

Annex A1: Safeguarding Children Policy Statement – [Non-children IRCs]

[‘Working Together to Safeguard Children’ \(2015\)](#) sets out how organisations and individuals should work together to safeguard and promote the welfare of children.

A child is defined by ‘Working Together’ as anyone who has not yet reached their 18th birthday. “Children” therefore means children and young people throughout. The fact that a child has reached 16 years of age, is living independently or is in further education, 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 relevant child welfare legislation.

Status of the policy statement

Detention Services Order 19/2012 requires each detention facility, including the escort supplier, to implement a safeguarding children policy statement consistent with the template provided for that purpose.

The safeguarding children policy statement will help staff to fulfil the duty, under section 55 of the Borders, Citizenship and Immigration Act 2009, to have regard to the need to safeguard and promote the welfare of children in the UK.

This policy statement is consistent with the template at Annex A1 of DSO 19/2012. It will be reviewed annually in consultation with the Home Office. Appropriate links will be developed with the Local Safeguarding Children Board (LSCB)/Child Protection Committee (Scotland and Northern Ireland) where necessary.

Strategic policy

The management of **[Name of IRC supplier]** recognises and accepts the requirements placed on them by section 55 of the Borders, Citizenship and Immigration Act 2009.

[Name of IRC supplier] understands our contribution to safeguarding and promoting the welfare of children to be primarily, in practice, the development and implementation of policies and arrangements designed to:

- safeguard the children not held in our care but with whom our staff have routine contact (when in contact with those children) – such as children visiting detainees in the IRC;

- minimise the risks of harm to children living in the community by detainees who have been identified as presenting such a risk, which could occur during any form of contact with a child, including telephone, internet and visits; and
- ensure that no unreasonable obstacles are placed in the way of contact being maintained between detainees and their children outside the facility.

All staff have a duty to contribute to the implementation of the above policies and arrangements. The role of all staff will be made clear in job specifications, through day to day unit and supervision management, through bilaterals and through performance management reviews.

Component policies/arrangements

The component policies/arrangements are as set out below.

Child Protection

[Name of IRC supplier] regards child protection as essential as part of our wider work to have regard to the need to safeguard and promote the welfare of children who are present in the centre. All staff will therefore aim to safeguard and promote the welfare of children, both proactively and in response to concerns, so that the need for specific action to protect children from harm, within detention and outside, is reduced.

Where staff become aware that a child has suffered or may be at risk of suffering harm at **[Name of centre]**, or information about/allegations of previous harm come to light from other sources, they will follow the procedure at Appendix 1. Staff in England and Wales should be aware of the statutory guidance titled "[Working together to safeguard children](#)" on inter-agency working. Staff in Scotland should be aware of the [national guidance for child protection in Scotland](#), while staff in Northern Ireland should be aware of guidance provided by the [Safeguarding Board for Northern Ireland](#).

Information sharing protocol

A written protocol has been published and is at annex [...]. The protocol is consistent with the Government guidance 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers', including the seven golden rules for sharing information effectively. **[Name of IRC supplier]** recognises that professional and lawful sharing of information is essential to enable early intervention and to safeguard children at risk of significant harm.

Staff training strategy

Staff working with children will receive suitable training, which must be at least equivalent to Tier 1 of Home Office “Keeping Children Safe”. A staff training strategy will set priorities for training in safeguarding and will provide access to the internal training programmes, e.g. ACDT **[centres to add additional local programmes]**, and to relevant LSCB and multi-agency training. Training will be monitored, and reviewed regularly.

Effective inter-agency working

[Name of IRC supplier] recognises that safeguarding and promoting the welfare of children who are present at the centre – and in particular protecting them from significant harm - depends on effective joint working between agencies and professionals that have different roles and expertise; and that individual children, especially some of the children most at risk, may need co-ordinated help from a number of different sectors (e.g. health, education, children’s services). We will contribute to these shared responsibilities by:

- being alert to potential indicators of abuse or neglect;
- being alert to the risks which individual abusers, or potential abusers, may pose to children;
- sharing and helping other agencies to analyse information so that a shared assessment can be made of the child’s needs and circumstances;
- contributing to whatever actions are needed to safeguard and promote the child’s welfare; and
- working co-operatively with parents, unless this is inconsistent with ensuring the child’s safety.

Diversity

[Name of IRC supplier] will respect and celebrate diversity and show sensitivity to the race, culture, religion, sexuality and disability of every child held in our care. We will do so in the following ways: communicate with each child, ensure that they are listened to and ensure that responses are provided to their views and concerns.

[insert details of local initiatives]

Complaints procedures

A complaints procedure that is age appropriate and ensures that each child feels safe from repercussions when making a complaint is a critical part of safeguarding and promoting the welfare of detained children. Arrangements for dealing with

complaints, formal requests and incidents requiring investigation will ensure that they are dealt with proactively, rigorously, fairly and promptly. Staff will seek to ensure that the procedures are clearly understood by every child and that they are given any necessary help to avail themselves of the procedures.

Whistle-blowing

[Name of supplier] will ensure that staff are aware of their contractual duties and of their professional obligation to raise legitimate concerns about the conduct of colleagues or managers; and will have in place clear procedures and support systems for dealing with expressions of concern by staff and carers about other staff or carers in ways which do not prejudice the “whistle-blower’s” own position and prospects.

Record keeping and use of IT

Private and secure records will be maintained, containing all relevant personal information, contact numbers and details of relevant occurrences. The effectiveness of the centre’s IT systems in enhancing the effectiveness of its work with children will be kept under review.

Children who are visitors

Visitors under the age of 18 are allowed to visit detainees if they have a close relationship with the detainee, such as if the detainee is their parent, sibling, step-parent, parent’s partner, other close family relationship or a family friend. A record must be kept of the minor’s name and date of birth. No visitor under the age of 18 years old is allowed to visit a detainee unless they are accompanied by an adult. No detainee with a known history of being a risk to children will normally be allowed a visit by anyone under the age of 18 years old. However, in exceptional circumstances, where the visit will be supervised by a social worker, the Safeguarding Children Manager/Safeguarding Lead must be consulted ahead of the planned visit to ensure that appropriate safeguards are in place. If centre staff have any concerns regarding the welfare of any visitor under 18 years encountered trying to visit a detainee, they should always refer the information to their local children’s social care for advice and information.

Minimising the risk by detainees to children not resident in the centre

[Name of supplier] will have procedures in place for minimising the risk by detainees at **[Name of centre]** to children in the community.

Annex A1 – Appendix 1: Safeguarding Children Procedure (non-children IRCs)

Where a member of staff identifies a child in need or a child who has suffered harm or is likely to do so, a safeguarding referral must be made to local authority children's social care immediately.

In an emergency, staff must contact the police.

Staff who have concerns about a child must not let uncertainty about the type of case being dealt with delay referral. Staff must always err on the side of caution and refer without delay. Their role is to identify concerns, not to investigate or to assess risk/ need.

It will need to be established whether the alleged perpetrator of the harm can immediately be identified and what action, without prejudice to any later internal or external assessment, should be taken. There may be child protection considerations in respect of the alleged perpetrator and in respect of other children within the centre who may be at risk of harm. Where the alleged perpetrator is a member of staff, **[IRC supplier]** will act in accordance with approved internal investigation and disciplinary procedures.

Any allegation referred to the police must, in addition, be immediately notified to the Child Abuse Referrals inbox in the Home Office. The email to the referrals inbox should contain the following information:

- The title of the file and the file reference number so that the knowledge and information management unit (KIMU) can access the referral in future, if required;
- A clear statement that the police have been informed, so that the Home Office safeguarding unit and KIMU are aware;
- The police reference for the referral, if available.

Whether it is to local authority children's social care or the police, staff must **always** immediately refer cases in which they consider:

- There are signs the child may be a victim of physical, emotional or sexual abuse, or neglect. Definitions of these can be found in appendix A of [Working Together](#).
- The child is a potential victim of modern slavery or [human trafficking](#).
- The child has been, or is at risk of being, subjected to [female genital mutilation](#).

- The child is missing – a safeguarding referral must always be made when a child is identified as having run away from their parent(s) or carer(s), or where they are looked after by a local authority and have gone missing from their care placement.
- The child is unaccompanied – this means:
 - there is no person with parental responsibility;
 - the child is lost or abandoned;
 - the person who has been caring for the child is prevented from providing the child with suitable accommodation and/or care.
- The child is being cared for as part of a private fostering agreement.
- There are signs the child may be a victim of child sexual exploitation (see what to do if you suspect a child is being sexually exploited for a list of key indicators).

If staff are dissatisfied with, or do not receive, the local authority response, they must escalate the matter in line with local protocol and to the local authority manager, if needed.

Where staff consider it appropriate, they can inform the parent(s)/carer(s) that they are making or have made a safeguarding referral.