

Safeguarding Policy

‘Safeguarding is Everyone’s Business’

PLL Group is committed to building a ‘culture of safety’ in which the children in our care are protected from abuse, harm and radicalisation.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be actively listened to with a timely response.

PLL will respond promptly and appropriately to all incidents or concerns regarding the safety of a child that may occur. PLL’s child protection procedures comply with all relevant legislation and with guidance.

The Designated Safeguarding Lead (DSL) or deputy DSL is always available while PLL is in session. The DSL coordinates child protection issues and liaises with external agencies (e.g., Social Care and Ofsted).

PLL’s designated DSL is **Charlie Adams**. The deputy DSL is **Robbie Trimm.**

Our Team

- When new staff join, they will be informed of the safeguarding arrangements in place.
- They will be given a copy of the safeguarding policy along with the staff code of conduct.
- They will take part in a bespoke induction training delivered by members of the safeguarding team, told who our Designated Safeguarding Lead (DSL) and Deputy DSLs are.
- This will include details of how to record and report safeguarding concerns via the **‘Logging a concern**’ form.

Child abuse and neglect

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. An individual may abuse or neglect a child directly, or by failing to protect them from harm. Some forms of child abuse and neglect are listed below.

- **Physical abuse** can involve hitting, shaking, throwing, poisoning, burning, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may be also caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child.
- **Emotional abuse** is the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve making the child feel that they are worthless, unloved, or inadequate. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
- **Neglect** is the persistent failure to meet a child's basic physical and emotional needs. It can involve a failure to provide adequate food, clothing and shelter, to protect a child from physical and emotional harm, to ensure adequate supervision or to allow access to medical treatment.
- **Sexual abuse** involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This can involve physical contact, or non-contact activities such as showing children sexual activities or encouraging them to behave in sexually inappropriate ways.

Signs of child abuse and neglect may include:

- significant changes in a child's behaviour
- deterioration in a child's general well-being
- unexplained bruising or marks
- comments made by a child that give cause for concern
- reasons to suspect neglect or abuse outside the setting, eg in the child's home, or that a girl may have been subjected to (or is at risk of) female genital mutilation, 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.

If abuse is suspected or disclosed 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
- give reassurance that the staff member will take action
- record the incident as soon as possible (see *Logging an incident* below).

If a member of staff witnesses or suspects abuse, they will record the matter straightaway using the **Logging a concern** form. If a third party expresses concern that a child is being abused, we will encourage them to contact C-SPA directly. If they do not do so, we will explain that PLL is obliged to and the incident will be logged accordingly.

Logging a concern

All information about suspected abuse, disclosure, or concern will be recorded on the **Logging a Concern form** as soon as possible after the event. The record should include:

- date of the disclosure, or the incident, or the observation causing concern
- date and time at which the record was made
- name and date of birth of the child involved
- a factual report of what happened. If recording a disclosure, you must use the child's own words
- name, signature and job title of the person making the record.

The record will be given to PLL's DSL who will decide on the appropriate course of action.

For concerns about **child abuse,** the DSL will contact the children's services single point of access (C-SPA) and Ofsted. The DSL will follow up on all referrals to C-SPA and Ofsted, in writing, within 48 hours. If a member of staff believes that the incident has not been handled properly, they may contact C-SPA directly.

For minor concerns regarding **radicalisation,** the DSL will contact The Relevant Local Authority Prevent Co-ordinator. 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.

Peer-on-peer abuse

Children are vulnerable to abuse by their peers. Peer-on-peer abuse is taken seriously by staff and will be subject to the same child protection procedures as other forms of abuse. Staff are aware of the potential uses of information technology for bullying and abusive behaviour between young people.

Staff will not dismiss abusive behaviour as normal between young people. The presence of one or more of the following in relationships between children should always trigger concern about the possibility of peer-on-peer abuse:

- Sexual activity (in primary school-aged children) of any kind, including sexting
- One of the children is significantly more dominant than the other (eg much older)
- One of the children is significantly more vulnerable than the other (eg in terms of disability, confidence, physical strength)
- There has been some use of threats, bribes or coercion to ensure compliance or secrecy.

If peer-on-peer abuse is suspected or disclosed

We will follow the same procedures as set out above for responding to child abuse.

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, eg:

- 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 a **Logging a concern** form, and refer the matter to the CPO.

Female Genital Mutilation (FGM)

FGM is a form of **child abuse and violence against women and girls**. It is illegal in the UK and a recognised form of significant harm. PLL Group is committed to preventing FGM and protecting any child at risk.

FGM involves the **partial or total removal of external female genitalia** or other injury to the female genital organs for non-medical reasons. It is typically carried out on girls between infancy and age 15, often during school holidays to allow for recovery.

FGM has **no health benefits** and causes severe pain, physical harm, emotional trauma, and long-term complications.

- FGM is illegal under the **Female Genital Mutilation Act 2003** (and the **Serious Crime Act 2015**).
- It is a criminal offence to:
    - Perform FGM
    - Assist or encourage FGM.
    - Take a child abroad to be subjected to FGM.
- There is a **mandatory reporting duty** in England and Wales to report known cases of FGM in under 18s directly to the police.

Signs a Child May Be at Risk of FGM

- A family belonging to a community where FGM is practiced.
- A girl talking about an upcoming "special ceremony," holiday, or "becoming a woman."
- Withdrawal from lessons or school just before a planned trip abroad.
- Mother or siblings having undergone FGM.
- Sudden decline in academic performance or attendance.

Signs a Child May Have Undergone FGM

- Difficulty walking, sitting, or standing.
- Spending longer than usual in the bathroom or toilet.
- Frequent urinary tract infections or menstrual problems.
- Reluctance to undergo medical examinations.
- Disclosure of pain or distress, particularly when using the toilet.

Responding to FGM Concerns

- Concerns about potential or actual FGM must be reported **immediately** to the **Designated Safeguarding Lead (DSL)**.

- If a staff member **suspects** that a child may be at risk, a referral should be made to Children's Social Care in accordance with safeguarding procedures.
- If a staff member **discovers (either through disclosure or visual evidence)** that an act of FGM has been carried out on a girl under 18, they must report it directly to the **police by calling 101**, as well as informing the DSL.

County Lines:

PLL Group are alert to a form of criminal exploitation where gangs and organised criminal networks exploit children and vulnerable adults to move drugs and money across the country using dedicated mobile phone lines.

Common Indicators of County Lines Involvement and Exploitation:

- Unexplained Gifts or Money
- Regularly going missing from home or school, particularly overnight or for days at a time.
- Use of Multiple Phones or SIM Cards
- Regular trips to coastal, rural, or market towns with no obvious reason.
- Association with older adults who may be gang-affiliated or exerting control.
- Unexplained injuries, appearing frightened or withdrawn.
- Sudden changes in school attendance or performance.
- Carrying knives or being found with drugs.
- Displaying volatile behavior, increased stress, paranoia, or fear.

Allegations against staff

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

- The allegation will be recorded on an **Incident record** form. 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 PLL 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, PLL will make a referral to the Disclosure and Barring Service.
- The DSL will notify Ofsted of the allegation and will also update them of the outcome of the investigation.

Promoting awareness among staff

PLL promotes awareness of child abuse and the risk of radicalisation through its staff training. PLL ensures that:

- The DSL 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
- DSL training is refreshed every two years.
- 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 comprehensive safeguarding training
- Safeguarding is discussed during all staff meetings
- All staff complete training in the Prevent Duty
- PLL's procedures are in line with the guidance in 'Working Together to Safeguard Children (2026)' - GOV.UK — Working Together to Safeguard Children 2026 and staff are familiar with 'What To Do If You're Worried A Child Is Being Abused (2015)'.

Electronic devices

We have clear procedures for the use of mobile phones, cameras and electronic devices:

- **Staff Use:** Staff are not permitted to use personal mobile phones or devices for taking photographs or recording children. Personal phones must be stored securely during session times and may only be accessed during breaks or in designated staff areas.
- **Club cameras/Devices:** Only setting-owned cameras or tablets may be used to capture photographs or videos of children, and solely for educational, observational or promotional purposes agreed by parents/carers. Images are stored securely and in line with data protection requirements.
- **Smart watches:** Smart watches that have a camera, recording, or internet capabilities are treated in the same way as mobile phones. Children are not permitted to use them during sessions. If worn, they must be set in silent mode and cannot be used for calls, messaging, photography, or internet access while at PLL. Staff are not permitted to wear smartwatches with camera or messaging capabilities while working directly with children, unless notifications are disabled.
- **Parental use:** Parents, carers and visitors are asked not to use mobile phones or cameras within the setting when children are present, unless specific permission has been granted by PLL leader for special occasions (e.g. performances).
- **Children's use:** Children are not allowed to bring mobile phones or personal devices to PLL. If a child does bring a phone, it must be handed to staff and kept securely until collection time.
- **Online safety:** No images or videos will be shared on social media or other online platforms without explicit written consent from parents/carers. Staff follow PLL's safeguarding and GDPR policies at all times.

By implementing these measures, PLL ensures that children's safety, privacy and wellbeing are protected, while still allowing for appropriate and positive use of technology in line with safeguarding and data protection legislation.

Online Safety

Children do not have access to the internet or an electronic device whilst at PLL. However, where appropriate, we teach children about risks associated online:

- Inappropriate content (violence, sexual content, harmful language)
- Online bullying or harassment
- Contact from strangers
- Sharing personal information
- Excessive screen time
- Recording or sharing images without consent

We would respond to online safety concerns promptly by following our safeguarding procedure. PLL Group shares online safety information with parents to help promote their understanding of risks associated online.

Recruitment procedure:

The Designated safeguarding lead (DSL), **Charlie Adams**, has overall responsibility for safer recruitment.

Job descriptions and person specifications:

- Each role will have a clearly defined job description and personal specification.
- The advert will state that PLL Group is committed to safeguarding and any appointment is subject to DBS and references

Application forms:
Applicants must provide:

- Full employment history with explanations for gaps
- Relevant qualifications
- Two references (one from the most recent employer)
- A declaration of criminal convictions

Shortlisting:

- Applications are scrutinised for gaps or concerns.
- Shortlisting decisions are recorded.
- Only shortlisted candidates are invited to interview.

Interviews

- All candidates are interviewed face-to-face
- Interviews include **safeguarding-related questions**
- Notes are taken and retained

References:

- Two references will be required, one of which must be from the most recent employer. We cannot accept references from a personal email address. All references must come from a company email address.
- References will confirm dates of employment, roles, and suitability for working with children.
- We will speak directly to referees if anything is unclear.

Pre-Employment Checks
No adult will begin work until the following checks are completed:

- Enhanced DBS check with barred list
- Identity check
- Right to work in the UK
- Two written references (verified and checked)
- Qualification checks (where relevant)
- DBS certificates are seen in original form and recorded

- Health declaration to ensure fitness for the role
- Staff suitability check
- Overseas criminal checks (if applicable)

Disqualification by association:
Where applicable, PLL group will comply with the statutory guidance or disqualification checks under the Childcare Act 2006 and ensure that staff are not disqualified from working with children.

Single Central Record (SCR)
PLL Group maintains a **Single Central Record** which includes:

- Name of staff
- Date of birth
- DBS number and date
- Barred list check
- Identity check
- Reference checks
- Right to work check

The SCR is kept up to date and available for inspection.

Induction and Training
All new staff receive an induction which includes:

- Safeguarding and child protection procedures
- Code of conduct
- Behaviour management
- Whistleblowing procedures
- Health and safety
- A probationary period of 3 months will be in place, during which performance and suitability will be closely monitored.
- Safeguarding training is refreshed regularly.

Confidentiality and Record Keeping

- Recruitment records are retained in line with data protection requirements.
- Information is shared only on a need-to-know basis

Contact numbers

Social Care: 0300 200 1005
Social Care out of hours contact: 01483 517 898
LADO (Local Authority Designated Officer):

- 0300 123 1650 (option 3) - Monday to Friday 9am - 5pm (Surrey)
- 07774 332675/0208 583 5730 (Hounslow)

Children's Single Point of Access (C-SPA/KRSCP):

- 0300 4709100 (Surrey)
- 020 8583 6600 option 2 (London Borough of Hounslow)

Police: 101 (non-emergency) or 999 (emergency)
Anti-terrorist hotline: 0800 789 321
NSPCC: 0808 800 500
Ofsted: 0300 123 1231

This policy was adopted by: Charlie Adams	Date adopted: 05 June 2026 16 November 2026 – Updated statutory safeguarding guidance references.
To be reviewed: 31st August 2027	Signed: 