Comfort Care Recruitment and Training Ltd.

Safeguarding Children Policy and Procedure

APRIL 2026

ISSUED DATE:	AUTHORISED BY:	DATE OF NEXT REVIEW:
14/04/2026	BENSON OZOUR	14/04/2027

Safeguarding Children Policy and Procedure

Purpose of Policy

This Safeguarding Children Policy outlines Comfort Care Recruitment and Training Limited's policy on how we will manage safeguarding concerns and promote the safety and welfare of children at risk of abuse and neglect.

To meet the legal requirements of the following legislation:

- Children Act 1989
- Public Interest Disclosure Act 1998
- Human Rights Act 1998
- Adoption and Children Act 2002
- Female Genital Mutilation Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Care Quality Commission (Registration) Regulations 2009
- Equality Act 2010
- Protection of Freedoms Act 2012
- The Care Act 2014
- Children and Families Act 2014
- The Counter Terrorism and Security Act 2015
- The Modern Slavery Act 2015
- Children and Social Work Act 2017
- Data Protection Act 2018
- Domestic Abuse Act 2021

To meet the following guidance:

- Working Together To Safeguard Children
- HM Government - Information Sharing Advice For Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers
- National Institute for Health and Care Excellence (NICE) Guidance – Child Abuse and Neglect

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Scope

The policy applies to:

- All employees, including those designated as temporary, bank staff, agency staff, volunteers or work experience
- Contractors
- Stakeholders

Objectives

The objectives of this policy are:

- To ensure compliance with legislation and guidance
- To ensure that employees can identify signs and indicators of child abuse and neglect
- To provide procedures for employees to follow in relation to reporting and managing safeguarding children concerns and incidents
- To define employee roles and responsibilities in relation to safeguarding children

Definitions

Child – refers to a person under the age of 18 years.

'Harm' is defined in the Children Act 1989 as 'ill-treatment or the impairment of health or development'. There is no single definition of 'significant harm'. An amendment to the Children Act 1989, included in Section 120 of the Adoption and Children Act 2002 clarifies that the definition of harm includes 'impairment suffered from seeing or hearing the ill-treatment of another'.

Reference: National Institute for Health and Care Excellence (NICE) Guidance – Child Abuse and Neglect

Types of Abuse

The 4 types of abuse relating to children are:

- Physical
- Emotional
- Sexual
- Neglect

Working Together to Safeguard Children has a 'Particular safeguarding issues' section which also cites:

- Child Sexual Exploitation
- Female Genital Mutilation
- Forced Marriage
- Child Trafficking

The Domestic Abuse Act 2021 includes children aged 16 and 17 years old.

Appendix 1 of this Safeguarding Children Policy and Procedure contains guidance on the types of abuse.

Contextual Safeguarding

Contextual safeguarding recognises that as young people grow and develop they are influenced by a whole range of environments and people outside of their family. For example in school or college, in the local community, in their peer groups or online. Children and young people may encounter risk in any of these environments. Sometimes the different contexts are inter-related and can mean that children and young people may encounter multiple risks. Contextual safeguarding looks at how we can best understand these risks, engage with children and young people and help to keep them safe.

Reference: NSPCC Learning

Policy Statement

Comfort Care Recruitment and Training Limited will ensure that this Safeguarding Children Policy dovetails with the Local Authority Safeguarding Children Policy and that we comply with Local Safeguarding Protocols.

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Comfort Care Recruitment and Training Limitedrecognises that although we may not directly provide services to people less than 18 years of age we have a responsibility to keep children safe. We recognise that many of our clients may have access to children in their home, in the community and online.

Comfort Care Recruitment and Training Limitedrecognises that safeguarding children is everybody's business. We will follow the 4 R's relating to safeguarding children:

- Recognise –abuse, harmand neglect
- Respond – alert the Registered Manager/Safeguarding Lead
- Record – ensure records are kept up-to-date and secure
- Refer – share information and refer to external agencies to safeguard and protect children from harm

Comfort Care Recruitment and Training Limited recognises Contextual Safeguarding and that children may be at risk of abuse from outside their families.

Comfort Care Recruitment and Training Limitedis committed toensuring robust management of safeguarding and that good safeguarding governance is maintained.

Comfort Care Recruitment and Training Limitedwill have robust recruitment and employment policies in place to ensure that our employees are suitable to work in social care.

The Registered Manager is the safeguarding lead and is responsible for embedding safeguarding practices and improving practice in line with national and local developments.

Comfort Care Recruitment and Training Limitedrequires employees to report all safeguarding concerns as soon as possible using the Safeguarding Children Policy and Procedure or the Whistle Blowing Policy and Procedure.

Comfort Care Recruitment and Training Limitedwill report all safeguarding concerns and incidents to the Local Authority and to the Care Quality Commission (CQC) in line with our regulatory requirements.

Comfort Care Recruitment and Training Limited will ensure that appropriate action is taken when safeguarding concerns are reported and that all concerns will be investigated.

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Comfort Care Recruitment and Training Limitedwill work in partnership with other agencies to manage safeguarding concerns.

Comfort Care Recruitment and Training Limitedrecognises our responsibilities in relation to confidentiality and data protection and will share information appropriately.

Comfort Care Recruitment and Training Limited will identify areas to improve safeguarding practice by analysing all safeguarding reports to identify trends and lessons learned.

Comfort Care Recruitment and Training Limited will provide safeguarding training for all staff as part of the induction training and on an annual basis. It is a requirement that all employees complete safeguarding children training.

Comfort Care Recruitment and Training Limitedwill have a clear Whistle Blowing Policy and Procedure in place and will ensure that employees have access to this.

Comfort Care Recruitment and Training Limitedis committed to implementing this Safeguarding Children Policy and the practices it sets out.

Procedure

Reporting Abuse or Neglect

When employees become aware of safeguarding children concerns they must take the following action:

- Ensure the immediate safety of the child by assessing the immediate risk and taking action if the child, or others, are in danger
- If there is a medical emergency, imminent danger, or if a crime is being committed the emergency services must be called on 999
- If the situation is not life threatening but the child may need medical assistance, NHS 111 must be called
- If a crime is suspected leave the scene untouched if possible
- Reassure and support the child

The employee must inform the Registered Manager once the above actions have been taken. In the absence of the Registered Manager the employee must contact the designated person on call.

Appendix 2 of this Safeguarding Children Policy and Procedure contains contact details for the Registered Manager, Nominated Individual, Police and Local Authority Safeguarding Children.

The employee must give the Registered Manager an account of what has happened and if there are any other people who could be at risk of harm.

If the concern relates to the Registered Manager the employee must contact the Provider/Nominated Individual.

The employee must follow the instructions and advice given by the Registered Manager.

The employee must complete a Safeguarding Report Form as soon as possible after the incident and forward this to the Registered Manager.

The Registered Manager must debrief with the employee and offer additional support if required.

Responding to a Disclosure

Comfort Care Recruitment and Training Limitedrecognises that responding to a disclosure of abuse or harm can be a distressing experience for employees; however it is important that employees are able to deal with disclosures appropriately to support the child.

Whena child discloses or discusses potential abuse the employeemust:

- Listen carefully to what they are saying
- Give them the tools to talk
- Let them know they've done the right thing by telling you
- Tell them it's not their fault
- Say you'll take them seriously
- Not confront the alleged abuser

- Explain what you'll do next

Reference: NSPCC – What To Do When A Child Reveals Abuse
https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/what-to-do-child-reveals-abuse/

Preserving Evidence

If employees are supporting a child where a potential crime has been committed it is important that they leave the area as it is and keep handling to a minimum to prevent cross-contamination of evidence.

If possible the employee should:

- Leave things as and where they are
- Secure the area if possible and do not let others enter
- Don't touch anything unless required to provide emergency assistance to a child
- Don't clear the area
- Don't wash anything
- Don't launder anything
- Don't clear any spillages
- Don't dispose of any rubbish or items
- If there are weapons or objects that may have been used in relation to the incident leave these where they are
- Try to ensure that others do not have physical contact with the child
- Encourage the child not to wash or change clothing and footwear
- If the child does change their clothing or footwear advise them they must not be washed or disposed of, leave them untouched if possible
- If you have used an item when supporting the child, such as a blanket, this must be preserved by leaving it where it is
- Note any footprints or fingerprints and make the Police aware

Referral to the Police and Local Authority Safeguarding Children Team

The Registered Managermust ensure that the Local Authority Safeguarding Children/Child Protectionreferral process is followed and should ensure they have all the required information to make the referral.

The Registered Manager is responsible for reporting the concern to the Local Authority Safeguarding Children and/or the Police. In the absence of the Registered Manager another member of the management team is responsible for reporting the concern.

Comfort Care Recruitment and Training Limitedshould have the following information available when making the referral:

- Child's details
- Child's communication needs
- Details of the person who has raised the concern
- Details of the alleged perpetrator
- Details of other relevant people e.g. witnesses
- Details of the concern
- Harm caused to the child
- Immediate risks
- Action already taken by Comfort Care Recruitment and Training Limited
- If reported to Police details of crime reference number
- If there have been previous similar concerns

The Registered Manager must discuss with the Local Authority Safeguarding Children what actions need to be taken by Comfort Care Recruitment and Training Limited.

Until a safeguarding referral has been closed by the Local Authority the Registered Manager must maintain contact with the Local Authority and/or Police to discuss the progress and outcome of the referral.

Completing a Safeguarding Report Form

Comfort Care Recruitment and Training Limitedmust ensure that when completing a safeguarding report employees must:

- Write a factual report
- Record what the childactually said, using their own words and phrases
- Describe the circumstanceswhich led to the safeguarding concern – e.g. disclosure, witnessing an incident
- Record the location of the concern
- Record details of witnesses
- Ensure the report is legible
- Check spelling and grammar
- Type the report or use black ink for hand written reports
- Sign and date the report

Safeguarding reports completed by employees may be used as part of investigations, disciplinary action or legal proceedings.

The Registered Manager must complete a management report detailing the actions they have taken to manage the safeguarding concern. The management report must contain details of the investigation outcome and any learning points.

The Registered Manager should maintain a log of all safeguarding concerns to enable analysis for trends.

Confidentiality and Information Sharing

When sharing information for safeguarding purposes, Comfort Care Recruitment and Training Limited will ensure that:

- All sharing of personal and sensitive information will be shared in compliance with the legal requirement of the Data Protection Act 2018 and the General Data Protection Regulations (GDPR).
- Employees must follow Comfort Care Recruitment and Training Limited's Data Protection Policy and Procedure.
- All employees will receive training on Data Protection and Confidentiality.

If an employee is unsure about what information they should share they must contact the Registered Manager for advice.

The Registered Manager should refer to the guidance 'Information Sharing Advice For Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers' to ensure that information is shared appropriately.

Safeguarding Meetings

Comfort Care Recruitment and Training Limitedwill ensure that we will attend multi-agency safeguarding meetings when invited.

Where possible the Registered Manager will attend but there may be occasions when other employees are required to attend.

A written report must be prepared by the Registered Manager prior to attending multi-agency meetings.

Care Quality Commission (CQC) Notifications

The Registered Manager must notify the Care Quality Commission without delay, of incidents of abuse and allegations of abuse, as well as any incident which is reported to or investigated by the Police.

The Registered Manager must notify the CQC about abuse or alleged abuse involving a client using the service, whether the client is the victim, the abuser, or both.

The Registered Manager must ensure that in their absence there is a person delegated to complete CQC notifications.

Professional Disagreements

Comfort Care Recruitment and Training Limited will work to develop professional working relationships with agencies.

If a difference of professional opinion occurs between professionals, the Registered Manager must ensure that this does not detract from the safeguarding process and must ensure that the safety and wellbeing of the child is prioritised.

The Registered Manager should refer to the Local Authority Safeguarding Children Policy and Local Protocols for managing professional disagreements.

Managing Allegations againstEmployees

All allegations of abuse, neglect and maltreatment by an employee will be taken seriously and managed in accordance with Comfort Care Recruitment and Training Limited's Safeguarding Children Policy and Procedure, Comfort Care Recruitment and Training Limited's Disciplinary Policy and Procedure and the Local Authority Safeguarding Children Policy and Procedure.

When there are allegations about employees the Registered Manager must immediately make a decision on whether to suspend the employee. Suspension is a neutral action to allow Comfort Care Recruitment and Training Limited to carry out an investigation into the allegations. Employees suspended will receive full pay.

Suspension is not automatic but must be considered if:

- It is suspected that a child has experienced abuse or neglect
- The allegation is being investigated by the Police or Local Authority
- The allegation might be grounds for dismissal
- It is not possible to fully investigate the allegations whilst the employee remains in the workplace
- There is a risk that the employee may remove evidence or attempt to influence witnesses

If the Registered Manager decides that suspension is necessary they must suspend the employee as soon as possible and not allow them to continue working. The Registered Manager must contact the employee and arrange to meet them soon as possible to inform them of the allegations and the suspension. Where possible the meeting should be done face to face, in circumstances where this is not possible this can be done by telephone. If possible the Registered Manager should have another member of the management team witness the meeting with the employee.

The Registered Manager must send a letter to the employee giving them the details of the suspension and allegations. This letter must be sent by recorded delivery.

The Registered Manager must record the reasons why they decided suspension was necessary. This must include reference to evidence available.

The Registered Manager must ensure that confidentiality is maintained and must not give details of the suspension to other employees unless members of the management team.

The suspended employee must be considered innocent unless the allegations are proven and must be offered support.

The Registered Manager must allocate a senior person in the organisation to act as a contact person for the employee. The allocated person should maintain contact with the employee to update them on the suspension and to provide sources of external support if required.

The Registered Manager must ensure that a full investigation is completed and if the allegations are founded action must be taken in accordance with Comfort Care Recruitment and Training Limited's Disciplinary Policy and Procedure.

If the employee resigns during the investigation process or refuses to co-operate in the investigation, the Registered Manager must proceed with the investigation in the employee's absence.

If the investigation concludes that the allegations are not founded the employee must be supported to return to the workplace. Comfort Care Recruitment and Training Limited recognises that suspension can be difficult for employees and will ensure the employee is supported on their return to work. The Registered Manager must meet with the employee on their return and discuss what support they require.

If the investigation concludes that the evidence is not sufficient to substantiate the allegations the Registered Manager will consider if any further action is required. The Registered Manager mustcontact the Local Authority Safeguarding Adults Team to discuss the investigation outcome.

If the investigation concludes that the allegations of abuse and neglect are substantiated the Registered Manager must take appropriate action under Comfort Care Recruitment and Training Limited's Disciplinary Policy and Procedure. The

Registered Manager must discuss the outcome of the investigation with the Local Authority Safeguarding Adults Team. The Registered Manager will make a referral to the Disclosure and Barring Service (DBS) for consideration for the Adult Barred List if this is required.

It is the policy of Comfort Care Recruitment and Training Limited that settlement agreements will not be provided for allegations relating to safeguarding concerns. Comfort Care Recruitment and Training Limited has statutory and contractual responsibilities in relation to safeguarding which will be adhered to.

After the investigation is completed the Registered Manager must review the incident and identify any learning points.

Roles and Responsibilities

All employees are responsible for:

- Following the Safeguarding Children Policy and Procedure.
- CompletingSafeguarding Childrentraining.
- Recognising and reporting safeguarding concerns and incidents to the Registered Manager without delay.
- Reporting concerns of poor practice to the Registered Manager.
- Being aware of the Local Authority's Safeguarding Children Board's Policies and Procedures for safeguarding children.
- Contributing, when requested to do so, to multi-agency meetings.

The Registered Manager is responsible for:

- Ensuring this Safeguarding Children Policy and Procedure is implemented.
- Keeping up to date with local safeguarding policies and protocols and ensuring that they are adhered to.
- Ensuring good governance and management of Safeguarding within Comfort Care Recruitment and Training Limited.
- Ensuring that contractual requirements relating to safeguarding are met.
- Managingsafeguarding children concerns and incidents and identifying learning points from these.
- Being a point of contact for clients, relatives and others to contact to report concerns.
- Reporting Safeguarding Children concerns to the Local Authority and Police.

- Completing CQC Notifications relating to safeguarding.
- Ensuring that employees receive SafeguardingChildren Training appropriate for their role.
- Ensuring that safeguarding responsibilities are reflected in all job descriptions.
- Ensuring that safe recruitment processes are in place.
- Making referrals to the Disclosure and Barring Service (DBS) when required.
- Updating the Provider/Nominated Individual about safeguarding children concerns and incidents.

The Provider/Nominated Individual is responsible for:

- Maintaining oversight of how safeguarding children concerns and incidents aremanaged.
- Reviewing learning points with the Registered Manager.
- Providing appropriate supervision and support to the Registered Manager.

Breaches of Policy

For employees, failure to adhere to the Safeguarding Children Policy could lead to possible disciplinary action being taken.

For others (volunteers, agency staff, contractors) their individual relationship with the organisation may be terminated.

Monitoring and Review

This Policy will be reviewed annually or sooner if necessary due to legislative or regulatory requirements.

Appendix 1 – Categories of Abuse

Physical Abuse

Physical abuse 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.

Definition is taken from Working Together to Safeguard Children 2015

Emotional Abuse

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 children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may feature age – or developmentally – inappropriate expectations 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.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Definition is taken from Working Together to Safeguard Children 2015

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Definition is taken from Working Together to Safeguard Children 2015

Neglect

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 misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Definition is taken from Working Together to Safeguard Children 2015

Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a type of sexual abuse. When a child or young person is exploited they're given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities. Children and young people are often tricked into believing they're in a loving and consensual relationship. This is called grooming. They may trust their abuser and not understand that they're being abused.

Children and young people can be trafficked into or within the UK to be sexually exploited. They're moved around the country and abused by being forced to take part in sexual activities, often with more than one person. Young people in gangs can also be sexually exploited.

Sometimes abusers use violence and intimidation to frighten or force a child or young person, making them feel as if they've no choice. They may lend them large sums of money they know can't be repaid or use financial abuse to control them.

CSE can happen in person or online. An abuser will gain a child's trust or control them through violence or blackmail before moving onto sexually abusing them. This can happen in a short period of time.

When a child is sexually exploited online they might be persuaded or forced to:

- send or post sexually explicit images of themselves
- film or stream sexual activities
- have sexual conversations

Reference – NSPCC Website

Female Genital Mutilation (FGM)

Female Genital Mutilation is when a female's genitals are deliberately altered or removed for non-medical reasons. It is also known as 'female circumcision' or 'cutting'.

FGM is a form of child abuse. It's dangerous and a criminal offence in the UK. We know:

- there are no medical reasons to carry out FGM
- it's often performed by someone with no medical training, using instruments such as knives, scalpels, scissors, glass or razor blades
- children are rarely given anaesthetic or antiseptic treatment and are often forcibly restrained
- it's used to control female sexuality and can cause long-lasting damage to physical and emotional health

FGM can happen at different times in a girl or woman's life, including:

- when a baby is new-born
- during childhood or as a teenager
- just before marriage
- during pregnancy

Reference – NSPCC Website

Forced Marriage

Some families force their children to marry because they:

- think it's an important part of religion or culture
- are worried about the family's reputation and honour (in some cultures also known as 'izzat')
- want all of the family's money to stay together
- want to marry their children off in exchange for money
- don't approve of their child being gay, lesbian, bisexual or transgender
- don't want their children to have relationships or sex
- feel pressured by the community or other family members to follow traditions
- want to keep family values and honour

Forced marriage is against the law in the UK.

Reference – Childline Website

Child Trafficking

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:

- sexual exploitation
- benefit fraud
- forced marriage
- domestic slavery like cleaning, cooking and childcare
- forced labour in factories or agriculture
- committing crimes, like begging, theft, working on cannabis farms or moving drugs

Trafficked children experience many types of abuse and neglect. Traffickers use physical, sexual and emotional abuse as a form of control. Children and young people are also likely to be physically and emotionally neglected and may be sexually exploited.

Traffickers often groom children, families and communities to gain their trust. They may also threaten families with violence or threats. Traffickers often promise children and families that they'll have a better future elsewhere.

Trafficking is also an economic crime. Traffickers may ask families for money for providing documents or transport and they'll make a profit from money a child "earns" through exploitation, forced labour or crime. They'll often be told this money is to pay off a debt they or their family "owe" to the traffickers.

Traffickers may:

- work alone or in small groups, recruiting a small number of children, often from areas they know and live in

- be medium-sized groups who recruit, move and exploit children and young people on a small scale
- be large criminal networks that operate internationally with high-level corruption, money laundering and a large numbers of victims.

Reference – NSPCC Website

Domestic Abuse

The Domestic Abuse Act 2021 creates a statutory definition of domestic abuse:

'Abusive behaviour' is defined in the act as any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and 'personally connected'.

'Personally connected' is defined in the act as parties who:

- are married to each other
- are civil partners of each other
- have agreed to marry one another (whether or not the agreement has been terminated)
- have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- are or have been in an intimate personal relationship with each other
- have, or there has been a time when they each have had, a parental relationship in relation to the same child
- are relatives

Reference: The Domestic Abuse Act 2021

Appendix 2 – Safeguarding Management Responsibilities

Safeguarding Lead/Registered Manager –

Contact Details:

Address:

ISSUED DATE:	AUTHORISED BY:	DATE OF NEXT REVIEW:
14/04/2026	BENSON OZOUR	14/04/2027

Telephone:

Email:

Director/Nominated Individual -

Address:

Telephone:

Email:

Local Authority Safeguarding Children

Address:

Telephone:

Out of Hours:

Police

In an emergency telephone 999

For non-emergencies telephone 101