

## Safeguarding Children and Young People Policy October 2025

This policy is implemented by Midlands Rural Housing on behalf of four independent partner associations: Leicestershire Rural Housing Association, Northamptonshire Rural Housing Association, Peak District Rural Housing Association and Warwickshire Rural Housing Association. Midlands Rural Housing provides the full range of housing and management services for these four associations in line with a procedure agreement.

<b>Document title</b>	Safeguarding Children and Young People Policy Statement
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<b>Author title &amp; issuing department</b>	Area Housing Manager
<b>Target audience</b>	This policy applies to all colleagues working for MRH whether employed, contracted or on a voluntary basis.
<b>Approved by</b>	Richard Mugglestone
<b>Date approved</b>	20.10.2025
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<b>Links to Regulatory Standards – Economic/ Consumer Standards</b>	<p>The Transparency, Influence and Accountability Standard (“the TIA Standard”)</p> <p>The Safety and Quality Standard (“the SQ Standard”)</p> <p>The Tenancy Standard</p> <p>The Neighbourhood and Community Standard (“the NC Standard”)</p> <p>Childrens Act (1989) and (2004)</p> <p>United Nations Convention on the Rights of the Child</p> <p>Working Together to Safeguard Children 2018 (Updated 2019)</p> <p>The Framework for Assessment (2000)</p> <p>What to do if you’re worried a child is being abused (2015) Munro</p> <p>Review of Child Protection (2011)</p> <p>Children and Social Work Act (2017)</p> <p>Housing Act (2004)</p> <p>NSPCC Guidelines</p> <p>The Equality Act 2010</p>
<b>Outcome for customers</b>	<p><b>Residents</b></p> <p>The policy will ensure a clear process and proactive approach for the reporting and monitoring of any child or young person identified at risk.</p>

## 1. Introduction

Safeguarding Children and Young People is everyone’s responsibility. The Safeguarding Children and Young People Policy and Procedure for MRH provides the framework for the management of concerns about the safeguarding and promotion of the welfare of children and young people. This includes children in need and children suffering or likely to suffer significant harm as outlined in Sections 11, 17 and 47 of The Children Act 1989 and 2004.

Safeguarding Children and Young People requires MRH to work in partnership to support and safeguard children and young people at risk of abuse and neglect. Strong partnerships are those whose work is based on an agreed policy and strategy, with common definitions and a good understanding of each other’s roles and responsibilities.

Whilst we are not a statutory childcare organisation, all colleagues and contractors have an obligation and responsibility to be aware of and report concerns related to protection, safeguarding and promotion of the welfare of children and young people. Everyone who comes into contact with children and families directly or indirectly has a role to play and as such, we are in a unique position to be able to identify children and families who would benefit from early help and the provision of effective early support services.

## 2. Scope

This policy aims to help all colleagues working within MRH whether employed, contracted or on a voluntary basis working with children and young people to spot signs of abuse and neglect and to know how to respond.

This policy should be read in conjunction with the local authority policy for Safeguarding Children and Young People.

This policy applies to all individuals aged below 18 whom MRH colleagues or representatives may come into contact within the course of carrying out their normal work. This may include a child visiting a care service or a child being present during housing visits where concerns are observed or heard

## 3. Definitions

<b>Safeguarding Incident</b>	A safeguarding incident which is reportable to external parties.
<b>Safeguarding Concern</b>	A concern around an individual who is potentially at risk of harm and abuse, however this may not reach external reporting thresholds, this may require signposting and documented internal actions. The concern process will also track information requests from other professionals linked to statutory and / or mandatory reviews which cannot be linked to safeguarding incidents already reported and logged within MRH, this also includes if we received requests in relation to a PIPOT.
<b>Child or Young Person</b>	All individuals who have not reached the age of 18.
<b>Colleague</b>	Someone working within emh whether employed, contracted or on a voluntary basis.
<b>Alerter</b>	The colleague who alerts the referrer of a safeguarding incident / concern.
<b>Referrer</b>	The colleague who has the appropriate training and experience, who is responsible for submitting relevant referrals to local authorities and statutory bodies in relation to safeguarding incident / concern, this will be a member of the HM Team.
<b>PIPOT</b>	A PIPOT means 'Person in a position of trust' that work with (either paid or unpaid) adults with care and support needs and/or is in a role where they hold power and authority over these individuals.
<b>LADO</b>	Local Authority Designated Officer (LADO).

## 4. Legislation and Guidance

Safeguarding children and young people and promoting their welfare means:

- ▶ Protecting children from maltreatment.
- ▶ Preventing wherever possible impairment of children's health or development.
- ▶ Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- ▶ Taking action to enable all children to have the best outcomes.

Child protection is defined as being part of safeguarding and promoting welfare. It is the

work done to protect specific children who are suffering, or are likely to suffer, significant harm.

The 'Working Together to Safeguard Children 2018' guidance states that: "children are best protected when professionals are clear about what is required of them individually, and how they need to work together." In addition, the guidance states that "effective safeguarding of children can only be achieved by putting children at the centre of the system and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children."

When considering the welfare of children there are several pieces of legislation that should be taken into account:

▶ **The Children Act 1989:**

Protects the welfare of children who are at risk and children who may be in need of services. This tells you exactly what you need to do if you suspect a child or young person is at risk of harm or in need of support.

[www.legislation.gov.uk/ukpga/1989/41/contents](http://www.legislation.gov.uk/ukpga/1989/41/contents)

▶ **The Children Act 2004:**

This act covers services that children and young people may access. It places a duty on local authorities and their partners to cooperate and make sure that services work together and (where possible) have a joint plan developed in partnership with the parents, children and young people. This is known as the Common Assessment Framework (CAF). The Act also encouraged the establishment of local Safeguarding Children Boards and joint databases.

[www.legislation.gov.uk/ukpga/2004/31/contents](http://www.legislation.gov.uk/ukpga/2004/31/contents)

▶ **The Sexual Offences Act 2003:**

This act has two parts, the first one states what is considered a sexual offence, including physical and non-physical contact. It defines what are sexual offences against children under 13 and under 16 and sets the age of consent at 16 in most cases.

However, if an adult holds a position of trust in relation to the young person, for example as their worker, teacher, trainer, etc., the age of consent is 18. The second part of the Act deals with the sex offenders register and civil protective orders.

[www.legislation.gov.uk/ukpga/2003/42/contents](http://www.legislation.gov.uk/ukpga/2003/42/contents)

▶ **The Care Act 2014:**

Brings care and support legislation together into a single act with new wellbeing principles at its heart. Although the Care Act is meant for adults in need of support and their carers it also makes some provisions for children and young carers. Children who care for their parents in their own home are made part of their parent's needs assessment to establish the support and help they need.

▶ **The Children and Families Act 2014:**

Provides young carers with the same help and support as adult carers. All carers under the age of 18 have the right to have their support needs assessed and local authorities must

help them care for a family member as best as they can.

## 5. Children's Rights

All MRH colleagues, have a duty to make sure the rights of all individuals are promoted and that includes children's rights. MRH colleagues may not directly care for or support children or young people but through their work may come into contact with them. It is important that all colleagues understand their rights. The Code of Conduct stated that colleagues should "promote and uphold the privacy, dignity, rights, health and wellbeing of people, who use health and social care services and their carers". It is important to remember that children or young people can be carers too.

The Human Rights Act 1998 gives a number of fundamental rights to every person living in the UK. Some of these rights including:

- ▶ The right to life
- ▶ Freedom from torture or degrading treatment
- ▶ The right to education
- ▶ The right to liberty and security
- ▶ Protection from discrimination

The United Nations Convention on the Right of the Child (UNCRC) is a worldwide agreement between countries as to the basic rights that children under 18 should have.

Some of the rights relating to child protection are:

- ▶ The right to life
- ▶ The right to live a healthy life.
- ▶ The right to not be separated from their parents unless they are at risk of harm.
- ▶ The right of protection from drugs, sexual abuse or any harm to their development

<https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

## 6. The Six Principles

These six principles apply to all health and care settings and all safeguarding work should be based on them

- ▶ Empowerment - People being supported and encouraged to make their own decisions and informed consent.
- ▶ Prevention - It is better to act before harm occurs.
- ▶ Proportionality - The least intrusive response appropriate to the risk presented.
- ▶ Protection - Putting measures in place to help stop abuse from occurring and offer help and support to those at risk.
- ▶ Partnership - Local solutions through services working with their communities.

Communities have a part to play in preventing, detecting, and reporting risk and abuse.

- ▶ **Accountability** - Accountability and transparency in safeguarding practice, ensuring that everyone plays their part when it comes to safeguarding children.

## 7. PIPOT

The PIPOT process is the framework and protocols for responding to concerns about people in these roles. It involves:

- ▶ Identifying a concern- noticing something that raises concerns about a PIPOT and their ability to work safely with vulnerable adults.
- ▶ Risk Assessment – evaluating the immediate risk to the people with care and support needs.
- ▶ Information Sharing – sharing concerns and information with relevant partners as such the regulatory bodies, the police, and local authorities.
- ▶ Action – Consider safeguarding duties and disciplinary policies within MRH.

The PIPOT process must be followed even if the person in a position of trust works for another organisation.

Children and young people may be at risk of harm from individuals working with them in any environment. This includes, but is not limited to, professionals, staff members, sports coaches, foster carers, and volunteers. If concerns arise about a person's behaviour towards adults that could affect their suitability to work with children, these concerns must also be referred to the Local Authority Designated Officer (LADO).

Refer to PIPOT and LADO procedures set by the relevant local authority / safeguarding adults board.

If MRH are requested to be part of an investigation of a PIPOT (for example, from a local authority) a safeguarding concern form must be completed and submitted to Central Hub (managed homes only) Area Housing Manager and the Peoples Team must be informed for consideration against policies and procedures held by the Peoples Team department.

## 8. Abuse

### What Is Child Abuse?

Child abuse is any wrongdoing that causes, or can cause, significant emotional or physical harm to a child. Abuse and neglect can take many forms. MRH should not be constrained in its view of what constitutes abuse, neglect or harm and should always consider the circumstances on a child-centred basis. Colleagues do not need to know what type of abuse or harm is happening to report concerns, simply state what was seen or heard that has caused concern.

Incidents of abuse may be one-off or multiple, and in a service, can affect one person or more. The responsible individual who is appointed to investigate and review incidents should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of safeguarding concerns / incidents may be an indication of more serious problems and of what is organisational abuse. It is important that information is recorded and appropriately shared so that themes, trends and patterns can be identified.

## 9. Types Of Abuse

Within the Safeguarding Children and Young Persons Process & Guidance document there is a list of different types of abuse - this is not an exhaustive list - which provides a wide range of examples of the types of abuse children or young people may experience. If colleagues suspect a children or young person is at risk of abuse, exploitation or neglect they must contact their Line Manager or Out of Hour Support in the first instance. If colleagues believe that the child or young person is in immediate danger, they can also contact the police and the relevant Local Authority Social Services team.

## 10. Impact of parent's/carer's physical and mental health or domestic violence on child wellbeing

To grow up happy and safe, children need parents or carer's who love, protect and care for them in a stable, safe and secure home. Physical care and daily routines are important for development, so anything that upsets routines can be unhelpful. If a parent or carer's physical or mental health is poor, this could be a risk to the wellbeing of their child. It may increase their vulnerability or slow their development. It is important to remember that a parent or carer's health might affect their ability to safeguard.

Seeing or hearing acts of domestic violence can have a similar effect on children as being emotionally abused. As well as feeling helpless, they may not feel safe. Domestic violence is a risk to the children's physical, emotional and social development.

## 11. Anti-Social Behaviour and Homelessness

MRH has a 'Anti-Social Behaviour Policy' in place which covers all aspects of Anti-Social Behaviour and the impact this could have on children and young people. Employees of MRH dealing with Anti-Social Behaviour must always act to Safeguard children and young people.

Employees of MRH must work in partnership with relevant agencies such as, District and County Councils, Police Services, Childrens Social Services, Youth Offending Teams etc to protect and prevent any children or young people being subject to any form of abuse or neglect.

## 12. Damp and Mould (Housing Regulations)

MRH group as a landlord have a statutory duty to ensure their properties are fit for human habitation at the start, and throughout the tenancy. One of the factors considered in determining if a property is unfit is "freedom from damp".

Any individual, including children and young people living in a home with damp and mould can cause detrimental health conditions if left untreated.

MRH adopts a 'zero-tolerance' based approach to damp and mould, in line with the Housing Ombudsman 'It's not a life-style report'. MRH must ensure that any damp and

mould cases are dealt with and resolved promptly and effectively. Where damp and mould cases are not responded to and resolved, this could result in Safeguarding concerns for the child and/or young person.

*For more information regarding Damp and Mould, you should refer to the MRH Damp and Mould Policy.*

### 13. Implementation

Child protection and safeguarding is everyone's responsibility: it is not only childcare workers that have a duty to promote the welfare of children and protect them from harm.

When you come into contact with children in any way in your day-to-day work, it is part of your job to make sure that their wellbeing is safeguarded.

#### Employers Responsibility

It is MRH responsibility to ensure all colleagues follow the principles of all previously listed legislations and guidance, to ensure that the welfare of children is paramount and that they are best looked after. Everyone who works with children have a responsibility for keeping them safe. Everyone who comes into contact with children and/or young people have a role to play in identifying concerns, sharing information and taking prompt action.

MRH will work in collaboration with everyone working with children and families, complying with, the published arrangements set out by the local safeguarding partners.

#### Colleagues Responsibility

All colleagues working within MRH whether employed, contracted or on a voluntary basis must follow the principle that Safeguarding is 'everyone's responsibility'. All colleagues working within MRH must receive and complete safeguarding training which is proportionate to their roles and responsibilities.

All 'Alerters' must know what to do if a child or young person tells them they are being abused or neglected and how to record and share this information appropriately, by making the 'Referrer' aware immediately.

All 'Referrers' must be aware of the process for making safeguarding referrals internally and externally to Children's Social Care, Local Authority Children Services and other relevant agencies, and for statutory assessments that may follow referrals and the role they may play in such assessments.

#### Board Members Responsibility

Duties and responsibilities of RHA Board members. RHA Boards have a responsibility to ensure that the organisation as a whole complies with safeguarding duties under legislation and will take leadership responsibility for overseeing safeguarding arrangements. Safeguarding is a standing item at quarterly Board meetings.

## Senior Management Team

SMT will ensure that:

The safeguarding policies and procedures approved and adopted by the Board(s) are fully implemented and followed by all colleagues and volunteers.

Sufficient resources are allocated to enable the Designated Safeguarding Lead (DSL) and other colleagues to discharge their responsibilities, including recording and monitoring safeguarding activities, taking part in strategy discussions, other inter-agency meetings and contributing to the assessments.

They undertake appropriate training to carry out their safeguarding responsibilities effectively and keep this up to date.

## 14. Designated Safeguarding Lead and Deputy Designated Safeguarding Lead (DDSL):

The Designated Safeguarding Lead (DSL) is a senior member of staff who co-ordinates adult safeguarding and child protection arrangements by providing advice and support to other staff on safeguarding matters, to take part in strategy meetings and inter-agency meetings and /or to support other staff to do so and to contribute to the assessment of adults at risk. The lead is responsible for the development of a safeguarding framework which includes: - policies, processes, guidance, and training for MRH, which each area will implement and maintain.

A Deputy Designated Safeguarding Lead (DDSL) is in place to cover for when the DSL is not available; however, the responsibility remains with the Designated Safeguarding Lead. The deputy will support and be involved in internal committee meetings, ensure guidance, training, and colleague support is provided across group with a focus in their own area of the business (housing).

The DDSL will support the DSL and referrers to liaise with local authorities where there are serious and / or complex children and young people at risk safeguarding incidents, case reviews, and investigations.

## 15. Reporting & Recording

If there is a risk of serious danger, or a crime has been committed, immediately report the incident to the Police calling 999. To report a non-emergency police matter call 101.

Serious cases where there is a significant risk of immediate danger must be reported to Central Hub within 24 hours (for EMH managed homes only) and internal safeguarding form sent to an Area Housing Manager for review and sign off and then saved on our Safeguarding file for monitoring.

Where there is a Safeguarding Concern, the Alerter must notify the Referrer immediately. Referrer must then decide whether this meets the safeguarding requirements set by the Local Authority.

The Referrer must complete either of the following:

- ▶ **If classed as a 'Safeguarding Concern'** - The Referrer must complete the 'Safeguarding Concern and Prevent Reporting Form' with a clear description of the concern and action(s) taken as soon as possible. The 'Safeguarding Concern and Prevent Reporting Form' must then submit to Central Hub (for EMH managed homes only) and the Area Housing Manager within 3 working days. Depending on the nature of the concern, a follow up may be required.
- ▶ **If classed as a 'Safeguarding Incident'** - Where there's a Safeguarding Incident that meets requirements set by the Local Authority, the Referrer must submit the relevant referrals. The referral document must be submitted to Central Hub within 3 working days (for EMH managed homes only) and also sent to the Area Housing Manager. Central Hub and the Area Housing Manager requires all updates relevant to the Safeguarding Incident and proof of closure. Where applicable, the Referrer is responsible to submit referrals to statutory bodies, also ensuring copies are submitted to Central Hub.

Updates in relation to each safeguarding case must be submitted to Central Hub (Managed homes only) and Area Housing Manager within 5 working days of the case being logged. Further follow up correspondence may be required whilst the case is still open and there's on-going actions. Follow ups must contain factual information and include lessons learned and how the learning has been embedded to improve our services.

The Referrer of the safeguarding must ensure that all records are legible, factual, timely and accurate of the witnessed, suspected, or disclosed abuse. Information recorded for sharing with the local authority or to the police must be as accurate as possible, as it may be used in any subsequent legal action; hence there is the necessity for making a factual and detailed record.

KPIs, along with qualitative reports relating to safeguarding incidents, practices, audits, and developments will be submitted to the Board on a quarterly basis to provide members with assurances that MRH is meeting its safeguarding duties.

## 16. Information Sharing

This policy must be read alongside the groups' Data Protection Policy. Where there are safeguarding concerns / incidents, colleagues have a duty to share information. It is important to remember that in most serious case reviews, lack of information sharing can be a significant contributor when things go wrong.

Information should be shared with consent wherever possible. A person's right to confidentiality is not absolute and may be overridden where there is evidence that sharing information is necessary to support an investigation or in best interests e.g. in the interests of public safety, police investigation, implications for regulated service. 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.

Data protection legislation (the Data Protection Act 2018 (the DPA 2018) and UK General Data Protection Regulations UK GDPR does not prevent the sharing of information for the purpose of safeguarding children, when it is necessary proportionate and justified to do so.

The UK GDPR contains provisions intended to enhance the protection of children's personal data and to ensure that children are addressed in plain clear language that they understand. Transparent and accountability are important where children's data is concerned, and this is especially relevant when they are accessing online services.

## 17. Statutory and mandatory reviews

MRH will participate in statutory and mandatory reviews as required, with support from legal teams on a case-by-case basis. The input and involvement will be agreed in the terms of reference for the review. Broadly this could involve evidence of contribution, meeting regularly, attending panel or review meeting throughout the investigation phase. At times parallel investigations can be commissioned for example domestic homicide review and a child death review. The review leads should aim to avoid duplication and follow a parallel process. The following reviews could include but not limited to.

- a. Rapid reviews: - serious child safeguarding cases
- b. Child safeguarding practice review
- c. Child death reviews
- d. Learning disability mortality review
- e. Domestic homicide reviews
- f. Safeguarding adult reviews

If any area of MRH is notified of any reviews or request for information linked to statutory or mandatory reviews, central hub and an Area Housing Manager must be informed immediately for monitoring and support purposes.

## 10. Training & DBS

All colleagues must be trained to an appropriate level for their role. The training levels include:

<b>Level 1</b>	Safeguarding Children and Young People – E-Learning
<b>Level 2</b>	Referrer Training – Housing Officers and Housing Managers

All colleagues will have completed Level 1 training. Colleagues who are responsible to submit safeguarding referrals as part of their role (the Referrer) will receive Level 1 and Level 2 training.

Safeguarding Children and Young People E-Learning will be refreshed every 3 years or sooner if required for all colleagues.

The Disclosure and Barring Service (DBS) helps employers in England, Wales and Northern Ireland make safer recruitment decisions and prevent unsuitable people from

working with vulnerable groups, including children. The DBS decides whether it is suitable for a person to be placed on or removed from the barred list.

The Quality & Compliance Team will share wider learning opportunities within the organisation to support learning and development. For example, webinars, events, and quarterly learning log reports that share learning from cases to prevent reoccurrence.

All colleagues who require a in date DBS check must be conducted by the Disclosure and Barring Service within their roles and responsibilities to maintain compliance with statutory requirements.

*Please refer to DBS Risk Assessment Form & Guidance for Managers and Recruitment Policy for further reading and information.*

## 11. Prevent

### What is Prevent?

The Government's counter-terrorism strategy is known as CONTEST. Prevent is part of the strategy and its aim is to stop people becoming terrorists or supporting terrorism. The strategy promotes collaboration and co-operation among public service organisations. The Office for Security and Counter Terrorism in the Home Office is responsible for providing strategic direction and governance on CONTEST.

CONTEST has four key principles:

- ▶ Pursue: to stop terrorist attacks
- ▶ Prevent: to stop people becoming terrorists or supporting terrorism
- ▶ Protect: to strengthen our protection against a terrorist attack
- ▶ Prepare: to mitigate

There is no such thing as a "typical extremist" and those involved in extremism come from a range of backgrounds and experiences.

Both adults at risk and children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a person at risk of being drawn into criminal activity and has the potential to cause significant harm.

The risk of radicalisation is the product of a number of factors and identifying this risk requires that colleagues exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

- ▶ Noticeable behavioural changes.

- ▶ Expression of extreme views
- ▶ Possession of extremist literature or symbolism
- ▶ Advocating violent actions and means
- ▶ Seeking to recruit others to an extremist ideology

See 'Safeguarding Children and Young People Process & Guidance' for the referral process in relation to PREVENT.

## 12. Associated Documents

- ▶ Data Protection Policy
- ▶ Recruitment Policy
- ▶ Safeguarding Children and Young People Process & Guidance
- ▶ Safeguarding Concern / PREVENT Reporting Form
- ▶ Safeguarding Body Map Form
- ▶ DBS Risk Assessment & Guidance for Managers
- ▶ Anti-Social Behaviour Policy
- ▶ Vulnerability Policy Statement
- ▶ Damp and Mould Policy
- ▶ Safeguarding follow up form
- ▶ NHS Safeguarding App
- ▶ Disciplinary Policy

## 13. Data protection

Midlands Rural Housing will treat personal data in line with our obligations under the current data protection regulations and our own Data Protection Policy. Information regarding how resident data will be used and the basis for processing customer data is provided in the Association's Privacy Notice.

## 14. Equality of access

It is essential that the Safeguarding of Children and Young People should be equally accessible to our residents. We will ensure that the policy is provided in easy-to-read formats and provide customers access to appropriate support which will include:

- ▶ translation of communications into another language
- ▶ translation of communications into braille
- ▶ use of Language Line interpretation service
- ▶ communicating with the resident's advocate, where permission has been granted.

## 15. Review

We will review this Policy every 3 years and/or to address changes in legislative, regulatory, best practice or operational issues.

## 16. Complaints

If you're dissatisfied with the service you have received you can raise a complaint by accessing the relevant association's link below:

[Warwickshire Rural Housing Association](#)

[Peak District Rural Housing Association](#)

[Leicestershire Rural Housing Association](#)

[Northamptonshire Rural Housing Association](#)