



Safeguarding Children/Child Protection Policy

The Designated Safeguarding Lead at ClubsComplete are Amelia Gillespie & Zoe Higgins & Nichola Daand may be contacted on our office line 01530 412750 to support any safeguarding concerns.

Each Ofsted registered setting has their own qualified DSL on site who is the designated Manager of the setting. It is their responsibility to report any safeguarding concerns to the relevant authority, including reporting to the school DSL.

At ClubsComplete, we work with children, parents, schools, external agencies and the community to ensure the welfare and safety of children and to give them the very best start in life. Children have the right to be treated with respect, be helped to thrive and to be safe from any abuse in whatever form. We support the children within our care, protect them from maltreatment and have robust procedures in place to prevent the impairment of children's health and development. In our settings we strive to protect children from the risk of radicalisation and we promote acceptance and tolerance of other beliefs and cultures (please refer to our inclusion and equality policy for further information).

All of our staff complete an online safeguarding course, prevent duty course and are trained in wider safeguarding as part of their induction, their probation review and are asked training questions on their supervision visits and annual reviews. They are also provided with all relevant contact details (below) of who to contact when and have safeguarding logs and referral forms on site. We also advise our staff to contact both a DSL at ClubsComplete and the DSL in the school they are working so that both parties can discuss the concern.

Our staff are provided with the contact telephone numbers for the following:

- Their local authority children's social care team (First Response 24 hours phone line)
- Local authority Designated Officer (LADO)
- NSPCC 0800 800 5000
- NSPCC Helpline FGM: 08000283550
- Ofsted 0300 123 1231
- Their local Safeguarding Children Board (LSCB)
- Emergency police 999
- Non-emergency police 101
- Government helpline for extremism concerns 020 7340 7264
- Child exploitation and Online protection command (CEOP)
<https://www.ceop.police.uk/safety-centre/>

Safeguarding children is everybody's responsibility. All staff, students, any supply staff and visitors are made aware of and asked to adhere to the policy. Safeguarding is a much wider

subject than the elements covered within this single policy, therefore this document should be used in conjunction with the our other policies and procedures including:

- Human Trafficking and Modern Slavery
- Prevent Duty and Radicalisation
- Whistleblowing
- Safe recruitment of staff

Safer Recruitment and Suitability of Staff

As part of our commitment to safeguarding and promoting the welfare of children, we follow strict safer recruitment procedures to ensure that all staff, volunteers, and any individuals working directly with children are suitable and safe to do so. All applicants must complete an application form providing their full employment history, explanations for any gaps, a declaration of any criminal convictions, and contact details for at least two referees, one of whom must be the most recent employer.

Shortlisted candidates are selected objectively based on the job criteria and are invited to a formal interview. Interviews include questions specifically designed to assess a candidate's understanding of safeguarding and their ability to manage situations involving children. All interviews are conducted by appropriately trained staff and documented. Before an offer of employment is made, we obtain at least two references, which are followed up and must confirm the candidate's suitability to work with children. Any concerns arising from references are explored further.

All staff and volunteers are required to undergo an **Enhanced DBS (Disclosure and Barring Service) check**, including a check against the Children's Barred List. No staff member is permitted to work unsupervised with children until all relevant checks have been completed and deemed satisfactory. We also verify the individual's right to work in the UK by checking and retaining appropriate documentation.

Relevant qualifications, such as safeguarding training, paediatric first aid, or childcare certifications, are checked and copies retained. New staff participate in a structured induction process covering our safeguarding procedures, behaviour expectations, and health and safety protocols. They are also subject to a probationary period, typically lasting between three to six months, during which their performance and conduct are closely monitored.

We are committed to the ongoing suitability and development of all staff. This includes regular supervision, performance reviews, and up-to-date safeguarding training. Staff are expected to disclose any changes in their circumstances that might affect their ability to work safely with children. Volunteers undergo a similar vetting process if they have regular or unsupervised access to children. All visitors to the setting who are not DBS-checked are supervised at all times. Through these procedures, we aim to maintain a safe, transparent, and child-focused environment.

All staff receive safeguarding training as part of their induction, which includes an overview of the setting's safeguarding policies, procedures, and code of conduct. This training is delivered in person by a designated safeguarding lead (DSL) or qualified trainer and includes practical guidance on recognising signs of abuse, how to respond to disclosures, and how to record and report concerns correctly. Staff are also required to complete refresher training annually, and additional updates are provided throughout the year to reflect any changes in legislation, policy, or local safeguarding arrangements. To support staff in putting their training into practice, regular supervision and team meetings are held, where safeguarding concerns can be discussed in a safe and supportive environment. The DSL is always available to provide advice or guidance, and safeguarding is treated as a shared responsibility within the team. Staff are encouraged to ask questions, reflect on real-life scenarios, and use learning from training in their day-to-day interactions with children.

Training to be renewed every 2 years MINIMUM and suggested annual refresher training.

Legal framework and definition of safeguarding

- Children Act 1989 and 2004 1
- Childcare Act 2006 (amended 2018)
- Safeguarding Vulnerable Groups Act 2006
- Children and Social Work Act 2017
- The Statutory Framework for the Early Years Foundation Stage (EYFS) 2021
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2023
- Data Protection Act 2018
- What to do if you're worried a child is being abused 2015
- Counter-Terrorism and Security Act 2015.
- Inspecting Safeguarding in Early years, Education and Skills settings 2019
- Prevent Duty 2015

Safeguarding and promoting the welfare of children, in relation to this policy is defined as:

- Protecting children from maltreatment
- Preventing the 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 outcomes. (Definition taken from the HM Government document 'Working together to safeguard children 2018').

Policy intention

To safeguard children and promote their welfare we will:

- Create an environment to encourage children to develop a positive self-image
- Provide positive role models and develop a safe culture where staff are confident to raise concerns about professional conduct
- Ensure all staff are able to identify the signs and indicators of abuse, including the softer signs of abuse, and know what action to take
- Support staff to notice the softer signs of abuse and know what action to take
- Encourage children to develop a sense of independence and autonomy in a way that is appropriate to their age and stage of development
- Provide a safe and secure environment for all children.
 - Ensure staff are aware of the appropriate contact boundaries.
- Promote tolerance and acceptance of different beliefs, cultures and communities
- Help children to understand how they can influence and participate in decision-making and how to promote British values through play, discussion and role modelling
- Always listen to children
- Provide an environment where practitioners are confident to identify where children and families may need intervention and seek the help they need
- Share information with other agencies as appropriate.

Our staff are aware that abuse does occur in our society and we are vigilant in identifying signs of abuse and reporting concerns. They have a duty to protect and promote the welfare of children. Staff working on the frontline with children and families are often the first people to identify a concern, observe changes in a child's behaviour or receive information relating to indicators of abuse. They may well be the first people in whom children confide information that may suggest abuse or to spot changes in a child's behaviour which may indicate abuse. Our prime responsibility is the welfare and well-being of each child in our care. As such we believe we have a duty to the children, parents and staff to act quickly and responsibly in any instance that may come to our attention. This includes sharing information with any relevant agencies such as local authority services for children's social care, health professionals or the police. All staff will work with other agencies in the best interest of the child, including as part of a multi-agency team, where needed.

Our settings aim to:

- Keep the child at the centre of all we do, providing sensitive interactions that develops and builds children's well-being, confidence and resilience. We will support children to develop an awareness of how to keep themselves safe, healthy and develop positive relationships.
- Ensure staff are trained right from induction to understand the child protection and safeguarding policy and procedures, are alert to identify possible signs of abuse (including the signs known as softer signs of abuse), understand what is meant by child protection and are aware of the different ways in which children can be harmed, including by other children through bullying or discriminatory behaviour
- Be aware of the increased vulnerability of children with Special Educational Needs and Disabilities (SEND) and other vulnerable or isolated families and children
- Ensure staff understand how to recognise early indicators of potential radicalisation and terrorism threats and act on them appropriately in line with national and local procedures
- Ensure that all staff feel confident and supported to act in the best interest of the child, share information and seek the help that the child may need

- Ensure that all staff are familiar and updated regularly with child protection training and procedures and kept informed of changes to local/national procedures, including thorough annual safeguarding newsletters and updates
- Make any child protection referrals in a timely way, sharing relevant information as necessary in line with procedures set out by the North West Leicestershire Safeguarding Children Board
- Make any referrals relating to extremism to the police (or the Government helpline) in a timely way, sharing relevant information as appropriate
- Ensure that information is shared only with those people who need to know in order to protect the child and act in their best interest
- Ensure that children are never placed at risk while in the care of our staff.
- Identify changes in staff behaviour and act on these as per the Staff Behaviour Policy.
- Take any appropriate action relating to allegations of serious harm or abuse against any person working with children or living or working on the club premises including reporting such allegations to Ofsted and other relevant authorities including the local authority.
- Ensure parents are fully aware of our safeguarding and child protection policies and procedures when they register their child to any of our settings and are kept informed of all updates when they occur.
- Regularly review and update this policy with staff and parents where appropriate and make sure it complies with any legal requirements and any guidance or procedures issued to activity providers.

We will support children by offering reassurance, comfort and sensitive interactions. We will devise activities according to individual circumstances to enable children to develop confidence and self-esteem within their peer group and support them to learn how to keep themselves safe.

Types of abuse and particular procedures followed

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by harming them or by failing to act to prevent harm. Children may be abused within a family, institution or community setting by those known to them or a stranger. This could be an adult or adults, another child or children.

What to do if you're worried a child is being abused (advice for practitioners) 2015 and Working Together to Safeguard Children (2018).

Children can be at risk of harm, abuse, or neglect due to a range of factors and situations. These may include exposure to domestic violence, parental substance misuse, mental health issues within the family, or living in poverty or unstable housing. Situations where children experience isolation, a lack of supervision, or inconsistent care can also increase vulnerability. Harm may occur through deliberate actions such as physical, emotional, or sexual abuse, or through failure to act, as seen in cases of neglect. Warning signs may include unexplained injuries, changes in behaviour, poor hygiene, or withdrawn or anxious behaviour. Abuse or neglect can also happen within trusted environments, including schools, clubs, or family homes, and may be carried out by adults or other children. It's vital that all staff remain alert to these risks and respond appropriately to any signs or disclosures,

following the correct safeguarding procedures to ensure children are protected from further harm.

The signs and indicators listed below may not necessarily indicate that a child has been abused, but will help us to recognise that something may be wrong, especially if a child shows a number of these symptoms or any of them to a marked degree. Indicators of child abuse:

- Failure to thrive and meet developmental milestones
- Fearful or withdrawn tendencies
- Unexplained injuries to a child or conflicting reports from parents or staff
- Repeated injuries
- Unaddressed illnesses or injuries
- Significant changes to behaviour patterns.

Softer signs of abuse as defined by National Institute for Health and Care Excellence (NICE) include:

Emotional states:

- Fearful
- Withdrawn
- Low self-esteem.

Behaviour:

- Aggressive
- Oppositional habitual body rocking.

Interpersonal behaviours:

- Indiscriminate contact or affection seeking
- Over-friendliness to strangers including healthcare professionals
- Excessive clinginess, persistently resorting to gaining attention
- Demonstrating excessively 'good' behaviour to prevent parental or carer disapproval
- Failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed
- Coercive controlling behaviour towards parents or carers
- Lack of ability to understand and recognise emotions
- Very young children showing excessive comforting behaviours when witnessing parental or carer distress.

Peer-on-peer abuse

We are aware that peer-on-peer abuse does take place, so we include children in our policies when we talk about potential abusers. This may take the form of bullying, physically hurting another child, emotional abuse or sexual abuse. We will report this in the same way we do for adults abusing children, and will take advice from the appropriate bodies on this area; to support both the victim and the perpetrator, as they could also be a victim of abuse. We know that children who develop harmful sexual behaviour have often experienced abuse and neglect themselves.

Physical abuse

A form of abuse which may involve hitting, No 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. All children can suffer injuries during their childhood as they explore and develop. If an explanation of how a child received their injury doesn't match the injury itself or if a child's injuries are a regular occurrence or there is a pattern to their injuries, then we will report our concerns.

Fabricated illness

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. The parent or carer may seek out unnecessary medical treatment or investigation; they may exaggerate a real illness and symptoms or deliberately induce an illness through poisoning with medication or other substances or they may interfere with medical treatments. Fabricated illness is a form of physical abuse and any concerns will be reported, in line with our safeguarding procedures.

Female genital mutilation (FGM)

FGM can also be known as Female Genital Cutting. FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death (definition taken from the Multi-agency Statutory Guidance on Female Genital Mutilation). The procedure may be carried out shortly after birth and during childhood as well as adolescence, just before marriage or during a woman's first pregnancy and varies widely according to the community. FGM is child abuse and is illegal in the UK. It can be extremely dangerous and can cause:

- Severe pain
- Shock
- Bleeding
- Infection such as tetanus, HIV and hepatitis B and C
- Organ damage
- Blood loss and infections
- Death in some cases

Any concerns about a child or family, will be reported to the children's social care team in the same way as other types of physical abuse. We have a mandatory duty to report to police any case where an act of female genital mutilation appears to have been carried out on a girl under the age of 18.

Breast ironing/flattening

Breast ironing also known as "breast flattening" is the process where young girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear, or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction

and early forced marriage. Breast Ironing/Flattening is a form of physical abuse and can cause serious health issues such as:

- Abscesses
- Cysts
- Itching
- Tissue damage
- Infection
- Discharge of milk
- Dissymmetry of the breasts
- Severe fever.

Any concerns about a child or family, will be reported to the children's social care team in the same way as other types of physical abuse.

Sexual abuse

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, whether or not the child is 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. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Adult males do not solely perpetrate sexual abuse; women can also commit acts of sexual abuse, as can other children. Action must be taken if a staff member witnesses an occasion(s) where a child indicates sexual activity through words, play, drawing, has an excessive preoccupation with sexual matters; or has an inappropriate knowledge of adult sexual behaviour, or language, for their developmental age. This may include acting out sexual activity on dolls/toys or in the role-play area with their peers; drawing pictures that are inappropriate for a child, talking about sexual activities or using sexual language or words. If a child is being sexually abused staff may observe both emotional and physical symptoms.

Emotional signs:

- Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- Personality changes such as becoming insecure or clingy
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a carer
- Becoming worried about clothing being removed
- Suddenly drawing sexually explicit pictures or acting out actions inappropriate for their age
- Using sexually explicit language

Physical Signs:

- Bruises
- Bleeding, discharge, pains or soreness in their genital or anal area
- Sexually transmitted infections
- Pregnancy

To safeguard children from abuse, harm, and neglect, staff must always work in a child-centred, vigilant, and proactive manner. This means creating a safe, supportive environment where children feel respected, listened to, and valued. All staff should build positive, trusting relationships with children while maintaining professional boundaries at all times. It is essential to recognise signs of abuse or neglect and how to respond appropriately to concerns or disclosures. Staff must report any safeguarding concerns immediately to the Designated Safeguarding Lead (DSL) and never assume someone else will act. Good record-keeping is also vital—accurate, timely documentation helps build a clear picture of any issues. Regular supervision, training, and team discussions support staff in staying alert and confident in their role. By working collaboratively, sharing concerns, and promoting a culture of openness and accountability, staff help to create a setting where children are protected and their welfare is always a priority.

Any concerns about a child or family will be reported to the children's social care team.

Child sexual exploitation (CSE)

Keeping Children Safe in Education (2020) describes CSE as: CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

Signs and indicators may include:

- Physical injuries such as bruising or bleeding
- Having money or gifts they are unable to explain
- Sudden changes in their appearance
- Becoming involved in drugs or alcohol, particularly if you suspect they are being supplied by older men or women
- Becoming emotionally volatile (mood swings are common in all young people, but more severe changes could indicate that something is wrong)
- Using sexual language that you wouldn't expect them to know
- Engaging less with their usual friends
- Appearing controlled by their phone
- Switching to a new screen when you come near the computer

- Nightmares or sleeping problems
- Running away, staying out overnight, missing school
- Changes in eating habits
- Talk of a new, older friend, boyfriend or girlfriend
- Losing contact with family and friends or becoming secretive
- Contracting sexually transmitted diseases.

Child Criminal Exploitation (CCE) CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child 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. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or do not take part in education.

If staff have any concerns regarding CSE or CCE, they will be reported in the usual way. Emotional abuse Working Together to Safeguard Children (2018) defines emotional abuse as 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 a child that they are worthless or unloved, inadequate, or valued only if 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. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Signs and indicators may include:

- Physical, mental and emotional development lags
- Sudden speech disorders
- Overreaction to mistakes
- Extreme fear of any new situation
- Neurotic behaviour (rocking, hair twisting, self-mutilation)
- Extremes of passivity or aggression
- Appear unconfident or lack self-assurance.

Action will be taken if the staff member has reason to believe that there is a severe, adverse effect on the behaviour and emotional development of a child, caused by persistent or severe ill treatment or rejection. Children may also experience emotional abuse through witnessing domestic abuse and alcohol and drug misuse by adults caring for them.

Neglect

Working Together to Safeguard Children (2018) defines neglect as 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: a. Provide adequate food, clothing and shelter (including exclusion from home or abandonment) b. Protect a child from physical and emotional harm or danger c. Ensure adequate supervision (including the use of inadequate caregivers) d. Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Signs may include a child persistently arriving at club unwashed or unkempt, wearing clothes that are too small (especially shoes that may restrict the child's growth or hurt them), or a child having an illness or identified special educational need or disability that is not being addressed by the parent. A child may also be persistently hungry if a parent is withholding food or not providing enough for a child's needs. Neglect may also be shown through emotional signs, e.g. a child may not be receiving the attention they need at home and may crave love and support at club. Action will be taken if the staff member has reason to believe that there has been any type of neglect of a child.

County Lines

The National Crime Agency (NCA) describe county lines as a term used to describe gangs and organised criminal networks involved in exporting illegal drugs from big cities into smaller towns, using dedicated mobile phone lines or other form of 'deal line.' Customers will live in a different area to where the dealers and networks are based, so drug runners are needed to transport the drugs and collect payment. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Signs and indicators to be aware of include:

- Changes in the way young people you might know dress
- Unexplained, sometimes unaffordable new things (e.g. clothes, jewellery, cars etc.)
- Missing from home or schools and/or significant decline in performance
- New friends or relationships with those who don't share any mutual friendships with the victim or anyone else
- May be carrying a weapon
- Receiving more texts or calls than usual
- Sudden influx of cash, clothes or mobile phones
- Unexplained injuries
- Significant changes in emotional well-being
- Young people seen in different cars/taxis driven by unknown adults

- Young people seeming unfamiliar with your community or where they are
- Truancy, exclusion, disengagement from school
- An increase in anti-social behaviour in the community
- Unexplained injuries
- Gang association or isolation from peers or social networks.

Cuckooing

Cuckooing is a form of county lines crime in which drug dealers take over the home of a vulnerable person in order to criminally exploit them as a base for drug dealing, often in multi-occupancy or social housing properties. Signs that this is happening in a family property may be an increase in people entering or leaving the property, an increase in cars or bikes outside the home; windows covered or curtains closed for long periods, family not being seen for extended periods; signs of drug use or an increase in anti-social behaviour at the home. If we recognise any of these signs, we will report our concerns as per our reporting process. If staff have any concerns regarding county lines/cuckooing they will be reported in the usual way.

Contextual safeguarding

As young people grow and develop they may be vulnerable to abuse or exploitation from outside their family. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. As part of our safeguarding procedures we will work in partnership with parents/carers and other agencies to work together to safeguard children and provide the support around contextual safeguarding concerns.

Domestic Abuse / Honour Based Abuse / Forced Marriages

We look at these areas as a child protection concern. Please refer to the separate policy for further details on this.

Extremism – the Prevent Duty

Under the Counter-Terrorism and Security Act 2015 we have a duty to safeguard at risk or vulnerable children under the Counter-Terrorism and Security Act 2015 to have “due regard to the need to prevent people from being drawn into terrorism and refer any concerns of extremism to the police (In Prevent priority areas the local authority will have a Prevent lead who can also provide support). Children can be exposed to different views and receive information from various sources. Some of these views may be considered radical or extreme. Radicalisation is the way a person comes to support or be involved in extremism and terrorism. It's a gradual process so young people who are affected may not realise what's happening. Radicalisation is a form of harm. The process may involve:

- Being groomed online or in person
- Exploitation, including sexual exploitation
- Psychological manipulation
- Exposure to violent material and other inappropriate information
- The risk of physical harm or death through extremist acts

We have a Prevent Duty and Radicalisation policy in place. Please refer to this for specific details.

Online Safety

We take the safety of our children very seriously and this includes their online safety. Please refer to the Online Safety policy for further details. Human Trafficking and Slavery Please refer to our Human Trafficking and Slavery policy for detail on how we keep children safe in this area.

Adult sexual exploitation

As part of our safeguarding procedures we will also ensure that staff and students are safeguarded from sexual exploitation.

Up skirting

Up skirting involves taking a picture of someone's genitals or buttocks under their clothing without them knowing, either for sexual gratification or in order to humiliate, or distress, the individual. This is a criminal offence and any such action would be reported following our reporting procedures.

Child abuse linked to faith or belief (CALFB)

Child abuse linked to faith or belief (CALFB) can happen in families when there is a concept of belief in:

- Witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)
- The evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)
- Ritual or multi murders where the killing of children is believed to bring supernatural benefits, or the use of their body parts is believed to produce potent magical remedies
- Use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune.

Reporting Procedures

All staff have a responsibility to report safeguarding/ child protection concerns and suspicions of abuse. These concerns will be discussed with the designated safeguarding coordinator (DCSO) as soon as possible.

- Staff will report their concerns to the DCSO (in the absence of the DCSO they will be reported to the Deputy DCSO)
- Any signs of marks/injuries to a child or information a child has given will be recorded and stored securely. Any child arriving into the club with marks should be recorded, or as soon as the marks are discovered they should be recorded.

- For children who arrive at club with an existing injury, a form will be completed along with the parent's/ carers explanation as to how the injury happened. Staff will have professional curiosity around any explanations given, any concerns around existing injuries will be reported.
- If appropriate, the incident will be discussed with the parent/carer, such discussions will be recorded and the parent will have access to these records on request
- If there are queries/concerns regarding the injury/information given then the following procedures will take place:

The designated safeguarding lead will:

- Contact the local authority children's social care team to report concerns and seek advice (if it is believed a child is in immediate danger we will contact the police. If the safeguarding concern relates to an allegation against an adult working or volunteering with children then the DSL will follow the reporting allegations procedure (see below).
- Record the information and action taken relating to the concern raised
- Liaise with the school on these matters where appropriate. This applies regardless to whether or not the children who attend any of these services or activities are the children in the school roll.
- Speak to the parents (unless advised not to do so by LA children's social care team)
- The designated safeguarding lead will follow up action taken by the LA social children's care team if they have not contacted the setting within the timeframe set out in Working Together to Safeguarding Children (2018).

We will never assume that action has been taken. Keeping children safe is our highest priority and if, for whatever reason, staff do not feel able to report concerns to the DCSO or deputy DCSO they should call the Local Authority Children's social care team or the NSPCC and report their concerns anonymously.

Responding to a spontaneous disclosure from a child

If a child starts to talk openly to a member of staff about abuse they may be experiencing then the staff will:

- Give full attention to the child or young person
- Keep body language open and encouraging
- Be compassionate, be understanding and reassure them their feelings are important using phrases such as 'you've shown such courage today'
- Take time and slow down: show respect, pauses and will not interrupt the child – let them go at their own pace
- Recognise and respond to their body language
- Show understanding and reflect back
- Make it clear you are interested in what the child is telling you
- Reflect back what they have said to check your understanding – and use their language to show it's their experience
- Reassure the child that they have done the right thing in telling you. Make sure they know that abuse is never their fault

- Never talk to the alleged perpetrator about the child's disclosure. This could make things a lot worse for the child. (Information taken from NSPCC) Any disclosure will be reported to the DSL and will be referred to the local authority children's social care team immediately, following our reporting procedures.

Recording Suspicions of Abuse and Disclosures

Staff should make an objective record of any observation or disclosure, supported by the Setting or Staff Manager at ClubsComplete or a named Designated Safeguarding Lead (DSL).

This record should include:

- Child's name
- Child's address
- Age of the child and date of birth
- Date and time of the observation or the disclosure
- Exact words spoken by the child
- Exact position and type of any injuries or marks seen
- Exact observation of any incident including any concern was reported, with date and time; and the names of any other person present at the time
- Any discussion held with the parent(s) (where deemed appropriate).

These records should be signed by the person reporting this and the manager, dated and kept in a separate confidential file. If a child starts to talk to an adult about potential abuse it is important not to promise the child complete confidentiality. This promise cannot be kept. It is vital that the child is allowed to talk openly and disclosure is not forced or words put into the child's mouth. As soon as possible after the disclosure details must be logged accurately. It is not the ClubsComplete's role to investigate, it is the role of statutory services to complete this. Staff involved may be asked to supply details of any information/concerns they have with regard to a child. ClubsComplete expects all members of staff to cooperate with the local authority children's social care, police, and Ofsted in any way necessary to ensure the safety of the children. Staff must not make any comments either publicly or in private about the supposed or actual behaviour of a parent or member of staff.

Informing parents

Parents are normally the first point of contact. If a suspicion of abuse is recorded, parents are informed at the same time as the report is made, except where the guidance of the Local authority children's social care team/police does not allow this. This will usually be the case where the parent or family member is the likely abuser or where a child may be endangered by this disclosure. In these cases the investigating officers will inform parents.

Confidentiality

All suspicions, enquiries and external investigations are kept confidential and shared only with those who need to know. Any information is shared in line with guidance from the Local Authority. All staff, students and volunteers are bound by confidentiality and any information will not be discussed out of work, or this will become a disciplinary matter. ClubsComplete has due regard to the data protection principles as in the Data Protection Act 2018 and

General Data Protection Regulations (GDPR)[1]. These do not prohibit the collection and sharing of personal information, even without consent if this would put the child at further risk. We will follow the principles around data collection and information sharing, and ensure any information is recorded and shared in an appropriate way.

Support to families

The company takes every step in its power to build up trusting and supportive relations among families, staff, students and volunteers within the organisation. ClubsComplete continues to welcome the child and the family whilst enquiries are being made in relation to abuse in the home situation. Parents and families will be treated with respect in a non-judgmental manner whilst any external investigations are carried out in the best interest of the child.

Record Keeping

Confidential records kept on a child are shared with the child's parents or those who have parental responsibility for the child, only if appropriate and in line with guidance of the local authority with the proviso that the care and safety of the child is paramount. We will do all in our power to support and work with the child's family. ClubsComplete keeps appropriate records to support the early identification of children and families that would benefit from support. Factual records are maintained in a chronological order with parental discussions. Records are reviewed regularly by the DSL to look holistically at identifying children's needs.

Allegations against adults working or volunteering with children

Allegations If an allegation is made against a member of staff, student or volunteer or any other person who lives or works on the club premises regardless of whether the allegation relates to the club premises or elsewhere, we will follow the procedure below. An allegation against a member of staff/student/volunteer/supply staff or any other person may relate to a person who has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The allegation should be reported to the senior manager on duty. If this person is the subject of the allegation then this should be reported to the owner/registered person/DSL/deputy manager instead. At ClubsComplete each setting we will follow our own local safeguarding partnership website information about how to report an allegation and we would also inform Ofsted immediately in order for this to be investigated by the appropriate bodies promptly. This includes:

- If as an individual you feel this will not be taken seriously or are worried about the allegation getting back to the person in question then it is your duty to inform the local authority children's social care team yourself directly

- The local authority children's social care team will be informed immediately for advice and guidance
- A full investigation will be carried out by the appropriate professionals (local authority children's social care team , Ofsted) to determine how this will be handled
- The company will follow all instructions from the local authority children's social care team and Ofsted and ask all staff members to do the same and co-operate where required
- Support will be provided to all those involved in an allegation throughout the external investigation in line with local authority children's social care team support and advice
- The company reserves the right to suspend any member of staff during an investigation, Legal advice will be sought to ensure compliance with the law.
- All enquiries/external investigations/interviews will be documented and kept in a locked file for access by the relevant authorities
- Founded allegations will be passed on to the relevant organisations including the local authority children's social care team and where an offence is believed to have been committed, the police will also be informed.
- Founded allegations will be dealt with as gross misconduct in accordance with our disciplinary procedures and may result in the termination of employment, Ofsted will be notified immediately of this decision along with notifying the Disclosure and Barring Service (DBS) to ensure their records are updated.
- All safeguarding records will be kept until the person reaches normal retirement age or for 21 years and 3 months if that is longer. This will ensure accurate information is available for references and future DBS checks and avoids any unnecessary reinvestigation
- ClubsComplete retains the right to dismiss any member of staff in connection with founded allegations following an inquiry
- Unfounded allegations will result in all rights being reinstated
- A return to work plan will be put in place for any member of staff returning to work after an allegation has been deemed unfounded. Individual support will be offered to meet the needs of the individual staff member and the nature of the incident; this may include more frequent supervisions, coaching and mentoring and external support.

Procedure for dealing with the allegation

The procedures to be followed, including when the alleged abuser is a volunteer or student, are as follows: Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. If the time and place is inappropriate, arrange a suitable time and place as soon as possible. If you can, write brief notes of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said); keep your original notes, however rough. Never make a promise that you will keep what is said confidential or secret. If you are told about abuse you have a responsibility to report it so that action can be taken. Give reassurance that only those who need to know will be told. Do not ask leading questions that might give your own ideas of what might have happened (e.g. "Did he do X to you?" -just ask, "What do you want to tell me?" or "Is there anything else that you want to say?" Immediately tell the Designated Safeguarding Representative – A member of staff must make a detailed written note of allegations of abuse, and pass this directly to the Designated Person as quickly as possible and certainly within twenty-four hours, since any reports to the LADO will be required by then. The Designated Person will consult with other colleagues as appropriate and a course of action will be decided upon. If an allegation is made against the Designated Safeguarding

Representative, or a member of the Management Team then the Proprietor must be informed immediately. If an allegation is made against the Proprietor, the Operations Manager must be informed immediately. Discuss with the Designated Safeguarding Representative whether any steps need to be taken to protect the person who has told you about the abuse. Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc. Social services and police staff are the people trained to do this. You could cause more damage and spoil possible criminal proceedings. If the complaint is considered to be sufficiently serious, i.e. the allegation is that a member of staff or volunteer has:

- (a) behaved in a way that has harmed a child, or may have harmed a child;
- (b) possibly committed a criminal offence against or related to a child; or
- (c) behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they worked regularly or closely with children.(e.g. sexual or physical abuse, criminal acts or gross misconduct) then the Designated Safeguarding Representative must refer the matter to LADO as soon as possible (and certainly within 24 hours) and their guidance is followed next.

Suspension of the staff member in question should not be a default response to an allegation; it should be used only if there is no reasonable alternative. Suspension may be appropriate where:

- A child or children are at risk
- Allegations are so serious that dismissal for gross misconduct is considered
- Suspension will allow the investigation to proceed unimpeded

Allegations found to be malicious should be removed from personnel records. Records of all others must be kept but any that are not substantiated, are unfounded or malicious should not be referred to in employer references.

Looked after children

As part of our safeguarding practice we will ensure our staff are aware of how to keep looked after children safe.

In order to do this we ask that we are informed of:

- The legal status of the child (e.g. whether the child is being looked after under voluntary arrangements with consent of parents or on an interim or full care order)
- Contact arrangements for the biological parents (or those with parental responsibility)
- The child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her
- The details of the child's social worker and any other support agencies involved
- Any child protection plan or care plan in place for the child in question.

Staffing and volunteering

Our policy is to provide a secure and safe environment for all children. We follow safer recruitment practices including obtaining references and all staff employed to work with children will have enhanced criminal record checks from the Disclosure and Barring Service (DBS) before being able to carry out intimate care routines or have unsupervised contact with children. We will obtain enhanced criminal records checks (DBS) for all volunteers and

do not allow any volunteers to be unsupervised access to children. All staff will attend child protection training and receive initial basic child protection training during their induction period. This will include the procedures for spotting signs and behaviours of abuse and abusers/potential abusers, recording and reporting concerns and creating a safe and secure environment for the children in the club. During induction staff will be given contact details for the LADO (local authority designated officer), the local authority children's services team, the Local Safeguarding Children Board (LSCB) and Ofsted to enable them to report any safeguarding concerns, independently, if they feel it necessary to do so.

Ongoing suitability of staff is monitored through:

- Regular 1:1's
- Peer observations
- Monthly declaration form
- Safeguarding competencies
- Regular review of everyone's DBS using the online update service

Designated Safeguarding Lead

We have named persons within the organisation who take lead responsibility for safeguarding and co-ordinate child protection and welfare issues, known as the Designated Safeguarding Lead (DSL), there is always at least one designated person on duty during all opening hours of any setting. These designated persons will receive comprehensive training at least every two years and update their knowledge on an ongoing basis, but at least once a year.

The role of the Designated Safeguarding Lead:

- Ensure that the organisations safeguarding policy and procedures are reviewed and developed in line with current guidance; and develop staff understanding of the settings safeguarding policies
- Take the lead on responding to information from the staff team relating to child protection concerns
- Provide advice, support and guidance on an on-going basis to staff, students and volunteers.
- To identify children who may need early help or who are at risk of abuse
- To help staff to ensure the right support is provided to families
- To liaise with the local authority and other agencies with regard to child protection concerns
- To ensure policies are in line with the local safeguarding procedures and details
- Disseminate updates to legislation to ensure all staff are kept up to date with safeguarding practices

Last reviewed: September 2025

Next reviewed : September 2026