

Safeguarding Children Policy

Document Reference Information

Version	1
Status	Live
Author	Heather Manning
Directorate responsible	Quality and Safeguarding
Directorate lead	Lisa Levy
Ratified by	QPS
Date ratified	12/2018
Date effective	01/2019
Date of next formal	08/2023
Target Audience	All HWCCG Staff

Version Control Record

Version	Description of changes	Reason for changes	Author	Date
1	New paperwork	Herefordshire CCG Policy now for HWCCG. EIA form Updated	Heather Manning	01/06/2020
1.1	Updated links and Partnership Groups	General updates required	Heather Manning	11/08/2021

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Introduction

- 1.1** This document defines the Safeguarding Children Policy for the Herefordshire and Worcestershire Clinical Commissioning Group, hereafter referred to as HWCCG. This policy illustrates the requirements and compliance with legislative duties to safeguard children. It is applicable to all HWCCG staff and all independent contracted staff. All NHS providers or independent health organisations (including GP Practices) will have their own policies for safeguarding children in accordance with their own statutory responsibilities.
- 1.2** This document should be read in conjunction with:
- Working Together to Safeguard Children, July 2018
Statutory guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004
[Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/690362/Working-Together-to-Safeguard-Children-2018.pdf)
 - Herefordshire Safeguarding Children Partnership (HSCP) Policies and Procedures
[For professionals - Herefordshire Safeguarding \(herefordshiresafeguardingboards.org.uk\)](https://www.herefordshiresafeguardingboards.org.uk/)
 - Worcestershire Safeguarding Children Partnership (WSCP) Policies and Procedures
[Safeguarding Policies and Procedures - Worcestershire Safeguarding Boards \(safeguardingworcestershire.org.uk\)](https://www.safeguardingworcestershire.org.uk/)
 - HWCCG Safeguarding Adults Policy
[Safeguarding Adults Policy \(herefordshireandworcestershireccg.nhs.uk\)](https://www.herefordshireandworcestershireccg.nhs.uk/)
 - HWCCG Management of Allegations (PiPoT) policy
[PIPOT \(herefordshireandworcestershireccg.nhs.uk\)](https://www.herefordshireandworcestershireccg.nhs.uk/)
- 1.3** It is the intention of this policy to outline a series of principles and ways of working whilst recognising that safeguarding children is everybody's responsibility.
- 1.4** HWCCG is committed to safeguarding and promoting the welfare of children and will make arrangements for ensuring that its functions are discharged fully according to statute.
- HWCCG fully recognises its responsibility for protecting and safeguarding the welfare of children and acknowledges its responsibility to take all reasonable steps to promote safe practice, to protect children and young people from harm, abuse or exploitation and to work with service providers to continually improve service quality.
- 1.5** Section 11 of the Children Act 2004 sets out duties for a wide range of bodies including Health which is incorporated into the statutory guidance: "Working Together to Safeguard Children" (2018) which sets out how organisations and individuals have

a duty to work together to safeguard and promote the welfare of children. The 'Safeguarding Children, Young People and Adults at Risk in the NHS: Safeguarding Accountability and Assurance Framework' (August 2019) is the update for 'Safeguarding Vulnerable People in the NHS - Accountability and Assurance Framework' (July 2015). As before it sets out a clear framework for safeguarding including roles, duties and responsibilities of all organisations commissioning health and social care. It has built on its predecessor by strengthening the NHS commitment to promoting the safety, protection and welfare of children, young people and adults. It has been developed in partnership with professional bodies and leaders in the system, in collaboration with all who use it.

Both CCGs and NHS England and NHS Improvement are statutorily responsible for ensuring that the organisations from which they commission services provide a safe system that safeguards children (and adults) at risk of abuse and neglect. This means safeguarding and promoting the welfare of children must be an integral part of the care offered to all children and their families by all staff working within HWCCG.

This may be care offered to children, young people, families or adults who are parents or carers.

This duty applies to commissioners, providers from whom services are commissioned and also our partner agencies. HWCCG has a Governance Framework for Safeguarding Children and Adults which shows its relationship to the wider health economy and partners.

1.6 In addition these duties require all agencies to have:

- Senior management commitment to the importance of safeguarding and promoting the welfare of children
- A clear statement of the agency's responsibilities towards child service users, available for all staff
- A clear line of accountability within the organisation for work on safeguarding and promoting the welfare of children
- Service development that takes account of the need to safeguard and promote welfare
- Training on child safeguarding for all staff working with, or in contact with child service users
- Safe recruitment procedures in place
- Effective inter-agency working to safeguard and promote the welfare of children
- Effective information sharing.

2 Policy Statement

2.1 HWCCG will fulfil its statutory duties relating to the safety and welfare of children through the demonstration of:

- Compliance with all statutory guidance on safeguarding children Including Children Act 2004 section 11.
- Active partnership and co-operation with Herefordshire Safeguarding Partnership Arrangements – Herefordshire Safeguarding Children Partnership (HSCP) and Worcestershire Safeguarding Children Partnership (WSCP)
- Ensuring that children and young people are valued, and their safety and welfare is considered at all stages of commissioning, including contracting arrangements and performance management frameworks. This will be best achieved through partnership processes across the HSCP and WSCP areas.

3 Scope of the Policy

- 3.1** This policy applies to all staff working within HWCCG and independent contractors. The key principles are also applicable to all services commissioned by HWCCG.
- 3.2** All employees of HWCCG have an individual responsibility for the protection and safeguarding of children and young people.
- 3.3** All managers must ensure their staff are aware of, able to access this policy, and ensure its implementation in their line of responsibility and accountability.
- 3.4** HWCCG is committed to all processes that safeguard children and young people and promote their welfare and aims to commission safeguarding services that will ensure equal access to all children and young people, regardless of:
- Race, religion, first language or ethnicity
 - Gender or sexuality
 - Age
 - Health status or disability
 - Political or immigration status.

4 NHS requirements

4.1 There are two fundamental requirements for effective safeguarding in the care delivery of NHS

- To prevent safeguarding incidents from arising through the provision of high-quality care
- To ensure effective responses where harm or abuse occurs through implementing interagency safeguarding children policies and procedures

5 Definitions

- 5.1** A child is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.
- 5.2** Safeguarding and promoting the welfare of children is defined as:
- Protecting children from maltreatment
 - Preventing impairment of children's health or development
 - Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best life chances
- 5.3** Child protection is part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering at risk of suffering significant harm

6 Roles and Responsibilities

6.1 Equal system leadership between LA children's services, the police and HWCCG is now required under the Working Together to Safeguard Children Statutory Guidance 2018

6.2 The roles and responsibilities of all organisations and staff groups regarding safeguarding children are outlined in the statutory guidance section of '*Working Together to Safeguard Children*' (HM Government 2018). All staff and managers should be aware of those responsibilities.

HWCCG has a duty under Section 11 of the Children Act 2004 to ensure that:

(a) Their functions are discharged having regard to the need to safeguard and promote the welfare of children; and

(b) Any services provided by another person pursuant to arrangements made by the person or body in the discharge of their functions are provided having regard to that need.

HM Government, 2004

6.3 It is also the responsibility of HWCCG to ensure that both a Senior Doctor and Nurse are contracted to fulfil the functions of Designated Professionals in accordance with Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff - Intercollegiate Document (2019) and Chapter 2 of Working Together to Safeguard Children 2018. HWCCG has the expertise of a Designated Doctor and Designated Nurse for Safeguarding, as well as a structure of Deputy Designated Nurses to support this function and meet its responsibilities.

6.4 CCG's are responsible in law for the safeguarding element of services they commission. As commissioners of local health services, HWCCG need to assure themselves that organisations from which they commission have effective safeguarding arrangements in place. It is worth acknowledging the changing landscape of place-based system leadership with the introduction of Integrated Care Systems (ICSs) and Primary Care Networks (PCNs). Safeguarding must be considered in these new integrated systems, however, currently the responsibility to provide safeguarding services still sits with CCGs.

6.5 HWCCG is further required to ensure that it clearly identifies the standards expected from its staff members with regard to ensuring the safety and welfare of children is promoted.

Staff members employed or contracted who do **not** directly deliver services to individuals, in circumstances where they identify a concern around the safety and welfare of a child or young person, are expected to ensure that they act in accordance with the HSCP and WSCP Procedures and National Guidance if there are concerns a child is being abused.

6.6 Any independent contractors who deliver services directly to children, young people and their families should ensure that they:

- Access safeguarding children training in accordance with national and local guidance and competency frameworks.
- Have robust guidance for staff to follow in relation to safeguarding children
- Have robust HR policies and procedures
- Have robust information sharing policies which are guided by:
 - . What to Do If You Are Worried A Child Is Being Abused DOH 2015;
 - . The Data Protection Act 2018;
 - . The Human Rights Act 1998;
 - . The Freedom of Information Act 2000;
 - . Protecting Children & Young People; The Responsibilities of All Doctors GMC 2012;
 - . Confidentiality NHS Code of Practice 2003;
 - . HM Government Information Sharing Advice for Practitioners providing safeguarding services to children, young people, parents and carers 2018.
- Act in accordance with the HSCP and WSCP policies and procedures

NB this is not an exhaustive list

6.7 CCGs are required to undertake regular capacity reviews to ensure that there is sufficient safeguarding expertise available via the designated professionals. The requirements for CCG designated capacity are outlined in the Intercollegiate Documents which are built upon the legislative requirements for safeguarding - Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff (2019), Looked After Children: Roles and Competencies of Healthcare Staff (2020) and Adult Safeguarding: Roles and Competencies for Health Care Staff (2018).

7 Reporting concerns

- 7.1** Appendix 1 identifies local contacts for advice support and supervision with regards to safeguarding children and young people.

8 The National Prevent Strategy and the Prevent and Channel Duties

The [National Prevent Strategy \(2011\)](#) is part of the Government's Counter Terrorism Strategy called CONTEST. The aim of the Prevent Strategy within CONTEST is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. Prevent is one of the four elements of '[CONTEST: the government's counter-terrorism strategy](#)'. These are:

- **Pursue** is about detecting and disrupting threats of terrorism. It is targeted at those who have committed or who are planning to commit a crime
- **Protect** is concerned with strengthening the country's infrastructure from an attack
- **Prepare** focuses on areas of the infrastructure where an attack cannot be stopped and the aim is to reduce the impact of an attack by preparing to respond effectively
- **Prevent** is an early intervention process and operates in the "pre-criminal space" It aims to stop people becoming terrorists or supporting terrorism.

The basis of Prevent is simple: it is about keeping our communities safe from extremists. It does not carry a pre-conceived idea of who the extremists are, or their message. However it has to be responsive to the prevailing national and international situation.

2.3 The Channel Duty: Sections 36-41 of the Counter-Terrorism and Security Act 2015 sets out the duty on local authorities and partners of local panels to provide support for people vulnerable to being drawn into terrorism. In England and Wales this duty is the Channel programme. As part of this duty, these specified authorities and other partners protect individuals by adopting a multi-agency approach (the Channel Panel) which will:

- a. identify individuals at risk;
- b. assess the nature and extent of that risk;
and
- c. Develop the most appropriate support plan for individuals concerned.

Source: [Channel Duty Guidance April 2015.pdf](#)

There is a greater emphasis to ensure that Prevent falls under the umbrella of safeguarding and a requirement that capabilities and resources need to be interconnected to provide a closer link between the Prevent and Pursue work strands.

The Prevent Duty under the Counter-Terrorism and Security Act 2015 requires all specified authorities, including health to have "due regard to the need to prevent people from being drawn into terrorism" and therefore HWCCG commissioned mental health providers have a core role in supporting the Prevent agenda in safeguarding individuals within our services who may be at risk, including those referred into mental health services from the Channel panel.

The purpose of **Prevent** is to safeguard and support vulnerable people to stop them from becoming terrorists or supporting terrorism.

Furthermore it now extends to supporting the rehabilitation and disengagement of those already involved in terrorism.

Re-enforce that **safeguarding** is at the heart of Prevent by ensuring individuals are supported in the same way that they would be under other **safeguarding processes**.

9 Information Governance

9.1 Consent is not required to breach confidentiality and make a safeguarding referral where;

- A serious crime has been committed.
- Where the alleged perpetrator may go on to abuse other children.
- Other children or young people are at risk in some way.
- The child is deemed to be in serious and or immediate risk.
- The public interest overrides the interest of the individual.
- When a member of staff of a statutory service, a private or voluntary service or a volunteer is the person accused of abuse, malpractice or poor professional standards.
- If a worker has any doubt about the legality of sharing information, they must in the first instance consult HWCCG Safeguarding Leads, their manager or HWCCG's Caldicott Guardian.

10 Staff training

- 10.1** 'Safeguarding Children: Roles and Competences for Healthcare Staff - Intercollegiate Document', (RCPCH 2019), sets out the levels of competence expected of all staff working within the health service. All staff must ensure that they possess the required knowledge, skills and competences as set out in this document.

- 10.2** HWCCG will enable staff to participate in training on safeguarding and promoting the welfare of children and young people as per intercollegiate guidance Roles and Responsibilities 2019 provided on both a single and interagency basis. The training will be proportionate and relevant to the roles and responsibilities of each staff member as outlined in HWCCG Training Strategy 2021-2023.

11 HWCCG Governing Body Responsibilities

- 11.1** The Accountable Officer has overall responsibility for ensuring that the health contribution to safeguarding and promoting the welfare of children is discharged effectively across the whole local health economy through the CCG commissioning arrangements. Within HWCCG this responsibility has been delegated to the Chief Nursing Officer and is supported by the Head of Safeguarding/Designated Nurse.
- 11.2** The Chief Nursing Officer is the Governing Body Member with Executive Lead for Safeguarding and will ensure that HWCCG works closely with partner organisations and provides appropriate representation for the Local Safeguarding Children Partnerships.
- 11.3** The Chief Nursing Officer will work in partnership with the NHS England Director of Nursing in complying with the NHS accountability and assurance framework and will work closely with regulators to ensure sharing and learning of key information relating to all aspects of patient safety and quality, including safeguarding.
- 11.4** The Chief Nursing Officer is responsible for ensuring that the needs of all children and young people are at the forefront of local planning and that high quality health services that meet identified quality and safety standards are commissioned.
- 11.5** The Chief Nursing Officer will ensure that all commissioned services give assurance on their processes and systems for children's safeguarding and that it is a standing agenda item at all Clinical Quality Review meetings.
- 11.6** The Chief Nursing Officer will ensure that processes for safeguarding children are also supported in primary care member practices and specialist services, offering advice and support in collaboration with NHS England to ensure safe services.
- 11.7** The Chief Nursing Officer will ensure that monitoring takes place of safeguarding activity to fulfil the requirements of Section 11 of the Children Act (2004), Working Together to Safeguard Children (2018), Standard 5 of the National Service Framework for Children Young People and Maternity Services (2004), the Care Quality Commission Regulations (2010) and the implementation of recommendations from national or local enquiries, serious case reviews and other learning reviews as required. The recommendations from these will impact upon commissioning arrangements and assurance processes by ensuring learning is embedded from national and local enquiries.
- 11.8** The Chief Nursing Officer will ensure that the expertise of the Designated Professionals is used to contribute to the design and planning of services.
- 11.9** The Chief Nursing Officer will ensure that the Joint Strategic Needs Assessment includes those needs which contribute to informing the strategic work of the Health

and Wellbeing board, the Children and Young People's Plan and the HSCP and WSCP business plans.

- 11.10** The Designated Doctor and Nurse take a strategic, professional lead on all aspects of the health service contribution to safeguarding children across the HWCCG area. They will be a member of the HSCP and WSCP, and serve, as appropriate, on the sub-committees providing safeguarding/child protection health advice on policy and individual cases to statutory and voluntary agencies, including the Police and Children's Social Care.

12 Commissioning Arrangements

- 12.1** HWCCG achieves safeguarding assurance by continuous improvement in quality outcomes of commissioned services through the use of its contract monitoring and quality assurance processes. These include quality schedules, contracts, assurance processes, CQUINS and learning from Child Safeguarding Practice Reviews, Safeguarding Adult Reviews, Domestic Homicide Reviews, incidents and complaints. Assurance is also gained through compliance with safeguarding adults and children policies and the adherence to a learning and development framework for safeguarding adults and children.
- 12.2** Specifications and service standards should be consistent with national guidance, West Midlands Safeguarding Children Procedures and local policy and procedures.
- 12.3** HWCCG must ensure that service specifications for commissioned and contracted services include clear service standards and monitoring arrangements for safeguarding children and young people.
- 12.4** In developing or redesigning services, HWCCG will take into account the need to safeguard and promote the welfare of children and young people.
- 12.5** HWCCG will involve children and young people and/or their families in the planning of services and incorporate their wishes and feelings in service design and delivery where relevant.
- 12.6** CCGs are responsible in law for the safeguarding element of services they commission. As commissioners of local health services, CCGs need to assure themselves that organisations from which they commission have effective safeguarding arrangements in place. It is worth acknowledging the changing landscape of place-based system leadership with the introduction of Integrated Care Systems (ICSs) and Primary Care Networks (PCNs). Safeguarding must be considered in these new integrated systems, however, currently the responsibility to provide safeguarding services still sits with CCGs. CCGs need to demonstrate that their designated experts (for children, children in care and adults), are embedded in the clinical decision-making of the organisation, with the authority to work within local health economies to influence local thinking and practice and the capacity to do so.

13 Recruitment and Personnel Processes

- 13.1** HWCCG has a duty to ensure that safe recruitment processes are compiled, and all staff employed or provider trusts have up to date recruitment processes in place to ensure safe selection and retention of staff and are acting in accordance with NHS employer's regulations, the local HR recruitment policies and the Disclosure and Barring Service (DBS).

14 Clinical Governance

- 14.1** HWCCG will apply the principles of sound clinical and corporate governance in relation to safeguarding children and young people, which takes into account the corporate governance framework for NHS organisations.
- 14.2** HWCCG staff are responsible for recording near misses, incidents or serious untoward incidents in relation to safeguarding children and young people according to the organisation reporting policy.
- 14.3** HWCCG will ensure that safeguarding and promoting the welfare of children is integral to clinical governance and audit arrangements.
- 14.4** HWCCG Head of Safeguarding/Designated Nurse will inform the Accountable Officer and the HWCCG Quality Forum meeting of all Child Safeguarding Practice Reviews.

15 Support and Supervision

- 15.1** Access to Safeguarding supervision is provided HWCCG Designated Professionals and Safeguarding Leads (Please refer to HWCCG Safeguarding Supervision Policy). HWCCG will ensure that protected time is available to enable staff to receive Safeguarding supervision when required and it will be provided in addition to and separately from clinical supervision and/or management supervision.

16 Staff Accused/Suspected of Harming a Child or Who May Pose a Risk to Children

- 16.1** If a member of staff becomes aware of any information regarding another member of staff, which identifies that a child either may have or has been at risk of significant harm (including the member of staff's own child), then they must immediately report this information to HWCCG Head of Quality and Safeguarding/Designated Nurse or in their absence the Chief Nursing Officer. If the concern is about the Chief Nursing Officer this must be reported to the Accountable Officer. The Head of Quality and Safeguarding/Designated Nurse or Chief Nursing Officer in their absence will ensure that all appropriate action is taken in accordance with the HWCCG Management of Allegations (PiPoT) policy and HSCP or WSCP Local Authority Designated Officer (LADO) Procedures.

17 Child Safeguarding Practice Reviews

- 17.1** Safeguarding children and young people serious incidents or near misses will be reported via agreed systems and processes of the HWCCG in conjunction with the HSCP and WSCP arrangements.
- 17.2** HWCCG has a statutory duty to work in partnership with the HSCP and WSCP, and any other Partnership arrangement, in conducting Child Safeguarding Practice Reviews (CSPR) in accordance with Chapter 4 of Working Together to Safeguard Children (HM Government, 2018).
- 17.3** The Designated Safeguarding Professionals will inform NHS England and the Care Quality Commission (CQC) through their reporting processes when a CSPR is commissioned.
- 17.4** Where required by the HSCP or WSCP, HWCCG will commission an Independent Management Review (IMR) with regard to GP Practice, Continuing Health Care, or any services delivered through independent contractors. This will be formally signed off for HWCCG by the Head of Quality and Safeguarding/Designated Nurse or the Chief Nursing Officer in their absence.
- 17.5** It is expected that each provider organisation will have a robust sign off process by their board level lead and that reports received will have been subject to this scrutiny process.
- 17.6** HWCCG must ensure that the review, and all actions following the review, are carried out according to the timescale set out by the HSCP or WSCP CSPR scoping and terms of reference.

18 Review and Maintenance of Policy

- 18.1** This policy will be subject to a routine 2 yearly review and will also be subject to alteration if required through the creation of additional national policy, legislation or guidance and / or local guidance. If revised, stakeholders will be alerted to the new version.

- 18.2** Implementation of the policy will be monitored through HWCCG Quality Forum Meeting.

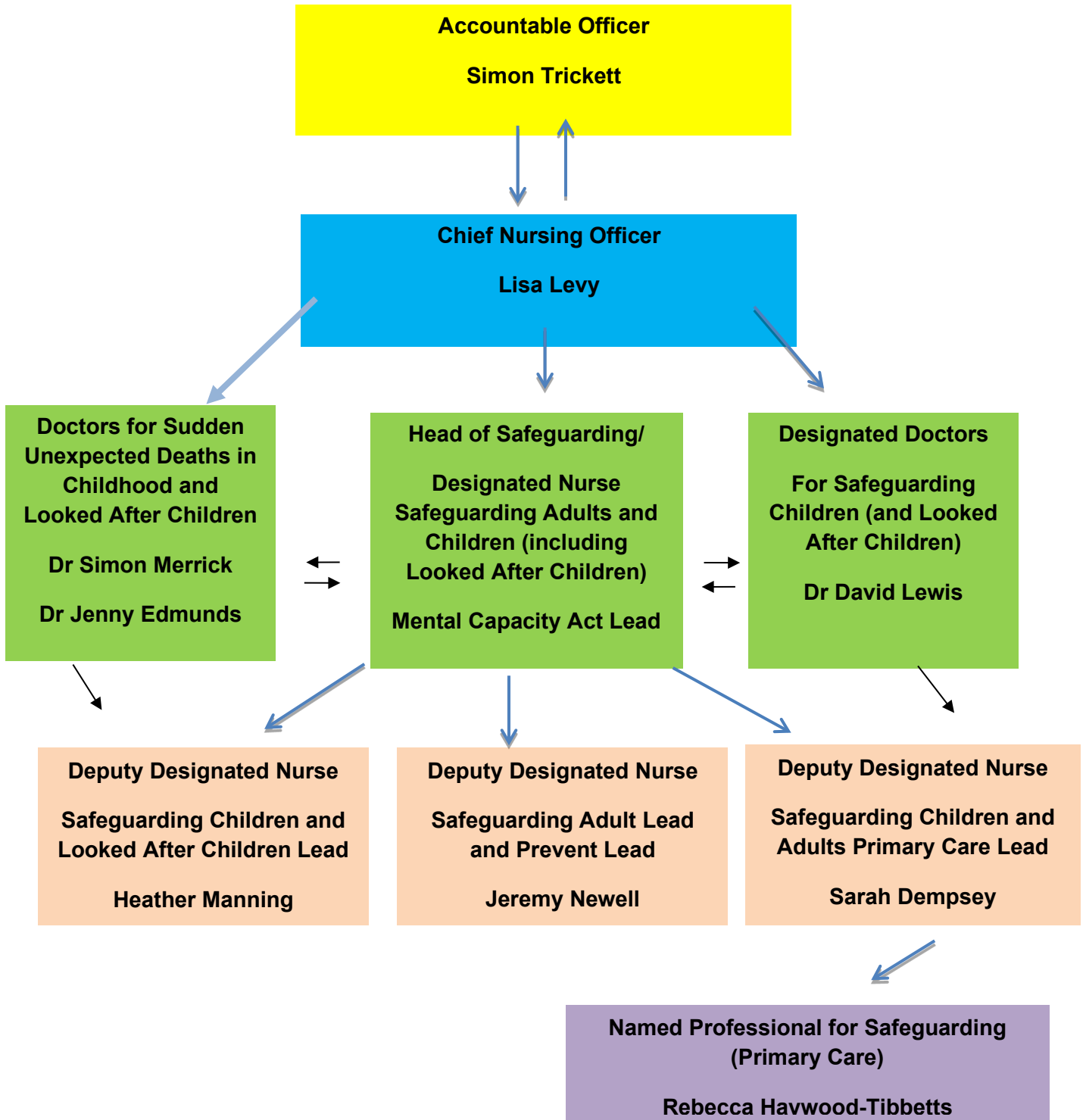
- 18.3** Equality Impact Assessment Form will be considered and updated at each 2 yearly review.

19 Equality Statement

- All public bodies have a statutory duty under the Equality Act 2010 to set out arrangements to assess and consult on how their policies and functions impact on race equality. This obligation has been increased to include equality and human rights with regard to disability, age, gender, sexual orientation, gender reassignment and religion.
- HWCCG endeavours to challenge discrimination, promote equality, respect human rights, and aims to design and implement services, policies and measures that meet the diverse needs of our service, and population, ensuring that none are placed at a disadvantage over others.
- All staff are expected to deliver services and provide care in a manner which respects the individuality of patients and their Carer's and as such treat them and members of the workforce respectfully, regardless of age, gender, race, ethnicity, religion/belief, disability and sexual orientation.
- Providers are expected to use the appropriate interpreting, translating or preferred method of communication for those who have language and/or other communication needs. CCG staff and Providers will need to assess that the policy is applied fairly and equitably for all groups covered under the Equality Act 2010 and that they are implementing the Accessible Information Standard and have considered health inequalities.
- Any change to this policy will require a conscious effort from the HWCCG to actively consider the impact that this will have on any Protected group(s) and act due diligence. Where an impact on any of the Equality groups is realised after the implementation of this policy, HWCCG and the Providers, will seek to minimise such an impact and simultaneously carry out a full review.
- HWCCG aims to design and implement policy documents that meet the diverse needs of our services, population and workforce, ensuring that none are placed at a disadvantage over others. It takes into account current UK legislative requirements, including the Equality Act 2010 and the Human Rights Act 1998, and promotes equal opportunities for all. This document has been designed to ensure that no-one receives less favourable treatment due to their personal circumstances, i.e. the protected characteristics of their age, disability, sex, gender reassignment, sexual orientation, marriage and civil partnership, race, religion or belief, pregnancy and maternity. Appropriate consideration has also been given to gender identity, socio-economic status, immigration status and the principles of the Human Rights Act.

Appendix 1 - Accountability structure for Herefordshire & Worcestershire CCG

Safeguarding Structures and Governance Arrangement for Safeguarding and Looked After Children



Appendix 2 - Ask Do Share – Record Model



Appendix 3: In the event of Child Safeguarding concerns please contact

<u>Herefordshire and Worcestershire CCG (HWCCG) –Children and Adult Safeguarding Team</u>	
Herefordshire and Worcestershire CCGs’ Safeguarding Team Generic email address:	Hw.safeguarding@nhs.net
Ellen Footman Head of Quality and Safeguarding/Designated Nurse	07885 265970 Or 01527 482920 ellen.footman@nhs.net
Heather Manning Deputy Designated Nurse (Safeguarding Children & CiC Lead)	07854 415449 Or 01432 260768 h.manning@nhs.net
Sarah Dempsey Deputy Designated Nurse (Primary Care Lead)	07834 172270 Or 01527 482920 sarah.dempsey3@nhs.net
Jeremy Newell Deputy Designated Nurse (Safeguarding Adults/Prevent Lead)	07730 029810 Or 01527 482920 jeremynewell@nhs.net
Rebecca Haywood-Tibbetts Named Professional (Primary Care)	07976 481413 Or 01432 383692 rebecca.haywood-tibbetts@nhs.net
DESIGNATED DOCTORS FOR SAFEGUARDING CHILDREN	
Herefordshire and Worcestershire	
Dr David Lewis (Designated Doctor for Safeguarding Children)	07718 118312 Office: 01905 681071 (or internal extension 51071) david.lewis5@nhs.net

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HM Government (2004) *The Children Act*

http://www.opsi.gov.uk/Acts/acts2004/ukpga_20040031_en_1

HM Government (2006) *What to do if you are worried a child is being abused*

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

HM Government (2007) *Statutory Guidance under S.11 of the Children Act* TSO London

<http://www.legislation.gov.uk/ukpga/2004/31/section/11>

RCPCH (2019) Safeguarding Children and Young People, *Roles and Competencies for Health Care Staff: Intercollegiate Document*

<https://www.rcn.org.uk/professional-development/publications/pub-007366>

Herefordshire Right Help Right Time Guidance

<http://westmidlands.procedures.org.uk/local-content/2gjN/thresholds-guidance/?b=Herefordshire>

Worcestershire Levels of Need Guidance

http://www.worcestershire.gov.uk/downloads/file/7962/levels_of_need_guidance_formerly_threshold_guidance

Further guidance can be accessed via:

Herefordshire Safeguarding Children partnership

[Herefordshire Safeguarding Children Partnership - Herefordshire Safeguarding \(herefordshiresafeguardingboards.org.uk\)](http://HerefordshireSafeguardingChildrenPartnership-HerefordshireSafeguarding(herefordshiresafeguardingboards.org.uk))

Worcestershire Safeguarding Children Partnership

[WSCP - Worcestershire Safeguarding Boards \(safeguardingworcestershire.org.uk\)](http://WSCP-WorcestershireSafeguardingBoards(safeguardingworcestershire.org.uk))