

# **Safeguarding Children/Young People**

Policy:	Safeguarding Children/Young People Policy			
Version number:	5.0			
Date effective from:	14 February 2025			
Policy Owner:	Director of Customer			
Policy Author(s):	Operations Manager, Safeguarding			
Accountable Executive:	Executive Director of Customer, People and Engagement			
Approved by:	Executive Director of Customer, People and Engagement			
Equality Assessment:	Yes			
Next review of policy due:	February 2028			
Policy Grade:	2			
For the full version history of this policy, see the back page				

Please avoid referring to printed versions of this policy.

Printed versions may quickly go out of date – the latest version will be on the Policy Hub or contact the Governance Team. For support and advice regarding the policy, please contact the Policy Owner.

# **Contents Page**

1.0	Introduction and Scope	3
2.0	Our Core Purpose, Vision and Priorities	3
3.0	Regulation, Legislation and Strategic Alignment	5
4.0	Definitions	5
5.0	Modern Slavery	8
6.0	Policy Statement and Reporting	9
7.0	Records	9
8.0	Roles and Responsibilities	9
9.0	Policy Delivery	10
10.0	Policy Outcomes	11
11.0	Escalation	11
12.0	Confidentiality	11
13.0	Monitoring and Review	12
	Version Control	12
	Appendices	13

## 1.0 Introduction and Scope

- 1.1 This document covers our policy on Safeguarding Children/Young People. The policy should be read in conjunction with the Safeguarding Children/Young People Toolkit and aims to provide clear direction to staff and others about expected behaviour in dealing with child safeguarding issues.
- 1.2 The purpose of the policy is, therefore, to ensure that safeguarding concerns and referrals are handled sensitively, professionally and in ways that support the needs of the child or young person.
- 1.3 The scope of this policy covers:

Gentoo Group	X	
Gentoo Homes		
Gentoo Developments		
Gentoo Genie		

#### 1.4 It applies to:

General Needs rented properties		
Supported Housing		
Sheltered Housing		
Leasehold/Shared ownership		
Rent to Buy properties		
Market rented properties (domestic)		
Temporary Accommodation		
Stock owned but not managed by the Group		
Communal Areas, including those relating to Leasehold/Shared		
Ownership properties		
Commercial Property (offices, depots etc)		
Stock managed by Gentoo on behalf of a third party		
Garages and outbuildings		
Remote plant (district heating, electrical pumps etc)		
Curtilage		

# 2.0 Our core purpose and vison and priorities

Our core purpose is to provide safe and decent homes for our customers of today and tomorrow.

Our vision is to provide great homes, strong communities, and inspired people for Sunderland.

The safety of our customers and colleagues will always be our number one priority.

We have identified six further priorities which will guide the delivery of our services.

We live our values in everything we do from the boardroom to the front room, to deliver our priorities for our customers.

- We know our customers.
- We provide great homes.
- We help communities to thrive.
- We are a great place to work.
- We spend our money wisely.
- We are well governed.

Our values are what we stand for and what we want to be known for. They are what makes us, us.

- We care about people.
- We take accountability.
- We shape the future.
- We bring leadership.
- We deliver.
- 2.1 This Policy operates within our Vision and Values and links to the Safeguarding Adults at Risk Policy and Toolkit, Hoarding Toolkit, Data Protection Policy, Domestic Abuse Policy and Community Safety Policy and Toolkit.

#### 2.2 Consumer Standards

We are guided by the Consumer Standards, which describe ways to improve things for people living in Social Housing.

- The Safety and Quality Standard (https://www.gov.uk/government/publications/safety-and-quality-standard)
- The Transparency, Influence and Accountability Standard (https://www.gov.uk/government/collections/transparency-influence-and-accountability-including-tenant-satisfaction-measures)
- The Neighbourhood and Community Standard (https://www.gov.uk/government/publications/neighbourhood-and-community-standard)

 The Tenancy Standard (https://www.gov.uk/government/publications/tenancy-standard)

# 3.0 Regulation and Legislation and Strategic Alignment

3.1 Our Regulator sets out the Neighbourhood and Community Standard which we must meet. Failure to properly discharge these responsibilities could lead to a serious detriment or other judgement from the Regulator if we breach the Standards in place at the time

#### 4.0 Definitions

- **4.1 Safeguarding children** is defined in working together to Safeguard Children 2023 as:
  - protecting children from maltreatment
  - preventing impairment of children's health or development
  - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes
- **4.2 A child** is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means children and young people.
- 4.3 Gentoo recognises that harm can take place in many forms. The categories below set out key categories, however, this is not a definitive list, and our teams will always consider the individual circumstances of cases that arise when deciding if an act or incident may be abuse:
  - 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. Children may be abused by a stranger, or someone known to them within their family or family network. Abuse can also take place by someone known to them in an institutional or community setting. Abuse can take place in person, child's phone or via the internet. They may be abused by an adult or adults, or another child or children.
  - 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.

• **Emotional Abuse** is the persistent emotional maltreatment of a child such 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 expectation being imposed on children. These may include interactions that are beyond the 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 on-line bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved with all types of maltreatment of a child, though it may occur alone.

- Sexual Abuse 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 using technology, for example making sexually explicit films or online grooming. Children and young people who are sexually exploited are the victims of child sexual abuse, and their needs require careful assessment. They are likely to be in need of welfare services and, in many cases, protection under the Children Act 1989. This group may include children who have been sexually abused through the misuse of technology, coerced into sexual activity by criminal gangs or the victims of trafficking. The identification of a child who is being sexually exploited, or at risk of being sexually exploited, should always trigger an immediate referral and staff should follow procedure by reporting this to Gentoo Safeguarding Team.
- 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- Domestic Abuse Children can witness domestic abuse in a variety of ways and this can have many negative physical and emotional effects. The Domestic Abuse Act 2021 states that children are a victim of domestic abuse in their own right if they witness, hear or have an awareness of domestic abuse happening. More information can be found in our separate Domestic Abuse policy.
- 4.4 All colleagues also need to be aware of other specific sources of harm which may include:
  - Online Abuse is any type of abuse that happens online, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online). Children can feel like there is no escape from online abuse abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.
  - Exploitation Child Sexual Exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.
  - Grooming is when someone builds an emotional connection with a child
    to gain their trust for the purposes of sexual abuse, sexual exploitation or
    trafficking. Children and young people can be groomed online or face-toface, by a stranger or by someone they know for example a family
    member, friend or professional. Groomers may be male or female. They
    could be any age.
  - Gang Exploitation falls into three categories: peer groups, street gangs
    and organised crime groups. There is a distinction between organised
    criminal groups and street gangs based on the level of criminality,
    organisation, planning and control. Children can often feel a strong sense
    of belonging to a gang and view this as their family and therefore do not
    often see the exploitation or abuse that exists. Effective information
    sharing can help agencies to respond in a timely and appropriate way.

- County lines is a term used by the police where children and young people are exploited into moving drugs, often to towns outside of their home county.
- Cuckooing is where a criminal befriends an individual who lives on their own. The criminal then moves in and uses the property to operate unlawful activity.
- Human Trafficking / Child trafficking is where 'children and young people are tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children are trafficked for many reasons, including domestic slavery and forced labour, sexual exploitation, forced marriage or to be used in committing criminal offences / involved in gangs.
- Radicalisation is the process by which a person comes to adopt increasingly extreme political, social, or religious ideals. This can, in extreme cases, result in condonation or support of terrorism. Extremism covers 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.
- Self-harm is when a person hurts themselves intentionally. This is often a way of coping with difficult feelings or situations, painful memories or trauma. Self-harm can present in many forms including cutting, pinching, burning, hitting or punching oneself and hair pulling (not an exhaustive list). Excessive use of alcohol and/or drugs and people putting themselves into harmful situations, where they may be subjected to physical or sexual abuse, can also be considered as self-harm.
- **Suicide** involves a person intentionally ending their own life. Suicidal feelings can range from a person having fleeting or general thoughts of ending their own life, right through thinking of or planning ways to end their own life.

# 5.0 Modern Slavery

5.1 Gentoo take a zero-tolerance approach to human trafficking and slavery. Modern slavery encompasses human trafficking, forced labour and domestic servitude which are all a form of abuse and must be dealt with as our highest priority. Gentoo carry out customer checks at various points within the tenancy which aim to ensure that the legal tenant and their household are living in the property and that it is not being used for illegal purposes, which includes human trafficking and slavery.

# 6.0 Policy Statement and Reporting

- 6.1 Gentoo regards the safeguarding and protection of children/young people as paramount within all its activities whether this involves direct or indirect contact with children/young people. Our aims with this policy are:
  - Associated Toolkits will ensure that tenants are treated as individuals with fairness and respect
  - Staff and customers will be clear in their understanding of how Safeguarding is defined.
  - We will review good practice, regulator recommendations, revised legislation, awareness of support and early intervention options and follow guidelines from Sunderland Safeguarding Children Partnership to ensure that our safeguarding service is effectively managed.
  - Encourage and use reports of abuse and neglect to enable us to have a better understanding of issues affecting our neighbourhoods.
  - We will cooperate with local partnership arrangements both operationally and strategically to gain a better understanding of safeguarding issues and amend our approach accordingly.

#### 7.0 Records

7.1 All safeguarding referrals and information relating to attendance at meetings is recorded on our case management system. All correspondence with agencies regarding safeguarding should be forwarded to the Safeguarding Team who will ensure that a copy is stored in the appropriate location.

# 8.0 Roles and Responsibilities

8.1 As a Housing Association, we have a statutory responsibility to comply with all relevant regulation and legislation in relation to safeguarding children.

Roles	Responsibility
Director of Customer Service	Is accountable for the effective implementation of this policy and ensuring colleagues involved in its delivery understand their roles and responsibilities
Head of Neighbourhoods / Head of Safety and Support/Operations Manager, Safeguarding	Will assist with implementing this policy and ensuring all staff involved in it are trained in our procedures and adequately skilled to implement those.
Housing and Safety and Support Colleagues	Should have awareness of the policy, act accordingly and help in recognising and reporting any safeguarding issues they come across. They should attend Safeguarding meetings where relevant and see cases through to their conclusion.

# 9.0 Policy Delivery

- 9.1 Gentoo does not operate in isolation. Safeguarding children and young people is the responsibility of all adults and especially those working with children. **Safeguarding is everyone's business.**
- 9.2 Gentoo staff are encouraged to recognise and report anything that does not seem right. However, they also may have to act immediately to prevent any further harm from occurring such as contacting the Police if there is an immediate risk of harm.
- 9.3 Gentoo's aim is to help protect the children for whom we have responsibility as part of our group functions and work consistently and appropriately with safeguarding agencies/authorities.
- 9.4 The work undertaken by Gentoo is increasingly diverse and of a cross-boundary nature. The policy therefore acts in accordance with national legislation, guidance and good practice implemented locally by the Sunderland Safeguarding Children Partnership (SSCP).
- 9.5 Whilst SSCP has a role in co-ordinating and ensuring the effectiveness of local individuals and organisations work to safeguard and promote the welfare of children, it is not accountable for their operational work. This means that Gentoo Group retains accountability for safeguarding and promoting the welfare of children through our services.
- 9.6 Gentoo is committed to respond in accordance with the SSCP procedures in all cases where there is a concern about significant harm.
- 9.7 This policy and accompanying toolkit covers the range of interactions the group has with children and young people and recognises the three overarching principles of **prevention**, **protection** and **support**.

# 10.0 Policy Outcomes

- 10.1 Our policy aims to achieve the following outcomes:
- 10.2 **Prevention** by providing a positive atmosphere, providing training to raise awareness, providing appropriate support and good adult role models in our contact with children/young people.
- 10.3 **Protection** by all staff being recruited, trained and supported to follow Gentoo's Safeguarding Policy and respond effectively to any suspicions of significant harm and understand their accountability with regard to safeguarding children.
- 10.4 **Support** by looking after all staff who have handled suspicions/ disclosures as well as support for children/young people Gentoo come into contact with who may have been abused. Gentoo will ensure that support from outside the organisation is sought where appropriate.

#### 11.0 Escalation

- 11.1 Where the Board or any Board member has concerns about significant issues in any area of compliance with the safeguarding children policy and toolkit, they must escalate these concerns to the Executive Director of Housing and the Chair of the Board.
- 11.2 Where a member of staff has concerns about significant issues in any area of compliance with safeguarding children, they must escalate these concerns through their line management structure, ultimately to the Group Executive Team.
- 11.3 Where a member of staff continues to have concerns about significant issues in any area of compliance with safeguarding children, they should refer to the Group Whistleblowing Policy for further guidance.

# 12.0 Confidentiality

- 12.1 We will treat all information received in a private and confidential manner as far as possible but if we believe a child is at risk there may be situations where we cannot do this.
- 12.2 We will only disclose information to perpetrators, legal representatives, or other third parties once we have the consent of the complainant to do so.
- 12.3 We may, however, have a legal obligation to pass information on, for example to the Police or Children's Services or other statutory agencies.
- 12.4 This policy fully complies with the Group's Data Protection Policy.

# 13.0 Monitoring and Review

- 13.1 This policy will be reviewed every 3 years or in line with business need or changes in legislation.
- 13.2 This policy may be subject to an audit in line with the internal audit plan.
- 13.3 The toolkit will be regularly reviewed and updated where appropriate, drawing on external expertise where required.
- 13.4 This Policy is Grade 2 and changes require the approval of the Executive Director of Housing and the Executive Director of Corporate Services.

#### **Version Control**

Version	Reason	Issuer	Date
2.0	Approved.	Julie Lister	2017
2.0	Amended format.	Sarah Treadwell	22/03/2018
2.1	Changed names to job titles and added accountable ED.	Sarah Treadwell	07/10/2019
2.2	Draft for review.	Julie Lister	16/12/2020
2.3	Changes made after discussions with Carol Long, Susie Thompson, Julie Walker and Julie Lister.	Julie Lister	21/12/2020
3.0	Approved.	Julie Lister	11/01/2021
4.0	Job titles amended. Policy reviewed to bring in line with review of Safeguarding Adults (audit recommendation). Inc Julie Walker's amends. Sent to Tenants Voice Team for comments, no suggestions to change or add anything.	Julie Lister	19/10/2021
4.1	Updated core purpose and vision and priorities	Catherine Loftus	31/08/2023
5.0	Policy reviewed as per procedures (no suggestions for changes from safeguarding audit Approved by the Executive Team.	Julie Lister Chloe Appleby	14/01/2025 14/02/2025

#### **Appendix 1**

#### **Regulation and Legislation**

In fulfilling our obligations under this Policy, Gentoo will comply with all legislation and regulations as appropriate. This section aims to highlight the different areas of law and guidance, which may be of particular significance to Safeguarding Children.

This is a general overview and should not be used as a substitute for seeking legal advice in specific cases. If there is any doubt about the law relevant to a particular case, legal advice should be sought immediately from the Legal team.

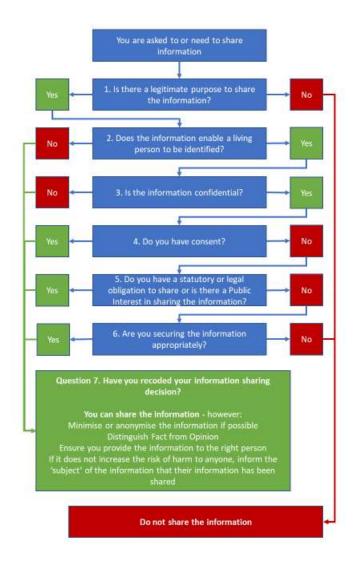
- Children Act 1989
- Children Act 2004
- Children and Social Work Act 2017
- Working Together to Safeguard Children a guide to multi agency working 2023
- Sunderland Safeguarding Children Partnership Procedures
- GDPR 2018
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Care Act 2014
- Anti-Social Behaviour Crime and Policing Act 2014
- Housing Act 1988, 1996 & 2004.
- Domestic Abuse Act 2021.

Gentoo has a suite of complementary policies and toolkits which staff may refer to in cases where there are cross cutting concerns, these include (but are not limited to):

- Safeguarding Adults at Risk Policy & Toolkit
- Community Safety Policy & Toolkit
- Domestic Abuse Policy & Toolkit
- Forced Marriages Toolkit
- Hate Incidents Toolkit
- Vulnerability Toolkit
- Whistle Blowing Policy & Toolkit

#### Appendix 2

Information Sharing – Community Safety Team All requests to share information related to safeguarding must be referred to the Community Safety Team.



You are asked to or wish to share information.

# Question 1 - Is there a clear and legitimate purpose for sharing information?

- Ensure there is a good enough reason to share the information?
- What is the outcome you are trying to achieve?
- Could the aims be achieved without sharing the information at all?
- Could the aims be achieved by anonymising the information, or minimising (reducing the amount of) the information shared?

Golden Rule - Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.

#### Other things to consider:

- Do not assume that you need to share the whole case file.
- Different agencies may have different processes for sharing information.

You will need to be guided by Gentoo's Data Protection Policy and Procedure, the Group's Code of Conduct and the code of conduct specifically relating to working with young people set out in this policy.

#### Question 2 - Does the information enable a living person to be identified?

If the information is about an identifiable living individual or could enable a living person to be identified when considered with other information, then it is classed as personal information under the Data Protection Act and subject to Data Protection law. This is likely to be the case in the course of your work. You should be open about what information you might need to share and why. However, it may not be appropriate to inform a person that information is being shared or seek consent to this sharing. This is the case if informing them is likely to hamper the prevention or investigation of a serious crime or put a child at risk of significant harm or an adult at risk of serious harm. Golden Rule - Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is safe or inappropriate to do so.

### Other things to consider:

 If the person was informed about how and with whom their personal information might be shared at the outset, it will usually not be necessary to inform them again as long as the use as described in the original notification is the same.

#### Question 3 - Is the information confidential?

- Not all information is confidential
- Confidential information is information of a private or sensitive nature that is:
  - not already lawfully in the public domain or readily available from another public source; and
  - had been provided in circumstances where the person giving the

information could reasonably expect that it would not be shared with others.

Golden Rule - Seek advice from the **Community Safety Team** if you are in any doubt, without disclosing the identity of the person where possible.

If the information is not confidential, you must now consider question 6.

If the information is confidential, you must now consider question 4.

#### Question 4 - Do you have consent to share?

- You should seek consent where possible and respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement on the facts of the case, that lack of consent can be ignored due to the 'public interest' i.e. it is important that others are aware of the information as withholding it would potentially put others in danger.
- You do not always need consent to share personal information. There will be some circumstances where you should not seek consent, for example, where doing so would:
  - place a child at increased risk of significant harm; or
  - place an adult at increased risk of serious harm; or
  - prejudice the prevention, detection or prosecution or a serious crime; or
  - lead to unjustified delay in making enquiries about allegations of significant harm or serious harm.

Golden Rule - Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.

#### Other things to consider:

Generally, there should be 'no surprises'. Obtaining explicit consent is best practice. It can be expressed either verbally or in writing, although written consent is preferable since that reduces scope for subsequent dispute. You will need to consider whose consent should be sought. Does the person have the capacity to understand and make their own decisions on this occasion? If not, is someone else authorised to act on their behalf? Consent must be informed, i.e. when people agree to information sharing, they must understand how much of their information

needs to be shared, who will see it, why it is necessary to share the information and any implications of sharing or not sharing.

Consent can be withdrawn at any time – if someone consents to sharing information and changes their mind, you should aim to respect their wishes. That said, there are still circumstances whereby you may still need to share information without someone's consent as discussed in Question 4, however in this case, they have previously provided it and withdrawn it. You would need to acknowledge their request to remove consent and then revisit Question 4 and 5 to see if you should continue to allow it to be shared.

# Question 5 – Do you have a statutory or legal obligation to share the information, or do you think there is sufficient public interest to share the information (i.e., it's in the Public's interest to share it)?

- Even where you do not have consent to share confidential information, you may lawfully share if this can be justified in the public interest. Where consent cannot be obtained or is refused, or where seeking it is unsafe or inappropriate (as explained at Question 4), the question of whether there is sufficient public interest must be judged by the practitioner on the facts of each case. A public interest request to share information can arise in a wide range of circumstances.
- Where you have a concern about a person, you should not regard refusal
  of consent to automatically mean that you cannot share confidential
  information.
- In making the decision you must weigh up what might happen if the information is shared against what might happen if it is not, and make a decision based on professional judgement.

Golden Rule - Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

Other things to consider:

A competent adult has the right to make decisions which may put themselves at risk but which present no risk of significant harm to children or serious harm to other adults. In this case it may not be justifiable to share information without consent.

If you decide not to share information you must consider Question 7.

If you decide to share information you must consider Question 6.

Question 6 - Are you sharing information appropriately and securely?

Only share what is necessary to achieve the purpose, distinguishing clearly between fact and opinion.

Ensure you have not simply 'hidden' information in a spreadsheet, where someone can 'unhide' it.

Share only with the person or people who really need to know the information. Make sure the information is accurate and up to date.

- Understand the limits of any consent given and especially if the information has been provided by a third party.
- Check who will see the information and share the information in a secure way. For example, confirm the identity of the person you are talking to; ensure a conversation or phone call cannot be overheard; use secure email; ensure that the intended person will be on hand to receive a fax.
- Establish with the recipient whether they intend to pass it on to other people and ensure that they understand the limits of any consent that has been given.
- Inform the person to whom the information relates that you are sharing the information, if it is safe to do so, and if you have not already told them that their information may be shared.

Golden Rule - Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.

# Question 7 - Have you properly recorded your information sharing decision?

- Record your information sharing decision and your reasons, including what information you have shared and with whom, following the Group's arrangements for recording information and in line with any local information sharing procedures in place.
- If, at any stage, you decide not to share information you should record this
  decision and the reasons for it.

Golden Rule - Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

If there are concerns that a child may be at risk of significant harm or an adult may be at risk of serious harm, then follow the relevant procedures without delay.

Seek advice from a member of the Community Safety Team or your local Neighbourhood Operations Manager if you are not sure what to do at any stage and ensure that the outcome of the discussion is recorded.

# Appendix 3

#### What is Prevent\* and what should I do if I have a concern?

Prevent safeguards vulnerable adults or children at risk of being radicalised to stop them becoming terrorists or supporting terrorism. It safeguards people in the same way as safeguarding individuals from being drawn into sexual exploitation, gangs, county lines etc. Prevent works in the non-criminal space so those referred will not be criminalised. Prevent is a multi-agency response to offer support to individuals referred and deals with all forms of extremism such as Right Wing and Islamist extremist. The referral process is:

#### NOTICE

If you identify that a vulnerable person may be at risk of being radicalised or drawn into terrorism... (NOTE: if there is an IMMEDIATE RISK of a terror incident taking place you MUST call 999 or the Anti-Terrorist Hotline 0800 789321)

#### CHECK

Ask relevant questions that will help you describe your concerns and any vulnerabilities the person may have e.g. by speaking with your line manager and/or your agency's Safeguarding/Prevent lead (see below for examples of types of information you should attempt to check out)

# SHARE

If your concern is valid then you MUST share the concern by following Gentoo's SAFEGUARDING procedures for making a safeguarding referral/reporting a concern.

Make sure you state that you are making a referral under 'PREVENT' (risk of radicalisation).



Staff in the Adult/Child Safeguarding front door will then make their named Prevent single point of contact (SPOC) aware that there has been a safeguarding referral made under Prevent.



The Adult or Child Prevent SPOC will then contact the referrer to ask them to complete the national Prevent referral form. They will assist the referrer to complete this if required. This form gathers more detail about the concern and how it is relevant to Prevent (i.e. risk of radicalisation) as well as anything in the individual's life that might be affecting their wellbeing or that might make them more vulnerable.



The Adult of Child Prevent SPOC will then send the national Prevent referral form to the Police Prevent Team who will check that it is within the scope of 'Prevent' (i.e. that it is in the non-criminal space, before a crime happens).



The Police Prevent Team will then send a copy of the National Prevent referral form to relevant partner agencies with a request that they carry out an information sweep. The Police Prevent Team will carry out a Police Gateway Assessment (PGA) to decide if a case is appropriate for Channel. If it is, they will complete a vulnerability assessment framework (VAF) to determine if the threshold is met for a Channel Panel.



If CHANNEL PANEL threshold is met then a multiagency Channel Panel is convened to address the risk of radicalisation. The Adult/Child Prevent SPOC chairs this panel. If CHANNEL PANEL is not met, then the case is signposted to relevant partner agencies for other safeguarding support or early help.

\*Prevent is one of the 4 strands of the Government's Counter Terrorism Strategy (CONTEST). It operates in the non-criminal space to safeguard anyone who is at risk of being radicalised or drawn into terrorism. The following agencies have a duty to report Prevent concerns: local authorities, schools and registered childcare providers, higher and further education, the health sector, police, prisons, and probation.

Prevent referral Process: Last Updated March 2020

For the **check and share stage**, attempt to check and collate information that can include, but is not limited to:

YOUR CONCERNS – Describe in as much detail as possible the specific concern(s) relevant to Prevent.

#### For example:

- How / why did the Individual come to your organisation's notice in this instance?
- Does it involve a specific event? What happened? Is it a combination of factors? Describe them
- Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? If so, Where? When? How?
- Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?
- Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?
- Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?
- Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism?
   Consider any extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures.
- Please describe any other concerns you may have that are not mentioned here.

COMPLEX NEEDS - Is there anything in the Individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense? For example:

- Victim of crime, abuse or bullying.
- Work, financial or housing problems.
- Citizenship, asylum or immigration issues.
- Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings.
- On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency.
- Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.
- Educational issues, developmental or behavioural difficulties, mental ill health (see Safeguarding Considerations below).
- Please describe any other need or potential vulnerability you think may be present.

#### SAFEGUARDING CONSIDERATIONS for example:

- Does the Individual have any stated or diagnosed disabilities, disorders or mental health issues? If so, has this been diagnosed.
- Have you discussed this Individual with your organisations Safeguarding / Prevent lead? What was the result of the discussion?
- If your concerns as sufficient that you want to make a safeguarding referral, have you informed the Individual that you are making this referral? If so, what was the response?
- Have you taken any direct action with the Individual since receiving this information? What was the action & the result?
- Have you discussed your concerns around the Individual with any other agencies?

OTHER INFORMATION you think may be relevant. For example: social media details, military service number, other agencies or professionals working with the Individual, etc...