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## 1 Policy Statement

- 1.1 St Mungo's has ethical and legal duties to prevent abuse and neglect. This policy outlines key definitions and responsibilities that frame these duties, and accompanies the [Safeguarding Children procedure](#), which details the practical steps by which St Mungo's fulfils these duties. St Mungo's is committed to preventing, identifying, investigating, and responding to cases of abuse or suspected abuse of children.
- 1.2 St Mungo's has a responsibility to act if information is discovered to suggest that a child, including an unborn child, is at risk of harm, irrespective of the relationship of that child to the organisation.
- 1.3 St Mungo's is committed to a recovery and personalisation ethos which, in the context of safeguarding, involves an outcome focussed approach that is multidisciplinary, client centred and responsive to change, to manage short- and long-term safety concerns.
- 1.4 St Mungo's will contribute to effective inter-agency working and effective multidisciplinary assessments and joint working partnerships, including with the police, local authorities, the Care Quality Commission, and the NHS.
- 1.5 St Mungo's Child Safeguarding procedure is informed by relevant legislation that St Mungo's is required to comply with in the context of safeguarding. St Mungo's is not bound by The Protection of Freedoms Act 2012, since it applies to public authorities, but acts within its principles.
- 1.6 The [Charity Commission safeguarding and protecting people guidance](#) requires St Mungo's to safeguarding everyone who comes into contact with the organisation. The Safeguarding Children procedure, along with those listed in section 7, contribute to meeting these requirements.

## 2 Scope

This procedure is to be followed by all staff, volunteers, locums, agency workers, trustees and students on placement and details the process required when there is alleged or suspected abuse of a child who is:

- a client of a St Mungo's service,
- related or in contact with a client in a St Mungo's service. See [Supporting Pregnant Clients and Clients with Children](#), or
- in contact with a member of St Mungo's staff, volunteer, locum, agency worker, trustee or student on placement as part of the work of that individual.

This procedure does not apply to St Mungo's clients who are accessing our services whilst they are in prison; however, St Mungo's Criminal Justice services should adhere to prison processes for safeguarding.

St Mungo's services have a responsibility for the welfare of children in a range of services, including:

- services for children and young people, for example, accommodation-based services for clients, aged 16 to 25,
- services for families, for example, women and children fleeing domestic abuse,
- services which provide support to adult clients in the family home,
- adult clients who have contact with children, for example, family members,
- adult clients who have contact with children in the community/public spaces,
- unborn children of pregnant clients.

### 3 Diversity implications

- 3.1 The welfare of a child is paramount, and all children have the right to protection from abuse. Research shows that children who may be perceived as 'different', for example, children with disabilities or children with differing sexual orientations are more vulnerable to abuse. Therefore, all staff must promote equality of opportunity and anti-discriminatory practice as part of child protection.

## 4 Definitions

### 4.1 Child Safeguarding

Child safeguarding is more than 'child protection'; it also includes prevention. Child safeguarding is a legal framework, defined in the statutory guidance Working Together to Safeguard Children 2018 as:

- protecting children from maltreatment,
- preventing impairment of children's health or development,
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

### 4.2 A Child

A child is any person aged under 18 years and includes an unborn child when the lifestyle of a pregnant woman is thought to be detrimental to the health of the unborn child. Regarding clients who have learning difficulties or disabilities, it should be noted that the Mental Capacity Act 2005 Code of Practice, defines a child as anyone under the age of 16.

### 4.3 'Child in need'

A child in need may be:

- a child who is disabled,

- a child who is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority, and/or
- a child whose health or development is likely to be significantly impaired without the provision of services by a local authority.

#### 4.4 **Significant Harm**

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Physical abuse, sexual abuse, emotional abuse, and neglect are all categories of significant harm.

The act states significant harm means ill-treatment or the impairment of health or development including, for example, impairment suffered from seeing or hearing the ill-treatment of another. "Ill-treatment" includes sexual abuse and forms of ill-treatment which are not physical; "health" means physical or mental health; and "development" means physical, intellectual, emotional, social or behavioural development.

Consideration of the severity of ill treatment may include: the degree and extent of physical harm; the duration and frequency of abuse and neglect; the extent of premeditation; and the presence or degree of threat, coercion, sadism, bizarre or unusual elements.

The local authority is under a duty to make enquiries, or cause enquiries to be made, where it has reasonable cause to suspect that a child is suffering, or likely to suffer significant harm.

#### 4.5 **Abuse**

Abuse can be "a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children" (Working Together to Safeguard Children 2018).

#### 4.6 **Designated Safeguarding Leads**

The role of the Designated Deputy Safeguarding Lead (internally, [Claire Tuffin](#), and at the local authority) is to:

- provide advice, information and guidance to employers and voluntary organisations around allegations and concerns about paid and unpaid workers and volunteers, recommending a referral as appropriate,
- recommend actions and next steps,
- chair/attend the strategy/joint evaluation meetings in cases where the allegation requires investigation by police and/or social care,
- manage and oversee individual cases from all partner agencies,
- ensure the child's voice is heard and that they are safeguarded,
- ensure there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made,
- monitor the progress of cases to ensure they are dealt with as quickly as possible,
- maintain a confidential database in relation to allegations, and
- share learning from cases and serious case reviews.

4.7 See [Glossary of Terms and Acronyms](#) for a full glossary relating to Child Safeguarding.

## 5 Responsibilities for implementation

### 5.1 Staff in services with adult clients

- ask if a client is in contact with a child, begins contact with a child or gets back in contact with a child and ensure this is incorporated into support overview, action plan and Safety and Wellbeing Plan, and inform the Service Manager,
- if a client is pregnant (or has a relationship with somebody who is pregnant), attention should be paid to issues such as substance use or engagement in other risky behaviours and how this may impact on the health of the unborn child,
- record safeguarding concerns as part of the support overview and ensure they are raised with the Service Manager,
- where a client's child is an open case to Children's Social Care, the keyworker should ensure they have contact details for the child's social worker,
- refer to [Visitors of Clients](#) for guidance on child visitors to St Mungo's services, adult and otherwise.

### 5.2 Staff in family services

- Be aware the service may be targeted by abusers, as a source of vulnerable children.
- Be familiar with the Local Safeguarding Children Board's procedures which contain:
  - the process for the early help assessment,
  - the type and level of early help services to be provided,
  - thresholds for when a case should be referred to local authority children's social care for assessment and for statutory services,
  - details of the Designated Officer in the local area and methods for contacting in case of an alert.
- Be familiar with local partnerships/multi-disciplinary teams (sometimes called Multi-Agency Safeguarding Hub – MASH).

### 5.3 All staff, volunteers, locums, trustees and students on placement must

- be alert to indicators of abuse or neglect,
- be alert to the risks which individual abusers, or potential abusers, may pose to children,
- report any knowledge or suspicions of safeguarding or radicalisation **within four hours** to your line Manager, on-call Manager (out of hours) or Service Head if neither are available and/or are implicated,
- where a colleague or volunteer is suspected, report as above, and additionally to the service's HR partner **and** local authority or Multi-Agency Safeguarding Hub (MASH) team which commissions the service **within 24 hours**,
- local external reporting processes may apply depending on contractual agreements. This should be checked and followed at a local level,
- contribute to whatever actions are needed to safeguard and promote the child's welfare,
- share and help to analyse information so that an assessment can be made of the child's needs and circumstances,
- work co-operatively with parents **when** this is consistent with ensuring the child's safety,
- communicate with and participate fully in all meetings as necessary, with the client, staff, St Mungo's safeguarding leads and external agencies, for example, local authority, Care Quality Commission, or police,

- ensure safeguarding children is discussed regularly in staff meetings,
- ensure safeguarding children and child protection issues are discussed as part of key work sessions (where relevant to the client). See [Safeguarding Leaflet for Clients](#),
- undergo checks by the Disclosure and Barring Service,
- be aware of individual and organisational liability under the Criminal Justice and Courts Act 2015 regarding wilful neglect or ill treatment of clients in mental health services, registered care services and other services which provide a high level of support to clients,
- empower clients to have open conversations about safeguarding, equalities and radicalisation, while challenging unacceptable views, attitudes, and behaviours,
- ensure the client's Opal safeguarding log is updated as/when needed. All Services should record client safeguarding concerns on Opal whether they use Opal as a recording system or not. See [Opal Safeguarding Log Guidance](#),
- offer clients multiple opportunities to provide feedback: email, phone, face to face and written surveys, quality audit feedback, participation in external reviews, house/resident meetings, staff appraisal feedback, client satisfaction survey, the complaints process. See the [Complaints](#) procedure.

## 5.2 All managers must:

- ensure this procedure is implemented and reporting structures are adhered to,
- ensure all staff have an appropriate level of knowledge of safeguarding, by completing training in current best practice and legislation, especially where and how it differs from practice around safeguarding adults,
- ensure relevant leaflets and information is put on display and restocked and updated whenever necessary, including complaints leaflets and posters, contact details for the local police team and local authority. See [Useful Contacts Related to Safeguarding Children](#),
- ensure all clients are given safeguarding information. See [Safeguarding Leaflet for Clients](#),
- highlight and discuss the organisational and local safeguarding procedures with all new members of staff as part of the induction,
- ensure child safeguarding and child protection issues are standing items on team meeting agendas and discussed during staff supervision and case management sessions,
- be familiar with the local Safeguarding Children Board's assessment protocol (based on the guidance in Working Together to Safeguard Children 2018), fulfilling information and other requests from the Board, and the process for challenging lack of action or disagreement with the local authority (often called the escalation or dissent procedure),
- be familiar with local appeals processes and St Mungo's escalation process,
- ensure all reporting and recording of safeguarding concerns is accurate, timely and client centred and recorded appropriately,
- ensure regular checks (at least once every 2 weeks) are carried out of the Service's Opal safeguarding log to manage/monitor the progress of concerns. All Services should record safeguarding concerns on Opal whether they use Opal as a recording system or not.

- ensure all interview panels for staff who will be working with children, include at least one manager who has completed appropriate training,
- ensure awareness of the service's local contact for Prevent – who may work for the local authority or the police and know how to refer concerns about radicalisation to the appropriate Prevent Channel. See [Preventing Radicalisation and Extremism](#);

#### 5.5 IT team will

- produce and implement staff and client IT policies so that staff and clients can use IT safely, securely, and legally, regarding safeguarding and Prevent duties.

#### 5.6 Volunteer Services team will

- produce volunteer handbook which includes guidance on safeguarding and professional boundaries,
- produce written guidance for staff who manage volunteers on local induction and volunteer supervision,
- deliver volunteer management training to staff,
- deliver safeguarding training appropriate to volunteers in client facing roles.

#### 5.7 Safety and Quality Team will

- produce safeguarding policies and procedures for staff which are legally compliant, reflect best practice in the sector and update them as often as needed and once a year as a minimum,
- ensure staff are informed of new guidance or changes to existing policies and procedures through organisational methods for example, Weekly Bulletin, staff intranet, Managers Digest,
- facilitate face to face Safeguarding and Professional Boundaries training,
- manage both the quality and safeguarding inbox to respond to and support with queries relating to safeguarding,
- review safeguarding incident reports and provide advice and guidance, as required,
- Make the Safeguarding Lead or Deputy Lead aware of any serious child safeguarding incidents or allegations,
- manage the complaints inbox and raise any concerns that relate to safeguarding to relevant Managers and the Safeguarding Lead or Deputy Lead where necessary.

#### 5.8 Safeguarding Lead and Deputy Lead will

- review safeguarding incident reports and provide advice and guidance, as required.
- support staff to make referrals to appropriate agencies regarding concerns about safeguarding, including radicalisation, as required,
- support staff to work constructively with partners, including local authorities, police, NHS, and other providers,
- ensure internal safeguarding and professional boundaries, both face to face and e-learning, is comprehensive and compliant with our safeguarding and Prevent duties,
- monitor the most serious safeguarding incidents escalated by the Quality and Continuous Improvement team or any other person in the organisation,
- provide a monthly report to the Chief Executive of the most serious safeguarding cases and make recommendations about whether to report to the Charity Commission.

#### 5.9 St Mungo's Organisational Leads

- Board Lead: Mike Adamson



- Safeguarding Lead: David Fisher, Executive Director of Services.
- Safeguarding Deputy Lead (& Designated Officer): Claire Tuffin, Director of Governance and Compliance
- Governance Lead: Claire Tuffin, Director of Governance and Compliance

## 6 Associated documents

- S1 Categories and Indicators of Child Abuse B46
- S2 Useful Contacts Related to Safeguarding Children B46
- S3 Good Practice Guidance and Professional Boundaries B46
- S4 Safeguarding Children Service Contact List B46
- S5 Quick Guide to Safeguarding Children B46
- S6 Safeguarding Children in Outreach Work B46
- S8 Glossary of Terms and Acronyms B46
- S9 Content Guide for Raising Child Safeguarding B46
- S11 Child Criminal Exploitation and County Lines B46
  
- S14 StreetLink Quick Guide to Safeguarding B46
- S3 Preventing Radicalisation and Extremism B37
- S6 Safeguarding Responsibility Chart B37
- S11 Three Step Guide to Reporting Safeguarding B37
- S13 Safeguarding Leaflet for Clients B37
- S15 Opal Safeguarding Log Guidance B37

## 7 Relevant procedures and documents

- [Assessing Mental Capacity and the Mental Capacity Act](#) B49
- [Bullying and Harassment of Clients](#) B15
- [Complaints](#) A02
- [Deprivation of Liberty Safeguards](#) B21
- [Domestic Abuse](#) B23
- [Handling clients' money and valuables](#) B06
- [Leaving Accommodation, Abandonment and Storage of Belongings](#) B26
- [Preventing and Responding to Sexual Assault](#) B48
- [Responding to Challenging Behaviour \(Accommodation Services\)](#) B17
- [Responding to Challenging Behaviour \(Non-Accommodation Services\)](#) B17A
- [Safeguarding Adults](#) B37
- [Supporting Pregnant Clients and Clients with Children](#) B24
- [Visitors of Clients](#) B20
- [Whistleblowing](#) A04
- [Working with the Police](#) B18
- [Working with Clients who Hoard](#) B51
- [Working with Clients who Self-Injure](#) B45
  
- [Information Sharing Procedure](#) J06
  
- [Code of Conduct](#) (applies to staff and volunteers)
- [Induction checklists](#)
- [Supervision Guidance and Agenda](#)

- [Disciplinary policy](#)
- [Capability policy](#)
- [Learning and Development programme](#)
- [Volunteer Policies](#)
- [Volunteer Handbook](#)
- [Volunteer Supervisor Resources](#)
- [IT Systems Acceptable Use policy](#)
- [Client IT Acceptable Use policy and Service Level Agreement](#)

**The following documents were consulted for the review of this policy and procedure:**

1. The Children Acts 1989 and 2004
2. The Children and Families Act 2014
3. Working Together to Safeguard Children 2018
4. Adoption and Children Act 2002
5. The Care Act 2014
6. Health and Social Care Act 2012
7. Public Disclosures Act 1998
8. The Equality Act 2010
9. London Child Protection Procedures and Practice Guidance, 2019
10. Mental Capacity Act 2005
11. General Data Protection Regulation, 2018
12. Public Disclosures Act 1998
13. The Protection of Freedoms Act 2012
14. Criminal Justice and Courts Act 2015
15. The Anti-social Behaviour, Crime and Policing Act 2014
16. London Child Protection Procedures 2015
17. Serious Crime Act 2015
18. Female Genital Mutilation Act 2003
19. Counter Terrorism and Security Act 2015
20. Child Criminal Exploitation – Catch22
21. Criminal Exploitation of children and vulnerable adults: County Lines guidance – The Home Office, 2018
22. Child Abuse – NSPCC
23. Social Care Institute of Excellence – Child Safeguarding
24. Social Care Institute of Excellence – Safeguarding for Charities
25. Safeguarding Guidance for Charities – gov.uk
26. National Council for Voluntary Organisations - Safeguarding
27. Safeguarding Children, Young People and Adults at risk in the NHS – Accountability and Assurance Framework

**This policy and procedure were developed in consultation with:**

- Staff and Managers from a range of client facing services.
- Central Services Support teams
- The Organisational Safeguarding Group