Service  
Education Act 2002  
Family Law Act 1996  
Female Genital Mutilation Act 2003 (amended by the Serious Crime Act 2015)  
UK General Data Protection Regulation  
Domestic Abuse Act 2021  
Human Rights Act 1998  
Homelessness Act 2002  
Modern Slavery Act 2015  
Sexual offences Act 2003  
Working Together to Safeguard Children - A guide to inter-agency working to safeguard and promote the welfare of children (2018)

#### **Related Pivotal Policies and Procedures**

Policies and procedures which must reference this policy include but are not limited to:

Adult Safeguarding procedure  
Antisocial behaviour policy  
Domestic abuse policy  
Allocations policy  
Data Protection policy  
DBS policy and procedure  
Information sharing protocol  
Disciplinary and appeals policy and procedure  
Grievance policy and procedure  
Student placement and volunteers' policy  
Recruitment and selection policy and procedures  
Whistleblowing and allegations against employees' policy  
Employee code of conduct

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