

#### 1. Introduction

- 1.1 This policy outlines our approach to preventing and reducing the risk of harm to children who are experiencing or are at risk from abuse, neglect or exploitation.
- 1.2 This policy should be read in conjunction with the Safeguarding Adults policy Other related documents:
  - Whistleblowing Policy
  - Domestic Abuse and VAWG Policy
  - Wellbeing Policy
  - Code of Conduct
  - Data Protection Policy
  - Recruitment and Selection Policy
  - Equality, Diversity and Inclusion Policy

### 2. Scope

- 2.1 This policy applies to children and young people including young people who are pregnant, leaving care or a secure youth establishment that live in our properties or use our services, and all Peabody Group colleagues and volunteers. It also applies to all board and committee members and agency workers. The term 'colleague' in this policy refers to Peabody employees and volunteers.
- 2.2 Other organisations working on our behalf, or on our premises, are expected to have their own safeguarding policy and procedures or adhere to ours.

### 3. Key terms and definitions

- 3.1 Children may be vulnerable to **neglect** and **abuse** or **exploitation**. This can take a variety of forms including: sexual, physical, emotional and psychological abuse; neglect; domestic abuse, including controlling or coercive behaviour; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading radicalisation. The four recognised categories of child abuse are: physical; sexual; psychological and emotional abuse; and neglect.
- 3.2 A **child** is defined as anyone who has not yet reached their 18<sup>th</sup> birthday as defined under the Children Act 1989, irrespective of circumstances and including unborn children.

#### 4. Our approach

- 4.1 Peabody recognises its responsibilities under the terms of the Children Act 1989 and 2004 legislation and guidance with regards to the safeguarding of children and young people.
- 4.2 All Peabody Group colleagues have a duty to act upon and report actual, suspected or allegations of abuse in line with the Peabody Code of Conduct.
- 4.3 We make sure colleagues in direct contact with residents, customers and service users are aware of the signs of abuse and know the appropriate action to take when any concerns are raised, this includes contractors. Training is provided to colleagues appropriate to their role within the organisation.

- 4.4 We take a child centred approach when working with individuals, family members and their representatives. We support and assess their circumstances and recognise the confidentiality of all the individuals concerned. However, the safety of the individual child/children is paramount and where it is suspected that abuse may be occurring and a child / children is in immediate risk of harm we will contact the emergency services and authorities.
- 4.5 We will record and refer all concerns, suspicions and allegations of abuse or neglect to appropriate agencies responsible for carrying out safeguarding assessments and enquiries, specifically the Local Authority. Referrals will be made to internal teams where appropriate.
- 4.6 We will work in partnership with lead agencies and relevant partners, to respond to suspicions or incidents of abuse or make safeguarding enquiries in accordance with statutory procedures
- 4.7 We will report any incidents of abuse that we suspect are a criminal offence to the Police. We will treat any disclosures of actual historical abuse in the same way as an allegation, disclosure or suspicion of current child abuse.
- 4.8 We will recognise children as victims of domestic abuse in accordance with the Domestic Abuse Act 2021. A victim of domestic abuse includes a child who sees or hears or experiences the effect of the abuse and is related to either person where behaviour of a person towards another person is domestic abuse. A full definition of domestic abuse can be found in our Domestic Abuse and VAWG policy.
- 4.9 We will share information for the purposes of safeguarding and will comply with the statutory duty to provide information where requested. We will develop processes and principles for sharing information.
- 4.10 We will handle data in accordance with the Data Protection Act, UK General Data Protection Regulation and the Peabody Data Protection Policy.
- 4.11 We will develop and implement internal procedures for colleagues that establish clear lines of accountability, responsibility and processes for reporting safeguarding concerns.
- 4.12 We will meet our responsibilities in the safe recruitment, selection and vetting of colleagues by using the Disclosure and Barring Service and undertake any other pre-employment screening checks as appropriate.
- 4.13 We will provide support and supervision for employees, creating a safe environment in which they feel able to report safeguarding issues, including where they have concerns about the behaviour of another Peabody employee in line with our Whistleblowing Policy.
- 4.14 We will address any allegations or suspected abuse by Peabody employees through formal statutory investigative procedures and will report cases to the police where appropriate. Further action may be taken through our own internal disciplinary procedures.
- 4.15 We recognise the emotional impact on staff of recognising and reporting safeguarding concerns. Employee support will be available through line managers and in line with our Wellbeing Policy.
- 4.16 We promote our safeguarding policy and principles to customers through our lettings processes, support services and through the day to day services provided to customers in their homes, on estates and in the communities where we work. We are committed to minimising the



circumstances that make children vulnerable to abuse and neglect through our community initiatives and support services.

### 5. Equality, Diversity and Inclusion

- 5.1 We value diversity and promote equality, ensuring people are treated accordingly to their individual needs. This ensures that no person or other organisation is discriminated against on the grounds of race, colour, nationality, ethnic origins, sex, disability, sexual orientation, gender reassignment, martial or civil partner status, pregnancy, unrelated criminal activities, illness or any other matter that may cause a person to be treated with prejudice.
- 5.2 We will endeavour to ensure that services are delivered fairly and equally to all and to the highest possible standard. We provide all customers, prospective customers and other stakeholders with the information they require, in a format to meet their individual needs, using clear language which is easy to understand.
- 5.3 This policy impacts on our most vulnerable customers, many who will have protected characteristics under the Equality Act 2010. Therefore, we have completed an Equality Impact Assessment to ensure that any action we take does not discriminate, is the least restrictive and enables the person as much choice and control over decisions as is possible.

### 6. Legislation and Regulation

- Children Act 1989
- Children Act 2004
- Children and Families Act 2014
- Domestic Abuse Act 2021
- Modern Slavery Act 2015
- The Protection of Children Act 1999
- Counter Terrorism and Security Act 2015
- Working Together to Safeguard Children (2018) & supplementary DfE guidance on specific safeguarding issues – Appendix C
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2011
- London Child Protection Procedures and Practice Guidance Updated October 2017
- Data Protection Act and General Data Protection Regulation

### 7. Responsibilities

7.1 The Managing Directors of all regions have overall responsibility for delivery and compliance with the policy



## Approval

Version number	01
Effective from	21 November 2022
Policy owner	Managing Director South London and Hackney

