Safeguarding Children Policy

April 2025

SUMMARY			
This policy outlines Torus' commitment to safeguarding children and young people, ensuring compliance with the latest UK legislation and best practices. It defines responsibilities, reporting structures, and key safeguarding measures within the organisation.			
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Approved by		Group Executive Management Team (GEMT)	July 2021

UPDATE HISTORY		
Date	**Change owner**	**Reason for change**
April 2023	Kate Shone	Biennial Review
April 2025	Colin Scicluna	Biennial Review

DISTRIBUTION	
Name / Department	**Title**
All colleagues	

ASSOCIATED DOCUMENTS		
Safeguarding Strategy – Think Family: Playing Our Role		
Safeguarding Adult Policy		
Safeguarding Adult Procedure 2025		
Safeguarding Children Procedure 2025		
Prevent Procedure 2025		
EIA STATUS: ***Check the appropriate box**	☒	EIA has been completed
	☐	EIA is not needed for this policy
NEXT REVIEW DUE:	April 2027	
RESPONSIBLE OFFICER:	Colin Scicluna, Head of Youth	

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EXECUTIVE SUMMARY

The Torus Safeguarding Children Policy outlines the organisation's commitment to ensuring the safety, protection, and welfare of children and young people. It applies to all employees, board members, volunteers, and contractors, ensuring a unified approach to safeguarding.

Key Principles and Commitments:

- Torus recognises that children's welfare is paramount, and all colleagues have a duty to protect them from harm, abuse, and neglect.
- The policy is informed by key legislation, including the Children Act 1989 & 2004, Working Together to Safeguard Children 2023, and the Online Safety Act 2023.
- A structured and systematic approach to safeguarding is maintained, with clear lines of accountability from governance level to frontline teams.

Implementation and Responsibilities:

- Board & Leadership: The Board holds ultimate accountability for compliance, while the Chief Executive and Chief Operating Officer provide strategic leadership.
- Safeguarding Assurance Group: Oversees and monitors safeguarding policies and practices across the organisation.
- Colleagues & Managers: All colleagues are responsible for recognising and reporting safeguarding concerns, with mandatory training provided to ensure competency.

Key Safeguarding Measures:

- Robust recruitment and vetting procedures, including Disclosure and Barring Service (DBS) checks.
- Clear escalation and reporting structures for safeguarding concerns, ensuring swift and appropriate responses.
- Multi-agency collaboration to enhance protection and intervention measures for at-risk children.
- Early intervention and preventative measures, ensuring concerns are addressed before they escalate.

Monitoring & Review:

- The Safeguarding Assurance Group: conducts regular audits and case reviews to evaluate the effectiveness of policies and procedures.
- An annual safeguarding report is submitted to the Board for accountability and improvement.
- The policy is subject to biennial review or earlier updates in response to legislative changes or emerging safeguarding risks.

This policy ensures that Torus continues to uphold the highest standards in child safeguarding, fostering a safe environment where children and young people can thrive.

1. INTRODUCTION

1.1 This Safeguarding Children Policy outlines Torus's commitment to protecting children and young people from harm, abuse, and exploitation. It establishes clear safeguarding procedures and responsibilities, ensuring that all colleagues, board members, volunteers and contractors uphold the highest standards of child protection. The policy applies to all employees and associates who interact with children and young people in any capacity.

1.2 Torus has a **statutory duty to safeguard children** under key legislation, including:

- **Children Act 1989 & 2004** – Establishes legal frameworks for child protection.
- **Working Together to Safeguard Children (2023)** – Defines multi-agency safeguarding responsibilities.
- **Online Safety Act 2023** – Strengthens digital safeguarding measures.
- **Domestic Abuse Act 2021** – Recognises children as victims of domestic abuse.

1.3 This policy is aligned with the Torus Group Corporate Plan (2024-2029), which focuses on growing stronger communities, enhancing services, and ensuring tenant well-being. Safeguarding plays a key role in the Group's strategic objectives, ensuring safe, inclusive, and supportive environments for children and families. The policy also supports Torus' commitment to delivering community interventions, which provides essential services to young people and families in need.

1.4 The policy has been informed by government legislation, and policy, ensuring it reflects the latest best practices and legal requirements. It is essential reading for all Torus employees working with children and young people. The policy is a key part of Torus' mission to provide safe, secure, and thriving communities where children's welfare is prioritised and protected.

2. POLICY STATEMENT

2.1 The Torus Group recognises that nothing is more important than children's welfare, and that children who need help and protection deserve high quality and effective support as soon as needs are identified.

2.2 The Torus Group has a responsibility to contribute to the safeguarding of the children and young people that it works with, and to act on any concerns when someone is at risk of abuse. Everyone within the Torus Group who comes into contact with children and young people has a part to play and a responsibility for promoting their welfare and keeping them safe.

2.3 Responsibilities for safeguarding are enshrined in legislation. This policy has been informed by all relevant guidance (statutory and non-statutory) that seeks to protect children and young people, including:

- The Children Act 1989
- The Children Act 2004
- Working Together to Safeguard Children (2023)
- The Children and Social Work Act 2017
- The UN Convention on the Rights of the Child 1989
- The Human Rights Act 1998
- Handling Cases of Forced Marriage (Ministry of Justice, 2009)
- Multi-Agency Statutory Guidance on Female Genital Mutilation (2020)

- Safeguarding Children and Young People Who May Be Affected by Gang Activity (2010)
- Information Sharing: Advice for Practitioners (2018)
- Crime and Disorder Act 1998
- Serious Crime Act 2015
- Housing Act 1996
- Protection of Freedoms Act 2012
- Online Safety Act 2023 (formerly the Online Safety Bill 2022)

3. IMPLEMENTATION

3.1 Torus will seek to keep children and young people safe through a defined safeguarding governance structure, associated procedures, and workstreams. This will include:

- Ensuring a structured and systematic approach to safeguarding children and young people with clear lines of accountability
- Providing clarity regarding roles and responsibility from 'Board to Floor' in safeguarding children and young people
- Adopting child protection and safeguarding practices through procedures and a code of conduct for all colleagues and volunteers
- Having robust systems in place to manage any allegations against staff and volunteers appropriately
- Having effective complaints and whistleblowing measures in place
- Monitor the effectiveness of safeguarding policies, procedures and practice through a series of audits and case reviews
- Embedding safe working practices, including recruitment, vetting, and barring procedures
- Ensuring everyone in the organisation understands their role and responsibilities in relation to safeguarding and is provided with appropriate support to recognise, identify and respond to signs of abuse, neglect or other safeguarding concerns relating to children and young people
- Ensure colleagues are aware of how and when to raise safeguarding concerns using appropriate escalation procedures where relevant to their role
- Offering training and continuing professional development so that colleagues are competent to undertake their roles and responsibilities, and understand those of other professionals and organisations in relation to safeguarding children and young people
- Ensure effective interagency working and information sharing practices
- Ensuring appropriate action is taken in the event of an incident or concern being raised and support provided to those who raise or disclose the concern
- Providing effective management for colleagues and volunteers through providing supervision, support, training and quality assurance measures
- Recording and storing information safely and securely and sharing information about safeguarding and good practice with children, their families, colleagues and volunteers
- Valuing, listening to and respecting children and young people
- Providing early help, where appropriate, to support children and their families as soon as a problem emerges to prevent needs escalating to a point where intervention would be needed via a statutory assessment
- Creating and maintaining an anti-bullying environment and dealing with any bullying effectively as and when it does arise

- Providing a safe physical environment for our children, young people, colleagues and volunteers, by applying health and safety measures in accordance with the law and appropriate regulatory guidance
- Sharing our concerns, along with relevant information, with agencies who need to know, and involving children, young people and their families and carers appropriately
- Ensure we produce safeguarding materials and information in a way which is accessible and understandable

3.2 **The Board** has ultimate responsibility for ensuring that this policy and associated procedures are in place and complied with to protect children and young people.

3.3 The Board has ultimate responsibility for ensuring that an effective system for managing any risks associated with safeguarding children and young people exists within Torus and that all colleagues working in Torus are aware of and operate within this policy.

3.4 The Board will assure itself of compliance with this policy through the accountability arrangements delegated to the safeguarding subcommittee and via an annual report prepared by the Safeguarding Officer supported by the Safeguarding workstreams.

3.5 **The Chief Executive** provides strategic leadership, promoting a culture of supporting good practice and excellence in relation to safeguarding within the organisation and promotes collaborative working with other agencies.

3.6 **The Chief Operating Officer** is the nominated Director at board level responsible for reporting to the Board on safeguarding issues, providing assurance that the organisation is meeting its safeguarding requirements on an annual basis, promoting initiatives to ensure that Torus has robust arrangements for safeguarding and providing leadership in the long term.

3.7 **The Safeguarding Assurance Group** is responsible for the implementation of the Safeguarding Strategy and for ensuring robust safeguarding arrangements are in place across the group. The safeguarding assurance group is accountable for its work to the board.

3.8 **The Domestic Abuse and Safeguarding Practice and Culture Steering Groups** are responsible for the delivery of key safeguarding priorities and safeguarding operational plans, reporting progress to the committee on a quarterly basis.

3.9 Safeguarding reports will be produced on a quarterly basis for the Safeguarding Assurance Group, the scrutiny and risk panel and an annual report for the board.

3.10 **The Safeguarding Officer** will provide operational support and expert advice to support the management of safeguarding concerns, significant events and will lead the development of best practice and effectiveness of services.

3.11 **All Torus Colleagues (including contractors and volunteers)** have responsibility for adherence to this policy and associated procedures.

3.12 All colleagues are responsible for understanding the different types of abuse and reporting concerns or suspected abuse via the relevant escalation route.

3.13 All colleagues are responsible for recognising and responding to allegations of abuse by ensuring that they discuss their concerns with their line manager, refer their concerns or assist in the referral and complete an incident report in accordance with Policy.

3.14 All colleagues should contribute to whatever actions are needed to safeguard and promote the welfare of children and young people and take part in regularly reviewing the outcomes for the child, young person or family against specific plans and outcomes.

3.15 Line managers will be responsible for:

- Contribute to the dissemination and implementation of this policy
- Ensure all team members within their department are aware of this policy and the process to be followed in the event of suspected abuse of a child or young person
- Ensure all team members access the appropriate level of training as defined in the Torus safeguarding training strategy and training needs analysis
- Develop and promote training needs and priorities and contribute to the delivery of training for colleagues
- Provide/ensure provision of effective safeguarding appraisal, support, peer review and supervision for colleagues
- Provide routine management supervision assuring core competencies in safeguarding practice
- Manage/oversee immediate safeguarding and protection issues
- Co-ordinate referrals, safe transfer of responsibilities and support the implementation and attendance of multi-agency processes and meetings
- Co-ordinate any alternative action plans
- Make decisions about referrals to local authority Safeguarding Services and utilise escalation procedures
- Ensure team members in their area meet mandatory training requirements in safeguarding and provide support to those making safeguarding referrals.

3.16 The Safeguarding Children Policy is underpinned and supported by a series of operational procedures, including but not limited to:

- Safeguarding Children's Procedure
- Safeguarding Adult Procedure
- ABC Respond+ Procedure
- Domestic Abuse and Harmful Practices Procedure
- Code of Conduct
- Whistleblowing Procedure

4. CONSULTATION

4.1 Consultation with residents, service users and operational colleagues has been established throughout the development of this policy at several stages and the policy content has been influenced by their feedback.

5. INCLUSION

5.1 Torus is committed to cultivating an inclusive environment where every individual is valued, respected, and empowered. We embrace diversity and recognise that inclusion drives

creativity, innovation, and business excellence. Discrimination, harassment, and bias have no place in our organisation. We strive to promote a culture of respect, understanding, and equal opportunity for all.

5.2   This policy aligns with the Torus Diversity & Inclusion Policy, ensuring that safeguarding practices and procedures are fair, equitable, and accessible to all. The policy supports the creation of safe environments for children and young people regardless of their race, gender, disability, sexual orientation, religion, or socio-economic background.

5.3   An Equality Impact Assessment (EIA) has been completed as part of the policy development process. The EIA found no adverse impact on any protected characteristic groups. It identified opportunities to enhance awareness of Torus Safeguarding Children Policy and procedures, particularly with children and young people.

5.4   As a result, targeted measures have been incorporated into the policy, including:

- Ensuring all safeguarding communications and materials are accessible and inclusive.

5.5   Under the Equality Act 2010, Torus may be considered as exercising a public function in the provision of its services and therefore remains committed to meeting all associated Equality, Diversity and Inclusion duties. This approach ensures that inclusion is embedded in service delivery, policy implementation, and everyday practice.

- Equality is the fair and unbiased treatment of others.
- Diversity refers to the presence of people who, as a group, have a wide range of characteristics, seen and unseen.
- Inclusion is where people's differences are valued.

5.6   An Inclusive Torus has fair policies and practices in place and enables a diverse range of people to come together effectively to promote the welfare and safety of all children and young people.

6.   MONITORING AND REVIEW

6.1   The Safeguarding Assurance Group will monitor this policy through a range of measures including audit and case review, training compliance and safeguarding reporting data

6.2   The Safeguarding Assurance Group will monitor performance on a quarterly basis and produce an annual safeguarding report which will be presented to the Torus Group and subsidiary Boards.

6.3   Subsequent reviews will be carried out on a biennial basis, unless earlier revision is triggered by:

- New or updated legislation, statutory guidance, or national safeguarding reviews;
- Lessons learned from local safeguarding partnerships, serious case reviews, or audits.

Appendix A

PHYSICAL ABUSE	This includes actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. It also encompasses situations where a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
EMOTIONAL ABUSE	Persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. 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. 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. May feature age or developmentally inappropriate expectations being imposed on children.
SEXUAL ABUSE	Sexual abuse entails forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. These activities may involve physical contact, including assault by penetration (e.g., rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can occur both online and offline and is not solely perpetrated by adult males; women and other children can also commit acts of sexual abuse.

NEGLECT	Neglect is the ongoing failure to meet a child's basic needs and is the most common form of child abuse. It can manifest in various ways: Physical Neglect: Failing to provide adequate food, clothing, or shelter, or not ensuring appropriate supervision to keep the child safe. Educational Neglect: Not ensuring the child receives an education. Emotional Neglect: Not providing the nurture and stimulation needed, which may involve ignoring, humiliating, intimidating, or isolating the child. Medical Neglect: Failing to provide appropriate health care, including dental care, or ignoring medical recommendations Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect can lead to serious impairments in health or development.
CHILD SEXUAL EXPLOITATION	CSE is a form of child sexual abuse 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: - In exchange for something the victim needs or wants, and/or - 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. CSE does not always involve physical contact; it can also occur through the use of technology. Children rarely self-report sexual exploitation, making it crucial for professionals to be vigilant for indicators.
CHILD CRIMINAL EXPLOITATION	While there is no agreed statutory definition of CCE, it generally refers to situations where children are exploited, coerced, or manipulated into committing criminal activities. This exploitation often occurs through an imbalance of power and may involve: - Receiving something (e.g., money, drugs, affection) in exchange for carrying out a criminal act. - Experiencing violence, coercion, or intimidation. Children involved in CCE often face limited choices due to their social, economic, or emotional vulnerabilities.
COUNTY LINES	County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or

	more importing areas within the UK, using dedicated mobile phone lines or other forms of "deal lines." These gangs exploit children and vulnerable adults to move and store drugs and money, often using coercion, intimidation, violence (including sexual violence), and weapons. They may also take over a vulnerable person's home (a practice known as "cuckooing") to use as a base for drug dealing.
DOMESTIC ABUSE	Domestic abuse is any type of controlling, coercive, threatening behaviour, violence, or abuse between individuals aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. It can encompass, but is not limited to: • Psychological abuse • Physical abuse • Sexual abuse • Financial abuse • Emotional abuse Children affected by domestic abuse are now recognized as victims in their own right, even if they were not present during violent incidents.
HARMFUL PRACTICES:	It can encompass but is not limited to the following types of abuse:
HONOUR BASED ABUSE	Violent crimes or incidents committed to protect or defend the honour of a family or community. Such abuse often involves family members or acquaintances who believe someone has brought shame to their family or community by acting contrary to traditional beliefs or customs.
FORCED MARRIAGE	A marriage in which one or both spouses do not consent and are coerced into it. Coercion can include physical, psychological, financial, sexual, and emotional pressure. In cases involving vulnerable adults who lack the capacity to consent, coercion is not required for a marriage to be considered forced. It is important to distinguish between forced and arranged marriages; in arranged marriages, families take a leading role in arranging the marriage, but the choice to accept remains with the prospective spouses.
FEMALE GENITAL MUTILATION (FGM)	Procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. FGM has no health benefits and causes severe pain, along with immediate and long-term health consequences, including difficulties in childbirth. It is illegal in the UK to subject a child to FGM or to take a child abroad for FGM.

RADICALISTION AND PREVENT	The current threat from terrorism in the UK is severe and can involve the exploitation of vulnerable people. This threat can extend to children and young people to draw them into extremist ideology and behaviors.
MODERN DAY SLAVERY & CHILD TRAFFICKING	Modern slavery is an illicit trade where human beings are exploited for vast profits. Under the Modern Slavery Act 2015, it encompasses human trafficking, slavery, servitude, forced or compulsory labour, and sexual exploitation. Child trafficking involves recruiting, transporting, transferring, harbouring, or receiving children for the purpose of exploitation.
BULLYING AND CYBER BULLYING	Bullying Behaviour that hurts someone else, including hitting, pushing, name-calling, threats, and undermining someone. It can happen anywhere—at school, at home, or online.

Cyberbullying takes place online, using social networks, games, and mobile phones. Unlike offline bullying, online bullying can follow the child wherever they go, via social networks, gaming, and mobile phones. |
| ONLINE ABUSE | Online abuse is any type of abuse that happens on the internet. It can happen across any device that is connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including social media, text messages and messaging apps, emails, online chats, online gaming, live streaming sites.

Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse might only happen online. |
| GROOMING | Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them.

Children and young people who are groomed can be sexually abused, exploited or trafficked.

Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative. |
| CHILD ON CHILD ABUSE | Child-on-child abuse occurs when a child is exploited, bullied, or harmed by another child. This may include physical abuse, emotional abuse, sexual abuse, coercion, sexual harassment, or online abuse. It can happen in various settings, including schools, youth services, homes, or online. |

SEXUAL VIOLENCE OR HARRASSMENT	Sexual violence refers to offences such as rape, assault by penetration, or sexual assault. Sexual harassment includes unwanted conduct of a sexual nature, such as sexual comments, remarks about appearance, upskirting, or sharing of sexual images. These behaviours can happen online and offline and should never be dismissed as "banter" or "part of growing up.