

Safeguarding Children Policy - Housing and Property Management

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1. Purpose

This Policy sets out our approach to safeguarding children and young people in line with the Children Act 1989 and the Children Act 2004.

2. Scope

This policy applies to all Camden employees, volunteers, and agency workers responsible for carrying out housing and property management services. This applies to all residents, regardless of tenure type.

This policy also applies to all contractors and third-party providers working on behalf of any part of housing and property management services.

3. Definitions

For the purposes of this policy and related policy, the following definitions apply:

Child: anyone aged 0 -18 years old.

Harm and abuse: *Working together to safeguard children (2023)* defines harm and abuse as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. This can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others, i.e., children who see, hear or witness the effects of domestic abuse are recognised as child victims.

Types of abuse can include but are not limited to:

- Neglect
- Emotional abuse
- Physical abuse
- Sexual abuse
- Extra-familial harm
- Child criminal exploitation
- Child sexual exploitation
- Peer-on-peer abuse

See **Appendix I** for full definitions.

Disclosure and Barring Service (DBS) check: A UK criminal record check used to help employers safely recruit people for roles involving children or vulnerable adults.

Hoarding: Hoarding disorder is a recognised psychiatric condition in the **DSM 5**, and is often linked to trauma. It is considered a form of self-neglect and characterised by the over-accumulation of objects or animals, combined with difficulty in discarding items, which results in excessive clutter.

Multi-Agency Risk Assessment Conference (MARAC): Refers to a confidential meeting where representatives from various agencies share information and create a coordinated safety plan for high-risk victims of domestic abuse.

Rapid Review: A multi-agency process undertaken by local safeguarding partners within 15 working days of a child's death or serious harm where abuse or neglect is suspected. Its primary purpose is to implement immediate safety actions for other children, determine any urgent practice learning, and decide whether a more comprehensive Child Safeguarding Practice Review is needed.

Safeguarding: The responsibility for protecting and promoting the well-being of children, particularly those who are at risk or in need.

Significant harm: This is defined as ill-treatment or impairment of health and development arising from neglect or abuse, including the impact of seeing or hearing another individual's ill-treatment. The Children Act 1989 refers to this as the threshold at which Children Safeguarding and Family Help have a duty to intervene in family life to protect a child.

4. Roles and responsibilities

ROLE

RESPONSIBILITY

Director of Housing and
Director of Property
Management

Responsible for ensuring services carry out the Section 11 duties as detailed in the **Children's Act 2004**. Practitioners working in these services may become aware of conditions that could have or are having an adverse impact on children and must act if they have a concern.

Housing Designated
Safeguarding Leads

The Housing Designated Safeguarding Leads (DSL) are the strategic leads for safeguarding matters within housing and property. DSLs represent the organisation in strategic partnership boards, and have oversight of safeguarding policies and procedures, ensuring policy

compliance and effective implementation. DSLs are notified of serious safeguarding concerns.

Director of Children's Family Help and Safeguarding

Responsible for ensuring local safeguarding services are provided for children to safeguard and promote their welfare, and to carry out an assessment to decide on services and interventions.

This includes the statutory duty of a local authority to carry out enquiries for child protection and children in need of concern.

Safeguarding Children's Partnership

Responsible for ensuring Camden Council is working in a multi-agency response and monitoring and evaluating the effectiveness of safeguarding measures.

The partnership is also responsible for quality checks and audits, ensuring effective training is available for organisations, and addressing the challenges and risks within safeguarding to provide best practices and information sharing.

4. Policy statement

Camden Council is committed to safeguarding its community. We aim to prevent abuse and neglect and ensure that children live happy and fulfilled lives. Safeguarding is everyone's responsibility. We recognise that housing and property management teams play a vital role in identifying and supporting residents and children at risk, and we will form effective multi-agency partnerships to safeguard and protect children.

We take a 'child-centred approach' which places the needs, wishes, and best interests of children at the heart of our work, in line with our [Vulnerability Policy](#). Our practice is relational, recognising the importance of maintaining curiosity, collaboratively, and enabling children and families to have a voice at the very outset of engagement. The support that we provide is aligned with our responsibilities as set out in the [London Child Protection Procedures](#) and [Working Together to Safeguarding Children \(2023\)](#) statutory guidance.

Our practice is informed by the following principles as set out in [Working Together to Safeguard Children \(2023\)](#):

- The child's needs are essential.

- Any interventions will be child-centred and focused on the whole family to ensure that where possible, children can be safeguarded within their family.
- We promote early intervention and preventative work.
- We will intervene at the lowest possible level needed to meet the child's needs and safety concerns.
- We will work in a culturally competent, anti-oppressive, anti-racist and non-discriminatory way that is compliant with the Equality Act 2010.
- We will work in partnership with families and will support children and parents to participate in decision-making so that their views and wishes can be taken into consideration.

5. Our child safeguarding response

5.1 Identifying a safeguarding concern

As a housing and property management service, we are well-positioned to identify and respond to safeguarding concerns. Our staff are encouraged to be 'professionally curious', looking beyond the surface and actively exploring any concerns about a child's well-being or needs.

Signs of child safeguarding concerns that may come to the attention of housing and property management may include:

- Neglect, hoarding, or insanitary conditions in the child's places of residence
- Physical, emotional or sexual abuse or exposure to domestic abuse in the child's places of residence
- Children whose care needs are not being met by their parent or caregiver, and whose growth and development may be harmed, because of challenges including substance misuse, mental health issues, or poverty
- Unborn babies who might be at risk because of the pregnant person's or parent's health, needs, or personal situation
- Families who are experiencing extreme financial hardship or financial abuse, which may be indicated by a reduction or capping of utilities or an inability to pay rent
- Children and young people who are experiencing homelessness and/or rough sleeping
- Children exhibiting high levels of behavioural difficulties and risk-taking behaviour or who are out of parental control.

We take all disclosures of abuse or neglect seriously and will respond to any sensitively and rapidly, ensuring that safety is always prioritised.

5.2 Making a safeguarding referral

All members of staff and contractors have the responsibility to immediately make a referral to Children's Safeguarding and Family Help, where there is a **reason to believe** that any of the following apply:

- A child is suffering or likely to suffer significant harm.
- A child who is not at risk or experiencing significant harm, but whose health and development are likely to be significantly impaired unless provided with support.

Where the above criteria are met, a **child safeguarding referral** must be made. Where there are high levels of concern around radicalisation, the Police must also be informed.

Where there are concerns that an adult with care and support needs is at risk of or experiencing abuse or neglect, we will raise a **adult safeguarding alert**. For more information, see our **Adult's Safeguarding Policy**.

5.3 Safeguarding enquiries and response

The Child in Need teams are responsible for safeguarding and working with children to promote their welfare in accordance with the Children's Act 1989. They will undertake an assessment to determine whether the concern relates to a 'child need' or 'child protection' matter. When making decisions on whether the threshold has been reached, social workers will consider the severity, frequency and duration of the harm and the extent to which it is premeditated.

Detailed information on thresholds for child protection and children in need can be found in the **Safeguarding Children Partnership thresholds**.

Effective safeguarding requires multi-agency collaboration. Housing and property management teams will actively collaborate on safeguarding enquiries and lead on housing-led actions, such as supporting a family to access safe accommodation.

5.4 Early Help at Camden

In line with **Working together to safeguard children (2023)**, Camden Council provides early intervention and prevention for families and children which aim to support child development, strengthen parenting skills, and improve outcomes and life chances for children at the earliest opportunity.

In situations where the threshold for child protection or child in need support is not met, housing services will support tenants to access Early Help or other targeted services. Further information can be **found here**.

6. Working in partnership with others

Camden housing and property management services recognise that effective safeguarding requires multi-agency collaboration at both strategic and operational levels. Strategically, the Designated Safeguarding Leads are core members of the [Safeguarding Adults Partnership Board](#) and the [Safeguarding Children Partnership Board](#). Housing representatives also attend specialist boards, such as the Violence Against Women and Girls Board.

Operationally, Housing and property management staff work within a multi-agency framework, with a designated lead professional coordinating and acting as a central point of contact for the family. Where a safeguarding concern is present, the allocated social worker is the lead professional, and we will work with others in the professional networks to implement child in need, child protection or care plans.

This includes working closely with partners who provide out-of-borough or temporary accommodation where there is a safeguarding concern and encouraging them to contribute to raising safeguarding alerts where necessary.

6.1 Camden Safeguarding Children Partnership (CSCP)

The Camden Safeguarding Children Partnership's (CSCP) purpose is to ensure that all local agencies work together effectively to safeguard and promote the welfare of children. It coordinates multi-agency efforts to protect children and support families, making sure each agency works well both individually and collectively. The CSCP also develops shared safeguarding policies, training standards, and promotes learning through quality assurance and reviews. It raises public awareness and helps identify and respond to emerging risks.

Housing is a core member of the partnership, represented by the Designated Safeguarding Lead. More details about Housing's role can be found in the [CSCP Multi-Agency Safeguarding Arrangements document](#).

7. Information sharing and data protection

Information sharing is an essential element of safeguarding, enabling professionals to assess risks effectively, make informed decisions, and provide timely support to children at risk of harm. Information about suspected or actual abuse or neglect cannot be ignored. We are duty-bound to report safeguarding concerns and will cooperate with safeguarding enquiries in accordance with our duties as set out in the Children Act (1989, 2004) and General Data Protection Regulations 2018.

Where it is safe to do so, we try to involve the parent or caregiver to seek to understand their needs and explain any action taken. However, we will not seek parental-involvement where there are concerns that this could:

- put the child at risk of further harm

- interfere with a criminal investigation
- cause undue delay

In accordance with Camden's multi-agency information sharing agreement, all staff are trained to understand the importance of information sharing.

8. Enabling our staff to safeguard

Camden's housing and property management services understand the critical role that we play in delivering an effective, multi-agency safeguarding offer to our residents. We aim to achieve this through ongoing management and supervision of staff and contractors, performance monitoring, and promoting an active learning culture.

8.1 Recruitment and retention, and training

Safeguarding is a key consideration in the selection and recruitment processes for all Camden staff, contractors, and agencies. All potential and existing staff will be subject to Disclosure and Barring Service (DBS) checks where eligible in their role, in line with [government guidance](#).

All staff are required to complete a mandatory safeguarding e-learning training and review our core safeguarding documents as part of their induction. This training is repeated annually; staff must complete this to qualify for pay progression or recognition awards.

We provide third-party contractors providing a service on behalf of Camden with a copy of the safeguarding policies, which they are required to adhere to when engaging with residents. Commissioned organisations have their own safeguarding policies and processes aligned to the statutory framework.

8.2 Supervision, support and staff safety

Housing and property management staff receive regular supervision that supports effective safeguarding in line with this policy and localised procedures.

Staff who raise safeguarding concerns should never be subject to violent, threatening or abusive behaviour.

8.3 Housing Designated Safeguarding Leads

The Housing Designated Safeguarding Leads (DSLs) play a crucial role in safeguarding children at risk within Camden's housing and property management services. DSLs are responsible for representing the organisation in strategic partnerships and ensuring compliance with policy and guidance.

DSLs are notified in all cases where a safeguarding incident results in serious harm; or involves an allegation against a Council employee or agent; or appears not to have been dealt with according to policy.

The details of our Housing Designated Safeguarding Leads can be found on our [housing leadership team webpage](#).

8.4 Allegations against staff or contractors

Camden Council takes seriously any allegations or complaints about the conduct of staff or contractors. All allegations and complaints received by the Council will be investigated fully, and where applicable, action will be taken against the accused member of staff.

Our Whistleblowing Policy 2023 encourages and enables employees to raise any serious concerns they have and to act on those concerns. Staff are duty-bound to report any concerns, and failure to do so could result in disciplinary action.

8.5 Dealing with complaints

If a resident is unhappy with our safeguarding response, they can make a complaint under [Camden' complaints process](#).

9. Community awareness

We know that community groups and voluntary and charity sector organisations can be the first point of contact for children and residents disclosing vulnerability, abuse, or neglect. We are committed to raising awareness within the communities we serve, so that they are informed and supported to respond to safeguarding concerns.

This policy is actively visible and available to all partners, organisations, and the public via the Council's website.

Where a member of the public is worried a child or young person is at risk of, or has suffered harm, they should contact the Children and Families Contact service:

Phone: 020 7974 3317

Email: LBCMAHadmin@camden.gov.uk

Out of office hours (after 5pm, weekends and bank holidays): 020 7974 4444

10. Diversity, inclusion, and holistic services

Our safeguarding policy is built on the fundamental principles of diversity, inclusion, and collaboration. We recognise that safeguarding is most effective when it addresses the unique needs and experiences of all.

We believe that all individuals, regardless of their age, disability, gender, gender identity, sexual orientation, race, ethnicity, religion, belief, socio-economic status, or any other characteristic, have an equal right to be safe from harm, abuse, and neglect.

Every member of housing and property management shares the responsibility for upholding these principles. We are committed to ongoing training, regular policy review, and continuous learning and development in our safeguarding practices to ensure they are truly inclusive and effective for all.

An equality impact assessment has been carried out as part of policy development.

11. Review

This policy will be reviewed every five years, and if required by changes in legislation, regulation, or the service, it will be reviewed more frequently.

The next review is scheduled to take place in 2030.

12. Related documents

Legal framework: Our safeguarding policy is underpinned by the following legislation and guidance:

- **Children Act 2004:** Establishes a framework for integrated safeguarding and promoting the well-being of children.
- **Working Together to Safeguard Children 2023:** Statutory guidance that sets out how all agencies and individuals should work together to help, support, and protect children.
- **Care Act 2014:** This legislation imposes a legal duty on local authorities to safeguard adults with care and support needs from abuse and neglect.
- **Crime and Disorder Act 1998:** Introduces measures to tackle crime and disorder at a local level, including the establishment of Youth Offending Teams and various orders to address anti-social behaviour.
- **Human Rights Act 1998:** This Act incorporates the rights set out in the European Convention on Human Rights into UK law, making it unlawful for public bodies to act incompatibly with these rights.
- **Domestic Abuse Act 2021:** Provides a comprehensive legal framework to tackle domestic abuse, including a statutory definition of domestic abuse and new powers to protect victims.

- **Anti-Social Behaviour, Crime and Policing Act 2014:** Consolidates and streamlines powers for dealing with anti-social behaviour, provides new police powers, and introduces measures to tackle crime and improve local policing.
- **Children and Social Work Act 2017:** This act introduces reforms to children's social care, including new duties for local authorities to promote children's well-being and a framework for local safeguarding arrangements.
- **Data Protection Act 2018:** This act updates UK data protection law to align with the General Data Protection Regulation (GDPR), which sets out how personal data must be processed and protected.
- **Equality Act 2010:** Mandates that the process is carried out without any discrimination and that tenants with disabilities or health problems receive appropriate support.

Further related **London Borough of Camden policies and documents:**

- London Multi Agency Adult Safeguarding policy and procedures (June 2019)
- **CSCP Multi-agency Safeguarding Arrangements 2024**
- Camden Safeguarding Children Partnership - Escalation and Resolving Professional Differences Policy 2024
- The Homeless Young Peoples Protocol
- London Child Protection Procedures
- London Multi-Agency Safeguarding Data Sharing Agreement for Safeguarding and Promoting the Welfare of Children 2021
- Whistleblowing Policy 2023
- Complaints Policy 2024
- Camden's Privacy Notice
- Vulnerability Policy – Housing and Property Management 2025
- Anti-Social Behaviour Policy 2025
- Housing Domestic Violence and Abuse Policy 2025
- Housing Allocations Scheme
- Housing and Property – Safeguarding Adults Policy

13. Information and version control

13.1. Information

Title	Housing and Property Management Safeguarding Children Policy	
Document number	1	
Authors	Hannah Slydel and Lydia Roberts	
Responsible officer	Glendine Shepherd Director of Housing Gavin Haynes Director of Property Management	
Audience	Public	
Policy Area	Housing and Property Management	
Consultation requirements	Internal	Not required
	External	Not required
Impact Assessment requirements	Equality Impact Assessment (EIA) completed on	1/10/2025
	Data Protection Impact Assessment (DPIA) completed on	Not required
	If an EIA or DPIA was not completed, please state why this was not required	No new method of collecting or processing data implemented
Next review date	2030	
Approved by	Dan Hawthorn, Executive Director of Homes and Communities	
Approval date	04/02/2026	
Effective date	09/02/2026	

13.2. Version control

Version	Date	Summary of Changes	Actioned by (role)
1	04/02/2026	Policy development	Housing Policy and Change Lead

14. Appendix I: Definitions of abuse

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. More information is available in the CSCP guidance: [CSCP-neglect-guidance.docx](#)

Emotional abuse: The persistent emotional maltreatment of a child to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

Physical abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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.

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, or the child being aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, 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.

As well as the general classifications, staff need to be aware of the following:

Extra-familial harm: Children may be at risk of or experiencing physical, sexual, or emotional abuse and exploitation in contexts outside their families (see glossary definition of extra-familial contexts). While there is no legal definition for the term

extra-familial harm, it is widely used to describe different forms of harm that occur outside the home. Children can be vulnerable to multiple forms of extra-familial harm from both adults and/or other children.

Child criminal exploitation: - As set out in the Serious Violence Strategy, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Child sexual exploitation: Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

(a) in exchange for something the victim needs or wants, and/or

(b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. More information is available in the CSCP guidance: [CSCP-extra-familial-harm-and-child-exploitation-guidance.pdf](#)

Peer-on-peer abuse is where a child or young person is bullied, abused, or exploited by peers of a similar age and where the victim and perpetrator are both under 18. It involves deliberate, harmful behaviour targeted at the victim that can put them at risk of significant harm. Research shows that children who harm other children are likely to be victims of abuse or have considerable needs themselves and may require a social care service to help them recover from their experiences and address their behaviour.