



## Safeguarding Children

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Policy Owner:	Operations Manager – Community Safety and Safeguarding
Policy Author(s):	Operations Manager – Community Safety and Safeguarding
Accountable Executive:	Chief Operating Officer
Approved by:	Executive Director of Corporate Service / Director of Housing
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For the full version history of this policy, see the back page	

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## 1.0 Introduction and Scope

1.1 This document covers our policy on Safeguarding Children. The policy should be read in conjunction with the Safeguarding Children Toolkit and aims to provide clear direction to staff and others about expected behaviour in dealing with child safeguarding issues.

1.2 The purpose of the policy is, therefore, to ensure that safeguarding concerns and referrals are handled sensitively, professionally and in ways that support the needs of the child or young person.

1.3 The scope of this policy covers:

Gentoo Group	X
Gentoo Homes	
Gentoo Developments	
Gentoo Genie	

1.4 It applies to:

General Needs rented properties	X
Supported Housing	X
Sheltered Housing	X
Leasehold/Shared ownership	X
Rent to Buy properties	X
Market rented properties (domestic)	X
Temporary Accommodation	X
Stock owned but not managed by the Group	X
Communal Areas, including those relating to Leasehold/Shared Ownership properties	X
Commercial Property (offices, depots etc)	X
Stock managed by Gentoo on behalf of a third party	X
Garages and outbuildings	
Remote plant (district heating, electrical pumps etc)	
Curtilage	

## 2.0 Links to Strategy and the Business Plan

2.1 Our vision and values set the direction and shape the culture of our organisation.

2.2 Gentoo's **vision** is:

Great Homes – Strong Communities – Inspired People

2.3 Our vision The Group's **values** are:

- Do the right thing
- Make a difference
- Keep learning

- Work together
  - Give all you've got
- 2.4 For this 2020 Business Plan, the Group's Board and Executive Team have refreshed Gentoo's strategic aims, centred on the following **themes**:
- Place
  - People
  - Perform
  - Partner
  - Pride
- 2.5 These "5P's" have been developed to articulate the delivery of our vision via the following strategic **aims**:
- Provide homes and services that enable our tenants and communities to succeed **(Place)**
  - Invest in people and communities to help realise opportunities and release potential **(People)**
  - Be well governed and financially resilient, operating efficiently and responsibly, investing wisely to fulfil our social purpose **(Perform)**
- 2.6 The above aims will be supported by the following **enablers**:
- Work with others to influence and generate sustainable change **(Partner)**
  - Harness the collective passion and energy of our people to support the city's plan **(Pride)**
- 2.7 This Policy operates within our Vision and Values and links to the Safeguarding Adults at Risk Policy and Toolkit, Hoarding Toolkit, Data Protection Policy, Domestic Abuse Policy and Community Safety Toolkit.

### **3.0 Regulation and Legislation**

- 3.1 The Chief Operating Officer will ensure this policy has regard to all legislation, regulation and best practice by seeking independent expert advice. The regulation and legislation applicable to this policy is attached in Appendix 1.

### **4.0 Our Policy Statement**

- 4.1 Gentoo regards the safeguarding and protection of children/young people as paramount within all of its activities whether this involves direct or indirect contact with children/young people.
- 4.2 Staff, volunteers and board members may regularly come into contact with children/young people as part of the Group's organised activities e.g. during volunteering programmes, as part of the regular housing and neighbourhood management functions, or during our support role. Managers within Gentoo in conjunction with HR will decide whether

checks are necessary and at what level these checks should be done. The Group will ensure that its activities, staff and volunteers as well as its procedures take account of the welfare of children and young people.

- 4.3 Gentoo does not operate in isolation. Safeguarding children and young people is the responsibility of all adults and especially those working with children.
- 4.4 Gentoo staff are encouraged to recognise and report anything that does not seem right, and this will be sent to the relevant team for further investigation if necessary. However, if necessary they also may have to act immediately to prevent any further harm from occurring such as contacting the Safeguarding Team or their line manager for further advice and guidance
- 4.5 Gentoo's aim is to help protect the children for whom we have responsibility as part of our group functions and work consistently and appropriately with safeguarding agencies/ authorities.
- 4.6 The work undertaken by Gentoo is increasingly diverse and of a cross boundary nature. The policy therefore acts in accordance with national legislation, guidance and good practice implemented locally by the Sunderland Safeguarding Children Partnership (SSCP).
- 4.7 Whilst SSCP has a role in co-ordinating and ensuring the effectiveness of local individuals and organisations work to safeguard and promote the welfare of children, it is not accountable for their operational work. This means that Gentoo Group retains accountability for safeguarding and promoting the welfare of children through our services.
- 4.8 Gentoo is committed to respond in accordance with the SSCP procedures in all cases where there is a concern about significant harm.
- 4.9 This policy and accompanying toolkit covers the range of interactions the group has with children and young people and recognises the three overarching principles of **prevention, protection and support**.
- 4.10 We are committed to the principles of diversity and inclusion throughout the organisation and aim to:
  - Meet the needs and choice of people from all backgrounds
  - Ensure that our services are relevant, responsive and sensitive to the needs of our existing and future customers
  - Ensure that all sections of the community in which we work have equal access to our services.
- 4.11 Our Safeguarding Children Policy will ensure that customers are treated as individuals with fairness and respect. An Equality Assessment has been completed on this policy.

## **5.0 Roles and Responsibilities**

- 5.1 As a Housing Association, we have a statutory responsibility to comply with all relevant regulation and legislation in relation to safeguarding children.
- 5.2 The Chief Operating Officer is accountable for ensuring this policy has regard to all legislation, regulation and best practice and for ensuring implementation of this policy effectively. Gentoo will also have representation on the Sunderland Children Safeguarding Partnership.
- 5.3 The Director of Housing is accountable for adequate resourcing and having effective processes in place to implement the policy.
- 5.4 The Heads of Operations are responsible for the day to day delivery of this policy but more specifically, the Operations Manager (Community Safety and Safeguarding) is the operational lead.
- 5.5 All Gentoo Staff are responsible for familiarising themselves with this policy and accompanying toolkit and for reporting any concerns they have around safeguarding children and as a minimum must have completed the internal E-learning training.
- 5.6 Gentoo staff should attend safeguarding meetings where relevant and see cases through to their conclusion.

## **6.0 Escalation**

- 6.1 Where the Board or any Board member has concerns about significant issues in any area of compliance with the safeguarding children policy and toolkit, they must escalate these concerns to the Chief Operating Officer and the Chair of the Board.
- 6.2 Where a member of staff has concerns about significant issues in any area of compliance with safeguarding children, they must escalate these concerns through their line management structure, ultimately to Group Executive Team.
- 6.3 Where a member of staff continues to have concerns about significant issues in any area of compliance with safeguarding children, they should refer to the Group Whistleblowing Policy for further guidance.

## **7.0 Monitoring and Review**

- 7.1 This policy will be reviewed every 3 years or in line with business need or changes in legislation.
- 7.2 This policy may be subject to an audit in line with the internal audit plan.

- 7.3 The toolkit will be regularly reviewed and updated where appropriate, drawing on external expertise where required.
- 7.4 This Policy is Grade 2 and changes will need the approval of Chief Operating Officer and Executive Director of Corporate Services.

## **8.0 Policy Outcomes**

- 8.1 Our policy aims to achieve the following outcomes:
- 8.2 **Prevention** – by providing a positive atmosphere, providing training to raise awareness, providing appropriate support and good adult role models in our contact with children/young people.
- 8.3 **Protection** – by all staff being recruited, trained and supported to follow Gentoo's Safeguarding Policy and respond effectively to any suspicions of significant harm and understand their accountability with regard to safeguarding children.
- 8.4 **Support** – by looking after all staff who have handled suspicions / disclosures as well as support for children / young people Gentoo come into contact with who may have been abused. Gentoo will ensure that support from outside the organisation is sought where appropriate.

## **9.0 Confidentiality**

- 9.1 We will treat all information received in a private and confidential manner as far as possible but if we believe a child is at risk there may be situations where we cannot do this.
- 9.2 We will only disclose information to perpetrators, legal representatives, or other third parties once we have the consent of the complainant to do so.
- 9.3 We may, however, have a legal obligation to pass information on, for example to the Police or Children's Services or other statutory agencies.

## **10.0 Data Protection**

- 10.1 This policy fully complies with the Group's Data Protection Policy.

## **11.0 Modern Slavery**

- 11.1 Gentoo take a zero-tolerance approach to human trafficking and slavery. Modern slavery encompasses human trafficking, forced labour and domestic servitude which are all a form of abuse and must be dealt with as a Category 1, which is our highest priority. Gentoo carry out customer surveys which aim to ensure that the legal tenant and their household are

living in the property and that it is not being used for illegal purposes, which includes human trafficking and slavery.

## 12.0 Records

11.1 All safeguarding referrals and information relating to attendance at meetings is recorded on Streetwise. This information is not available for all staff to see but is limited to the Safeguarding team and the local management teams at NOM level and above. All correspondence with agencies regarding safeguarding should be forwarded to the Safeguarding Team who will ensure that a copy is stored in a central location (Streetwise).

## 13.0 Qualifications and training

12.1 All new staff will be given initial induction training on our Safeguarding Children Policy and Procedure. Mandatory staff training is carried out annually to relevant staff (including depot staff) to remind them of their obligation to alert the safeguarding team to any concerns they may have and how they should communicate this alert.

12.2 Staff will have access to the [SSCP website](#) which provides information associated with child protection and includes advice and guidance for staff working with children and young people.

12.3 Managers across the group need to identify staff who will have interaction with children and young people within their job role. It is the managers' responsibility to ensure that their staff receive the necessary training and to inform Human Resources if staff require a Disclosure and Barring Service (DBS) check.

## Version Control

Version	Reason	Issuer	Date
2.0	Approved.	Julie Lister	2017
2.0	Amended format.	Sarah Treadwell	22/03/2018
2.1	Changed names to job titles and added accountable ED.	Sarah Treadwell	07/10/2019
2.2	Draft for review.	Julie Lister	16/12/2020
2.3	Changes made after discussions with Carol Long, Susie Thompson, Julie Walker and Julie Lister.	Julie Lister	21/12/2020
3.0	Approved.	Julie Lister	11/01/2021

# TOOLKIT



## 1.0 Introduction

1.1 This procedure should be read in conjunction with the Safeguarding Children Policy.

1.2 The procedure will cover the following areas:

- How we will ensure the welfare of children and young people by preventing and deterring abuse
- Responding to suspicions of harm, neglect and/or abuse
- Responding to allegations of harm and abuse, including those made against employees, volunteers, tenants and board members;
- Recruitment and background checks of staff/ volunteers who will work with children and young people
- Working with sexual offenders

## 2.0 Roles and Responsibilities

2.1 The *Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children 2018* sets out the important role that Housing Associations play in recognising child welfare issues, sharing information, making referrals and subsequently managing and promoting the welfare of children. This is even more important now that most local authorities do not directly own or manage housing.

Role	Responsibility
Board	The Board is responsible for seeking evidenced assurance that the way the Group operates its safeguarding children policy in line with what is set out in the policy.
Chief Operating Officer	The Chief Operating Officer is accountable for ensuring the effective implementation of this procedure and representation on the Sunderland Children Safeguarding Partnership.

Heads of Operations	The Heads of Operations are responsible for the day to day delivery of this procedure.
Lead Officer – Operations Manager (Community Safety and Safeguarding)	The Lead Officer will oversee Gentoo’s children safeguarding policy and toolkit and will champion safeguarding issues within the Group.
Community Safety staff (Operational Officers)	<p>Staff working within the Community Safety team will refer suspected or allegations of abuse to the relevant investigating agencies and they will monitor the referrals and outcomes.</p> <p>Staff will act as a source of support, advice, expertise and co-ordination and will liaise with the relevant agencies.</p> <p>Staff will obtain access to resources and attend any relevant training and ensure staff are trained and receive relevant updates in relation to safeguarding matters.</p>
Neighbourhood Operations Managers (NOMs)	<p>NOMs will be the lead contact for the area/ team to help and advise staff on safeguarding issues, will act as an advocate and will promote the use of the Early Help service within their area.</p> <p>NOMs will act as a link to the Community Safety Team and will attend Safeguarding meetings or nominate the best person within the team to attend. They will also keep up to date on Safeguarding training courses and will update the Community Safety Team on any issues or problems staff are having in relation to Safeguarding.</p>
All staff	All staff must attend relevant training sessions. All staff have the responsibility to refer any received information (disclosure) of abuse or any concerns about a child / young person to the Operational Officers. Failure to do so may result in disciplinary proceedings.

All adults	All adults working with or on behalf of children / young people have a responsibility to protect them and report their concerns appropriately.
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### 3.0 Definitions

3.1 The following provides clear definitions of who constitutes a child/young person, what constitutes harm and the types of abuse which may take place.

#### 3.2 Children / Young People

The Children Act 1989 provides the legislative framework for child protection in England. This is strengthened by the Children Act 2004, which encourages partnerships between agencies and creates more accountability, by placing a duty on local authorities and their partners to co-operate in safeguarding and promoting the wellbeing of children and young people. Both of these acts are amended by the Children and Social Work Act 2017.

The Children Act 1989 and 2004 defines a child as **any person under the age of 18**. In addition to this a person is classed as a child if aged 18, 19 or 20 and: (a) has been looked after by a local authority at any time after attaining the age of 16; or (b) has a learning disability.

#### 3.3 Significant Harm

'Harm' is defined in the Children Act 1989 Section 31 (9) as:

- Ill-treatment (including sexual, physical and non-physical abuse);  
or
- Impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural) as compared to a similar child
- Impairment of a child's health or development as a result of witnessing the ill-treatment of another person e.g. domestic violence (Adoption and Children Act 2002).

#### 3.4 Significance

Where the question of whether harm suffered by a child is significant depends on the child's development. His or her health or development shall be compared with that which could be reasonably be expected of a similar child. (Children Act Guidance and Regulations, Vol 1)

### 3.5 **Child Protection**

There is no legal definition of child protection, but services aim to identify those children who are at '**risk of serious harm**'. Child protection aims to keep children safe where there is a serious risk of harm. Serious risk of harm may arise from a single event or a series of concerns over time. Under Section 47 of the Children Act 1989, a local authority has a duty to investigate if they have reasonable cause to suspect a child is suffering or is likely to suffer significant harm.

3.6 In exceptionally serious situations, where a child is at risk of serious harm, an emergency protection order can be applied for. If a child is at risk of serious harm, staff should contact the Community Safety Team immediately.

### 3.7 **Child in Need**

Children who are defined as '**in need**' under the Children Act 1989 are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health and development, or their health and development will be significantly impaired without the provision of services.

3.8 The term derives from Section 17 of the Children Act 1989 that sets out the definition of "children in need" as:

- Children who are 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;
- Children whose health and development are likely to be significantly impaired, or further impaired without the provision of services;
- Children who are disabled.

### 3.9 **Types of abuse – there are four types of abuse**

#### 3.10 **Physical abuse**

Physical Abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

#### 3.11 **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse.

3.12 Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from

home or abandonment, failing to protect a child from physical harm and emotional harm or danger, or the failure to ensure adequate supervision including the use of inadequate caretakers or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### 3.13 **Sexual abuse**

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, including children being sold for sex, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts.

3.14 They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways.

Sexual exploitation of children and young people also constitutes sexual abuse. See ***Sexually Exploited Children***.

### 3.15 **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

3.16 It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children frequently to feel frightened or in danger or the exploitation or corruption of children.

3.17 Some level of emotional abuse is involved in all types of maltreatment of a child though it may occur alone. For more information on indicators of each type of abuse please see the **[Working Together to Safeguard Children: a guide to inter-agency working to safeguard and promote the welfare of children](#)**

## 4.0 **Exposure to abuse**

### 4.1 **Sexually exploited children**

The sexual exploitation of children and young people is a form of child sexual abuse. Working Together to Safeguard Children (2018) describes sexual exploitation as follows:

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

4.2 Child sexual exploitation does not always involve physical contact; it can also occur using technology, for example making sexually explicit films or on line grooming. Children and young people who are sexually exploited are the victims of child sexual abuse, and their needs require careful assessment. They are likely to be in need of welfare services and, in many cases, protection under the Children Act 1989. This group may include children who have been sexually abused through the misuse of technology, coerced into sexual activity by criminal gangs or the victims of trafficking.

4.3 The identification of a child who is being sexually exploited, or at risk of being sexually exploited, should always trigger an immediate referral and staff should follow procedure by reporting this to Gentoo Safeguarding Team.

#### 4.4 **Children affected by gang activity**

Children and young people who become involved in gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and professionals such as Gentoo, have a responsibility to safeguard these children and young people and to prevent further harm both to the young person and other potential victims.

4.5 Risks associated with gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs. Other risks include increased likelihood of involvement in knife crime, sexual violence and substance misuse. Guidance published on safeguarding children and young people who may be affected by gang activity is intended to assist agencies and professionals ensure the safeguarding process effectively responds to children and young people at risk of gang related violence. The guidance promotes an approach whereby agencies should work together to:

- clearly define the local problem;
- understand the risks posed by local gangs;
- effectively identify young people at risk;
- assess the needs of children, young people and their families;
- identify effective referral pathways;
- support professionals in delivering effective interventions.

#### 4.6 **E-safety**

Children can be exposed to abuse online. Terms such as 'e-safety',

'online', 'communication technologies' and 'digital technologies', when used in this document, refer to all fixed and mobile technologies that children may encounter, now and in the future, which allow them access to content and communications that could raise e-safety issues or pose risks to their wellbeing and safety.

#### **4.7 Grooming**

Social networking sites are often used by perpetrators as an easy way to access children and young people for sexual abuse. In addition radical and extremist groups may use social networking to attract children and young people into rigid and narrow ideologies that are intolerant of diversity: this is similar to the grooming process and exploits the same vulnerabilities. The 'grooming' of youngsters by paedophiles on the net remains rare, but it's important to be vigilant. An adult using a social networking site can become anyone they want to be when they're online - a 15-year-old girl looking for mates with the same taste in music, for example.

#### **4.8 Bullying**

Despite its lower profile, internet bullying occurs more frequently than grooming. This is when a child is tormented, threatened, harassed, humiliated, embarrassed or otherwise targeted by another child using the Internet and/or mobile devices. It is essentially behaviour between children, although it is possible for one victim to be bullied by many perpetrators. In any case of severe bullying it may be appropriate to consider the behaviour as child abuse by another young person. Threats, harassment and psychological torment via email or in a virtual chat room can have a devastating effect on a child.

4.9 Useful websites are listed below which offer advice to children, parents and teachers and offer reporting mechanisms to minimise dangerous sites:

- Guidance on BBC website - <http://www.bbc.co.uk/cbbc/shows/stay-safe>
- The Child Exploitation and Online Protection Centre - <http://www.ceop.police.uk/>
- Better Internet for Kids - <http://www.saferinternet.org/web/guest/home>
- Internet Watch Foundation <https://www.iwf.org.uk/>
- Kidscape - <http://www.kidscape.org.uk/>
  
- Know it all - <http://www.childnet-int.org/kia/>
- Stop it now - <http://www.stopitnow.org.uk/>

- Childline - <http://childline.org.uk>
- NSPCC professional helpline – <https://www.nspcc.org.uk/keeping-children-safe/our-services/nspcc-helpline/>

## **5.0 Domestic abuse**

5.1 Domestic abuse can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional
- Discriminatory

5.2 The definition includes coercive control, honour based abuse, forced marriage and female genital mutilation.

5.3 There is strong, evidenced based links between domestic abuse and child abuse. Exposure to domestic abuse is always detrimental to children, although the impacts may vary. Children exposed to abuse at home may be affected by physical and/or emotional abuse, neglect and ongoing psychological damage. This means that in domestic abuse cases where children are present, staff have a duty to make a safeguarding referral to the Community Safety Team.

## **6.0 Female Genital Mutilation (FGM)**

6.1 Female genital mutilation is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision or cutting.

6.2 Religious, social or cultural reasons are sometimes given for FGM, however, FGM is child abuse, it is dangerous and a criminal offence.

6.3 If any member of staff becomes aware that a child (or adult) has been subject to FGM they must contact the Community Safety Team immediately.

## **7.0 Forced marriages**



- 7.1 A marriage must be entered into with the full and free consent of both people. A forced marriage is a marriage where one or both partners do not consent, or consent is extracted under duress. Everyone has the right to live their life in the manner they choose, forced marriage is about removing that choice.
- 7.2 If families must resort to violence or emotional pressure to make someone marry, that person's consent has not been given freely and therefore it is a forced marriage.  
Forced marriage is an abuse of human rights, a form of domestic abuse and child abuse. Whilst women are the main victims of honour based violence, men too can be subjected to abuse to pressurise them into marriage.
- 7.3 The Forced Marriage (Civic Protection) Act came into force on 25th November 2008. The aim of this Act is to provide protection to those at risk of forced marriage and to provide recourse for those who have already been forced into marriage.
- 7.4 In July 2014 the Anti-social Behaviour, Crime and Policing Act made it a criminal offence to force someone to marry, this includes:
- Taking someone overseas to force them to marry (whether or not the forced marriage takes place)
  - Marrying someone who lacks the mental capacity to consent to the marriage (whether they are pressured to or not)
  - Breaching a Forced Marriage Protection Order

Please see Gentoo's Forced Marriage Policy and Procedure for further information.

## **8.0 Modern Slavery**

- 8.1 Gentoo take a zero tolerance approach to human trafficking and slavery. Modern slavery encompasses human trafficking, forced labour and domestic servitude which are all a form of abuse and must be dealt with as a Category 1, which is our highest priority. Gentoo carry out customer surveys which aim to ensure that the legal tenant and their household are living in the property and that it is not being used for illegal purposes, which includes human trafficking and slavery.
- 8.2 Victims of modern-day slavery are often hidden in plain sight within the communities we serve. Staff should remain vigilant and look out for tell-tale signs such as large numbers of people being ferried to and from properties in vans or minibuses early in the morning or returning late at night.

- 8.3 Northumbria Police work closely with local Safeguarding Children Partnerships to raise awareness. The National Referral Mechanism (NRM) is a gateway for locating and identifying potential victims of modern slavery and is designed to facilitate all agencies which could be involved in a modern slavery case to share information about and assist potential victims.
- 8.4 Any potential child victim must be referred into the NRM automatically. If staff have concerns about any of the issues above, they must contact the Community Safety Team for advice.

## 9.0 Trafficking – Child sexual exploitation

- 9.1 Child trafficking and modern slavery are child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold. Children can be trafficked for the specific purpose of sexual exploitation. Signs that a child has been trafficked may not be obvious so all staff should remain vigilant and report any unusual behaviour or events. These include a child who:
- Spends a lot of time doing household chores
  - Rarely leaves their house, has no freedom of movement and no time for playing
  - Is orphaned or living apart from their family, often in unregistered foster care
  - Lives in substandard accommodation
  - Isn't sure which country, city or town they're in and/or is unable to give address details or personal details
  - Might not be registered with a school or GP

This list is not exhaustive, for more information please visit:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-trafficking/signs-symptoms-effects/>

## 10.0 Radicalisation

- 10.1 Radicalisation is slowly becoming a pressing child protection issue. Children can be targeted and groomed online or in person and abusers use these techniques to target and exploit vulnerable children.
- 10.2 If Gentoo staff are suspicious or become aware that a child is being radicalised or targeted, they should follow our safeguarding procedures and raise a safeguarding concern as a Prevent referral with the Community Safety Team who will assess the information and may follow the flowchart in **appendix 3**.

## **11.0 Private Fostering Arrangements**

- 11.1 Private fostering occurs when a child under 16 (or under 18 if disabled) is cared for, and provided with accommodation, by an adult who is not a relative for 28 days or more, by private arrangement between parent and carer.
- 11.2 Private foster carers are legally required to notify their council but many do not. This means that Children's services are unable to check whether the child is being properly cared for.
- 11.3 It is vital that Children's services are aware of such arrangements so that they can safeguard and promote the welfare of potentially vulnerable children. Ideally, the notification should come from the carer and parent, but housing staff and other professionals can play an important role in explaining to private foster carers and parents that they have a duty to notify the local authority.
- 11.4 If staff become aware that a child is being privately fostered they should encourage the carer or parent of the child to notify the local council.

## **12.0 Children who run away or go missing from home or care home**

- 12.1 Although Gentoo do not offer services directly to children, it is important that staff have an awareness of the procedure that should be followed if a child goes missing or runs away. Staff must inform the Community Safety Team if they have any concerns and the team will consult with the Government's guidance in assessing the next course of action. The Government guidance can be found here:  
<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

## **13.0 Information to parents / carers**

- 13.1 Gentoo tenants and staff should be aware that Gentoo will take any reasonable action to safeguard the welfare of young people. In cases where Gentoo has reason to be concerned that a child/young person may be subject to significant harm, ill treatment, neglect or other forms of abuse, staff have no alternative but to follow Sunderland Safeguarding Children's Partnership procedures and inform Together for Children (TFC) of their concern.

## **14.0 Working with offenders**

- 14.1 The primary circumstance where employees of the organisation will be required to work with offenders will be in regard to the re-housing of offenders. See: **Suspensions Procedure** and **Allocations procedure**
- 14.2 The sex offender's register is maintained by the Police. The Sex Offenders Act 2003 allows the Police to 'flag' those convicted of sex offences on the Police National Computer (PNC). The information held on the computer will not include any assessment of risk and will be limited to details of age, address and convictions. It is for the Police to decide whether to share this information.

## **15.0 Multi Agency Protection Arrangements (MAPPA)**

- 15.1 Gentoo are signed up to this interagency risk management protocol, which provides a national framework for the assessment and management of risk posed by sexual and violent offenders.
- 15.2 The desirable outcome for MAPPA is to effectively manage any risk to the community from a sexual or violent offender. This could require Gentoo to consider an applicant which at first glance could be seen to be a possible exclusion.
- 15.3 Before any decision is made to re-housing such an applicant, a risk management meeting will be convened. These meetings are attended by a senior member of Gentoo's Community Safety Team. At the meeting, information on the offender's behaviour will be shared in order to inform a decision of whether to accept this person for housing and to find suitable accommodation for the offender where they can be effectively managed. The Operations Manager, Community Safety and Safeguarding attends MAPPA meetings on behalf of Gentoo.

## **16.0 Code of Conduct when working with children / young people**

- 16.1 In addition to the principles set out in the Group's Code of Practice, Gentoo has a responsibility to ensure that every member of staff who comes into contact with children/young people understands the boundaries of appropriate behaviour.
- 16.2 All Gentoo employees should treat all children and young people with fairness, respect and without discrimination, and provide an example that you would wish others to follow.

16.3 The purpose of the following code of conduct is therefore to:

- Inform staff members of the standards of professional conduct required of them when interacting with children/young people.
- Inform our partners, stakeholders, customers and the wider public of the standard of professional conduct that they can expect from a Gentoo employee when interacting with children/young people.

16.4 When encountering children / young people within your job, the following table should be followed:

<b>Do</b>	<b>Do Not</b>
Make sure you have read and understand the Gentoo Safeguarding Policies and Toolkits.	Use any kind of physical punishment or restraint.
Be vigilant for any possible signs of abuse.	Smoke in front of a child/young person.
Respect the background of the child/young person you encounter.	Use non-prescribed drugs or be under the influence of alcohol.
Exercise caution about being alone with a child/young person. In situations where this is unavoidable, ensure another worker or volunteer knows what you are doing and where you are.	Use any inappropriate language.
Listen to child/young person and take every opportunity to raise their self-esteem.	Let allegations a child/young person makes go unrecorded or acted upon.
Ensure that any physical contact is open and initiated by the child/young person's needs.	Meet with children/young people outside of organised activities, unless it is with the knowledge and consent of the parents and Gentoo.
Seek advice and support from the Operational Officers or your line manager if you have any queries.	Share personal information with a child or young person.
Communicate within clear and explicit professional boundaries, this includes the wider use of technology such as mobile phones, text messaging, emails, digital cameras, videos, web-cams, websites and blogs.	Give personal contact details including e-mail, home or mobile numbers, unless the need to do so is agreed with senior management and parents/carers.

### 16.5 Working directly with children / young people

16.6 In addition to the general principles outlined above, those working regularly with children/young people as part of their job or as a volunteer within a Gentoo project or activity should adhere to the following guidelines:

- **Knowing what is expected** – When undertaking work with children / young people, all staff / volunteers should be aware of what is expected of them by the organisation. This should include:
  - The person to whom they are responsible i.e. line manager
  - Who they will be responsible for / supervise
  - A description of the work they will be expected to carry out with children / young people.
- **Minimising risk** – Situations where abuse can occur within the organisation are minimised by the following:
  - Risk assessments should always be undertaken on a project by project basis.
  - Ensuring no one member of staff is left alone in an isolated setting.
  - Making sure that young people are not put at risk e.g. walking alone in a dark/isolated area when coming to or from an activity.
  - Ensuring an activity, which involves lone contact between a worker and child/young person, takes place in a room where others are able to see i.e. with a window.
  - Where workers need to meet a child/young person in their own home they are sure a parent or someone with parental responsibility is present.
  - A written report of any potential incidents is kept.

## **17.0 Practical guidance for staff**

### **17.1 Car travel**

17.2 Gentoo Group staff will not carry children/young people under the age of 18 in their vehicles while carrying out work duties unless the child is accompanied by a responsible adult and the staff member has adequate insurance to do so.

17.3 Staff must arrange to either:

- meet the customers at the venue or;
- travel on public transport with the customers to the venue.
- Staff can claim re-imburement for the cost of their use of public transport.
- Customers must bear their own costs.

Further advice can be obtained from the Health and Safety Section.

#### **17.4 Going into a customer's home**

- 17.5 All staff going into a customer's home for any reason will need to confirm in advance of entering the property that there will be no one alone under the age of 18.
- 17.6 If there is a lone person under the age of 18 in the property then an alternative appointment should be made.
- 17.7 If while working in a property you suspect that you may have been left alone with someone under the age of 18 they you should consult with your line manager before withdrawing from the property until an adult is present.
- 17.8 It is recognised that we have a number of tenants under the age of 18 who may require workers within their homes while they are alone. In such circumstances the member of staff entering the property should be DBS checked.

#### **17.9 Working with apprentices**

- 17.10 All apprentice mentors should have an Enhanced Disclosure Barring Service (DBS) check, as they are likely to come into regular contact with apprentices under the age of 18 at some point during their job.

#### **17.11 Physical restraint**

- 17.12 It is the policy of Gentoo that no physical restraint will be used.

#### **17.13 Administration of medicine**

- 17.14 Gentoo staff do not administer medicines and there are no facilities for securely or safely storing medicines on Gentoo premises. However, if a young person requires medication, the relevant information needs to be given to Gentoo. This information will be shared with relevant member of staff to enable them to take appropriate action in an emergency and to be aware of which young people are carrying medication.

#### **17.15 Allegation against a staff member**

- 17.16 If an allegation against a staff member is made then you should **immediately** contact the People Director on one of the following numbers: **0191 525 5241 or 0191 525 5000**
- The Group Company Secretary and General Counsel should be made aware of any allegations of a criminal nature on one of the following numbers: **0191 525 5870 or 0191 525 5000**

#### **18.0 Disclosure and Barring Service checks**

- 18.1 The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA). The DBS are responsible for:



- processing requests for Criminal Record Bureau (CRB) checks
- deciding whether it is appropriate for a person to be placed on or removed from a barred list
- placing or removing people from the DBS children's barred list and adults' barred list for England, Wales and Northern Ireland

## **18.2 Referrals**

18.3 Referrals can be made to the DBS by Gentoo when:

- We are employing staff or recruiting volunteers who will be working with children and vulnerable adults when carrying out their duties but this must be substantial unsupervised contact.
- Where Gentoo have serious concerns that a person has caused harm or poses a future risk of harm to children and vulnerable adults.

18.4 Gentoo request an **Enhanced CRB** check in these instances as outlined above.

## **18.5 Barring**

The DBS make fair, consistent and thorough barring decisions that are an appropriate response to the harm that has occurred, as well as the risk of harm posed.

## **18.6 Test for regulated activity**

18.7 A new test for regulated activity has been introduced which means the DBS can only bar a person from working within regulated activity with children or adults if it is believed the person is or has been, or might in the future be, engaged in regulated activity.

## **18.8 What is an Enhanced DBS check?**

Disclosures show current and spent convictions, cautions, reprimands and warnings held on the Police National Computer. If the post involves working with children or vulnerable adults, the following may also be searched:

- Protection of Children Act (POCA) List
- ISA Adult First Check
- Information that is held under Section 142 of the Education Act 2002 (formerly known as List 99)
- any relevant and proportionate information held by the local police forces.

18.9 The Disclosure Barring Service (DBS) recognises that the Standard and Enhanced Disclosure information can be extremely sensitive and personal, therefore it has published a Code of Practice and employers- guidance for recipients of Disclosures to ensure they are handled fairly and used properly.

18.10 A copy of the Standard or Enhanced Disclosure will be sent out to the applicant as well as the Registered Body.

## **19.0 Abuse in the workplace**

19.1 You have a legal obligation to report an allegation of abuse in your workplace. If you suspect abuse of a child or young person or if a child or a young person reports abuse by a member of staff you must:

- Immediately inform your line manager or a Head of Service within 24 hours, contact should be made with the People Director on one of the following numbers:

- **0191 525 5241 or 0191 525 5000**

- The Group Company Secretary and General Counsel should be made aware of any allegations of a criminal nature on one of the following numbers:

- 0191 525 5870 or 0191 525 5000

- Do not question the person but allow them to talk freely if they so wish.
- Do not allow the accused person to have access to the person until a full investigation has been carried out.
- All information must be kept confidential i.e. who discovered the abuse, who reported it, who the accused person is. However safeguarding concerns will always be reported to statutory agencies. All other employees who may be aware of the situation must respect the need for confidentiality to protect all parties until an investigation has been carried out.
- Document any statements, conversations or observations, keeping all documentation in a locked file.
- When a member of staff is accused of abusing a service user the disciplinary procedures will be enacted and this may include automatic without prejudice suspension for the accused staff member whilst an investigation into the case is complete.

19.2 All Alerts will be taken seriously, even when the Alerter remains anonymous. All requests for anonymity by the Alerter will be fully respected. It cannot, however, be guaranteed, especially if the Alerter's information becomes an essential element in any subsequent legal proceedings

19.3 If someone does decide to remain anonymous, they must consider that, by doing so, they may impede or delay the safeguarding process. If they do not give sufficient details or information in their Alert, it may be difficult to take the process forward and may, in some instances, prevent the process from being instigated.

19.4 The person must also understand that they will not be given feedback or outcomes in relation to their concern and may not know if their concerns have been looked into appropriately. Also, it would not be possible to provide the person with any support, if required.

19.5 The Whistle blowing process is a process that enables employed staff or volunteers to raise serious concerns in the workplace and to have these concerns properly addressed. Gentoo have enlisted the services of Safecall an external provider for whistleblowing services. Safecall provide an independent confidential reporting line where you can raise your concerns and be assured, they will be fully addressed. Calls are handled by skilled staff and all reports will be treated in complete confidence. Safecall will not disclose your name to Gentoo if you wish to remain anonymous. You can contact Safecall at any time on the freephone number **0800 91515717**. The Safe call line is available 24/7 365 days. Alternatively, Safecall can be contacted via e-mail Gentoo @safecall.co.uk or via the web [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

## **20.0 Responding to a disclosure**

20.1 If a child/young person discloses abuse you must:

- Listen calmly and openly.
- Reassure the child/young person.
- Believe in the child/young person and the fact they trust you enough to open up to you.
- As soon as you can in the conversation let them know you cannot keep it to yourself and other people may need to know what they are going to tell you.
- If the child/young person asks you not to tell anyone else you must be honest with them and tell them what your responsibilities are as a worker.
- Do not ask leading questions, your aim is to be supportive and ask open questions.

### **20.2 Open & Leading Questions**

20.3 Open Questions: This type of question is unstructured and possible answers are not suggested, with the respondent answering it in his or her own words. Such questions usually begin with a how, what, when, where, and why.

- E.g. Where were you last night?

Leading Questions: This type of question suggests the answer or contains the information the examiner is looking for. E.g. You were at the shopping centre last night, weren't you??

20.4 Make notes as soon as possible (within an hour if possible) writing down the date and location and exactly what the child/young person said, what you said in response and what has happening immediately beforehand (activity etc.). Report this as soon as possible to Gentoo's Community Safety Team. You should not discuss your suspicions or allegations with anyone other than those nominated above unless you wish to go direct to the police or children's services for emergencies.

### **20.5 You suspect significant harm**

20.6 You have a legal obligation to report an allegation of abuse in your workplace. If you suspect abuse of a child/young person you must:-

- Follow the Safeguarding Process below
- Do not question the child/young person, but allow them to talk freely if they so wish.
- Do not inform the parents of the allegation; this is the responsibility of the police/children's services.
- All information must be kept confidential i.e. who discovered the abuse, who reported it, who the accused person is. All other employees who may be aware of the situation must respect the need for confidentiality to protect all parties until an investigation has been carried out.
- Document any statements, conversations or observations, keeping all documentation in a locked file, in accordance with the Data Protection policy.

## **21.0 Making a Safeguarding Children referral**

- 21.1 A concern may arise as a disclosure from a child / young person, or from information from a third party or witness. It may also arise through concerns identified by staff during visits to our properties, or through working with children in schools and the community and during volunteering sessions.
- 21.2 All concerns must be passed onto the Community Safety Team. All information regarding the case should be passed onto the Community Safety Team. Concerns should be made on a safeguarding children prompt which can be found in the standard forms and letters section on the intranet. The link is as follows:  
<https://documents.gentooigroup.com/display/SFL/Safeguarding+Children?preview=%2F12911504%2F58359810%2FPROMPT+safeguarding+Children+Internal+Referral+Form.docx>
- 21.3 If the child / family are not currently known to Children's Services, the Community Safety Team will assess whether a referral needs to be made to Together for Children (TFC). If a referral is needed, the team will refer to TFC using the TFC Sunderland Contact Form or by email if it is felt a child is at risk of significant harm.
- 21.4 If the case warrants Child Protection or further investigation, Gentoo will be advised and the most relevant member of Gentoo staff should be invited to any Core Group meetings or Child Protection Conferences.
- 21.5 If TFC do not believe the case to warrant Child Protection it will be either classed as 'No Further Action' or referred to another service and Gentoo should be advised of this.

## **22.0 Together for Children**

- 22.1 Together for Children delivers children's services on behalf of Sunderland City Council. They provide a range of services for children and their families including:

- **Early Help** – Early Help services provide targeted support to children, young people and families at the earliest point of identified need.
- **Social Care** – social care services provide support to children in need of help and protection.

## **22.2 Early Help and Intervention**

- 22.3 The Early Help services provide targeted support to children, young people and families at the earliest point of identified need. The aims of early help are to support families to support themselves, to prevent problems escalating and to reduce the numbers needing statutory interventions.
- 22.4 The Early Help service can be classed as the ‘Tier 2’ area of targeted work with children, young people and their families which sits between Tier 1 universal services such as GPs, schools and health visiting and Tier 3 which include acute and specialist services such as Children’s Social Care.
- 22.5 Early Help will provide advice and guidance for partners and more targeted services focusing on the most vulnerable. As a targeted service, Early Help will add capacity to existing Early Help plans and Teams around the family.
- 22.6 An Early Help panel will be held once a fortnight and Gentoo have appointed our Safeguarding Officer to represent the Group at the panel.

## **23.0 Information sharing**

- 23.1 Staff must refer all requests for information sharing to the Community Safety Team.
- 23.2 Gentoo will only share information in line with the Group’s Data Protection Policy where there is a clear and legitimate purpose for sharing the information.
- 23.3 Customers will be informed that their information will be shared where appropriate where the information enables a living individual to be identified. However, it may not be appropriate to inform a person that information is being shared. This is the case if informing them is likely to hamper the prevention or investigation of a serious crime, or put a child or adult at risk of serious harm.
- 23.4 Where possible, consent to share information will be sought if the information is confidential. However, consent is not always needed and in some circumstances consent must not be sought where doing so would:
- Place a child or adult at increased risk of significant harm; or
  - Prejudice the prevention, detection or prosecution of a serious crime; or
  - Lead to unjustified delay in making enquiries about allegations of significant harm or serious harm.

- 23.6 Gentoo will always assess whether there is sufficient public interest to share information. This means that even where we do not have consent, we may lawfully share with statutory agencies if it can be justified in the public interest. In assessing whether we can share information without consent, we will base our decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
- 23.7 When we share information we will ensure we only share what is necessary to achieve the purpose, distinguishing clearly between fact and opinion.
- 23.8 We will only share with the person or people who really need to know the information.
- 23.9 Information shared must be accurate and up to date. Further guidance can be found in Appendix 2.

# Appendix 1

## Regulation and Legislation

In fulfilling our obligations under this Policy, Gentoo will comply with all legislation and regulations as appropriate. This section aims to highlight the different areas of law and guidance, which may be of particular significance to Safeguarding Children.

This is a general overview and should not be used as a substitute for seeking legal advice in specific cases. If there is any doubt about the law relevant to a particular case, legal advice should be sought immediately from the Legal team.

- Children Act 1989
- Children Act 2004
- Children and Social Work Act 2017
- Working Together to Safeguard Children – a guide to multi agency working 2018
- Sunderland Safeguarding Children Partnership Procedures
- GDPR 2018
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Care Act 2014
- Anti-Social Behaviour Crime and Policing Act 2014
- Housing Act 1988, 1996 & 2004.

Gentoo has a suite of complementary policies and procedures which staff may refer to in cases where there are cross cutting concerns, these include (but are not limited to):

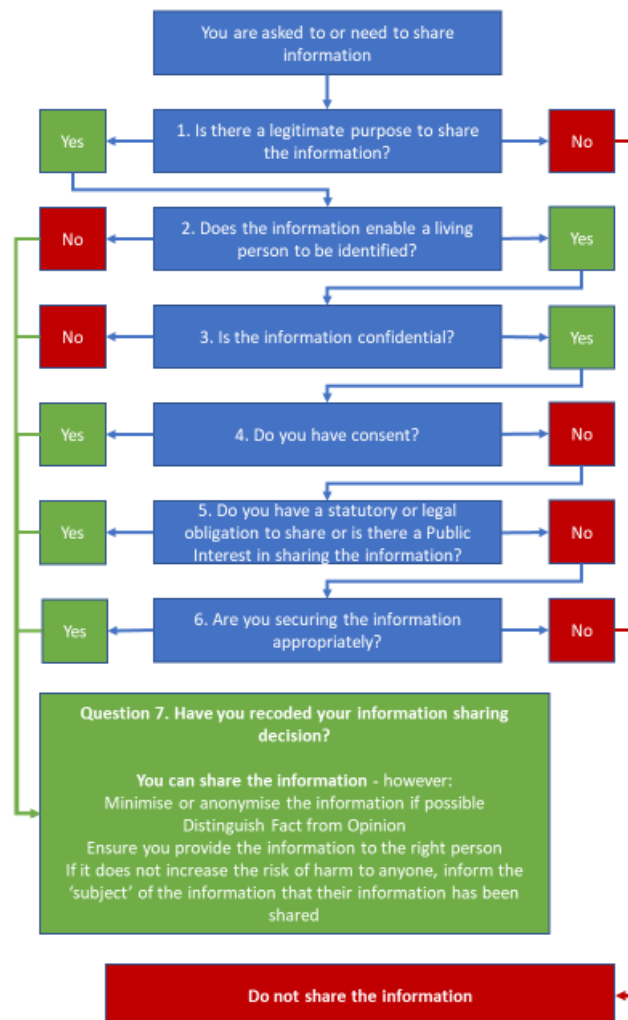
- Safeguarding adults at risk policy
- Community Safety
- Domestic abuse policy and toolkit

- Forced marriages policy
- Hate incidents policy and procedure
- Vulnerability toolkit
- Whistle Blowing



## Appendix 2

**Information Sharing – Community Safety Team All requests to share information related to safeguarding must be referred to the Community Safety Team.**



**You are asked to or wish to share information.**

**Question 1 - Is there a clear and legitimate purpose for sharing information?**

- Ensure there is a good enough reason to share the information?
- What is the outcome you are trying to achieve?
- Could the aims be achieved without sharing the information at all?
- Could the aims be achieved by anonymising the information, or minimising (reducing the amount of) the information shared?

Golden Rule - Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.

Other things to consider:

- Do not assume that you need to share the whole case file.
- Different agencies may have different processes for sharing information.

You will need to be guided by Gentoo's Data Protection Policy and Procedure, the Group's Code of Conduct and the code of conduct specifically relating to working with young people set out in this policy.

### **Question 2 - Does the information enable a living person to be identified?**

If the information is about an identifiable living individual, or could enable a living person to be identified when considered with other information, then it is classed as personal information under the Data Protection Act and subject to Data Protection law. This is likely to be the case in the course of your work. You should be open about what information you might need to share and why. However, it may not be appropriate to inform a person that information is being shared, or seek consent to this sharing. This is the case if informing them is likely to hamper the prevention or investigation of a serious crime, or put a child at risk of significant harm or an adult at risk of serious harm. Golden Rule - Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is safe or inappropriate to do so.

Other things to consider:

- If the person was informed about how and with whom their personal information might be shared at the outset, it will usually not be necessary to inform them again as long as the use as described in the original notification is the same.

### **Question 3 - Is the information confidential?**

- Not all information is confidential
- Confidential information is information of a private or sensitive nature that is:
  - not already lawfully in the public domain or readily available from another public source; and
  - had been provided in circumstances where the person giving the information could reasonably expect that it would not be shared with

others.

Golden Rule - Seek advice from the **Community Safety Team** if you are in any doubt, without disclosing the identity of the person where possible.

**If the information is not confidential you must now consider question 6.**

**If the information is confidential you must now consider question 4.**

#### **Question 4 - Do you have consent to share?**

- You should seek consent where possible and respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement on the facts of the case, that lack of consent can be ignored due to the 'public interest' i.e. it is important that others are aware of the information as withholding it would potentially put others in danger.
- You do not always need consent to share personal information. There will be some circumstances where you should not seek consent, for example, where doing so would:
  - place a child at increased risk of significant harm; or
  - place an adult at increased risk of serious harm; or
  - prejudice the prevention, detection or prosecution of a serious crime; orlead to unjustified delay in making enquiries about allegations of significant harm or serious harm.

Golden Rule - Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.

Other things to consider:

Generally, there should be 'no surprises'. Obtaining explicit consent is best practice. It can be expressed either verbally or in writing, although written consent is preferable since that reduces scope for subsequent dispute. You will need to consider whose consent should be sought. Does the person have the capacity to understand and make their own decisions on this occasion? If not, is someone else authorised to act on their behalf? Consent must be informed, i.e. when people agree to information sharing, they must understand how much of their information needs to be shared, who will see it, why it is necessary to share the information and any implications of sharing or not sharing.

Consent can be withdrawn at any time – if someone consents to sharing information and changes their mind, you should aim to respect their wishes. That said, there are still circumstances whereby you may still need to share information without someone's consent as discussed in Question 4, however in this case, they have previously provided it and withdrawn it. You would need to acknowledge their request to remove consent, and then revisit Question 4 and 5 to see if you should continue to allow it to be shared.

Question 5 – Do you have a statutory or legal obligation to share the information, or do you think there is sufficient public interest to share the information (i.e. it's in the Public's interest to share it)?

- Even where you do not have consent to share confidential information, you may lawfully share if this can be justified in the public interest. Where consent cannot be obtained or is refused, or where seeking it is unsafe or inappropriate (as explained at Question 4), the question of whether there is sufficient public interest must be judged by the practitioner on the facts of each case. A public interest request to share information can arise in a wide range of circumstances.
- Where you have a concern about a person, you should not regard refusal of consent to automatically mean that you cannot share confidential information.
- In making the decision you must weigh up what might happen if the information is shared against what might happen if it is not, and make a decision based on professional judgement.

Golden Rule - Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

Other things to consider:

A competent adult has the right to make decisions which may put themselves at risk but which present no risk of significant harm to children or serious harm to other adults. In this case it may not be justifiable to share information without consent.

**If you decide not to share information you must consider Question 7.**

**If you decide to share information you must consider Question 6.**

## **Question 6 - Are you sharing information appropriately and securely?**

Only share what is necessary to achieve the purpose, distinguishing clearly between fact and opinion.

Ensure you have not simply 'hidden' information in a spreadsheet, where someone can 'unhide' it.

Share only with the person or people who really need to know the information. Make sure the information is accurate and up-to-date.

- Understand the limits of any consent given and especially if the information has been provided by a third party.
- Check who will see the information and share the information in a secure way. For example, confirm the identity of the person you are talking to; ensure a conversation or phone call cannot be overheard; use secure email; ensure that the intended person will be on hand to receive a fax.
- Establish with the recipient whether they intend to pass it on to other people and ensure that they understand the limits of any consent that has been given.
- Inform the person to whom the information relates that you are sharing the information, if it is safe to do so, and if you have not already told them that their information may be shared.

Golden Rule - Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

## **Question 7 - Have you properly recorded your information sharing decision?**

- Record your information sharing decision and your reasons, including what information you have shared and with whom, following the Group's arrangements for recording information and in line with any local information sharing procedures in place.
- If, at any stage, you decide not to share information you should record this decision and the reasons for it.

Golden Rule - Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

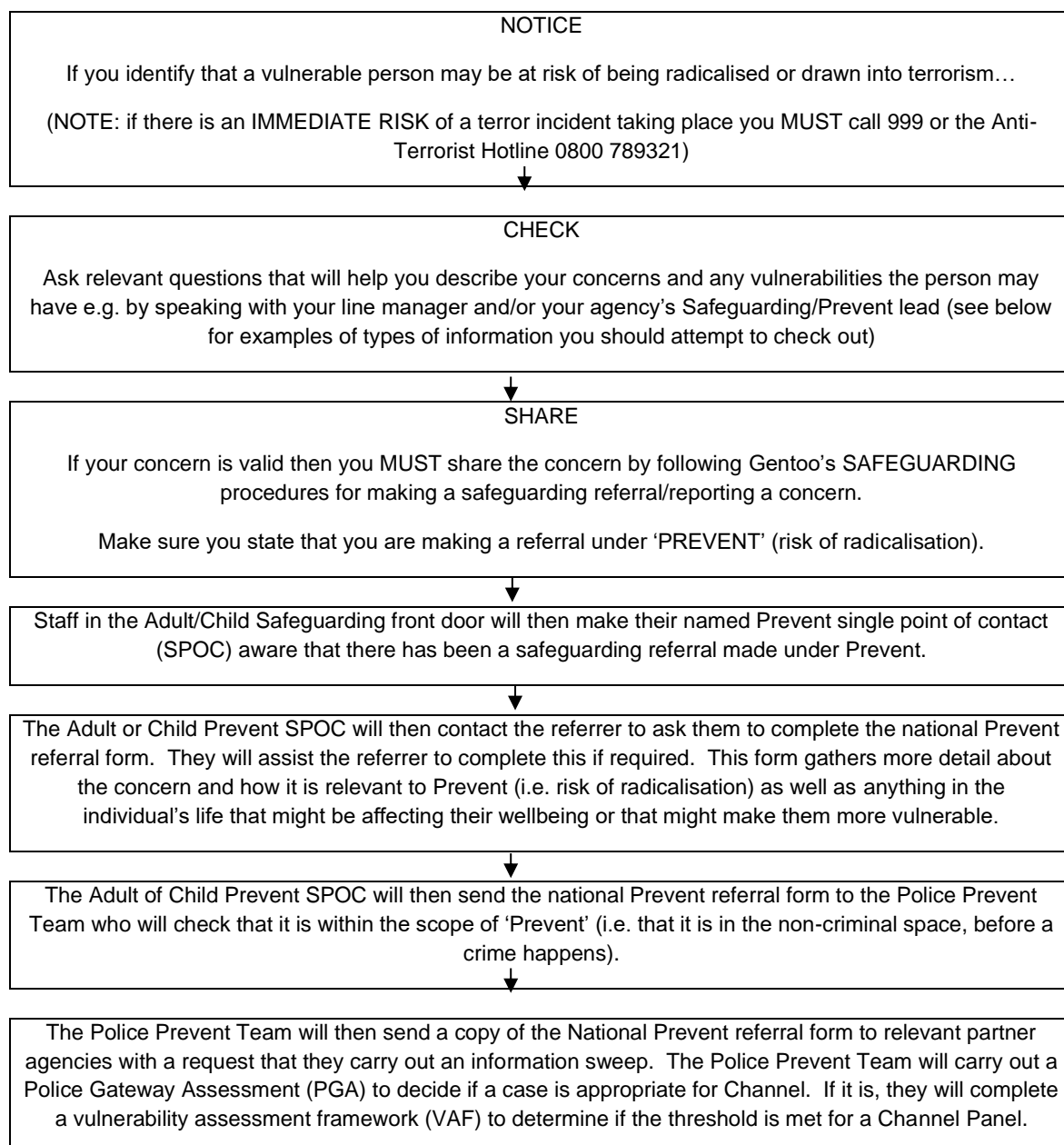
**If there are concerns that a child may be at risk of significant harm or an adult may be at risk of serious harm, then follow the relevant procedures without delay.**

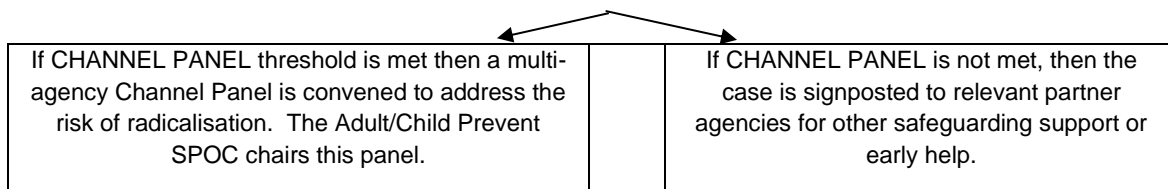
**Seek advice from a member of the Community Safety Team or your local Neighbourhood Operations Manager if you are not sure what to do at any stage and ensure that the outcome of the discussion is recorded.**

## Appendix 3

### What is Prevent\* and what should I do if I have a concern?

Prevent safeguards vulnerable adults or children at risk of being radicalised to stop them becoming terrorists or supporting terrorism. It safeguards people in the same way as safeguarding individuals from being drawn into sexual exploitation, gangs, county lines etc. Prevent works in the non-criminal space so those referred will not be criminalised. Prevent is a multi-agency response to offer support to individuals referred and deals with all forms of extremism such as Right Wing and Islamist extremist. The referral process is:





\*Prevent is one of the 4 strands of the Government's Counter Terrorism Strategy (CONTEST). It operates in the non-criminal space to safeguard anyone who is at risk of being radicalised or drawn into terrorism. The following agencies have a duty to report Prevent concerns: local authorities, schools and registered childcare providers, higher and further education, the health sector, police, prisons, and probation.

**Prevent referral Process: Last Updated March 2020**

For the **check and share stage**, attempt to check and collate information that can include, but is not limited to:

YOUR CONCERNS – Describe in as much detail as possible the specific concern(s) relevant to Prevent.

For example:

- How / why did the Individual come to your organisation's notice in this instance?
- Does it involve a specific event? What happened? Is it a combination of factors? Describe them.
- Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? If so, Where? When? How?
- Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?
- Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?
- Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?
- Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider any extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures.
- Please describe any other concerns you may have that are not mentioned here.

COMPLEX NEEDS - Is there anything in the Individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense? For example:

- Victim of crime, abuse or bullying.
- Work, financial or housing problems.
- Citizenship, asylum or immigration issues.
- Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings.
- On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency.
- Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.
- Educational issues, developmental or behavioural difficulties, mental ill health (see Safeguarding Considerations below).
- Please describe any other need or potential vulnerability you think may be present.



SAFEGUARDING CONSIDERATIONS for example:

- Does the Individual have any stated or diagnosed disabilities, disorders or mental health issues? If so, has this been diagnosed.
- Have you discussed this Individual with your organisations Safeguarding / Prevent lead? What was the result of the discussion?
- If your concerns are sufficient that you want to make a safeguarding referral, have you informed the Individual that you are making this referral? If so, what was the response?
- Have you taken any direct action with the Individual since receiving this information? What was the action & the result?
- Have you discussed your concerns around the Individual with any other agencies?

OTHER INFORMATION you think may be relevant. For example: social media details, military service number, other agencies or professionals working with the Individual, etc...

**Prevent referral Process: Last Updated March 2020**