

Child Safeguarding Policy



Safeguarding Policy

1. Policy Introduction

This policy sets out Legal & General Affordable Homes' (LGAH) approach and commitment to preventing and reducing the risk of harm, abuse and/or neglect of children and young people.

This policy applies to children and young people under the age of 18 including unborn children. If people over the age of 18 are involved, this policy should be read in conjunction with LGAH's Adult Safeguarding Policy.

LGAH considers the abuse of anyone to be unacceptable and fully recognises the harmful effect that abuse has, not just on the victim but also their families and the wider community.

2. Applies to

This policy will apply to the following entities and any reference to LGAH within this policy relates to all entities listed below:

Legal & General Affordable Homes Limited
Legal & General Affordable Homes (AR) LLP
Legal & General Affordable Homes (SO) LLP
Legal & General Affordable Homes (Capital) Limited
Legal & General Affordable Homes (Development 3) Limited
Legal & General Affordable Homes (SO) Limited
Legal & General Affordable Homes (Investment 2) Limited
Legal & General Affordable Homes (Investment 3) Limited
Legal & General Affordable Homes (Development 4) Limited

This policy also applies to all LGAH staff, (including those on fixed-term or temporary contracts) Board members, agency workers, consultants, volunteers, third party agencies, developers, contractors, subcontractors and suppliers providing services to LGAH and its customers.

3. Policy Aims

We know abuse against people occurs in society, and individuals from all communities may be at risk of abuse. We recognise there are children and vulnerable young people who live in our properties and receive services from us who may be at risk of abuse.

Abuse can take many different forms. It may occur via neglect of an individual, by inflicting harm, or failing to act to prevent harm. It is behaviour that either deliberately or unknowingly causes harm, endangers life, or infringes on rights.

The objective of this policy is to establish a clear framework to:

- **Protect and Empower:** safeguard children and young people by promoting awareness and access to reporting channels.
- **Define Responsibilities:** clarify roles in identifying, reporting, and preventing abuse.
- **Support Collaboration:** work with external partners to reinforce safeguarding practices.

- **Provide Training:** offer training and resources to ensure colleagues can respond effectively to concerns.
- **Monitor and Improve:** maintain effective governance, review practices regularly, and strive for continuous improvement.

LGAH and its partners engage with children and young people as part of their daily operations and collaborate with local authorities to meet safeguarding obligations.

4. Legal Framework

This policy is designed with consideration (but not limited to) the following legal and statutory instruments:

- Children Act 2004 and guidance on multi agency safeguarding from **Working Together to Safeguard Children 2023**
- Care Act 2014
- Data Protection Act 2018
- Crime and Disorder Act 1998
- Children Act 1989 and 2004
- Health and Social Care Act 2008
- Equality Act 2010
- Counter Terrorism and Security Act 2015

5. Definitions

Child safeguarding means protecting a child or young person's right to live in safety, free from abuse and neglect. By establishing a culture of personal responsibility, LGAH recognises the importance everyone in the organisation plays in preventing and appropriately responding to signs of abuse, harm and/or neglect.

Safeguarding can apply to all ages, and within this policy, are defined as a child or young people who have not yet reached their 18th birthday as defined under the Children Act 1989, irrespective of circumstances and including unborn children.

In addition, a child may be classed as a 'child at risk' where they have a form of vulnerability which may increase the risk of them suffering from abuse or neglect. The Care Act 2014 applies to those children at risk of abuse or neglect who meet the following three-part test:

- Has care and support needs (whether or not the authority is meeting any of those needs);
- Is experiencing, or is at risk of, abuse or neglect, and;
- As a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

A child at risk may be someone who:

- Has a physical disability and/or sensory impairment
- Has a learning disability
- Has mental health needs, including dementia or a personality disorder
- Is dependent on others to maintain their quality of life

- Has a long-term illness or condition
- Lacks the mental capacity to make particular decisions and is in need of care and support.

A child or young person is not automatically “at risk” if they have a disability. The extent to which someone is at risk will be determined by a range of factors including personal characteristics (e.g. mental capacity, ability to communicate, degree of physical dependency) and factors associated with their situation (e.g. extent of support network, access to information).

There are many types of safeguarding concerns which would raise concern to act. The below list is not exhaustive but covers the main areas categories of safeguarding:

- **Abuse** is the violation of a person’s human and/or civil rights by any other person or persons. Abuse can occur in any relationship and may result in significant harm to the person subjected to it. Abuse may consist of a single act or repeated acts, and it can be intentional or unintentional. We recognise that as risks evolve, new abuse types may emerge and therefore these categories do not limit our view of what we consider abuse.

The Care Act 2014 encourages all authorities not to limit their view of what they consider to be abuse, and to consider each case individually. The Act lists the following types of abuse, but this is not intended to be an exhaustive list:

- Physical abuse
 - Psychological/emotional abuse
 - Financial or material abuse
 - Child sexual exploitation
 - Online abuse, such as cyber-bullying
 - Modern slavery
 - Domestic abuse
 - Discriminatory abuse
 - Institutional / organisational abuse
- **Neglect** is the failure to meet a child’s basic needs through inadequate attention, especially through carelessness or disregard for their needs.
 - **Self-neglect** covers a wide range of behaviours that show that someone isn’t caring for their own personal hygiene, health or surroundings. It can include behaviour such as hoarding.
 - **Modern Slavery** pressurises, deceives and/or forces individuals into a life of obedience which is often linked to abuse and inhumane treatment.
 - **Radicalisation/Extremism** increasingly radicalisation and extremism are being included within multi-agency policy and procedures, with the aim of early identification and early intervention to divert young people away from being drawn into terrorist activity.
 - **Mate Crime** is where someone befriends a vulnerable person deliberately to take advantage of them.

6. Addressing Safeguarding Concerns

There are four stages to effective management of safeguarding concerns. These are identification, prevention, reporting and responding.

Identification

LGAH's responsibility is to be vigilant regarding the welfare of children at risk, and to train staff to recognise the signs of abuse and/or neglect. All staff undertake annual safeguarding training and LGAH will regularly raise awareness across its businesses to ensure staff remain vigilant to indicators of abuse and neglect. LGAH will ensure its management providers and contractors carry out regular training for their staff and abide by this Child Safeguarding Policy.

We also encourage customers and members of the local community to highlight, and report suspected abuse either to LGAH, its management providers or to a relevant agency. LGAH will facilitate this through wider communication with customers to raise awareness of child safeguarding matters and to offer support in reporting concerns as part of its housing management duties.

Prevention

LGAH's obligation is to ensure it only recruits and employs staff working with people at risk who are competent and safe to do so. LGAH will undertake the necessary DBS (Disclosure & Barring Service) checks and will share information on staff found to be unsuitable to work with people at risk, by referring their details to the DBS. LGAH will ensure via its selection processes that appointed contractors, and sub-contractors also comply with these requirements where they are in direct contact with customers.

LGAH views abuse or suspected abuse as extremely serious and is committed to investigating and addressing issues of abuse or suspected abuse. It recognises that because of the level of contact some staff and partners have with customers, we are well placed to identify children who may be experiencing, or be at risk of, abuse.

LGAH also recognises the need to be vigilant that abuse may be committed by a member of staff, agent or by others who are in a trusting relationship with a vulnerable young person.

By identifying signs early, LGAH's intention is to prevent and take appropriate action before any harm occurs.

Reporting

All staff are required to report any safeguarding concerns they have as soon as they arise. LGAH fully supports staff to report concerns and ensure that their concerns are taken seriously. When a concern is identified, we will always report it to the local authority or the police, who have a statutory duty to investigate any concern. Where further advice is also needed, a notification should be made to LGAH's Safeguarding Officer (Head of Customer Care & Nominations) to agree the best course of action going forward.

LGAH's Safeguarding Officer will record any reports of abuse, harm and/or neglect centrally which will be saved in a private and confidential location and will only be shared in line with LGAH's confidentiality and data protection procedures.

LGAH's responsibility is to ensure effective risk assessments are undertaken which is person-led and listen to the wishes and feelings of a child whilst acting in their best interests. Risk assessments will differ depending on the harm/abuse identified and LGAH will work in partnership with the relevant statutory agencies to get in place Child Protection Plans where required.

Overarching any safeguarding matters, LGAH places importance on operating a victim-centred approach, which treats people with dignity, respect and without prejudice.

If LGAH considers a criminal offence has occurred, or a child faces an imminent risk, the police will be notified immediately. If there are concerns about the immediate health and welfare of a child in relation to a safeguarding matter, LGAH will notify the emergency services and local authority as soon as possible.

Responding

LGAH seeks to offer children the safest and most supportive environment in which they can report abuse. Any report or allegation of abuse will be listened to and investigated. As a responsible housing provider, LGAH adopts the six key principles which underpin all safeguarding work within the [Care and Support Statutory Guidance](#) (Department of Health and Social Care 2014):

- Empowerment – listen to the wishes and feelings of a child.
- Prevention – it is better to take action before harm occurs.
- Proportionality – the least intrusive response appropriate to the risk presented.
- Protection – support and representation for those in greatest need.
- Partnership – local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability – and transparency in delivering safeguarding.

Essential to LGAH's response is keeping clear, concise, factual and accurate records as part of its safeguarding processes, enabling appropriate responses to concerns. This is also key to preventing abuse as it can provide indicators of particular risks or vulnerabilities, especially for customer facing officers and operatives visiting our customers who are alerted to a concern.

7. Working with Partners

Responsibility for safeguarding children is shared amongst a number of agencies. Local authorities and other statutory agencies play a vital role in our response to addressing concerns of safeguarding and hold the strategic responsibility for co-ordinating any local concerns for children. They also have expertise in handling cases of abuse, providing support and counselling to victims of abuse, and in assisting the police with any criminal investigations

LGAH recognises that its customers will include both victims and those committing these crimes. LGAH therefore works in partnership with other agencies to support victims of abuse and address the risks presented by people committing these crimes. In cases where someone committing these crimes is an LGAH customer, it will utilise the most appropriate intervention

available to manage their behaviour and will work with relevant agencies to provide support as needed.

In child safeguarding cases, LGAH will work with the family and other agencies as appropriate to produce a holistic solution that best meets the child and/or family's needs.

LGAH recognises the importance of cooperating with the police to help them protect, investigate and prevent abuse. LGAH will co-operate with local Safeguarding Children Boards and inform them of any serious concerns. LGAH will make relevant referrals to MARAC, MAPPA using prescribed risk assessment matrix's and will engage at a local and regional level with local authorities risk assessment frameworks for children safeguarding boards.

As a minimum, LGAH expects all its contracted management providers to hold policies that are at least equivalent to the policy position held by LGAH on this matter.

8. Consent

Where there is a safeguarding concern related to a child, LGAH does not need to seek consent to make a referral. As a child will be under the responsibility of an adult or statutory agency, they will not have independent control of all matters linked to their personal welfare and decision making. LGAH will therefore focus on how to best protect the child from neglect, abuse or harm.

Where there is an immediate risk, we have a duty of care to the child and will immediately contact the police. We also have a duty to report any concerns related to a child to the relevant statutory body. LGAH will do this by providing clear information about its concerns, highlight any risks identified, and work with the agencies involved to improve the child's safety.

9. Roles and Responsibilities

Specific roles ensure effective safeguarding implementation:

Management Provider (MP): Customer facing identification and reporting of concerns.

Customer Facing LGAH Colleagues (CFC): Identification and reporting of concerns.

Director of Customer and Property (DCP): Holds strategic oversight.

LGAH Head of Customer Care & Nominations (HOCN): Oversees safeguarding across services.

Contract Manager (CM): Oversees Management Provider services.

Responsibility	MP	CM	CFC	DCP	HOCN
Will complete training every 2 years	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Ensures operational risk considerations includes safeguarding				<input checked="" type="checkbox"/>	
Oversees MP casework		<input checked="" type="checkbox"/>			
Supports Leaders with specific safeguarding responsibilities					<input checked="" type="checkbox"/>
Fully understands and implements the safeguarding policy	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Reports to Business Committee and Boards				<input checked="" type="checkbox"/>	
Owns and maintains the central safeguarding log					<input checked="" type="checkbox"/>
Holds and reviews updates of safeguarding policies and procedures				<input checked="" type="checkbox"/>	
Will review safeguarding activities and ensure policy implementation				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Supports all colleagues across the organisation					<input checked="" type="checkbox"/>
Ensures adequate resources for safeguarding practices				<input checked="" type="checkbox"/>	
Leads on reviews for internal safeguarding matters					<input checked="" type="checkbox"/>
Oversees safeguarding training and compliance					<input checked="" type="checkbox"/>
Records and assesses safeguarding concerns	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Reports concerns to Safeguarding Lead	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
Makes safeguarding referrals promptly, maintains accurate records of concerns and actions taken	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Represents LGAH in multi-agency meetings if needed.	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>

10. Equality and Diversity

LGAH is committed to making sure all services are accessible to all our customers. Our employees will be trained to make sure they are communicating appropriately with our customers, and they have the relevant information.

This policy will be applied in a way which makes sure we treat all customers with fairness and respect. We recognise our duty to advance equality of opportunity and prevent discrimination or victimisation on the grounds of age, sex, sexual orientation, disability, race, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and any other protected characteristic defined within the Equality Act 2010.

On request, we will provide translations of all our documents, policies and procedures in various languages and formats including braille and large print.

11. Policy Review

We will review this policy every two years to make sure it meets our aims and continues to be relevant and accurate.

This policy will be reviewed sooner if:

- Legislation / regulation or industry changes require it.
- We identify any problems or failures in this policy as a result of customer or stakeholder feedback, complaints or findings from any independent organisations.

Recommendations are made following investigations into significant incidents.

Accountable Director	Manpreet Dillon
Approval Date	May2025
Review Date	April 2027 <i>(or subject to any changes in regulatory, legislative and/or areas of best practise where a review is required sooner than the stipulated review date)</i>