

C01a

Safeguarding and child protection policy (England)

This document is provided to Harrow Carers (now referred to as 'the organisation') as a Network Partner of Carers Trust.

Table of Contents

SCOPE	1
LEGISLATION	2
POLICY STATEMENT	4
RESPONSIBILITIES OF TRUSTEES	5
RECOGNISING ABUSE AND RAISING SAFEGUARDING CONCERNS	7
ALLEGATIONS OF ABUSE AGAINST STAFF OR VOLUNTEERS	7
LEARNING AND DEVELOPMENT	7
ADOPTION	8
APPENDIX 1 Definitions	9

1.0 SCOPE

1.1 The following documents set out the organisation's approach to safeguarding and protecting children and young people aged 17yrs and under:

- policy (C01a)
- procedure for managers (C01b)
- guidance for staff (C01c),
- guidance for volunteers (C01d)
- abuse of children: factors, types and indicators (C01e).

1.2 The intended aim of these documents is to safeguard and protect from abuse, harm or neglect ALL children and young people with whom staff come into contact, to promote their wellbeing and to respond promptly and effectively to any concerns.

This includes (but is not limited to) children and young people who:

- have an illness or disability **What is a learning disability? | Mencap**
- have a sensory loss including dual sensory impairments
- have special educational needs
- are young carers
- are in challenging family circumstances (such as substance abuse, adult mental health issues, domestic violence)
- are drawn into anti-social or criminal behaviour, including gangs, organised crime and criminal groups
- are frequently missing or go missing from home
- are at risk of modern slavery, trafficking, exploitation, radicalisation
- are viewing inappropriate online content **E-safety - Harrow Safeguarding Children Partnership**
- have recently returned home from Care

Reviewed May 2025, to be implemented by August 2025. Review due May 2026.

© Carers Trust. Carers Trust is a registered charity in England and Wales (1145181) and in Scotland (SC042870). Registered as a company limited by guarantee in England and Wales No. 7697170. Registered office: Carers Trust, Suite 11, Valiant Office Suites, Lumonics House, Valley Drive, Swift Valley Industrial Estate, Rugby CV21 1TQ. Crossroads Care trademark is a collective mark.

- are showing early signs of abuse and /or neglect – see NSPCC publication [Spotting the signs of child abuse](#)
- **Thresholds and factors of abuse Thresholds - Harrow Safeguarding Children Partnership**

- 1.3 Providers of both regulated and non-regulated services to children and young people will read this policy alongside their organisation's policies concerning:
- confidentiality and disclosure (providers of regulated services, see D05)
 - whistleblowing
 - diversity and equality
 - code of conduct
 - compliments and complaints
 - professional boundaries.
- 1.4 Organisations that provide regulated care and support services and have access to the care practice Operational Policy Framework will also read:
- children's personal care (C02) - including duty of candour
 - children's medication (C03) - including medicines-related safeguarding incidents
 - behaviour management (D03) - including use of restraint
 - autonomy and independence (D04) - including consent, Mental Capacity Act, Deprivation of Liberty Safeguards (DoLS)/Liberty Protection Safeguards (LPS)¹
 - financial protection (D07)
 - missing persons (model policy - AT18).
- 1.5 If appropriate to the services they provide, organisations will consider producing bespoke documentation covering how to deal with allegations of bullying and how to prevent it.
- 1.6 The term 'staff' as used in this policy refers to both employees and volunteers² throughout the organisation.

2.0 LEGISLATION

- 2.1 The organisation seeks to comply with:
- Children Act 1989
 - Human Rights Act 1998
 - Protection of Children Act 1999
 - Sexual Offences Act 2003
 - Female Genital Mutilation Act 2003
 - Health and Social Care Act 2008
 - Equality Act 2010
 - Protection of Freedoms Act 2012
 - Children and Families Act 2014
 - Young Carers Needs Assessment Regulations 2015
 - Counter-Terrorism and Security Act 2015

¹ There is currently no implementation date for when DoLS will be replaced by LPS.

² The National Council for Voluntary Organisations states that 'volunteers give their time, carrying out activities that aim to benefit community or society. Volunteers are unpaid and choose how they wish to give their time'. Central to this definition is the fact that volunteering must be a choice freely made by each individual.

- Children Act 2004 as amended by Children and Social Work Act 2017
- General Data Protection Regulation (GDPR) and Data Protection Act 2018³
- Domestic Abuse Act 2021⁴

2.2 Other relevant guidance includes:

- [‘Working together to safeguard children’](#) (updated 2023)
- [Safeguarding children and child protection | NSPCC Learning](#)
- [The eight Caldicott principles of good information sharing](#)

Caldicott Guardian Role in Safeguarding

- The Caldicott Guardian is a senior figure in health and social care organisations responsible for protecting the confidentiality of personal information and ensuring it is used appropriately.
- They play a critical role in safeguarding children by overseeing how and when personal data can be shared with external agencies (e.g., social services, police) to prevent harm[r1].
- The Organisation (Harrow Carers) will appoint an experienced senior manager with Caldicott responsibilities.

Caldicott Principles

These eight principles guide decisions about sharing confidential information:

1. **Justify the purpose** for using confidential information.
2. **Use only when necessary.**
3. **Use the minimum necessary.**
4. **Access on a need-to-know basis.**
5. **Ensure responsibility awareness.**
6. **Comply with the law.**
7. **Duty to share is as important as duty to protect.**
8. **Inform individuals how their data is used**

Children’s Services

- In children’s safeguarding, Caldicott Guardians help ensure that information sharing is lawful, proportionate, and justified, especially in complex cases involving consent, young adults, or multi-agency coordination(1).
- They support decisions about disclosure without consent when necessary to protect a child from harm.

Legal Frameworks

Their work is underpinned by laws such as:

³ The UK GDPR and Data Protection Act are not a barrier to sharing information in relation to safeguarding and child protection, but rather provide a framework to ensure that personal information about living persons is shared appropriately. See [Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers](#)

⁴ [Domestic abuse statutory guidance \(June 2022\)](#)

- **Children Act 1989 & 2004**
- **Data Protection Act 2018 (UK GDPR)**
- **Human Rights Act 1998** These laws allow data sharing for safeguarding under specific conditions

References

r1 [Caldicott Principles & Information Sharing - Children & Young People](#)

3.0 POLICY STATEMENT

3.1 The organisation:

- recognises that the welfare of a child or young person is paramount and that they each have a right to live safely, free from abuse or harm, regardless of their age, disability, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, or sexual reassignment⁵
- recognises that everyone involved with services for children or young people (including front-line staff, managers, trustees and volunteers), has a role to play in protecting and promoting their welfare and that everything possible must be done to **detect**, prevent, report and tackle abuse
- endorses a child-centred approach to safeguarding and child protection, keeping the child or young person in focus when making decisions about their lives, listening to them, taking their views into account and working in close partnership with them and their families
- is committed to fostering an honest, open, transparent culture for staff at all levels, ensuring they feel empowered to raise concerns about potential or actual abuse, fully recognising that it can be carried out by friends and family, as well as by strangers and those providing services in a professional role
- is committed to preventing the development of a closed culture⁶ defined as a poor culture that can lead to harm, including human rights breaches such as abuse, which can be deliberate or unintentional
- **ensures that concerns about safety are investigated thoroughly and lessons are learnt to keep children safe from harm**
- recognises that structural disadvantages like poverty, racism and sexism interact with the pressures associated with adolescent development to limit the safety and choices available to children and young people within particular contexts⁷.

3.2 The organisation seeks to honour the principles of [The United Nations Convention on the Rights of the Child](#)⁸, under which all children and young people have the right to:

- survive and grow
- participate and be heard

⁵ Known as [protected characteristics](#) under Equality Act 2010

⁶ [How CQC identifies and responds to closed cultures - Care Quality Commission](#)

⁷ [Contextual safeguarding: what is it and why does it matter? | NSPCC Learning](#)

⁸ See also [UN Convention on the Rights of the Child - UNICEF UK](#)

- fulfil their potential
- receive an education
- be healthy
- be treated fairly
- have a childhood.

3.3 No form of corporal punishment will be used at any time against any child or young person to whom services are provided.

4.0 RESPONSIBILITIES OF TRUSTEES

4.1 Safeguarding is a key governance concern for all charities. The Charity Commission states that trustees must put safeguards in place to protect those who come into contact with their charity. The Charity Commission publication: [Safeguarding and protecting people for charities and trustees](#)⁹ (updated June 2022) provides details.

4.2 Trustees have a responsibility to promptly disclose to the chair of the board or, if the chair is involved, to the vice-chair or other designated trustee, if they have been involved in a safeguarding concern outside of their role as trustee, including, but not limited to, any safeguarding allegations, investigations or incidents.

4.3 The organisation's trustees have a personal responsibility to familiarise themselves with this policy, and to be aware of the associated procedure and guidance documents. Responsibility for having detailed knowledge of the procedure and guidance and monitoring compliance may be carried out by a nominated board member or delegated to an appropriate member of the management team.

4.4 Trustees are responsible for ensuring managers have effective systems in place whereby staff at all levels of the organisation:

- work according to the safeguarding and child protection policy documents
- receive safeguarding training relevant to and at a suitable level for their role
- promote a culture of listening to children and young people
- are clear about their responsibilities and accountability in relation to preventing, identifying and reporting abuse
- know how to escalate concerns
- receive appropriate supervision and support, including following a safeguarding or child protection incident.

4.5 Specifically, trustees have a responsibility to:

- promote a culture of openness and candour at all levels of the organisation
- ensure senior managers are fully committed to safeguarding and protecting children and young people
- ensure their organisation operates zero tolerance to all forms of abuse, including unlawful discrimination, degrading or inhuman treatment, excessive or inappropriate use of restraint or restrictions on movement and activities

⁹ The publication includes a section on managing safeguarding risks when operating online. It also updates some terminology and links to other sources of support.

- ensure robust systems of scrutiny and internal inspection are in place to monitor and review safeguarding practice on an ongoing basis across the organisation, to inform continued development, quality assurance and improvement
- ensure any required improvements are openly shared and understood by all staff who have a responsibility to embed them
- oversee performance and risk in relation to safeguarding children/young people
- ensure adequate support for staff who raise concerns (whistleblowers).

4.6 In addition, trustees will ensure managers establish and operate robust systems to:

- engage with the Safeguarding Partners¹⁰ within the geographical area/s in which they operate, working in accordance with the safeguarding and child protection arrangements set out by them
- implement local authority inter-agency agreements, including information sharing¹¹ protocols that support the supply and exchange of information to the relevant Safeguarding Partners
- work cooperatively and in an integrated manner with other agencies in the statutory, voluntary and independent sectors
- select, recruit, vet staff in compliance with legal requirements and good practice (Safer recruitment practice to be followed at all times) [Guidance video Safer recruitment](#)
- make checks against the [Disclosure and Barring Service](#)¹²
- DBS checks must be refreshed once every 3 years for all staff and volunteers
- make referrals to the DBS once a safeguarding concern has been concluded
- deal with allegations against and concerns about staff who may have harmed a child or behaved in a way that indicates they may pose a risk of harm to children, in line with local authority protocols (see also 6.0 below)
- follow reporting requirements of safeguarding and child protection incidents as set out in the accompanying procedure (C01b).

4.7 Trustees are responsible for ensuring that:

- a senior staff member (suitably trained and competent to handle safeguarding and child protection issues) is appointed as the organisation's designated safeguarding and child protection **lead**.
- the designated person maintains up-to-date knowledge of national changes and developments in children's safeguarding policy and disseminates this information across the organisation in a format that is relevant to the intended audience.

4.8 It is recommended good practice to appoint to the organisation's board of trustees a person who is suitably trained/experienced in safeguarding and child protection to act as children's safeguarding lead to:

¹⁰ Local Safeguarding Partners are made up of a local authority, chief officers of police and integrated care boards for any area falling under that local authority. These partners are responsible for implementing arrangements to safeguard and promote the welfare of children locally in their area.

¹¹ Organisations must be transparent and accountable in relation to information shared and must record all decisions about whether they are sharing information, what they are sharing, with whom and why.

¹² [DBS checks: detailed guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/db-checks-detailed-guidance)

- work with the organisation's designated safeguarding and child protection officer, ensuring all necessary safeguarding protocols are in place
- inform the board when safeguarding protocols need revision following any issue/incident that identifies weaknesses or has policy implications.

In the absence of such an appointment, these duties will fall by default to the chair of the organisation's board of trustees, who will receive appropriate training and ongoing support to carry out the role.

5.0 RECOGNISING ABUSE AND RAISING SAFEGUARDING CONCERNS

- 5.1 Early help and intervention are paramount in reducing the risk of significant harm. Local Safeguarding Partners are required to have pathways in place documenting the process for early help and assessment¹³, bringing together parent, carer and multi-agency plans for interventions to improve a child or young person's circumstances. The organisation's staff will be familiar with and follow these local arrangements, participating as required.
- 5.2 Abuse may be prevented or diminished by good staff vigilance at all levels, from a staff team that is open to raising an alert in all potential as well as actual risk situations. Staff will be trained to recognise the early signs of abuse (C01e) and to understand the importance of taking speedy action to best protect the children and young people with whom they are in contact.

6.0 ALLEGATIONS OF ABUSE AGAINST STAFF

- 6.1 Allegations of staff abusing children or young people will be listened to, taken seriously, dealt with promptly in line with local protocols and reported to the relevant authorities. The accompanying procedure (C01b) provides further details.

7.0 LEARNING AND DEVELOPMENT

- 7.1 Managers will assess the roles undertaken by:
- employees **not** involved in providing care and support services
 - volunteers
- to determine level of training/induction/briefing needed in relation to safeguarding and child protection.
- 7.2 The learning and development policy documents (E13) provide general learning and development requirements relating to safeguarding and child protection for employees who provide regulated care and support services.
- 7.3 **All** employees involved in planning or providing care and support services will receive mandatory induction and ongoing training in safeguarding and child protection. Please note: this **includes** those who work solely with adults, as their role may bring them into contact with children or young people who are, for example, living or regularly visiting the homes of adult service users and who may be experiencing different forms of abuse which all staff need to be able to recognise¹⁴

¹³ [Early help \(or early intervention\) | NSPCC Learning](#) facilitate coordinated multi-agency support for children and young people at risk of poor outcomes, aiming to identify their needs and plan to meet those needs.

¹⁴ As well as being good practice, this is an insurance requirement for those organisations insured by a

- 7.4 All employees, volunteers working with children are required to carry out yearly safeguarding training.

8.0 MONITORING AND COMPLIANCE

- 8.1 The organisation is committed to ensuring that its safeguarding policies and procedures remain effective, up to date and responsive to emerging risk and best practice.
- 8.2 Its board of trustees will request for audits to be carried out to assess compliance with the safeguarding policies and procedures it operates.
- 8.3 The organisation recognises it is essential that where abuse has occurred, they understand what went wrong and what action is needed to ensure it never happens again.

9.0 ADOPTION

- 9.1 To formally adopt this policy, the organisation's board of trustees will document in the minutes of the appropriate board meeting its name, reference number and the date it was adopted. The chair of the trustees will sign the minutes on behalf of the board.

company brokered through Gallaghers.

APPENDIX 1 – DEFINITIONS

Abuse

Abuse is any form of maltreatment of a child or young person. Someone may abuse or neglect them by inflicting harm, or by failing to act to prevent harm. There are multiple forms of abuse relating to children and young people, and incidents can often involve several categories. The different types of abuse are covered in detail in C01e (the abuse of children: factors, types and indicators).

Being exposed to domestic abuse can have devastating consequences for children. The statutory definition of domestic abuse is set out in the Domestic Abuse Act 2021 and further outlined in C01e.

Child in need

This refers to a child or young person who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development are likely to be significantly or further impaired, without provision of services; or a child who is disabled.

Safeguarding and promoting the welfare of children

Adverse Childhood Experiences (ACE) are known to have lifelong impacts on children's mental and physical health and behaviour into adulthood.

Safeguarding and promoting the welfare of children is defined 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 life chances.

Child protection

This refers to the activity undertaken to protect specific children or young people who are suffering, or are likely to suffer, significant harm.

Significant harm

Significant harm is assessed in relation to:

- the nature of harm in terms of maltreatment or failure to provide adequate care
- the impact on the child or young person's health and development
- their development in context of their family and wider environment
- special needs such as a medical condition, communication impairment or disability that may affect the child or young person's development and care in a family
- the capacity of parents to adequately meet the child or young person's needs and
- the wider and environmental family context.

Some children or young people are in need because they are suffering or likely to suffer significant harm. This threshold gives a legal justification for compulsory intervention in their life and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote their welfare.

Abuser

Abuse may be carried out by any of a wide range of people. Examples include:

- relatives, friends, family members, neighbours, those in their social network
- professional paid staff or volunteers (including colleagues) in an institutional or community setting, including the child or young person's own home
- someone known to the child or young person or a stranger
- an adult or adults, or another child or children.

Exploitation

Exploitation is the act of using someone unfairly to another's advantage. There is often an unequal exchange (money, sex, work) with an adult at risk, in return for basic necessities, such as food, shelter or protection; where an individual has felt frightened of the consequences if they refuse (coercion); where the exploiter gains financially or socially.

Contextual Safeguarding

Contextual Safeguarding is a framework for safeguarding children beyond their family settings. While traditional safeguarding is focused on working with parents, within a contextual framework the focus is on identifying harm, or risk of harm within contexts beyond familial settings, for example:

- in educational facilities
- when taking part in local community activities (such as clubs and internet cafes)
- in peer groups
- online.

Contextual safeguarding then works to create safety within those environments; it builds on and does not replace safeguarding children within their family settings¹⁵.

Harrow Council Children's safeguarding contact

Children's MASH Team:

Golden Number

020 8901 2690

duty.assess@harrow.gov.uk

Additional Links

- [Mash Form](#)
- [Report a Concern](#)
- [LADO referral form](#)

¹⁵ [Contextual safeguarding | NSPCC Learning](#)

Safeguarding & Child Protection Policy	Date Adopted and Signed	Ref	Name	Signed	Position
		SCPP25	Geoff Broomhead		Chair of Trustees Harrow Carers
		SCPP25	Dr. Janice Howkins OBE		Vice Chair of Harrow Carers and Trustee safeguarding lead
		SCPP25	Colin Powell		C.E.O Harrow Carers DSL - NSP
		SCPP25	Tianae Gould		Head of Young & Young Adult Services Harrow Carers DSL
		SCPP25	Karen Gilchrist		Head of Adult Services Harrow Carers NSP – Caldicott Guardian