

Citizens Advice Wandsworth safeguarding children policy

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We have a safeguarding lead and deputy safeguarding leads. The lead is the person responsible for reporting concerns of abuse and neglect to the relevant authority. In their absence a deputy safeguarding lead will take this action. If no safeguarding leads are available two managers can agree and decide to breach confidentiality.

In addition a member of our trustee board is assigned the responsibility of overseeing safeguarding for our organization including reporting serious concerns to the Charity Commission and making decisions on safeguarding concerns about our staff and volunteers or children and adults at risk in their care

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 also apply to children who aren't our clients. For example the child of a client, anyone under the age of 18 who is volunteering, beneficiaries or other connections who meet our definition of children in relation to this safeguarding policy. Both policies should be read in conjunction with our safeguarding procedure.

No one should ignore allegations or suspicions of abuse or neglect, safeguarding is everyone's responsibility.

Why do we have a policy?

We have a policy to:

- protect children and young people who access our services. This 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.

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.

Our regulator, the Charity Commission, considers safeguarding to be taking reasonable steps to protect people from abuse or harm that we come into contact with, whether working online or in person.

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. While section 11 of the act doesn't list charities as one of the organisations in scope, we acknowledge Citizens Advice may receive their funding or be contracted to deliver services on their behalf and therefore essential that we understand our role in safeguarding and promoting the welfare of children as part of delivering a service.

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 use resources and follow standards from the NSPCC for safeguarding children.

Statutory guidance 'Working together to safeguard children' states that:

'Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.'

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.

Principles for guiding our safeguarding activities

We will use these principles to guide our safeguarding activities. They are also used by local authorities and other statutory bodies to direct their adult safeguarding activities:

- **empowerment:** actions or decisions must be based on the presumption of person-led decisions and informed consent
- **prevention:** it is better to take action before harm occurs
- **proportionality:** the least intrusive response appropriate to the risk presented
- **protection:** support and representation for those in greatest need
- **partnerships:** local solutions through services working with their communities
- **accountability:** accountability and transparency in delivering safeguarding

Fundamental to this policy is our aim to involve the person the concern is about in decisions about what should happen wherever possible.

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 we come into contact with as part of delivering our service. Note that concerns about those over the age of 18 should be reviewed under our separate adult safeguarding policy.

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 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.

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 for the purposes of this policy.

Type of abuse	Detail of abuse
Neglect/ acts of omission	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	Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and young people and hearing/witnessing domestic abuse is child abuse.
Emotional/ psychological	Involves the continual emotional mistreatment of a

	<p>child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child.</p>
Sexual	<p>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. It's never a child's fault they were sexually abused – it's important to make sure children know this.</p>
Child sexual exploitation (CSE)	<ul style="list-style-type: none"> • Unhealthy or inappropriate sexual behaviour • Being frightened of some people, places or situations • Being 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
Online	<p>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, online chats, online gaming and live-streaming sites.</p>
Physical	<p>Physical abuse is when someone hurts or harms a child or young person on purpose. It includes: hitting with hands or objects, slapping and punching, kicking, shaking, throwing, poisoning, burning and scalding, biting and scratching, breaking bones and drowning.</p>
Female genital mutilation (FGM)	<p>FGM is when a female's genitals are deliberately altered or removed for non-medical reasons. It's also known as 'female circumcision' or 'cutting', but has many other names.</p>
Bullying/ cyberbullying	<p>No single sign will indicate for certain that a child</p>

	<p>being bullied, but watch out for: belongings getting 'lost' or damaged, physical injuries (such as unexplained bruises), being afraid to go to school 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.</p>
Child trafficking	<p>Where children are tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold.</p>
Organisational / institution	<p>Can occur in various settings such as a hospital, school or care home. This type of abuse can be one-off incidents as well as ongoing patterns of abuse.</p>
Grooming	<p>When someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked.</p>
<p>Modern slavery This type of abuse encompasses slavery, human trafficking, forced labour and domestic servitude</p> <p>Note that if modern slavery is suspected we may also use the UK's National Referral Mechanism as well as going through our safeguarding referral process</p>	<p>These could include the following:</p> <ul style="list-style-type: none"> • signs of physical or emotional abuse • appearing to be malnourished, unkempt or withdrawn • 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
Criminal exploitation and gangs	<p>Criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes.</p>
Self neglect	<p>Although this isn't considered a official form of abuse by the NSPCC, it's important to consider things like a child self-harming or mentioning</p>

	suicide as self neglect. It could be a sign a child is experiencing another form of abuse or that they need mental health support.
<p>Suicide and self-harm</p> <p>Although not listed in the Care Act, we recognise that suicide and self-harm are forms of risk that can give rise to a safeguarding concern</p>	<p>These could include the following:</p> <ul style="list-style-type: none"> • a history of depression, anxiety, bipolar disorder, PTSD or other mental health conditions • previous suicide attempts • previous self-harm • recent trauma or life crisis • feelings of hopelessness or worthlessness • withdrawing from other people • changes in appearance and behaviour • dangerous or self-harmful behaviour e.g. • substance abuse • talking about death or wanting to die, talking about methods of suicide • making preparations e.g. putting affairs in order, giving away possessions, saying goodbye to friends and family • gathering materials that could be used to commit suicide.

Children and families at risk

Research shows that some children who've experienced abuse share similar characteristics making them more vulnerable. Having these characteristics doesn't necessarily mean they'll experience abuse or neglect, but we do know that these challenges are often interlinked and the more problems a child and their family are experiencing, the greater the risk of abuse (Cleaver, Unell and Aldgate, 2011):

- children experiencing parental mental health problems
- children experiencing parental substance misuse
- child who has been in the care of their local authority for more than 24 hours (a 'looked after' child)
- d/Deaf and disabled children
- children in households where domestic abuse has/is taking place.

As part of delivering our service we'll be especially vigilant for signs of child abuse where we're aware the above characteristics are present.

Radicalisation and safeguarding

If we are concerned about a child becoming radicalised, we follow our safeguarding procedure; but also take into account the statutory guidance of the '[Prevent Strategy](#)'. We acknowledge our responsibility under this guidance *'to have due regard to the need to prevent people from 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 to them should remain confidential, even if their parent(s) or guardian 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 thoughts and wishes of the person we're concerned about should be explored to inform our decision on whether to report a safeguarding concern; 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 making a confidentiality disclosure and reporting to a local authority if doing so is in the child's best interests. However in situations where a child has the 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 they don't want us to, we may still need to report our concerns under our statutory obligations as a charity.

There will be situations when confidentiality between ourselves and a client cannot be maintained. This includes:

- situations where the child we're concerned about is in serious and immediate danger and there's no time to get permission for a disclosure
- it's not possible to get permission or the child is not able to give permission (for

- example when the abuser is always present)
- it's not appropriate for us to get permission because it could 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 making a confidentiality disclosure and raising a safeguarding concern.

Screening 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.

As an organisational policy, if a DBS check reveals an unspent conviction for a sexual offence against a child or vulnerable adult, the individual won't be taken on. We also won't take on anyone who performs a regulated activity as part of their role if they're barred from working with adults or children. 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 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:

- online learning provided by national Citizens Advice
- policy awareness sessions delivered internally
- briefing sessions by a local authority or other relevant authority
- attendance at training arranged through partner agencies.

Staff and volunteer conduct

If a staff member or volunteer is suspected of inappropriate conduct, during the course of their role, that could put a child at risk of harm - this will be investigated immediately under the appropriate policy. They may be suspended during the investigation and we'll still aim to complete the investigation even if the staff member or volunteer resigns.

If a staff member or volunteer is 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. It may also be appropriate to make a serious incident report to the charity commission and other relevant funders and regulators.

We reserve the right to share factual, fair and proportionate details of the situation with other employers if we're asked for a reference.

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 protocols
- 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 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.