

Safeguarding & Child Protection Policy and Procedure

1. Policy Intent and Scope

1.1 PH ActiveEd are committed to building a 'culture of safety' in which the children in our care are protected from abuse, harm and radicalisation whatever their age, culture, disability, gender, language, race, religion / belief and / or sexual orientation.

1.2 Safeguarding and promoting the welfare of all of the children in our care is **ALL** staff's responsibility. Everyone who comes into contact with the children in our care and their families has a role to play. To fulfil this responsibility effectively, all staff should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

1.3 Safeguarding and promoting the welfare of children is defined in the Department of Education 'Keeping Children Safe in Education' guidance (1st September 2024) as:

- Protecting children from maltreatment; inside or outside the home, including online;
- Preventing the impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes;
- Providing help and support to meet the needs of children as soon as problems emerge;

1.4 There is a Designated Safeguarding Lead (DSL) available at all times while the clubs (Breakfast clubs, after school clubs and Summer Camps) are in session. The DSL coordinates safeguarding and child protection issues and liaises with external agencies (e.g. Social Care and Ofsted) if necessary.

1.5 The company DSL is Nick Herbert with Pete Hickerton, Peter Drew, Abbie Morrissey and Hayley Collins acting as Deputy Designated Safeguarding Leads (DDSL's) and site leaders operating as site safeguarding leads. The DSL and DDSL's have all received Level 3 Safeguarding training which is renewed every 2 years. All other team members have received Level 2 Safeguarding training which is renewed annually.

1.6 The Club will respond promptly and appropriately to all incidents or concerns regarding the safety of a child that may occur. The Club's child protection procedures comply with all relevant legislation and with guidance issued by the safeguarding partnership groups in the geographical locations that we operate in – formerly known as the Local Safeguarding Children's Boards (LSCB's).

2. Abuse, Neglect and Exploitation

2.1 *1 Abuse: is a form of maltreatment. Abuse or neglect can be caused by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Abuse may occur within a family or in an institution or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse can be inflicted by an adult or adults or by another child or children.

2.2 Emotional Abuse: This is persistent emotional maltreatment such as to cause severe and adverse effects on another's emotional development. It may involve conveying to someone 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 person opportunities to express their views;
- Deliberately silencing them or 'making fun' of what they say or how they communicate.
- Feature age or developmentally inappropriate expectations;
- May involve seeing or hearing the ill-treatment of another;
- May involve serious bullying (including cyberbullying), causing frequent feelings of fear or danger;

2.3 Neglect: is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Provide protection from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensuring access to appropriate medical care or treatment;

2.4 Physical Abuse: is a form of abuse that 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.

2.5 Sexual Abuse: involves forcing or enticing a child to take part in sexual activities. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation

for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

2.6 Signs of child abuse and neglect

Signs of possible abuse and neglect may include:

- Significant changes in a child's behaviour;
- Deterioration in a child's general well-being;
- Unexplained bruising or marks;

****1 Definitions from Department of Education 'Keeping Children Safe in Education' guidance – 1st September 2024 and Working Together to Safeguard Children, 2023)***

- Comments made by a child which give cause for concern;
- Reasons to suspect neglect or abuse outside the setting, e.g. in the child's home, or that a girl may have been subjected to (or is at risk of) female genital mutilation (FGM), or that the child may have witnessed domestic abuse;
- Inappropriate behaviour displayed by a member of staff, or any other person. For example, inappropriate sexual comments, excessive one-to-one attention beyond the requirements of their role, or inappropriate sharing of images;

2.7 If abuse is suspected or disclosed

When a child makes a disclosure to a member of staff, that member of staff will:

- Reassure the child that they were not to blame and were right to speak out;
- Listen to the child but not question them or ask leading questions;
- Give reassurance that the staff member will take action;
- Record the incident as soon as possible (see **Logging an incident** below);

2.8 If a member of staff witnesses or suspects abuse, they will record the incident straightaway on **My Concern**. If a third party expresses concern that a child is being abused, we, as an organisation, will encourage them to contact Social Care directly in the locality where the child lives or to contact the NSPCC. If they will not do so, we will explain that the Club is obliged to and the incident will be logged accordingly.

3. Specific Safeguarding Issues

3.1 Child-on-child abuse: Children can abuse other children (often referred to as child-on-child abuse), and staff need to know the importance of challenging inappropriate behaviours between children, that are abusive in nature. These can include:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence and sexual assault;

3.2 Child Sexual Exploitation (CSE): Form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual activity, in exchange for something the victim needs or wants.

3.3 Child Criminal Exploitation (CCE): Specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

3.4 Domestic Abuse: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may also see, hear, or experience the effects of abuse at home and/or suffer domestic abuse.

3.5 Female Genital Mutilation (FGM): FGM is an illegal, extremely harmful practice and a form of child abuse, and is therefore dealt with as part of our existing safeguarding procedures. All of our staff receive training in how to recognise when girls are at risk of FGM, or may have been subjected to it. **If FGM is suspected or disclosed we will follow the same procedures as set out above for responding to child abuse.**

3.6 Mental Health: Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

3.7 Extremism and radicalisation: All childcare settings have a legal duty to protect children from the risk of radicalisation and being drawn into extremism. There are many reasons why a child might be vulnerable to radicalisation, e.g.:

- Feeling alienated or alone;
- Seeking a sense of identity or individuality;
- Suffering from mental health issues such as depression;
- Desire for adventure or wanting to be part of a larger cause;
- Associating with others who hold extremist beliefs;

Signs of radicalisation

Signs that a child might be at risk of radicalisation include:

- Changes in behaviour, for example becoming withdrawn or aggressive;
- Claiming that terrorist attacks and violence are justified;
- Viewing violent extremist material online;
- Possessing or sharing violent extremist material;

If a member of staff suspects that a child is at risk of becoming radicalised, they will record any relevant information or observations on **My Concern**, and refer the matter to the DSL.

4. Logging a concern

4.1 All information about the suspected abuse, exploitation or disclosure, or concern about radicalisation, will be recorded on **My Concern** as soon as possible after the event. The record should include:

- Forename, Surname, gender and date of birth of any children involved (Victim / Preparator);
- Concern Summary;
- Concern Date and Time;
- Origin of Concern (where the concern originated from);
- Details of Concern (A factual report of what happened. If recording a disclosure, you must use the child's own words or language);
- Location of Incident (where it occurred);
- Action taken

4.2 The record will be submitted to the company DSL who will decide on the appropriate course of action. As well as keeping records of concerns, discussions and decisions, the DSL also keeps a record of the rationale for any decisions made.

4.3 For concerns about **child abuse**, the DSL will contact the local MASH (Multi Agency Safeguarding Hub) or Social Care First Response Team (Depending on local arrangements) *2.

4.4 The DSL will follow up all referrals to Social Care in writing within 48 hours. If a member of staff thinks that the incident has not been dealt with appropriately, they may escalate further themselves through contacting the MASH / Social Care First Response Team directly.

4.5 For low level concerns regarding possible **radicalisation**, the DSL will either contact the local safeguarding partnership, the Local Authority Prevent Co-ordinator or the MASH (Depending on local arrangements).

4.6 For more serious concerns the DSL will contact the Police on the non-emergency number (101), or the anti-terrorist hotline on 0800 789 321. For urgent concerns the DSL will contact the Police using 999.

5. 5. Allegations against staff

5.1 If anyone makes an allegation of child abuse against a member of staff:

- The allegation will be recorded on **My Concern**. Any witnesses to the incident should sign and date the entry to confirm it;
- The allegation must be reported to the Local Authority Designated Officer (LADO) and to Ofsted. The LADO will advise if other agencies (e.g. police) should be informed, and the Club will act upon their advice. Any telephone reports to the LADO will be followed up in writing within 48 hours;
- Following advice from the LADO, it may be necessary to suspend the member of staff pending full investigation of the allegation;
- If appropriate, the Club will make a referral to the Disclosure and Barring Service;

*2 – See Appendix 1 for local arrangement contact details

- As per the Department of Education ‘After School Clubs, Community Activities and Tuition – Safeguarding guidance for Providers (2023)’ document, PH ActiveEd has incorporated a **low-level concerns procedure** into our overarching company safeguarding and child protection policy and procedure
- The term ‘low-level’ is used to describe any concern involving an adult working in a setting that may have acted in a way that is inconsistent with the staff behaviour policy (in and out of the setting) yet is otherwise not serious enough to consider a referral to the LADO
- The term ‘low-level’ concern does not mean that it is insignificant
- Where a ‘low-level’ concern is raised about a staff member by a child, another PH ActiveEd employee or a third party, the DSL and relevant line-manager will review the concern and address as appropriate in line with company policies with the aim of upskilling and educating the employee

6. 6. Whistleblowing

6.1 All staff should feel able to raise concerns about poor or unsafe practice. General guidance on whistleblowing can be found at: <https://www.gov.uk/whistleblowing>. NSPCC guidance can also be found at: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/report-abuse-online/>

7. Staff Awareness

7.1 The Club promotes awareness and ensures compliance with ‘ALL’ of its responsibilities around safeguarding and protecting children, through its staff training and regular updates in staff meetings. The Club ensures that:

- The Designated Safeguarding Lead has relevant experience and receives appropriate training in safeguarding and the Prevent Duty, and is aware of the Channel Programme and how to access it;
- The DSL and DDSL’s receive Level 3 training every **two years**;
- **ALL staff receive update training on an annual basis and safeguarding is a permanent agenda item at all-staff meetings**
- Safe recruitment practices are followed for all new staff;
- All staff have a copy of this **Safeguarding policy**, understand its contents and are vigilant to signs of abuse, neglect or radicalisation;
- All staff are aware of their statutory duties with regard to the disclosure or discovery of child abuse, and concerns about radicalisation;
- All staff receive basic training in the Prevent Duty;
- The Club’s procedures are in line with the guidance in ‘Working Together to Safeguard Children (2020)’ and staff are familiar with ‘What To Do If You’re Worried A Child Is Being Abused (2015)’.

8. 8. Use of mobile phones and cameras

8.1 Photographs will only be taken of children with their parents’ permission. Only the company camera will be used to take photographs of children at the Club, except with the express permission of the manager. Neither staff nor children nor visitors may use their mobile phones to take photographs at the Club. For more details see our **Mobile Phone Policy**.

This policy was adopted by: PH ActiveEd	Date: 13/09/2024
To be reviewed: September 2025	Signed: 

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2021): Safeguarding and Welfare requirements: Child Protection [3.4-3.8] and Suitable People [3.9-3.13]*.

Appendix 1

Local Area Contact numbers

	LADO - Local Authority Designated Officer DOFA – Designated Officer for Allegations	MASH - Multi-Agency Safeguarding Hub
Bristol	Nicola Laird - 0117 9037795 nicola.laird@bristol.gov.uk childprotection@bristol.gov.uk	Children's Social Care, First Response 0117 9036444 Out of Hours Emergency Duty Team 01454 615165 First response referral form - bristol.gov.uk
Dorset	Bournemouth, Christchurch & Poole: John McLaughlin Tina.cooper@bcpcouncil.gov.uk 01202 453992 / LADO@bcpcouncil.gov.uk Laura Baldwin Stephanie.power@bcpcouncil.gov.uk uk Dorset Martha Sharp Martha.Sharp@dorsetcouncil.gov.uk k	Children's Advice and Duty Service (ChAD) for professionals 01305 228558/ childrensadviceduty@dorsetcouncil.gov.uk

	01305 228327 01305 221122 / LADO@dorsetcouncil.gov.uk	
Hampshire	Hampshire Barbara Piddington Barbara.piddington@hants.gov.uk 01962 876265 Fiona Armfield Fiona.armfield@hants.gov.uk 01962 832037 Mark Blackwell Mark.blackwell@hants.gov.uk 01962 847005 01962 876364 / child.protection@hants.gov.uk Southampton 023 8091 5535 / 07500 952 03 LADO@southampton.gov.uk Portsmouth (Hayley Cowmeadow) 023 9288 2500 / LADO@portsmouthcc.gov.uk	Hampshire Children Services 0300 555 1384 Inter-agency referral to Children's Services - Section 1 - Hampshire County Council (hants.gov.uk) Southampton Children's Services 023 8083 3336 / mash@southampton.gov.uk Out of Hours (5:00pm – 8:30am): 023 8023 3344 Portsmouth Children's Services 02392 688793 / pccraduty@portsmouthcc.gcsx.gov.uk Out of Hours (5:00pm – 8:30am): 0300 555 1373
North Somerset	Julie Bishop	01275 888 808 - Monday to Friday 8am - 6pm

	Julie.Bishop-HSS@n-somerset.gov.uk 01275 888211 / lado@n-somerset.gov.uk 07795 092692	01454 615 165 - Out of hours and at weekends
Somerset	Anthony Goble agoble@somerset.gov.uk somersetlado@somerset.gov.uk 01823 359029	Children's Social Care on 0300 123 2224 Email: childrens@somerset.gov.uk Emergency Duty Team (EDT) on 0300 123 23 27
Wiltshire	Anton Hammond Anton.hammond@wiltshire.gov.uk 01225 718825 Carolyn Cook Carolyn.Cook@wiltshire.gov.uk 01225 718825 dofaservice@wiltshire.gov.uk	Integrated Front Door Service (IFDS) MASH Early Support Hub (ESH) 0300 456 0108 E-mail: mash@wiltshire.gov.uk Out of Hours Emergency Duty Service (Mon-Thurs 5pm to midnight, Fri 4pm-midnight) 0300 456 0100

Other important contact numbers

Police: 101 (non-emergency) or 999 (emergency)

Prevent/Anti-terrorist hotline: 020 7340 7264 / 0800 789 321

NSPCC: 0808 800 500

Ofsted: 0300 123 1231