



City of London Corporation

Safeguarding Policy

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1 Purpose and Scope

- 1.1 This policy provides guidance for all City of London Corporation (City Corporation) staff, Members and individuals, consultants and agencies contracted by the City Corporation who may come across concerns regarding the safeguarding and protection of children, young people and adults at risk within the context of their work.
- 1.2 It supports the City Corporation in achieving Corporate Plan (2018-23) outcome 1: 'People are safe and feel safe'. It is relevant to the work contained in all corporate strategies that aim to impact children and vulnerable adults, from the apprenticeship strategy through to the volunteering strategy, and is key to ensuring that we are a responsible business.
- 1.3 The policy is relevant to all of the City Corporation's work it delivers, commissions and funds. In some cases, such as the schools and academies it sponsors outside the Square Mile, *statutory* safeguarding responsibilities will sit with the local authority in the area concerned but the City Corporation still holds some wider safeguarding responsibilities.

2. Wider context

2.1 This policy also sits in a wider context of safeguarding policies, procedures and guidance. This includes:

- the **London Safeguarding Children Board Procedures**
<https://www.londoncp.co.uk/>
- the **London Safeguarding Adults Board Policy and Procedure**
<http://londonadass.org.uk/wp-content/uploads/2019/05/2019.04.23-Review-of-the-Multi-Agency-Adult-Safeguarding-policy-and-procedures-2019-final-1-1.pdf>
- COL guidance on **safer recruitment**
<https://corpoflondon.sharepoint.com/sites/Intranet/SitePages/HR-Topic-Recruitment.aspx#safeguarding>
- Range of information and guidance on **Safeguarding Children and Young People** from the City and Hackney Safeguarding Children’s Partnership
<http://www.chscb.org.uk/>
- Range of information and guidance on **Safeguarding Adults** from the City and Hackney Safeguarding Adults Board
<https://hackney.gov.uk/safeguarding-adults-board>
- Guidance for **Charitable Organisations**
<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>
- Guidance on **Safeguarding Adults for Housing Staff**
<https://www.scie.org.uk/safeguarding/adults/practice/housing>
- Guidance on **Safeguarding in Public Places**
<https://saferlondon.org.uk/wp-content/uploads/2018/03/Safeguarding-in-Public-Spaces-Toolkit-March-2018.pdf>
- **Prevent – Counter Terrorism Strategy**
<https://www.cityoflondon.gov.uk/services/prevent-counter-terrorism-strategy>

3. Overview

- 3.1 It is a duty of the City Corporation to ensure that children and adults are safeguarded from harm.
- 3.2 Everyone has a responsibility to safeguard the welfare of children, young people and adults at risk, whatever the role of the individual, or the City Corporation service or department they work in.
- 3.3 Each department needs to be aware of how their staff interact with children and with adults at risk, providing appropriate training on safe working practices and on creating safe environments. Staff should be alert to any indications that a child or adult at risk may need to be safeguarded from harm and know who to contact if they have concerns.
- 3.4 Organisations the City Corporation contracts with will be required through the terms of their contract to have a similar policy in place for their staff as appropriate.
- 3.5 The significance of safeguarding to the wider organisation is recognised by its inclusion on the Corporate Risk Register and the development and adoption of this policy.
- 3.6 The City Corporation will work with the appropriate statutory bodies when an investigation into child abuse or a safeguarding adult's investigation is necessary.
- 3.7 For this policy to be effective it is essential that each City Corporation Department and related agencies and people working within them have an applied understanding of what safeguarding means, knows that safeguarding is everyone's responsibility, knows the signs and symptoms of potential harm, how to access safeguarding information, advice and guidance, and is committed to making an informed contribution to safeguard children, young people and adults at risk.

4. Safeguarding

- 4.1 Any allegations or concerns that children and adults may be suffering significant harm should be raised with the City Corporation's Children and Families service or Adult Social Care service. There is no such thing as information being given "in confidence" – there is a duty of care and legal responsibility to respond to safeguarding concerns or incidents.

Children and young people at risk

- 4.2 Safeguarding and promoting the welfare of children is defined 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; and
 - taking action to enable all children to have the best outcomes

- 4.3 The definition of a child and/or young person for the purpose of this document is anyone under the age of 18 years or under 25 years in the case of a child with Special Educational Needs or Disability (SEND).
- 4.4 It should be noted that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate for children and young people, does not change his or her status or entitlement to services or protection under the Children Act 1989.

Safeguarding adults at risk

- 4.5 Adult safeguarding is working with adults with care and support needs to keep them safe from abuse or neglect. It is an important part of what many public services do, and a key responsibility for the City Corporation.
- 4.6 Adult safeguarding is aimed at people with care and support needs who may be in vulnerable circumstances and at risk of abuse or neglect. In these cases, local services must work together to spot those at risk and take steps to protect them.
- 4.7 An adult at risk is a person who is or may be in need of social care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
- 4.8 An adult at risk may therefore be a person who:
- is elderly and frail due to ill health, physical disability or cognitive impairment
 - has a learning disability
 - has a physical disability and/or a sensory impairment
 - has mental health needs including dementia or a personality disorder
 - has a long-term illness/condition
 - misuses substances or alcohol
 - is a carer, such as a family member/friend, who provides personal assistance and care to adults and is subject to abuse
 - is unable to demonstrate the capacity to make a decision and is in need of care and support.

(This list is not exhaustive)

5 Signs of abuse

- 5.1 Staff will be able to recognise abuse. The main forms of abuse are divided into the following categories:
- **physical abuse** – including hitting, slapping, pushing, kicking, misuse of medication, restraint, inappropriate sanctions
 - **domestic violence or abuse** - any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those who are, or

have been, intimate partners or family members regardless of gender or sexuality.

- **sexual abuse** – including rape, sexual assault, sexual acts to which a person has not consented, could not consent or was pressurised into consenting
- **psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, withdrawal from services or supportive networks
- **financial or material abuse** – including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
 - **modern slavery** – encompasses human trafficking, forced labour and domestic servitude
 - **discriminatory abuse** – including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation, or religion
- **organisational abuse, or institutional abuse** - Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in one's own home. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- **neglect and acts of omission** – including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life such as medication, adequate nutrition, and heating
 - **Self-neglect** - this covers a wide range of behaviour, neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding

5.2 Children, young people and adults at risk can be influenced by those who would seek to radicalise them. The City Corporation has a legal duty to work to prevent people from being drawn into terrorism. This “prevent duty” is led by the Safer City Partnership but safeguarding children and adults from the risk of radicalisation extends to all staff. As such all staff should recognise the risk of radicalisation as a safeguarding issue and respond to signs of this as they would to other abuse.

6. Legal Framework

6.1 The City Corporation's local authority functions mean that it has an overarching responsibility for safeguarding and promoting the welfare of all children and young people in its area. The law requiring this is set out under the 1989 and 2004 Children Acts and complemented government guidance included in Working Together to Safeguard Children (July 2018).

6.2 For adults at risk the Care Act 2014 as well as the Mental Capacity Act 2005 sets out a clear legal framework for how local authorities and other parts of the health and care

system should protect adults at risk of abuse or neglect. It includes a duty for the City Corporation to make enquiries, or request others to make them, when we think an adult with care and support needs may be at risk of abuse or neglect and they need to find out what action may be needed. The City Corporation is committed to Making Safeguarding Personal (MSP) by developing a safeguarding culture that focuses on the personalised outcomes desired by people with care and support needs who may have been abused.

7 What this means for our work

7.1 In their day to day work, officers employed by City of London Corporation will endeavour to safeguard children and young people and adults at risk by:

- reporting in a timely way any concerns or suspicions that a child or young person, or an adult at risk is being or is at risk of being abused.
- always giving a high priority to actions to protect a child or an adult from abuse
- reporting without delay concerns or allegations
- ascertaining the wishes and feelings of children and adults at risk, valuing them, listening to and respecting them
- sharing information about safeguarding and good practice with children, parents, adults at risk, carers, staff and volunteers
- sharing information about concerns with agencies who need to know, and involving parents and children or adults at risk and carers appropriately
- providing effective management for staff and volunteers through supervision, support and training
- providing senior management commitment and accountability to safeguard and promote the welfare of children and of adults at risk
- being clear about the authority's responsibilities for safeguarding and promoting the welfare of children and adults at risk
- involving adults at risk, carers, children and young people and families in planning and developing services
- ensuring services for children and adults at risk are safe and accessible
- attending staff training and continuing professional development
- following safe recruitment, vetting procedures and responding to allegations against staff
- providing effective inter-agency working to safeguard and promote the welfare of children and adults at risk
- reviewing our policy and good practice annually.

7.2 The City Corporation will support safeguarding work by ensuring all staff, Members and individuals, consultants and agencies contracted by the City Corporation:

- understand their legal and moral responsibility to protect children, young people and adults at risk from harm, abuse and exploitation

- have at least a basic understanding of child protection and adult safeguarding as part of their training and induction if they work directly with children and young people or with adults at risk
- understand their duty to report concerns that arise about a child or young person or adult at risk, or a member of staff's conduct towards a child/young person or adult at risk.

7.3 The City Corporation will ensure that any procedures relating to the conduct of staff are implemented in a consistent and equitable manner.

7.4 Safeguarding is delivered and achieved through good interagency and multi-disciplinary working within the City Corporation and with other organisations. Standards of practice in work with children, young people, adults at risk and their families or carers are regularly reviewed in line with relevant national Guidance.

7.5 Working effectively with partners and other agencies means:

- supporting the City and Hackney Safeguarding Children Partnership and the Safeguarding Adults Board to carry out their duties in partnership with other local organisations
- commissioned organisations, including the voluntary sector, providing services to children, young people, adults at risk, their families or carers and to schools demonstrating standards of safeguarding compliant with those of the City Corporation, regional and national standards.
- information is shared efficiently and effectively in respect of issues that may affect the safety and welfare of children, young people or adults at risk.
- concerns are shared early in order to prevent any problems escalating.
- ensuring that the City Corporation has a network of departmental safeguarding leads who can act as trained and accessible safeguarding advocates to support staff to make alerts.

7.6 Schools located within the City of London boundaries are invited to participate in the Safeguarding Education Forum with the Assistant Director People regarding safeguarding issues. Statutory safeguarding responsibilities for academies outside the Square Mile rest with the relevant local authorities.

8 Responsibilities of individuals

8.1 The Director of Community and Children's Services is the designated person with overall responsibility for safeguarding of children, young people and adults.

8.2 All employees of City of London Corporation and elected Members are to:

- understand and apply this policy and procedure in their activities
- identify opportunities and undertake appropriate training to support them in their role
- act appropriately at all times and be able to challenge inappropriate behaviour in others

- be able to recognise harm
- know how to report any concerns in a timely and appropriate way.

8.3 In addition, Chief Officers, senior managers and Safeguarding Champions of the organisation should ensure they have sufficient oversight of the City Corporation's safeguarding responsibilities particular to their areas. They should ensure they:

- have a working knowledge of relevant legislation and guidance with respect to safeguarding and promoting the welfare of children and adults at risk and how this applies to their department
- are responsible for communicating to all staff the importance of safeguarding and promoting the welfare of children and adults and that it is everybody's responsibility to do so
- hold managers within their department to account for the contribution of their services to safeguarding and promoting the welfare of children and adults at risk;
- have effective working relationships with other parts of the Corporation and with other agencies in order to safeguard and promote the welfare of children and adults at risk;
- report identified training needs of staff to managers with responsibility for staff training and offer opportunities to undertake appropriate safeguarding training
- that the policy and procedure is adhered to; and
- that all staff know how to access the whistle blowing procedures.
- Chief Officers will provide safeguarding assurance to the Director of Community and Children's Services every 6 months.

8.4 The responsibilities of the Safeguarding Champions are:

- to ensure that all staff in their department are aware of what they should do and who they should go to if they are concerned that a child/young person or adult at risk maybe subject to abuse or neglect
- ensure that any concerns about a child/young person or adult at risk are acted on clearly recorded, referred on where necessary and, followed up to ensure the issues are addressed
- to record any reported incidents in relation to a child/young person or adult at risk or breach of Safeguarding policies and procedures
- ensure staff in their areas know how to access the authority's local Safeguarding procedures
- ensure relevant staff access appropriate training if required
- ensure appropriate safeguarding procedures are in place within their specific setting that fit with this policy and the wider London Safeguarding Procedures
- act as an escalation point for Safeguarding issues or cases where the appropriate or perceived appropriate steps have not been taken and the risk remains
- ensure that staff have regard to safeguarding issues in their areas of work
- to be familiar with the contact details for safeguarding leads for adults and children in the City of London, or within the borough in which they operate.

9 Acting on concerns

9.1 If you are worried about:

- i. **a child or young person** who lives in the City of London call:

020 7332 3621 (Monday to Friday, 9am-5pm only)

Email: children.duty@cityoflondon.gov.uk

Or *outside office hours* (emergency only) call:

020 8356 2710

Email: emergency.duty@hackney.gov.uk

- ii. **an adult** who lives in the City of London call:

0207 332 1224 - Monday to Friday, 9am-5pm only

Email: adultsduty@cityoflondon.gov.uk.

020 8356 2300 - for all other times, including weekends and Bank Holidays

- iii. **an adult or a child or young person who lives outside of the City of London**

Staff working outside the Square Mile who have concerns need to liaise with the Local Authority safeguarding arrangements in that area. Unless there is immediate risk of harm which requires an immediate response (i.e calling 999 as indicated below), they should be liaising with the local Children and / or Adult Social Care Services. If they are unsure, they should liaise with their line manager, their Service area's Safeguarding Champion or they can seek advice from the Corporate Safeguarding Lead.

9.2 **If you think a child, young person or adult is at risk of immediate harm call 999.**

10 Responding to allegations made against professionals

10.1 Where an allegation is made in relation to a professional working with children or young people you must contact the Local Authorities Designated Officer (LADO) Pat Dixon. You can make a referral by emailing LADO@cityoflondon.gov.uk or phoning 07795 090649.

10.2 Where an allegation is made in relation to a professional working with adults at risk you must contact the lead professional for safeguarding adults – Ian Tweedie. You can make a referral by emailing ian.tweedie@cityoflondon.gov.uk or phoning 020 7332 3129.

10.3 Any suspected immediate risk to any child or children, or adult at risk should be responded to immediately and the case referred to the Children and Families Team or Adult Social Care team using the contact details given below.

11 Oversight and challenge

- 11.1 Support, coordination and challenge of the City Corporation's actions, services and responsibilities to safeguard are overseen by the independently chaired City and Hackney Safeguarding Children Partnership and City and Hackney Safeguarding Adults Board. Annual Children's Safeguarding Audits are undertaken where all local agencies and organisations who provide services to children and young people are asked to self-assess the extent to which they meet the safeguarding requirements and standards as set out in Section 11 of the Children Act 2004. Similarly the City Corporation also completes the London Safeguarding Adults Partnership Audit tool. Both of these have to demonstrate how the City Corporation discharges its safeguarding responsibilities across the whole organisation and agencies it works with.
- 11.2 Member oversight is provided by the City Corporation's Safeguarding Sub Committee.

Appendix 1: Safeguarding leads and key contacts

The Safeguarding Lead within City Corporation is the Assistant Director People.

Key contact numbers

Children's Social Care Services	0207 332 3621
Adult Social Care Services	0207 332 1224
Out of hours Children's Social Care	0208 356 2346; or 0208 356 2710
Out of hours Adult Social Care	020 8356 2300
Police Public Protection Unit	0207 601 2941 (or in an emergency 999)
NSPCC	0808 800 5000
Designated Officer (Allegations against a professional or someone working with children)	07795 090649

Appendix 2: Safeguarding Champions

Each department has its own Safeguarding Champion, who ensure sufficient oversight of the City Corporation's safeguarding responsibilities, including those outside of the local authority area and those which apply to its charitable elements:

Position	Department
<i>Under review</i>	Community and Children's Services
<i>Under review</i>	Town Clerk's
<i>Under review</i>	Comptrollers and City Solicitors
<i>Under review</i>	Chamberlains
<i>Under review</i>	City Bridge Trust
<i>Under review</i>	Culture, Heritage and Libraries
<i>Under review</i>	Open Spaces
<i>Under review</i>	Markets and Consumer Protection
<i>Under review</i>	City Surveyor's
<i>Under review</i>	Built Environment
<i>Under review</i>	Barbican Centre
<i>Under review</i>	City of London School for Girls
<i>Under review</i>	Guildhall School of Music & Drama
<i>Under review</i>	City of London School
<i>Under review</i>	City of London Freeman's School
<i>Under review</i>	City of London Police