

Safeguarding Children Policy

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Policy Lead:	Director of Neighbourhoods
Approved by:	Board
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Purpose and scope of the policy

The purpose of this policy is to:

- set out our commitment to working in partnership to safeguard and promote the welfare of children (any person under the age of 18).
- ensure that we respond appropriately and effectively to any allegations, reports or suspicions of child abuse or neglect.

As set out in 'Working Together to Safeguard Children' (December 2023), safeguarding and promoting the welfare of children is:

- protecting children from maltreatment, whether that is within or outside the home, including online,
- preventing impairment of children's mental and physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care,
- taking action to enable all children to have the best outcomes.

Please see the Definitions section of this policy for definitions of the following:

- abuse
- child criminal exploitation
- child sexual exploitation
- county lines
- domestic abuse including controlling and coercive behaviour and so-called honour-based violence, forced marriage and female genital mutilation (but please see Domestic Abuse Policy for full definition)
- emotional abuse, which can include verbal abuse
- extra-familial harm and extra-familial contexts
- financial exploitation
- maltreatment
- neglect
- physical abuse
- sexual abuse

Whilst local authorities play a lead role, safeguarding children and protecting them from harm is everyone's responsibility. Everyone who comes into contact with children and families has a role to play.

At Moat all of these people must act in accordance with this policy:

- All Moat colleagues (including those on fixed-term contracts), Board members, agency workers, consultants, volunteers, contractors and third-party partners.
- Any developers, contractors and sub-contractors who we're working with.

1. Policy

- 1.1 Safeguarding is everyone's responsibility. Every Moat colleague, contractor and volunteer has a role to play in safeguarding and promoting the welfare of any child they come into contact with.
- 1.2 If you're worried that a child is, or children are, being abused or neglected (whether intentionally or unintentionally), please report your concerns to an agency with statutory safeguarding responsibilities such as the relevant local authority child safeguarding team, the child's school or the police. If a child is at immediate risk of harm, please report your concerns to the police.
- 1.3 If the child or children you're concerned about are living in a Moat home or connected to Moat in some other way (for example, accessing services provided by Moat), you can also report your concerns to us:
 - by telephone: 0300 323 0011
 - by email: customer@moat.co.uk
 - on our online portal [myMoat](#)
 - on web chat: [Moat | Contact us](#)
 - in person
 - by writing to us at: Moat, Mariner House, Galleon Boulevard, Dartford, DA2 6QE
- 1.4 We'll safeguard any children we come into contact with by doing everything we're required to do by safeguarding laws or regulations.
- 1.5 We'll work in partnership with other organisations such as local authorities (children's services), health and mental health services and the police to safeguard and promote the welfare of children.
- 1.6 We'll ensure that our recruitment policies and procedures support the safeguarding commitment set out in this policy and obtain Disclosure and Barring Service (DBS) checks for qualifying roles (Companies can only request DBS checks for roles which meet specified criteria).
- 1.7 We'll ensure that a Moat colleague or team of colleagues is / are identified as Moat's safeguarding lead(s) and champions and that this is communicated to all Moat colleagues and volunteers.
- 1.8 We'll provide Moat colleagues and volunteers with:
 - Robust, appropriate and effective safeguarding procedures and training to ensure that they're able to recognise, respond, report and refer concerns about abuse or neglect.

- Access to support and guidance which will include access to an appropriately trained safeguarding lead (or safeguarding leads), safeguarding champions and managers across the business who are also appropriately trained.
- 1.9 We'll work in partnership with our contractors, agents and partners to ensure that our joint working practices support our commitment to safeguarding children.
- 1.10 We'll cooperate with all reasonable requests from local authorities to make and support safeguarding-related enquiries, provide safeguarding-related information, attend safeguarding meetings (for example, child in need meetings and child protection meetings) and contribute to Child Safeguarding Practice Reviews. We'll do all this promptly and with sensitivity and we'll follow Government-issued information sharing guidance to ensure that we share information where this is required to safeguard children.
- 1.11 When required by relevant legal and regulatory requirements and / or where necessary to prevent harm and reduce the risk that children might experience abuse or neglect, we'll:
- Contact the Local Authority Designated Officer (LADO) within one working day to notify them of any allegations that a person who works with children has:
 - Behaved in a way that has harmed, or may have harmed, a child,
 - Possibly committed a criminal offence against or related to a child, or
 - Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
 - Take any appropriate action available to us in relation to the person or organisation alleged to have caused harm in accordance with other relevant policies.
 - Make a referral to the Disclosure and Barring Service (DBS)
 - Make a referral to the Care Quality Commission (CQC).

2 Making a safeguarding referral to the local authority

- 2.1 In situations where we're considering making a safeguarding children referral to the local authority, we'll seek consent from the child's parent(s) / carer(s) where it's possible for us to do this without increasing the risk to the child / children.
- 2.2 If we have concerns about the safety and wellbeing of a child / children, we'll make a safeguarding referral even if consent isn't given - please see section 3 below.

3. Confidentiality and Information Sharing

- 3.1 We can lawfully share information with organisations such as the local authority (child safeguarding team) and the police if it's in the public interest to do so – for example, to protect children from serious harm or to prevent crime and disorder.

3.2 In deciding whether to share information about your children / family without your consent we'll consider:

- **Necessity** – whether sharing the information is likely to make an effective contribution to preventing the risk.
- **Proportionality** – whether the public interest in sharing the information outweighs the interest in maintaining confidentiality.

3.3 If you lack the mental capacity to give us consent to share information about your child(ren) / family but we consider that it would be in the best interests of the child / children to share information we'll do so.

Definitions

Children – anyone who has not yet reached their 18th birthday, including unborn children.

Child Safeguarding Practice Reviews – When a child dies or is seriously harmed in circumstances where neglect or abuse are known or suspected, Local Safeguarding Children Partnerships / Boards are required to consider if a Child Safeguarding Practice Review (previously known as a Serious Case Review) is appropriate to consider the involvement of organisations and professionals with the child and family.

Disclosure and Barring Service (DBS) – Helps employers make safer recruitment decisions.

Local authority designated officer (LADO) – Local authorities must designate a particular officer, or team of officers (either as part of multi-agency arrangements or otherwise), to be involved in the management and oversight of allegations against people who work with children.

Types of abuse and exploitation, maltreatment and neglect which may result in a safeguarding referral being made may include the following (note this list is not exhaustive):

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Child criminal exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and / or (b) for the financial or other advantage of the perpetrator or facilitator and / or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Child sexual exploitation is a form of child sexual abuse. 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Domestic abuse including controlling and coercive behaviour and so-called honour-based violence, forced marriage and female genital mutilation– please see the Domestic Abuse Policy for a full definition of domestic abuse.

- All children can experience and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members, including where those being abusive do not live with the child. Experiencing domestic abuse can have a significant impact on children. The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children (0 to 18) as victims in their own right, if they see, hear or experience the effects of abuse.
- Children can also be used to control or coerce the victim / survivor, for example, by frustrating child contact and / or child arrangements, telling the children to call the victim / survivor derogatory names or to hit the victim / survivor, or by threatening to abduct the children. This abuse can have a significant impact on children and young people.
- Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Emotional abuse is the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a 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 (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Extra-familial harm – Children may be at risk of experiencing physical, sexual or emotional abuse and exploitation in contexts outside their families.

Children can be vulnerable to multiple forms of extra-familial harm from both adults and / or other children. Examples of extra-familial harm may include (but are not limited to):

- **criminal exploitation** (such as county lines and financial exploitation) – see above and below
- **serious violence** – this covers specific types of crime, such as homicide, knife crime, and gun crime, and areas of criminality where serious violence or threat is inherent, such as in gangs and county line drug dealing (see above). It also includes crime threats faced in some areas of the country such as the use of corrosive substances as weapons.
- **modern slavery and trafficking**
- **online harm**
- **sexual exploitation** – see below
- **child-on-child (non-familial) sexual abuse and other forms of harmful sexual behaviour** displayed by children towards their peers
- **abuse and / or coercive control children may experience in their own intimate relationships** (sometimes called teenage relationship abuse) – see above
- **the influences of extremism which could lead to radicalisation** – Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of our armed forces.

Extra-familial contexts include a range of environments outside the family home in which harm can occur. These can include peer groups, school, and community / public spaces, including known places in the community where there are concerns about risks to children (for example, parks, housing estates, shopping centres, takeaway restaurants, or transport hubs) as well as online, including social media or gaming platforms.

Financial exploitation can take many forms and is used in the context of 'Working Together to Safeguard Children' to describe exploitation which takes place for the purpose of money laundering. This is when criminals target children and adults and take advantage of an imbalance of power to coerce, control, manipulate or deceive them into facilitating the movement of illicit funds. This can include physical cash and / or payments through financial products, such as bank and cryptocurrency accounts.

Maltreatment is all forms of physical and / or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

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 abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical abuse is a form of abuse which 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.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what's happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Equality, Diversity and Inclusion

This policy will be delivered in accordance with our Equality, Diversity and Inclusion Policy. An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

Data protection

This policy will be delivered in accordance with our Data Protection Policy. A Data Impact Assessment was completed for this policy and considered as part of the approval process.

Related legislation, Regulations and Guidance

- Children Act 2004
- Working Together to Safeguard Children Guidance (HM Government, December 2023)
- Domestic Abuse Act 2021
- Equality Act 2010

Related policies and procedures

- Safeguarding Procedure
- Antisocial Behaviour Policy
- Code of Conduct
- Data Protection Policy
- Disciplinary Policy
- Domestic Abuse Policy (Customers)
- Equality, Diversity and Inclusion Policy
- Hate Related Incidents Policy
- Hoarding Policy
- Homes Lettings Policy, Priority Move Policy and Housing Potentially Dangerous Offenders Policy
- Recruitment, Selection and Appointment Policy
- Whistleblowing Policy

Customer engagement

On 1 February 2024, we contacted our Customer Advocates to invite them to comment on a draft of this policy by completing a survey. The survey, which closed on 19 February 2024, asked the following questions and invited them to provide comments:

- Did you find the policy clear and easy to understand?
- We are keen to remove jargon and buzzwords wherever possible. Were there any words, phrases or sections that you feel we should change to ensure it is plain English?
- Thinking more generally about this policy, is there anything you would change?
- Would you support Moat's adoption of this policy?

Feedback, comments and suggestions provided by customers through the survey have been used to improve the policy.

Document Revision History (Record of any changes made to the policy)

Date	Changes approved by	Details of changes made