

## IN SAFEGUARDING POLICY

Control	
PROTECTION SAFEGUARDING POLICY	
Director of Customer and Communities	
Distribution:	All Staff

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## CHILD PROTECTION SAFEGUARDING POLICY

### 1. PURPOSE

- 1.1. Safeguarding of children is a priority for Clanmil Housing Association. Clanmil recognises the issues related to the vulnerability of children and the need to support them to be as safe as possible.
- 1.2. Ensuring that proper policies and procedures are in place for safeguarding will support Clanmil to deliver a high standard of service as well as fulfil moral, legal and regulatory obligations.
- 1.3. Clanmil operates a zero tolerance approach to any abuse wherever it occurs and regardless of who is responsible. We consider safeguarding to be everyone's business and we are committed to ensuring that our operations enhance and promote safeguarding whenever possible.
- 1.4. Reporting arrangements are in place to ensure that we comply with our responsibilities. This policy outlines how we do this. The purpose of this policy and supporting procedures is to ensure that Clanmil staff, volunteers and contractors are aware of the issues that can potentially cause harm to children, know to report concerns and ultimately protect children who live in or visit our homes or otherwise encounter Clanmil.
- 1.5. Clanmil will ensure that staff members and volunteers who are in regular contact with children will undertake relevant training ensuring the highest in professional standards from our people delivering services.
- 1.6. The policy applies to staff at all levels throughout the organisation including members of the Board of Management. A report outlining the nature of child protection referrals made as well as on the effectiveness of arrangements will be provided to the Board of Management on an annual basis.

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## 2. POLICY STATEMENT

- 2.1. As a provider of regulated services that have contact with children (both directly and indirectly), Clanmil is required to comply with legislation and regulation that aims to ensure that children are safeguarded from abuse and harm. The legislative framework requires Clanmil to strive in protecting children and ensure that appropriate procedures are in place to provide effective responses to situations of actual, or potential, abuse, exploitation or harm.
- 2.2. This policy and supporting procedure(s) provide a mechanism that ensures Clanmil meets its duties and co-operates with relevant arrangements managed by the local Health and Social Care Trusts.
- 2.3. Clanmil recognises the issues related to the risks that children face in relation to their potential to be the victims of abuse and harm. Clanmil has a zero-tolerance approach to abuse, harm, exploitation or neglect of children. This policy and relevant procedure(s) are intended for the use of all staff and contractors to support them if dealing with a suspected or actual child protection/safeguarding incident.

## 3. GOVERNANCE

- 3.1. Robust governance arrangements are key to Clanmil's ability to keep children safe from harm. Governance arrangements are brought together to provide a level of assurance to managers and leaders that the Association is doing all it can to keep children safe from harm.
- 3.2. The Association will work to safeguard children by:
  - a. Adhering to this Child Protection/Safeguarding policy and relevant procedures;
  - b. Robust recruitment & selection procedures
  - c. Effective supervision, support and training for staff
  - d. Ensuring that procedures for responding to and reporting of abuse are clear to Board, staff, tenants and contractors;
  - e. Ensuring safety and risk management procedures are followed;
  - f. Effectively and sensitively managing information with due consideration for data protection, confidentiality and information sharing protocols;

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- g. Ensuring that contractors and other agents acting on behalf of Clanmil fulfil child protection and safeguarding responsibilities on its behalf
- 3.3. The safeguarding policy and procedures will be reviewed in line with organisational, regulatory or legal requirements but at least every three years.
- 3.4. Monitoring will be monthly by the Nominated Officer with quarterly reporting to Executive Director of Customer & Communities and Executive Team of any cases with annual reporting to Group Audit & Risk Committee per annual Safeguarding Assurance Report.

#### **4. PRINCIPLES**

- 4.1. The principles Clanmil shall follow in all child risk situations are:
- a. The child's welfare is paramount
  - b. Listen to and engage the child
  - c. Children and their family should be treated as partners in the decision making, as appropriate
  - d. Children and their families have a right to access services to meet their assessed need without discrimination
  - e. Appropriate signposting and reporting will be made at all stages

#### **5. EQUALITY**

- 5.1. All those working with children should respect the rights, dignity and worth of all participants. Every child must be treated equitably and sensitively within the context of their activity and ability, regardless of gender, ethnic origin, cultural background, religion or perceived political background, and, in the case of older children/young adults, sexual orientation.

#### **6. THE LEGISLATIVE FRAMEWORK**

The framework that identifies Clanmil's responsibilities regarding children includes:

- 6.1. The United Nations Convention on the Rights of the Child (UNCRC)

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- 6.2. The Children (NI) Order 1995
- 6.3. The Family Homes and Domestic Violence (NI) Order 1998
- 6.4. Health and Personal Social Services (Quality, Improvement and Regulation) (Northern Ireland) Order 2003
- 6.5. The Protection of Children and Vulnerable Adults (Northern Ireland) Order 2003
- 6.6. The Children (Leaving Care) NI Act 2002
- 6.7. Safeguarding Vulnerable Groups (2007) (No. 2) Order (NI) 2008
- 6.8. Article 50 of the Criminal Justice (N.I.) Order 2008
- 6.9. Public Protection Arrangements NI (PPANI)
- 6.10. General Data Protection Regulation (GDPR) 2018

## **7. RECRUITMENT, SELECTION AND EMPLOYMENT OF STAFF**

- 7.1. Clanmil will ensure that all staff and volunteers are recruited according to appropriate regulatory and legislative requirements and are supported to:
  - a. Understand and recognise possible child abuse/risk
  - b. Know what to do if they are told of, or suspect abuse.
  - c. Have access to a simple and clearly defined procedure specifically for dealing with actual or suspected incidents of abuse.
  - d. Be well informed about statutory child protection procedures.
  - e. Be prepared to act in the event of allegations against staff, volunteers, contractors or tenants.
  - f. All staff or volunteers who may have contact with children through their role in Clanmil will be subject to an appropriate Access NI check prior to commencing their role
  - g. All staff and volunteers will be required to advise Clanmil of any allegations or findings made against them of potential child protection issues so that appropriate protection measures can be made by the Association.

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## 8. TRAINING AND AWARENESS

- 8.1. Training given to staff in the area of Child Protection and Safeguarding will be updated every three years. Clanmil's Human Resources Team will be responsible for communicating training.
- 8.2. In general, this training will be at three levels:
- Level 1: General awareness for all staff
  - Level 2: Staff with substantial contact with tenants, their children and/or grandchildren e.g. Neighbourhood Services (Housing) Officers, Scheme Co-ordinators, Maintenance Officers, Good Relations and Community Cohesion Officers
  - Level 3: Comprehensive training designed for Nominated Officers and key Managers.

## 9. PROFESSIONAL REGULATORY ARRANGEMENTS

- 9.1. Clanmil complies with all statutory and regulatory requirements in relation to professional regulation of employees and potential employees including Access NI, RQIA and NISCC (Northern Ireland Social Care Council).
- 9.2. The Northern Ireland Social Care Council (NISCC) is responsible for ensuring that staff who are required to be on the NISCC register are fit to practice and meet all registration requirements.
- 9.3. The Regulation and Quality Improvement Authority (RQIA) is responsible for ensuring that all regulated services only engage appropriate individuals in regulated activities, by providing regular inspection of all aspects of the service including procedures that impact on the safety of children.
- 9.4. Clanmil has a responsibility to report appropriately to each of these organisations (and others as appropriate) when we have concerns regarding the suitability of staff to practice in services relating to children. Clanmil will comply with these requirements through reporting by the Nominated Officer and advising the Human Resources Manager of any potential concerns in relation to a potential, current or previous member of staff.

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## **10. DISCIPLINARY ARRANGEMENTS**

- 10.1. Where any Clanmil employee is suspected of causing harm as defined in this policy relevant statutory or regulatory provision, it shall be investigated in line with Clanmil's Disciplinary Procedures and relevant statutory requirements. Harm may be caused either through action by an employee or by failing to take appropriate action where a child welfare issue occurs.

## **11. CLANMIL CONTRACTORS/ PARTNERSHIPS**

- 11.1. Clanmil requires all contractors, partners and organisations acting on its behalf that engage in regulated activities with children to have appropriate Child Protection and Safeguarding policies in place.
- 11.2. All Clanmil Contractors must:
- a. Obtain Access NI Criminal Records checks for every member of staff before they first attend a property to undertake any works/activities in line with Access Guidance on Frequency and Intensity of works
  - b. Ensure that all Access NI Checks for its staff/agents are updated regularly
  - c. Ensure that no person who is listed as not being suitable to work with children engages in any works/activities that may include contact with children and/or vulnerable persons.
- 11.3. Contractors should raise any concerns related to abuse or harm of children that they witness or suspect as a result of their work in a Clanmil property. These concerns should be communicated to a Clanmil Officer as a matter of urgency.
- 11.4. The Officer will treat the concern in line with Clanmil's Child Protection/Safeguarding Policy and procedures.

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## 12. WHAT IS ABUSE/ HARM?

12.1. Child abuse occurs when a child is neglected, harmed or not provided with proper care. Clanmil staff are responsible for reporting concerns about or instances of child abuse to the Health Trust. Instances of abuse can be categorised as follows;

- a. *Physical abuse*: the deliberate physical injury to a child, or the wilful or neglectful failure to prevent physical injury or suffering.
- b. *Emotional abuse*: the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. Domestic violence, adult mental health problems and parental substance misuse may expose children to emotional abuse.
- c. *Sexual abuse*: forcing or enticing a child to take part in sexual activities. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities e.g. viewing acts of others or pornography.
- d. *Neglect*: the persistent failure to meet a child's physical, emotional and/or psychological needs, likely to result in significant harm.

12.2. This policy seeks to ensure that staff are aware of the issues that can potentially cause harm to children, know to report concerns and ultimately protect our tenants. Clanmil recognises the possibility that abuse may be carried out by staff /volunteers /contractors acting on behalf of the Association.

## 13. REPORTING ABUSE/ HARM

13.1. It is important to note that Clanmil staff are not responsible for determining whether abuse has occurred. This is the role of the relevant Health and Social Care Trust(s), the PSNI and the legal system.

13.2. Clanmil staff shall report any concerns related to potential child harm or abuse to a Child Protection "Nominated Officer" as named in Appendix A.

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- 13.3. Clanmil staff shall report any concerns related to potential child harm or abuse to the Child Protection “Nominated Officer” as named in the relevant procedure.
- 13.4. Concerns can be raised by any adult or child including but not limited to tenants, other Clanmil service users, relatives, staff, contractors or members of the public.
- 13.5. Concerns may arise from the actions of any individual(s), including but not limited to tenants, other Clanmil service users, relatives, staff, contractors or members of the public.
- 13.6. Clanmil has a Nominated Officer to lead on Child Protection within the organisation. Clanmil may also designate other personnel to assist with these duties. Contact details for these staff shall be made available to tenants, staff and others. These shall be listed at Appendix A of this policy.
- 13.7. Whenever harm or abuse is suspected, all staff will report immediately to the Nominated Officer who will make a referral to the relevant Health & Social Care Trust and/or PSNI and oversee any future communication and actions with those agencies, for Clanmil. A template referral form is attached at Appendix A
- 13.8. The Nominated Officer will notify the Executive Director of Customer & Communities and the Executive Director People and Organisational Development of any referrals made under this policy to a HSC Trust or PSNI.
- 13.9. The lead Nominated Officer will report quarterly to the Executive Director of Customer & Communities on all child protection alerts raised, detailing concerns reported and those screened out from reporting with reasons.
- 13.10. A Nominated Officer will always make a referral to the relevant HSC Trust where there is any grounds to suspect that a child protection issue has been raised.

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## **14. IMAGES AND PUBLICITY**

- 14.1. Permission must be sought and received from the parent, carer or guardian of anyone under age 16 years by Clanmil or its agents before taking photographs or recordings of any child. This should be in line with Data Protection principles, using template at Appendix B.
- 14.2. Clanmil will report any concerns about online abuse of children, whether it be images or behaviour, such as cyber-bullying or grooming, in line with this policy.

## **15. CONFIDENTIALITY AND DISCLOSURE OF INFORMATION**

- 15.1. The Nominated Officer shall inform the person making an allegation of Clanmil's intention to make a referral to the Health & Social Care Trust and/or PSNI.
- 15.2. The parent or guardian should be informed unless this could cause a risk of harm/abuse to a child or children or others and/or ability of the Health & Social Care Trust, PSNI or other agencies to investigate effectively.
- 15.3. If parents/ guardians have not been informed the rationale will be explained to the Trust/PSNI by the Nominated Officer as a part of the referral. This will also be set out in the notification to the Executive Director Customer & Communities and the Executive Director People and Organisational Development.

## **16. TRANSPORTING CHILDREN AND YOUNG PEOPLE**

- 16.1. Members of staff or other agents of Clanmil should not transport unaccompanied children or young people (under 18 years) in any vehicle unless in a case of an emergency.

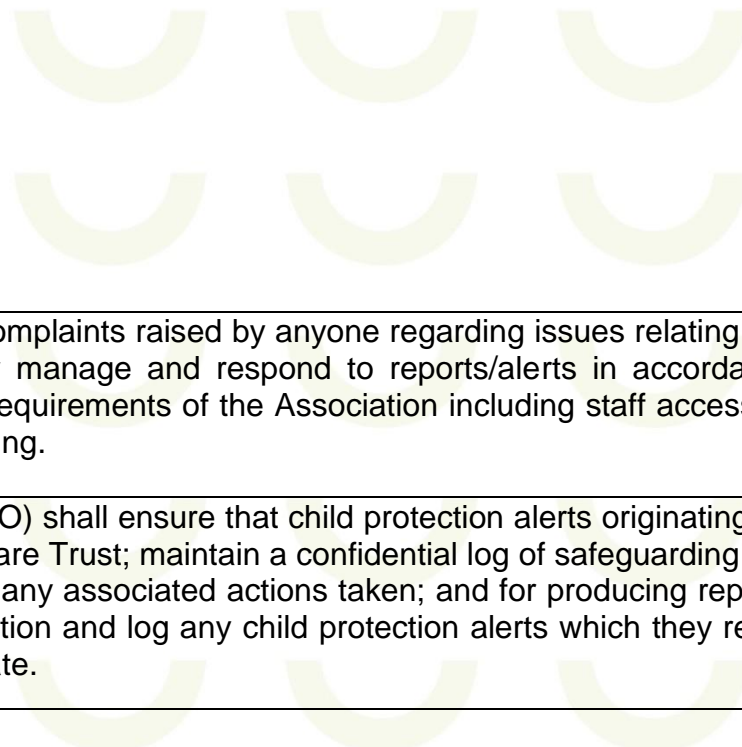
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## 17. ROLES AND RESPONSIBILITIES IN CLANMIL

<b>All Staff</b>	All Clanmil staff have a responsibility to be alert to the behaviours, or signs, which indicate that a child may have been subjected to abuse. Concerns must be reported immediately to a Nominated Officer (see Appendix A). This policy will also be made available on our website <a href="http://www.clanmil.org">www.clanmil.org</a> .
<b>Group Audit &amp; Risk Committee</b>	To approve any changes to child safeguarding policy; provide governance oversight in relation to child safeguarding; to monitor strategic performance on child safeguarding arrangements (e.g. through review of annual report) and to ensure that effective child protection arrangements remain in place.
<b>Chief Executive</b>	The Chief Executive is responsible for ensuring that all directorates are proactive in ensuring maximum health, safety and wellbeing outcomes for residents/tenants and that Directors are effectively monitoring and seeking mechanisms for improvement in relation to safeguarding within the Association. The Chief Executive is also responsible for ensuring the appointment of a Child Protection Nominated Officer who has the appropriate knowledge and skills to lead on safeguarding of Children within the Association.
<b>Executive Director Customer &amp; Communities</b>	Leads in Executive Team on safeguarding issues including oversight of safeguarding activities, reporting and implementation of this policy.
<b>Executive Directors</b>	Directors are responsible for ensuring that all services and departments under their direction are meeting requirements and standards to support effective safeguarding within and on behalf (e.g. by contractors) of the Association. They are responsible for ensuring that sufficient reporting mechanisms and monitoring exercises exist to review the effectiveness of safeguarding and to promote the exploration of potential improvement and beneficial resident/tenant outcomes.
<b>Assistant Directors &amp; Managers</b>	All Clanmil managers have a responsibility to ensure that services they manage use processes that do not create potential risk, harm or abuse to children, and that staff practice is appropriate and to agreed standards. There is a duty to be

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	responsive to any concerns or complaints raised by anyone regarding issues relating to the health, safety and wellbeing of children. They will effectively manage and respond to reports/alerts in accordance with the safeguarding policy, procedure and the governance requirements of the Association including staff access to appropriate training to support their understanding of safeguarding.
<b>Nominated Officer(s)</b>	The Lead Nominated Officer (LSO) shall ensure that child protection alerts originating in the organisation are referred to the relevant Health and Social Care Trust; maintain a confidential log of safeguarding referrals made, including evidence that the referral is received, and any associated actions taken; and for producing reports in accordance with this policy. Other Nominated Officers will action and log any child protection alerts which they receive and will assist the LSO with any reporting duties as appropriate.

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## 18. APPENDICES

### 18.1 Supporting Procedures

Procedure	Procedure Reference	Location
Child Safeguarding Reporting Procedure		
Access NI Vetting and Barring		
Adult Safeguarding Policy and Procedure		
Data Protection Policy and Procedures		

### 18.2 Policies

Policy Title	Policy Reference	Location
Adult Safeguarding Policy and Procedure		
Data Protection Policy and Procedures		

## 19. REFERENCE DOCUMENTS

- Photographic Consent Form
- Incident Report Form
- Incident Follow Up Form
- Standard Terms and Conditions of Contract

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## 20. APPENDIX A - NOMINATED CHILD PROTECTION OFFICERS

Child Protection Role	Name	Job Title	Phone	Email
Lead Nominated Officer	Brendan Morrissey	Assistant Director Housing & Communities	028 90 876 000	Brendan.morrissey@clanmil.org.uk
Nominated Officer	Gerard Rosato	Community Cohesion Officer	028 90 876 000	gerard.rosato@clanmil.org.uk

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