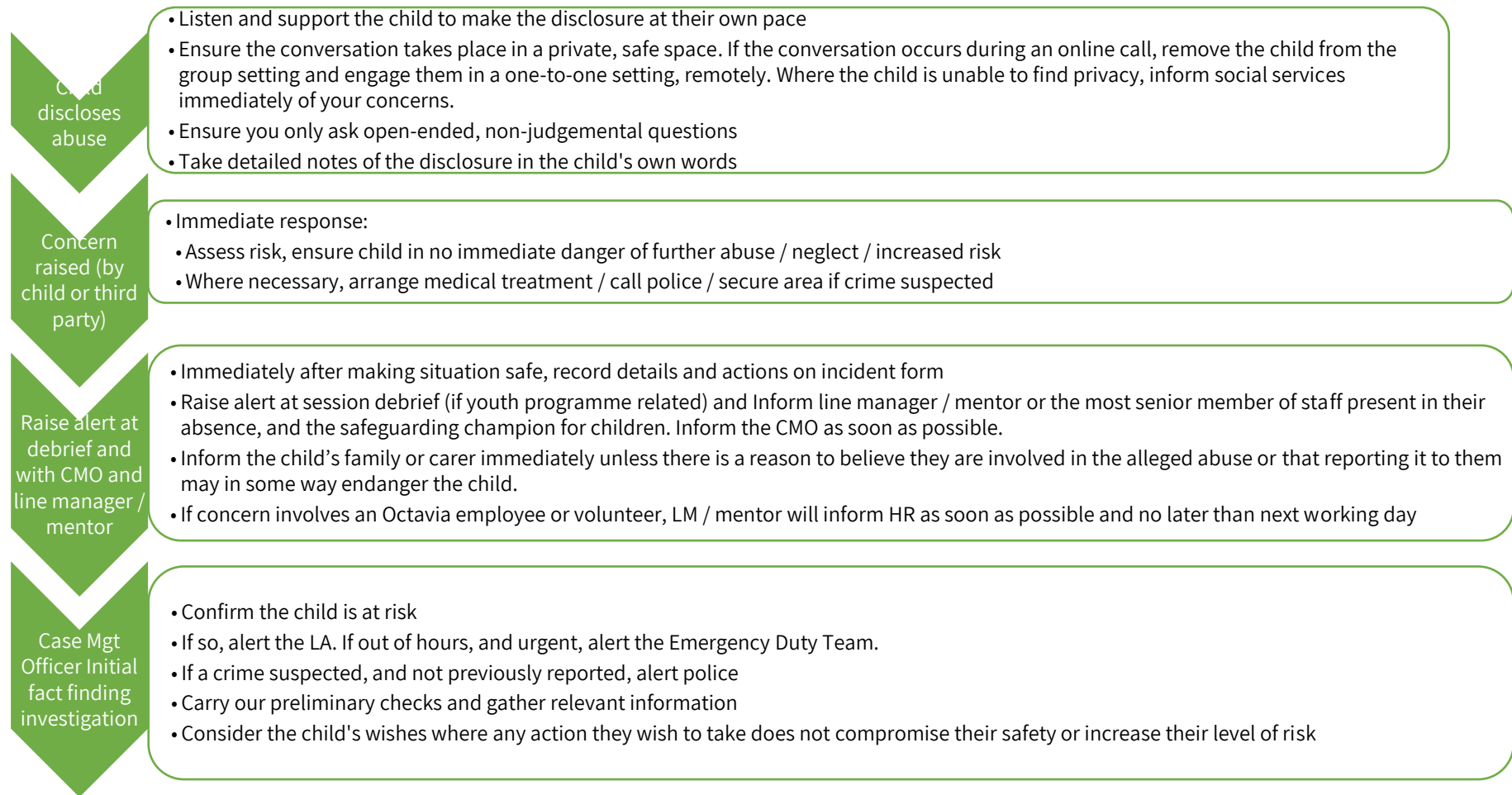


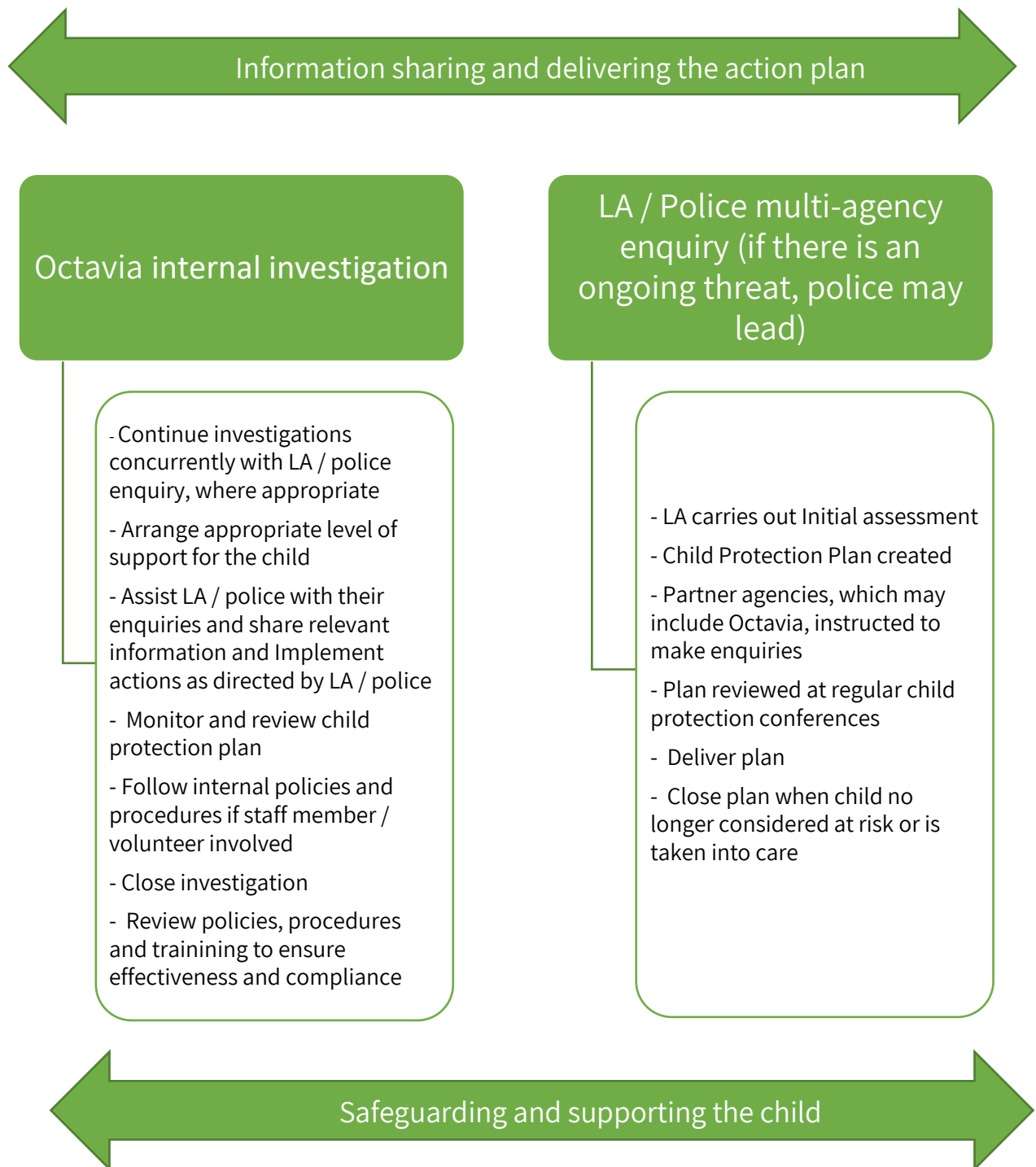
Safeguarding – Protecting Children from Abuse Procedure

This procedure applies to anyone working on behalf of Octavia, including all employees, board members, volunteers, contractors and agency staff.

1.a Safeguarding children from abuse process: initial response and investigation



1.b Safeguarding children process: Octavia and LA/Police enquiry



2 Promoting our approach

- 2.0.1 We promote safeguarding at each stage of a resident or service user's journey; at sign-up or when they join one of our services and when planning reviews.
- 2.0.2 We advertise how to report safeguarding concerns visually through posters and leaflets in our care and support schemes, offices and community centres, and publish information in newsletters and on our website.
- 2.0.3 We raise awareness of how to recognise and report safeguarding concerns verbally during remote working periods.
- 2.0.4 Managers raise awareness and actively support staff during supervision sessions and team meetings to meet their safeguarding responsibilities.
- 2.0.5 We ensure anyone working on behalf of Octavia, including board members, paid employees, volunteers, contractors and agency staff are familiar with our policy and procedure. We share information and best practice at our quarterly Safeguarding Coordination Group meetings, and staff receive safeguarding training appropriate for their role.

2.1 Promoting safeguarding through safe working practices

- 2.1.1 When working with children and young people (collectively known as children for the purposes of this procedure), all staff and volunteers are acting in a position of trust. It is important that all staff and volunteers act in an appropriate manner at all times and minimise the risk of unfounded allegations of abuse being made against them. All staff and volunteers working with children are subject to a Disclosure and Barring Service (DBS) check.
- 2.1.2 We will raise awareness amongst children and parents of new and increased risks due to national emergencies or public health crises. We will share information and signpost to safety resources through pre-emptive calls, emails, texts and letters.
- 2.1.3 Staff must follow the below guidelines when working with children:
 - Follow Octavia's code of conduct and safeguarding policies and procedures at all times
 - Keep up to date with the latest information and guidance on existing and emerging public health issues and emergencies
 - Maintain professional boundaries at all times when working face-to-face and remotely
 - Challenge unacceptable behaviour and report all suspicions and allegations of abuse in line with Octavia's procedures
 - Ensure all contact with children is appropriate and in relation to the work being undertaken
 - Listen to and respect children and young people at all times
 - Treat children and young people fairly and without prejudice or discrimination
 - Respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems between yourself and others
 - Always ensure language is appropriate and not offensive or discriminatory

- Encourage children and young people to speak out about attitudes or behaviour that makes them uncomfortable
- Value and take children's contributions seriously, actively involving children and young people in planning activities where possible
- Respect a child and young person's right to personal privacy whilst adhering to Octavia's duty of care when the child is under our supervision
- Avoid favouritism
- Recognise that special caution is required when you are discussing sensitive issues with children or young people.

2.1.4 Staff must follow the below guidelines for online group calls:

- At least two members of staff must be on the call, a facilitator and a quality assurance manager (QAM). The QAM will admit people to the call, remove people from the call where necessary and manage all technical issues regarding online video and call sharing.
- The QAM will verify the identities of all children and young people on the call. Where the QAM suspects a case of identify fraud they will remove the person from the group chat.
- At times staff may need to use personal devices during remote working. It is important staff take extra care when sharing content through online platforms. Staff must ensure they only share age and activity appropriate content during online calls.

2.1.5 When working with children and young people, staff must not:

- Allow concerns or allegations to go unreported
- Take unnecessary risks
- Smoke, consume alcohol or use illegal substances
- Develop inappropriate relationships with children and young people
- Make inappropriate promises to children and young people
- Engage in behaviour that is in any way abusive
 - This includes having any form of sexual contact with a child or young person.
- Let children and young people have your personal contact details (mobile number, email or address) or have contact with them via a personal social media account
- Act in a way that can be perceived as threatening or intrusive
- Patronise or belittle children and young people
- Make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people.
- Share inappropriate content

3 Our approach to safeguarding children and young people

- ### 3.0.1 Safeguarding concerns may come to light where an employee witnesses or suspects abuse or neglect, a child discloses directly or indirectly that they are experiencing abuse or neglect, or a third party reports a concern to an Octavia employee.

- 3.0.2 Where a child confides they are experiencing abuse or neglect, the disclosure will be taken seriously.
- 3.0.3 All Octavia employees and volunteers have a responsibility to report any allegation or concern to the appropriate statutory organisation such as Children’s Social Care services and the police.
- 3.0.4 It is essential that all concerns are reported to and discussed with a line manager as soon as possible after the concern is raised. An alternate manager should be sought in the absence of the usual manager.
- 3.0.5 Employees and volunteers must always act, and be seen to act, in the child’s best interests and ensure they are treated with dignity and respect. They must avoid any conduct which could lead any reasonable person to question their motivation and intentions, and take responsibility for their own actions and behaviour.
- 3.0.6 The employee will support the child to make the disclosure and will discuss concerns raised with the child and their family or carer, where the family or carer are not involved in the abuse, and agree actions to take forward.
- 3.0.7 Throughout the course of any investigations, appropriate measures will be put in place to protect the child from the risk of further abuse or neglect.
- 3.0.8 A Case Management Officer (CMO) will carry out internal investigations and will coordinate and share appropriate information with the local authority and police on any multi-agency enquiry.
- 3.0.9 Octavia’s safeguarding policy and procedure should be used in conjunction with Local Authority child protection procedures and are included in inductions and training for all employees and volunteers.
- 3.0.10 For the purposes of this procedure the word ‘employee’ refers to Octavia employees and volunteers.

3.1 Responding to disclosures from a child or young person

- 3.1.1 Where a child or young person chooses to disclose abuse to an Octavia employee or volunteer the employee must listen, understand and respond appropriately so the child or young person gets the support and protection they need.
- 3.1.2 The employee should help the child to make the disclosure and will:
- Ensure the conversation takes place in a private, safe space
 - When working remotely, ensure the online call takes place outside of a group environment and in a private video call
 - Disclose to the young person that we may need to share any information they provide with an appropriate adult or organisation, depending on the nature of the disclosure.

- Reassure the child that we will not take any action that could place them at increased risk.
- Help the child open up and give them full attention and reassurance that their feelings are important
- Allow the child to make the disclosure at their own pace and in their own way
- Communicate with the child in a manner appropriate to their age, understanding and ability
- Reassure the child they have done the right thing in making the disclosure

3.1.3 The employee must not talk to the alleged perpetrator about the disclosure

3.1.4 The employee will take detailed notes and share these with their line manager as soon as possible.

3.1.5 Ensure any incident report is password protected and saved in the designated secure area of OneDrive.

3.2 Managing concerns during periods of remote working

3.2.1 Staff will keep up to date with any additional risks that may arise during public health emergencies, such as a pandemic.

3.2.2 Staff will pre-emptively call, email and text children and share advice and information that they can use. Staff will assess any concerns or extra support the child or family may need and signpost to relevant safety resources.

3.2.3 Staff will record outcomes from the calls, and any other specific concerns on the concern call spreadsheet.

3.2.4 Staff will take any appropriate follow-up action to help ensure the child's safety and wellbeing.

3.3 Using personal devices

3.3.1 Where possible, staff should only use work devices to call children and their family. If staff need to use a personal device contact should be limited to calls only and should be context appropriate to the safety and wellbeing of the child.

3.3.2 Staff must never save the young person or their family's contact details to a personal device. Once the call details have been recorded on the concern call spreadsheet, the contact details must be deleted from the device's call records so no trace of the number remains.

3.3.3 Emails to children or their family must only be sent from Octavia email addresses. Where the employee does not have an Octavia email address, they must contact the Youth Programme Manager who will take appropriate action.

4. The processes

4.1 Immediate response and plan

- 4.1.1 Where a safeguarding concern is raised, the employee will immediately assess the risk to the child and take appropriate steps to ensure they are in no immediate danger of further abuse or neglect. This may include checking CCTV, building security and records of online video calls.
- 4.1.2 The employee will arrange any necessary medical treatment for the child.
- 4.1.3 If a crime is suspected, the employee will contact the police as soon as possible and secure the area of the alleged crime.
- 4.1.4 For youth programme related concerns, incidents, observations and behavioural issues will be discussed and recorded at the staff and volunteer debrief held after each session. The lead staff member will complete any necessary incident forms and, where sensitive information is present, the form will be password protected.
- 4.1.5 For concerns not related to youth programmes, the employee will record details of the concern, any actions taken and any follow-up actions on the relevant Local Authority alert form, or Octavia's safeguarding alert form where one isn't available.
- 4.1.6 The employee will inform their line manager / mentor, or an alternate manager in the absence of the line manager, and pass a copy of the alert form to the appropriate CMO, the Safeguarding Champion for children, Conor Lynch, and the Care and Support Quality and Compliance Officer as soon after the concern is raised as possible and within 24 hours.
- 4.1.7 The Quality and Compliance Officer will file the alert in the central safeguarding folder.
- 4.1.8 Where an alert involves an Octavia employee, the line manager will review the implications of the alert on staff. If any concerns or risks are identified, the line manager will alert the HR department and agree appropriate action in line with Octavia's disciplinary policy (see Box 1 for further information).
- 4.1.9 Where the child's family or carer are not suspected of being involved in the abuse, the employee will inform them immediately of the concern.

4.2 The Case Manager's initial fact-finding investigation

- 4.2.1 The CMO will review action taken and confirm whether the child is at risk (contact relevant local authority if unsure for further advice).
- 4.2.2 The CMO will explore what actions the child and their family or carer (where this will not put the child at further risk) wishes to take to protect their safety and wellbeing.

- 4.2.3 Once the CMO has confirmed the child is at risk they will alert the Local Authority to the concern. Where the CMO considers a crime has been committed, and the police have not yet been alerted, they will contact the police and ensure the area of the alleged crime is secured.
- 4.2.4 The CMO will explain to the child and their family or carer, where appropriate, how the information they provide will be shared with partner agencies and what actions will be taken, and request the child's consent to share information. It should be noted that it is permitted to share information without consent where the sharing of information is necessary to prevent harm. If information is shared or action taken without the consent of the adult at risk they must be advised of the actions taken and the reasons why.
- 4.2.5 Where the LA and police are alerted to the safeguarding concern, the CMO will add a safeguarding alert (code 'SAFE') to QLx.
- 4.2.6 Where an alert involves an Octavia resident or service user we will review their future engagement with Octavia services and take appropriate action to ensure the safety of the child in line with our internal policies and procedures.
- 4.2.7 Where the CMO does not consider the child to be at risk, they will record details of the rationale for the decision and pass to the Quality and Compliance Officer who will file in the relevant safeguarding file.

4.3 The Local Authority investigation

- 4.3.1 Once we have alerted the relevant local authority, they will carry out a child welfare assessment to establish what action needs to be taken to prevent or stop the abuse or neglect.
- 4.3.2 If the child is in immediate danger, the LA may take court action to protect the child.
- 4.3.3 If the child is not in immediate danger, the LA will assess the child's needs. A social worker will be appointed to carry out the assessment and determine next steps and the type of response required.
- 4.3.4 Octavia's internal investigations will continue alongside the LA assessment and any relevant findings will be shared with the LA to ensure a coordinated approach to supporting and protecting the child at risk.
- 4.3.5 We will review our policies, procedures and training to ensure it satisfactorily meets the necessary requirements for safeguarding children.

Box 1

Allegations against Octavia employees or volunteers

Where an employee is involved, the line manager will consider the employee's conduct and where there are any risks identified or concerns that the employee has not worked within the terms of the safeguarding framework the line manager and HR department will implement our disciplinary policy and take appropriate action, which could include termination of the employee's contract.

Where a volunteer is involved, our internal policies will be implemented and where the line manager / mentor and HR identify any risks or concerns this could result in the termination of the volunteering arrangement.

A referral to the Disclosure and Barring Service (DBS) will be made where appropriate.

- 4.3.6 The CMO and/or line manager will provide a summary of our actions to the LA multi-agency enquiry, where appropriate and in accordance with the GDPR.
- 4.3.7 If information gathered during the LA assessment suggests that a child is suffering or likely to suffer significant harm, the LA should hold a strategy discussion to enable it to decide, with other agencies, whether it must undertake a section 47 enquiry.
- 4.3.8 A Section 47 enquiry refers to Section 47 of the Children Act 1989 and involves social workers gathering evidence and speaking with the child, family and other relevant professionals to determine if any interventions may be beneficial to the child's welfare.
- 4.3.9 The LA may direct Octavia and other partner agencies to carry out enquiries.
- 4.3.10 As with our internal investigations, where Octavia are directed to carry out enquiries by the LA we will speak with the child and their family or carer (where this will not put the child at further risk). Enquiries should be handled sensitively and seek to:
- Ensure the child's safety and that the level of risk is managed appropriately
 - Establish the facts
 - Determine the child's views and preferred outcomes, and consider the child's wishes providing any actions they wish do not compromise their safety or increase the level of risk
 - Protect the child from the abuse and neglect, in accordance with the wishes of the child where possible
 - Enable the child to achieve resolution where possible
- 4.3.11 Following the meeting, the CMO will provide feedback to the LA and record details of all actions and conversations.
- 4.3.12 Once the LA has completed the assessment, the LA will prepare a child protection plan that may include actions for Octavia to prevent further abuse or neglect of the child.

4.4 Child protection plan

- 4.4.1 The LA child protection plan will include a timetable of actions and roles and responsibilities. Octavia may be responsible for some of these actions.
- 4.4.2 We will monitor and review the plan on an on-going basis and within agreed timeframes, and provide the appropriate level of support to the child.
- 4.4.3 We will keep in contact with partner agencies and provide updates to the LA as and where necessary.

4.5 Delivering the plan and closing the assessment

- 4.5.1 The CMO will ensure all actions for which Octavia has responsibility are implemented.
- 4.5.2 Following implementation, the CMO will speak with the child and let them know what actions have been taken to protect them from abuse or neglect.
- 4.5.3 The plan will be reviewed at regular child protection conferences until the child is no longer considered at risk of significant harm or until they are taken into care.
- 4.5.4 The CMO will record details of all internal investigations including communication with the child and their family or carer, any actions taken and the conclusion of the investigation. Where the LA provide updates on the progress of the child protection plan, and inform us of the plan's conclusion, the CMO will also record details.
- 4.5.5 The CMO will provide a copy of the closed plan to the Safeguarding Champion and the Care and Support Quality and Compliance Officer.
- 4.5.6 The Quality and Compliance Officer will file all details of the case in the central safeguarding file and, after six months, will delete the details in accordance with Octavia's Document Retention guidelines and the General Data Protection Regulation (GDPR).

5 Volunteers and contractors

- 5.1 Volunteers must report concerns to their line manager / mentor immediately. Where the line manager / mentor is not available, they will alert the most senior manager available. The manager / mentor must record the concerns on a Safeguarding Alert form, and send the form to the relevant Case Management Officer and Care and Support Quality and Compliance Officer within 24 hours.
- 5.2 Contractors must report any concerns about abuse at a property they visit during the course of their work, to their line manager who will fill out a safeguarding concern card and then pass it to the Housing Management team (for general needs properties) or the Care and Support team (for Care schemes and supported housing).

5.3 Contractors working with young people will be DBS checked, where necessary. An Octavia employee must be present at all times that a contractor is in contact with a child whilst undertaking activities at Octavia offices and day centres.

6 Performance monitoring

6.1 The Safeguarding Coordination Group have oversight of all safeguarding issues raised and conduct an annual review of all safeguarding reports received. This information will be included in the annual safeguarding report to Octavia Directors and Board members.

7 Whistleblowing

7.1 Staff with concerns about the working or implementation of the Safeguarding Policy or Procedure should report any concerns to their line manager in the first instance.

7.2 Staff should refer to Octavia’s Whistleblowing policy for further guidance on how to raise any concerns they may have about institutional abuse, or concerns that Octavia is failing in its duties to safeguard vulnerable adults. Disclosures made in good faith are protected by the Public Disclosure Act.

8 Data protection

8.1 We will manage and process personal data in line with the General Data Protection Regulations (GDPR). For further information on how we process personal data, see the Octavia Privacy Notice.

9 Roles and responsibilities

Case Management Officers will be appointed as follows:

Service User	Case Management Officer
General Needs tenant	Resident Services Officer
Homeowner	Home Ownership Officer
Floating Support recipient	Resident Support Officer
Housing for Older People	Scheme Manager
Care Scheme resident	Care and Support Scheme Manager
Day Centre Member	Scheme Manager
Foundation Volunteer	Youth Programme Manager, Foundation / Employability and Volunteering Manager
Foundation Project Participant	Employability and Volunteering Manager

Main roles and responsibilities are as follows:

Role	Responsibilities
Staff / contractors / volunteers / volunteer mentors / agency staff	<ul style="list-style-type: none"> Report concerns to the safeguarding champion / Case Management officer within 24 hours
Volunteer Mentors (Retail Volunteer Coordinator / Older Person's Programme Coordinator / Youth Worker Assistant / Employment and Training Advisor / Shop Manager)	<ul style="list-style-type: none"> Support volunteers with safeguarding concerns Complete Safeguarding Alert form and alert CMO and the Quality and Compliance Officer within 24 hours
Case Management Officer (Resident Services Officer / Home Ownership Officer / Scheme Manager / Youth Programme Manager / Employability and Volunteering Manager)	<ul style="list-style-type: none"> Report abuse to the authorities within 24 hours Communicate with the authorities to follow up progress of the investigation Ensure records are updated and information is only shared on a need to know basis Keep the safeguarding champion informed of development and ensure they are provided with copies of the alert and case closure forms
Care scheme manager / Housing Services Manager	<ul style="list-style-type: none"> Approve appropriate sanctions against service user perpetrators
Safeguarding Champion	<ul style="list-style-type: none"> Provide advice and support to Case Management Officer Follow up concerns with relevant authorities Share good practice with staff
Octavia Executive Team	<ul style="list-style-type: none"> Implement a Business Continuity approach in the event of a public health emergency or national crisis

10 Monitoring and reporting

PI	Reported to	Frequency
Reports of significant abuse of children are reported to Social Services within 24 hours	Safeguarding Champions	Monthly

- 10.1 A report on Safeguarding is produced annually for the Good Performance and Best Practice group.
- 10.2 The Safeguarding Coordination Group have oversight of all safeguarding issues raised and conduct an annual review of all safeguarding reports received. This information will be included in the annual safeguarding report to Octavia Directors and Board members.
- 10.3 Care and Support own properties managed by other agencies. They have their own safeguarding policies. We may request copies of their policies for monitoring purposes. We may also ask for information on safeguarding reporting figures / information.

11 Standard documents

- Octavia Safeguarding Alerts Form
- HMCDP1a Consent to Share Information Form
- Hounslow – safeguarding children referral details ([available online](#))
- Hammersmith & Fulham, Kensington & Chelsea, Westminster safeguarding referral details ([available online](#))
- Camden – safeguarding children contact details ([available online](#))
- Wandsworth – safeguarding children referral ([available online](#))
- Barnet – safeguarding children referral ([available online](#))
- Brent – safeguarding children referral ([available online](#))
- Ealing – safeguarding children referral details ([available online](#))

11.1 This procedure should be read alongside the following policies:

- Anti-Social Behaviour Policy & Procedure
- Code of Conduct
- Complaints Policy & Procedure
- Confidentiality and Data Protection Policy & Procedure
- Covid-19 Resource Centre documentation
- Disciplinary policy and procedure
- Disclosure and Barring Policy
- Domestic Abuse Policy and Procedure
- Extra Care Visitors and Safety Policy
- Protocol for recording and maintaining Client Alerts on QLx
- Serious Incidents Reporting to Committees and Board Policy (draft approved by directors)
- Supporting Tenants in General Needs Housing Policy & Procedure
- Violence at Work Policy & Procedure
- Whistleblowing Policy

11.2 This procedure complies with the following legislation, regulations and guidance:

- The Children Act (1989) and (2004)
- London Child Protection Procedures / Working Together to Safeguard Children
- United Nations Convention on the Rights of the Child
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Public Disclosures Act 1998
- Protection of Freedoms Act 2012
- Police Act 1997 (DBS's)