

Safeguarding Children Policy

Originator:	Regulatory Compliance Team
PCHA Board Approval Date:	December 2025
Review date:	December 2028

1	Introduction
1.1	The scope of this Policy sets out Pine Court Housing Association's (PCHA) responsibilities to comply with the relevant legislation and regulations in safeguarding children (Children defined as anyone who has not reached their 18th birthday – Children Act 2004, Children Act 1989 and Working Together to Safeguard Children Guidance 2023).
1.2	This Policy applies to all PCHA staff regardless of their role or work location when they are on PCHA contracts in all areas of operations.
1.3	If you believe a child is suffering harm or at risk of harm then you have a responsibility to report your concerns in line with the flowchart at 4.2 in this Policy and contacting the Designated Officers for advice as appropriate. If you believe a child is in immediate danger then you should contact the emergency services (Police and / or Ambulance) directly.
1.4	<p>PCHA will define safeguarding and promoting the welfare of children activity as:</p> <ul style="list-style-type: none"> • Providing help and support to meet the needs of children as soon as problems emerge • 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 • Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children • Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework
1.5	In operating this Policy, PCHA will comply with all relevant legislation that impacts on children's safeguarding issues including those that define forms of abuse as a crime, those concerned with the provision of health and social care services and any other relevant statutes and statutory instruments.
1.6	<p>The application of this Policy assists PCHA to meet the outcomes of the Regulatory Framework for Social Housing in England adopted by the Regulator of Social Housing, as outlined below:</p> <ul style="list-style-type: none"> • Local area co-operation (Neighbourhood and Community Standard)

Registered providers shall co-operate with relevant partners to help promote social, environmental and economic wellbeing in the areas where they own properties

1.7 Access and Communication

- 1.7.1 PCHA is committed to ensuring that its services are accessible to everyone. PCHA will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for PCHA or use its services.
- 1.7.2 Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers' needs in our service delivery and ensure this information is kept up to date.

1.8 Equality, Diversity and Human Rights

- 1.8.1 PCHA is committed to fairness and equality for all customers, colleagues, and stakeholders.
- 1.8.2 PCHA's approach to Equality, Diversity, and Inclusion (EDI) goes beyond legal or statutory obligations, however, PCHA will meet or exceed its legal requirements as outlined in the Equality Act 2010 and the Human Rights Act 1998. This policy also demonstrates how PCHA will meet the requirements of Public Sector Equality Duties, which it has chosen to adopt and implement as a matter of good practice rather than as a legal obligation.
- 1.8.3 PCHA is fully committed to eliminating unfair and unlawful discrimination. Hate Crime, Harassment, and Bullying will also not be tolerated, and take proactive steps to prevent such behaviours.
- 1.8.4 It is unlawful to discriminate directly or indirectly based on the following protected characteristics:
- Disability
 - Gender
 - Gender identity, or gender reassignment status
 - Race, racial group, ethnic or national origin, or nationality
 - Religion or belief
 - Sexual orientation
 - Age
 - Marriage or civil partnership status
 - Pregnancy or maternity
- 1.8.5 PCHA are also committed to ensuring that individuals are not treated less favourably due to their social, economic, or cultural backgrounds, as well as specific medical conditions as defined in the Equality Act.
- 1.8.6 PCHA regularly review policies and practices to ensure they reflect its commitment to equality and diversity.
- 1.9 The Policy should be read in conjunction with the following:
- PCHA Safeguarding Adults Policy
 - PCHA Recruitment and Selection Policy
 - PCHA Confidential Reporting (Whistleblowing) Policy

	<ul style="list-style-type: none"> • PCHA Data Protection Policy • PCHA Work Placement Policy • PCHA Domestic Abuse Policy
2	Statement of Intent
2.1	PCHA will comply with all relevant legislation, regulations and contractual obligations in all areas of work in regard to safeguarding and promoting the welfare of children.
2.2	The PCHA Board (under delegated authority) and senior management teams will demonstrate a clear commitment to the importance of safeguarding children and promoting their welfare by approving this Policy and ensuring its effective operation.
2.3	PCHA will have in place a Service Level Agreement (SLA) with its Sovini Group Partner, One Vision Housing (OVH) to provide a 'Designated Person' role for PCHA as a central point of contact for any investigations into alerts raised including, where appropriate, if a child is assessed as a child in need and / or subject to a child protection plan and to provide advice and guidance to PCHA staff who have any safeguarding concerns.
2.4	Staff wishing to contact the Designated Person with safeguarding concerns will receive priority over any other business.
2.5	PCHA have in place clearly understood and widely accessible procedures for staff to report safeguarding children concerns, that will be consistently applied.
2.6	PCHA will provide staff with comprehensive guidance on identifying safeguarding children concerns and training will be provided as part of the induction process for all new starters. For all staff with front line duties, refresher training will be provided on a rolling three-year basis. Staff will be trained to the level identified as required for their role and responsibilities.
2.7	PCHA will provide additional support services and make referrals to external agencies as necessary where concerns are raised that on investigation by the relevant safeguarding body are found to have no ongoing safeguarding implications but highlight other support needs for the individuals concerned.
2.8	Through training, PCHA staff will be encouraged to develop 'professional curiosity' (staff to avoid making assumptions and to look beyond face value information) to include recognising the 'voice of the child' in their understanding of a situation and ensure any safeguarding alerts they raise capture the child's lived experience and environment.
2.9	<p>PCHA will have in place recruitment and selection Policies that identify which positions are likely to involve 'regulated activity' and will ensure appropriate security checks and clearances are obtained before employees commence work with the organisation. Regulated activities are defined by the Protection of Freedoms Act 2012 as:</p> <ul style="list-style-type: none"> • Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children; • Work for a limited range of establishments ('specified places'), with opportunity for contact: for example, schools, children's homes, childcare premises. Not work by supervised volunteers

<p>2.10</p> <p>2.11</p> <p>2.12</p>	<ul style="list-style-type: none"> The full definitions of regulated activities can be found at https://www.gov.uk/government/organisations/disclosure-and-barring-service/about <p>PCHA has clear procedures in place for dealing with allegations made against staff members where safeguarding children concerns are raised, that adhere to the procedures outlined in the National Statutory Guidance, 'Working Together to Safeguard Children 2023'. In the event of any such allegations, PCHA will work in close liaison with the Local Authority Designated Officer.</p> <p>The procedures include scope for precautionary suspension of the staff member whilst any investigation into allegations raised is carried out by the appropriate authority. If found to be guilty and in line with its zero-tolerance stance to all forms of neglect, abusive or exploitative behaviour, subsequent disciplinary action will result. There are also clear procedures in place for dealing with malicious or unfounded allegations.</p> <p>PCHA will work closely with partner agencies in responding to safeguarding children concerns and will adhere to the Safeguarding procedures established by the local multi agency safeguarding arrangements in the area of its operations, including local authority partners to address child exploitation / child sexual exploitation issues.</p>
<p>3</p>	<p>Policy</p>
<p>3.1</p> <p>3.2</p> <p>3.3</p>	<p>PCHA recognises its responsibilities in safeguarding children and will take all reasonable measures to prevent or minimise the potential for abuse occurring in the areas of its service delivery where:</p> <ul style="list-style-type: none"> Children are known to live Children may live Children may visit or; Children neither live, or, visit but customers may have access to children <p>For the purposes of this Policy, PCHA will use the definition of 'safeguarding' adopted by the Home Office (with effect from 31st March 2013) as outlined below, in addition to the definitions outlined in the Working Together to Safeguard Children 2023 guidance:</p> <ul style="list-style-type: none"> Protecting children from maltreatment 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 <p>PCHA will also use the definition of domestic abuse as defined by the Home Office 2013, as follows:</p> <p>'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:</p> <ul style="list-style-type: none"> o psychological o physical o sexual o financial

- o emotional

'Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.'

'Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.'

3.4 PCHA will also include in its definitions of abuse issues of Modern Slavery which encompasses human trafficking, slavery, servitude and forced or compulsory labour and can also include child exploitation or child sexual exploitation. Where PCHA suspects modern slavery is taking place it will make a referral to one of the Government's 'First Responder' organisations e.g. Police or Local Authority as part of its alert raising process

3.5 PCHA will adhere to strict procedures for recording and sharing safeguarding children information that ensures client confidentiality and Data Protection responsibilities are met and will have appropriate systems in place to ensure the information held is systematically reviewed (including UK General Data Protection Regulation and UK Data Protection Act 2018 requirements).

3.6 In taking decisions to share information with external agencies the 'best interests of the child' about whom safeguarding concerns are raised will always be the overriding consideration. PCHA may also share information where:

- There is a public interest of sufficient force
- The child about whom safeguarding concerns are raised consents, or
- Where there is clear risk of significant harm to a child

3.7 PCHA will also share information using the Early Help Assessment Tool when there are concerns that a child will not progress towards the 'Every Child Matters Outcomes' of:

- Staying safe
- Being healthy
- Enjoying and achieving
- Making a positive contribution
- Achieving economic wellbeing

3.8 PCHA will also comply with the information sharing protocols required under Section 17 of the Children Act 1989 when there are concerns that a child is classed as being 'In Need'. The critical factors in deciding whether a child is in need are:

- What will happen to a child's health or development without services being provided, and
- The likely effect the services will have on a child's standard of health and development

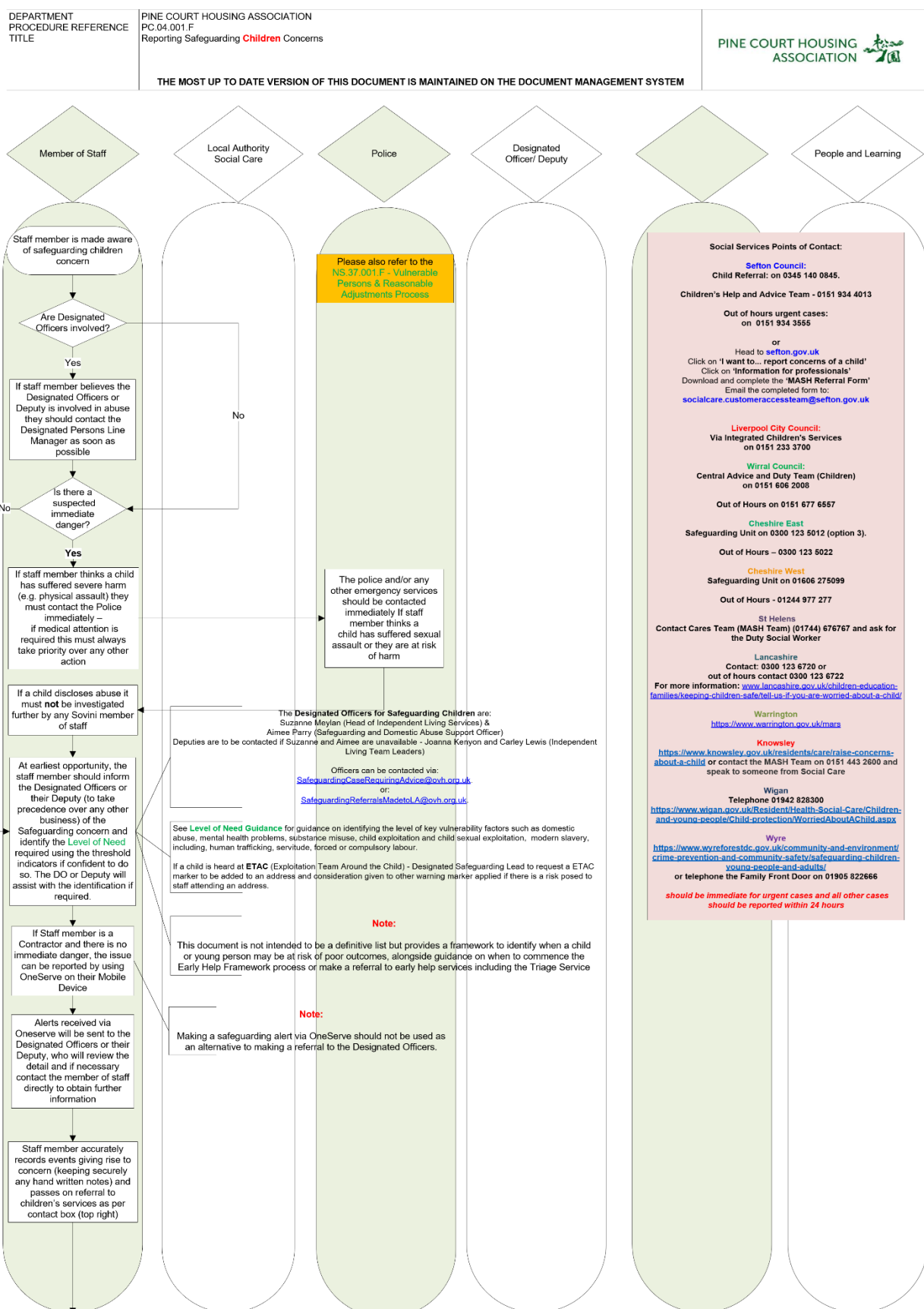
3.9 PCHA will ensure training is provided to all staff who have 'regular contact' with children and young people as part of their day-to-day duties on a rolling three-year basis.

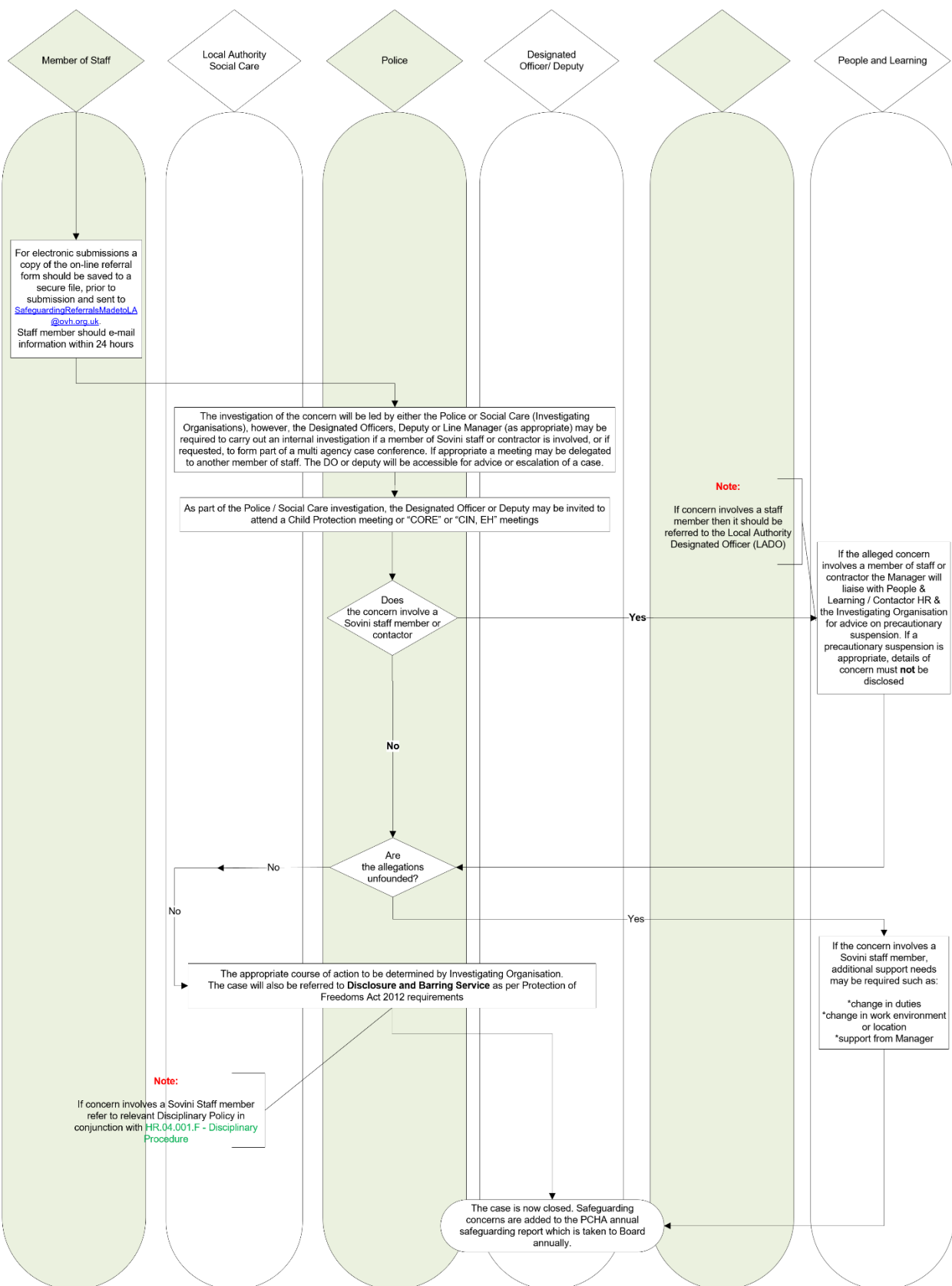
Where concerns are raised by staff members, the Designated Officers will ensure follow up referrals are in line with the 'Level of Need Guidance' or 'Thresholds' - (produced by local authorities).

3.10	PCHA will comply with the duty (effective from 1st December 2012) to refer information on any member of staff (after appropriate investigation process) to the Disclosure and Barring Service (DBS) where an employee has:
3.11	<ul style="list-style-type: none"> • Been cautioned or convicted for a relevant offence; or • Engaged in relevant conduct in relation to children and / or vulnerable adults (i.e. an action or inaction [neglect] that has harmed a child or vulnerable adult or put them at risk of harm); or • Satisfied the harm test in relation to children and / or vulnerable adults. (i.e. there has been no relevant conduct [i.e. no action or inaction] but a risk of harm to a child or vulnerable adult still exists)
3.12	<p>Through staff training and regular one-to-one supervision sessions with line-managers, all PCHA staff that are likely to have to deal with safeguarding children concerns will be informed of their responsibilities and good practice in maintaining professional boundaries and appropriate behaviour.</p> <p>This will include adopting high standards of personal conduct to maintain the confidence and respect of the public in general and all those with whom they work.</p>
3.13	In line with PCHA's Confidential Reporting (Whistleblowing) Policy, all staff will be made aware of how to access confidential and independent advice via Protect (formerly the Public Concern at Work Agency) for any concerns about fellow staff members or reporting safeguarding children
3.14	concerns direct to the relevant safeguarding body.
3.15	The Confidential Reporting Policy is compliant with the Public Interest Disclosure Act 1998 and staff that raise 'whistle-blowing' concerns will receive appropriate support and guidance.
3.16	PCHA will promote awareness amongst customers on what constitutes abuse and the methods of how to report issues of concern when they sign-up for an PCHA tenancy, including confidential reporting to independent agencies.
3.17	Awareness of safeguarding Children issues will also be promoted by various communication channels including tenants' newsletter, leaflets available in a variety of formats, website updates and informal information sessions held for residents of purpose-built independent living accommodation.
3.18	Customers will be encouraged to monitor performance of the Safeguarding Children Policy and procedures through the PCHA complaints, compliments and suggestions scheme, through regular surveys and via feedback to staff members during the conduct of their duties.
3.19	Customers will also have the opportunity to be involved in future revisions of the Policy and procedures based on performance information, in response to risk assessment information or changes in regulation / legislation, by participation in the PCHA Customer Empowerment Panel.
4	Implementation

4.1

As stated in 1.2 this Policy applies to PCHA staff working on PCHA contracts only. If a PCHA staff member becomes aware of a safeguarding concern whilst working on an PCHA contract they should follow the reporting procedure outlined below:





The PCHA Safeguarding Children Policy applies to all staff and there is a collective responsibility to prevent or minimise the potential for safeguarding concerns occurring. If staff become aware that there are problems with effective operation of the Policy or the procedures that support it, they

4.3	should complete a 'change request' within the PCHA document management system and these will be incorporated into the Policy / procedural review process.
4.4	PCHA will inform all staff of their responsibilities and duties to recognise safeguarding adults concerns via the staff induction programme, on-going training on a rolling three-year basis and management supervision sessions.
4.5	Any staff member that has to raise safeguarding adults concerns will be supported through the process via information and advice available via the Designated Persons.
4.6	The Head of Independent Living is the Designated Person, with the Safeguarding and Domestic Abuse Officer and the Independent Living Team Leaders having roles as deputies for the Designated Person. The Designated Person and the Safeguarding and Domestic Abuse Officer will be the main point of contact for Case Conferences and development of Safeguarding Plans if required. PCHA staff wishing to contact with safeguarding concerns will take priority over any other business.
4.7	If PCHA staff become aware of a safeguarding concern whilst working on non PCHA contacts they should follow local reporting requirements, as advised by commissioning companies.
4.8	PCHA will provide up-to-date contact details for the designated persons and local safeguarding agencies in the areas they may be operating in.
4.9	In line with PCHA's Confidential Reporting (whistleblowing) Policy staff will be made aware of how to access confidential and independent advice via Protect (formerly the Public Concern at Work Agency) for any concerns about fellow staff members or by reporting safeguarding adult concerns direct to the relevant Safeguarding authority.
4.10	The Confidential Reporting (Whistleblowing) Policy is compliant with the Public Interest Disclosure Act 1998 and staff that raise 'whistle-blowing' concerns will receive appropriate support and guidance.
4.11	<p>PCHA will have in place recruitment and selection policies that identify which positions are likely to involve 'regulated activity' and will ensure appropriate security checks and clearances are obtained before employees commence work with the organisation. Regulated activities are defined by the Protection of Freedoms Act 2012 as:</p> <ul style="list-style-type: none"> • Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice / guidance on well-being, or drive a vehicle only for children; • Work for a limited range of establishments ('specified places'), with opportunity for contact: for example, schools, children's homes, childcare premises. Not work by supervised volunteers • The full definitions of regulated activities can be found at https://www.gov.uk/government/organisations/disclosure-and-barring-service <p>PCHA will comply with the duty (effective from 1st December 2012) to refer information on any member of staff (after appropriate investigation process) to the Disclosure and Barring Service (DBS) where an employee has:</p> <ul style="list-style-type: none"> • Been cautioned or convicted for a relevant offence; or

4.12	<ul style="list-style-type: none"> Engaged in relevant conduct in relation to children and / or vulnerable adults (i.e. an action or inaction [neglect] that has harmed a child or vulnerable adult or put them at risk of harm); or Satisfied the harm test in relation to children and / or vulnerable adults (i.e. there has been no relevant conduct [i.e. no action or inaction] but a risk of harm to a child or vulnerable adult still exists) <p>PCHA will adhere to strict procedures for recording safeguarding adults' information that ensures client confidentiality and Data Protection responsibilities are met.</p>	
5	Performance	
5.1	The Board of PCHA will receive an annual assurance report on all safeguarding provisions including the number of cases referred to relevant investigation agencies.	
5.2	Safeguarding provisions are also included on the PCHA Risk Register which is reviewed quarterly by the Risk Assurance Committee.	
5.3	On an annual basis PCHA will undertake an audit of all referrals made in regard to safeguarding alerts raised, the results of which will feed into the policy and procedural review mechanisms outlined below in section 7.	
6	Consultation	
6.1	All PCHA Staff have been consulted in development of this Policy. The Customer Empowerment Panel have also been consulted in the development of this Policy.	
7	Review	
7.1	The Policy and supporting procedures will be reviewed every three years from the date of DMT approval.	
7.2	The review process will ensure continuing suitability, adequacy and effectiveness of the Policy and may be prompted by the introduction of new legislation or regulation or in the light of continual assessment of procedural effectiveness.	
7.3	The Policy and procedural review will show the impact of stakeholder and other agency feedback and involvement. The Policy and procedural review will seek to identify and address any disincentives that may exist to reporting concerns.	
8	Equality Impact Assessment	
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes
8.2	When was EIA conducted and by who?	An EIA was conducted by the Strategic Regulatory Compliance Manager and the Policy and Strategy Administrator in September 2025.
8.3	Results of EIA	Whilst the EIA acknowledged that there is potential for differential / adverse impact

		for groups who have multiple protected characteristics – the procedures and provisions for additional support that are inherent in the Policy offer sufficient mitigation of these risks. The EIA also identified the need to keep up-to-date contact details for all local authorities within the area of operations as this expands and this issue has been addressed with an update to the procedures.	
9	Scheme of Delegation		
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	Departmental Management Team	
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Director of Operations	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Director of Operations	
10	Amendment Log		
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
11th May 2021	Policy reviewed in line with the review schedule	See Section 6	<ul style="list-style-type: none">• New clause added at 2.8 in regard to professional curiosity• Revised definitions of ‘abuse’ included at 3.2• Reference to ‘Early Help Assessment Tool’ included at 3.5 in place of ‘Common Assessment Framework’
3 rd Oct 2022	Policy reviewed in line with the review schedule	See Section 6	<ul style="list-style-type: none">• Definitions of abuse broadened at 3.2 to encompass Modern Slavery (including referral mechanism)• Procedure updated at 4.2• EIA Updated at 8
18 th December 2025	Policy reviewed in line with the review schedule	See Section 6	<ul style="list-style-type: none">• EIA information updated in section 8• Job titles and Team names updated throughout

			<ul style="list-style-type: none">• Equality, Diversity and Human Rights statement updated• Amendment to section 4.5 to include new Officer and their role• In line with Board approved procedure the review period has been extended to every Three Years rather than annually• Procedure updated at 4.2 to reflect current Designated officer Details and areas of operation
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