

Policy: Safeguarding Children

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This, and all other policies and procedures apply to all members of the P3 group.

1. Policy statement

In all its work the P3 Group, will ensure that the welfare of the child and young person are of paramount importance.

We are committed to creating a secure and nurturing environment where every child

and young person can thrive.

This Safeguarding Children's Policy outlines our dedication and how we will fulfil our statutory duty to protect children from harm, abuse, and exploitation, and ensuring their rights are upheld in all our services and areas to which we work in.

A child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to recognise, respond to and report any safeguarding concerns. We will practise in a proactive way that protects them, following legislation and best practice guidance from the **Children's Act 1989**, **Children's Act 2004** and **Working Together to Safeguard Children 2026**.

We will foster a culture of openness and accountability, where the voices of children and young people are heard and respected. By working together, we can ensure that every child in our care is safe, valued, and empowered to reach their full potential.

This policy is underpinned by the UN Convention on the Rights of the Child in which Article 19: Protection from Abuse and Neglect requires:

Governments will do all they can to ensure that all children without exception are protected from physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment, or exploitation, including sexual abuse whilst in the care of parents, legal guardian or any other person who has the care of the child.

The P3 Group will comply with this standard in all the services it delivers. It will comply with its responsibility to safeguard and promote the welfare of children and young people. All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have a right to equal protection from all types of harm or abuse.

We will work in partnership and collaboratively with relevant agencies sharing relevant information within the guidelines to ensure that children and young people are kept safe and free from abuse.

It sets out clear procedures for identifying, reporting, and managing safeguarding concerns, and emphasizes the importance of training and continuous improvement in safeguarding practices along with our Local safeguarding procedures.

2. Why do we need this policy

The purpose of this policy is to protect children and young people who receive P3 Group services, including the children of adults who use and receive our services. This includes responding to direct concerns of safeguarding raised by children, young people and adults at risk and volunteers

The aim of this policy is to make clear the duties, responsibilities and arrangements,

which are in place to safeguard and promote the welfare of children. To ensure all staff, including contracted staff, voluntary staff, students and agency staff are aware of their roles and responsibilities for safeguarding children.

To provide staff and volunteers with the overarching principles that guide our approach to safeguarding.

3. Scope

This policy applies to all P3 Group staff, including contracted staff, Bank staff, voluntary staff, students, agency staff and other colleagues are clear about their role, responsibility and expectations in responding to any safeguarding concerns, regarding children at risk.

<i>Safeguarding is everyone's business.</i>
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4. Definitions

For child protection purposes, the term 'children' means: 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 their status or entitlements to services or protection.

Safeguarding children

Safeguarding and promoting the welfare of children - Defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing 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
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Child protection

Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Child abuse

Child abuse is defined as any action that causes significant harm to a child. This can take various forms, including physical abuse, emotional abuse, sexual abuse, and neglect.

Concerns

Refer to any suspicion, allegation, or other apprehension relating to the safety or wellbeing of a child or young person who may be experiencing or at risk of abuse. Individuals do not need proof to raise concerns under the safeguarding of children and young people procedures.

Looked after child

A child who has been in the care of their local authority for more than 24 hours is known as a looked after child. A term preferred by children and young people is a 'child in care'.

Parent

Refers to the person with legal Parental Responsibility for the child. Parental responsibility continues until the child reaches 18 years of age.

Multi-agency procedures

Are the locally agreed Child Protection Procedures which can be accessed via local webpages.

Parental responsibility

Defined in the Children Act 1989: 'all rights, duties, powers, responsibilities, and authority which by law a parent of a child has in relation to the child and their property. This includes, birth parents, adoptive parents, stepparents (if acquired through a court order), guardians. This does not include foster and carers but may include the local authority.

Types of abuse

Abuse - A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. 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, including what they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Main categories of abuse - Physical, emotional, sexual abuse or neglect, as recognised by 'Working Together to Safeguard Children 2026':

Physical abuse: A form of abuse which 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.

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

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.

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

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

Other categories of abuse - as detailed in 'Working Together to Safeguarding Children 2026' are:

Child criminal exploitation: As set out in the Serious Violence Strategy²³⁰, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young

person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Child sexual exploitation: Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) Serious Violence Strategy in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Domestic abuse: The Domestic Abuse Act 2021²³⁶ introduced the first ever statutory definition of domestic abuse (section 1 of the Act). The statutory definition is clear that domestic abuse may be a single incident or a course of conduct which can encompass a wide range of abusive behaviours, including a) physical or sexual abuse; b) violent or threatening behaviour; c) controlling or coercive behaviour; d) economic abuse; and e) psychological, emotional, or other abuse.

Under the statutory definition, both the person who is conducting the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the Domestic Abuse Act 2021). The definition ensures that different types of relationships are captured, including ex-partners and family members.

All children can experience and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members, including where those being abusive do not live with the child. Experiencing domestic abuse can have a significant impact on children. Section 3 of the Domestic Abuse Act 2021 recognises the impact of domestic abuse on children (0 to 18), as victims in their own right, if they see, hear or experience the effects of abuse.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Extra-familial harm: Children may be at risk of or experiencing physical, sexual, or emotional abuse and exploitation in contexts outside their families. While there is no legal definition for the term extra-familial harm, it is widely used to describe different forms of harm that occur outside the home. Children can be vulnerable to multiple

forms of extra-familial harm from both adults and/or other children. Examples of extra-familial harm may include (but are not limited to): criminal exploitation (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, child-on-child (non-familial) sexual abuse and other forms of harmful sexual behaviour displayed by children towards their peers, abuse, and/or coercive control, children may experience in their own intimate relationships²⁵ (sometimes called teenage relationship abuse), and the influences of extremism which could lead to radicalisation.

Extremism: Extremism is defined in the Prevent strategy as the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Female genital mutilation (FGM): FGM is where a female's genitals are deliberately altered or removed for non-medical reasons. It is also known as 'female circumcision' or 'cutting'. Signs it might be about to happen may include a relative or someone from abroad visiting, a special occasion where a girl 'becomes a woman', an unexpected or long absence from school. This list is not exhaustive. Signs it may have happened could include difficulty walking or standing, spending longer in the bathroom, change in mood, acting differently, a reluctance to go to the doctors. Again, this list is not exhaustive.

Financial exploitation: Financial exploitation can take many forms. In this context, we use the term to describe exploitation which takes place for the purpose of money laundering. This is when criminals target children and adults and take advantage of an imbalance of power to coerce, control, manipulate or deceive them into facilitating the movement of illicit funds. This can include physical cash and/or payments through financial products, such as bank and cryptocurrency accounts.

Maltreatment: All forms of physical and/or emotional ill-treatment, sexual abuse, neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

5. Diversity implications

The welfare of a child or young person is paramount, and all children have the right to protection from abuse, harm and exploitation. P3 will promote equality, inclusion and anti-discriminatory practice in all safeguarding work. Staff must recognise that children may experience increased vulnerability because of disability, neurodivergence, race, ethnicity, culture, faith, language, gender identity, sexual orientation, poverty, homelessness, immigration status, care experience, trauma, or previous involvement with services. These factors must never be used to minimise risk or delay action. Leaders, managers and staff are expected to create an inclusive culture, challenge racism and discrimination, and ensure that safeguarding responses are child-centred, culturally informed, accessible and fair.

6. Role and responsibilities

The Board of Trustees	The Board have a duty of care, which includes taking necessary steps to safeguard and protect children. They will act in the best interests of children and young people to ensure that all reasonable steps to prevent any harm to them are taken. Trustees also have duties to manage risk and to protect P3's assets and reputation. The Board of Trustees with support from the ELT and the HR, EDI and S/G Committee will have oversight of all matters relating to the effective implementation of this policy. The Board will receive from the Director of Quality, Safeguarding and Involvement an annual report which will highlight the progress made against the strategic plan and areas for improvement. The Board will receive quarterly reporting from the HR, EDI and S/G Committee. There is a named Trustee for safeguarding.										
P3 Senior Leadership Team	P3 Group's SLT will ensure that all staff are informed about, understand, and accept their responsibilities regarding child abuse. This will include the forms that it can take, signs and symptoms of possible abuse and the steps that they must take in recognising, preventing, and reporting child abuse. P3 Group's SLT will regularly review and update safeguarding policies annually to ensure they remain compliant with current legislation, led by the Director of Quality, Safeguarding and Involvement. P3 Group's SLT will ensure there are local child safeguarding procedures to follow that stem from this Policy and relevant to the local areas they work in. P3 Group's SLT will ensure there is a training budget to support the safeguarding strategy. All staff are trained in Safeguarding as per the following structure. This training will be mandatory for each role. <table border="1" data-bbox="491 1507 1401 1973"> <thead> <tr> <th>Job Roles</th><th>Level</th></tr> </thead> <tbody> <tr> <td>Finance, Development, Digital, Comms, 2., P3 Board members, Directors MD, Deputy MD.</td><td>2</td></tr> <tr> <td>Front Line, Front Line Managers, Bank Staff, Volunteers, or People and Culture.</td><td>3</td></tr> <tr> <td>People Managers, Contracts Managers and Operations Managers.</td><td>4</td></tr> <tr> <td>Heads of Services and Designated Safeguarding Leads, Chief Operating Officer, Director of QSI, Director of Young People's Services, Director of Adult Services, Director of People and Culture, Director of Housing.</td><td>5</td></tr> </tbody> </table>	Job Roles	Level	Finance, Development, Digital, Comms, 2., P3 Board members, Directors MD, Deputy MD.	2	Front Line, Front Line Managers, Bank Staff, Volunteers, or People and Culture.	3	People Managers, Contracts Managers and Operations Managers.	4	Heads of Services and Designated Safeguarding Leads, Chief Operating Officer, Director of QSI, Director of Young People's Services, Director of Adult Services, Director of People and Culture, Director of Housing.	5
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Director of Quality, Safeguarding and Involvement	This role ensures compliance with safeguarding at an organisational level including liaison with the Charity Commission and monitoring this in relation to our internal governance. The director of QSI will review this policy annually or sooner if there are legislation changes to be made. The director of QSI will chair the Safeguarding Team quarterly meetings and prepare the quarterly reports for the board of trustees EDI and safeguarding subcommittee. Is a key role in promoting good professional practice within their organisation, providing advice and expertise for colleagues, and ensuring safeguarding training is in place. Working closely with their organisation's safeguarding leads, designated professionals, they are responsible for providing advice and support to Directors and other senior managers on best practice in adhering to this Policy, Procedure, safer working practices, oversight of allegations, serious incidents, and significant case reviews. This role holds responsibility for ensuring mechanisms are in place for the implementation, monitoring and revision of this policy.
Director of Young Persons and Family Services	Is the Ofsted Nominated Individual Registered Manager who will be responsible for overseeing and in the absence of the Registered Service Manager reporting all safeguarding referrals to Ofsted in line with Ofsted requirements. Will work in partnership with the Director of QSI to ensure all services are aware of their responsibilities. Will support the safeguarding strategy to ensure it supports the work within the Child and young people's services.
Designated Safeguarding Lead (s)	The role of the Designated Safeguarding Leads is to support their regions with safeguarding issues or another region if appropriate, attend the quarterly Safeguarding Team meetings and support the overall Safeguarding Strategy. The DSLs promote safer working practices and oversight of allegations of serious incidents, case reviews, and ensure all staff have appropriate training. They are to be competent to advise staff and volunteers. Will be available respond to safeguarding concerns, ensuring that actions are always swift, respectful, professional and based on what we know to be good practice. The DSLs will support the training compliance monitoring along with the Director of QSI. A full list of DSLs can be found on SharePoint within the Safeguarding folder and on the local safeguarding procedures. Will attend quarterly meetings to review our safeguarding strategy.

Line Managers	Line Managers are responsible for ensuring that all safeguarding and child protection concerns are addressed through respective line management structures. Are responsible for ensuring staff receive a mandatory induction which includes completing their level of Child Safeguarding Training and subsequent refreshers are completed in a timely manner. Are responsible for auditing files that have safeguarding concerns or referrals made. Are responsible for ensuring their staff and volunteers have access to the right training provided by P3 and the Local authorities offer. Will reflect on safeguarding concerns and referrals within the support and supervision process. Ensuring all staff and volunteers they are line managing know who and how to contact key safeguarding professionals (P3 Safeguarding Team, and local authorities) for advice and support around safeguarding children and young people's issues.
All P3 Group Staff and Volunteers	Will ensure the safety and well-being of all beneficiaries, particularly children and vulnerable adults. Will have an understanding how this is intrinsically related to Safeguarding and how they are responsible for setting and maintaining boundaries. All staff must adhere to the 'Relationships with people we work alongside' policy as part of our approach to safeguarding. Will be responsible for managing their personal training requirements and must not let their training expire. Will discuss safeguarding within their support and supervisions and have the attitude to improve their practise and knowledge. Will comply with all relevant safeguarding laws and regulations, striving to achieve above compliance. Will follow our code of conduct, which is issued as part of our induction.
People and Culture Team	The People and Culture Team will offer consultation and advice in relation to the implication of safeguarding in Human Resources and Learning and Development issues. They must ensure that employment policies incorporate the requirements of 'Safer Recruitment', including Disclosure and Barring Service (2012).
P3 Safeguarding Team	Is made up of Directors, Designated Safeguarding Leads, a Trustee and representatives from the PWWAS for Children and a PWWAS for Adults services. The Teams contact details can be found on SharePoint and our website. P3 Group will have a Safeguarding Team to ensure we are working towards the Safeguarding Strategic plans. The team will meet quarterly to review data and ensure we are up to date

	with legislation and compliance. The team will source and share resources to help improve overall practise.
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7. Recording and reporting of incidents

A full written record of all incidents which may indicate child safeguarding concerns will be maintained, setting out what has been said and to whom.

Staff will have due regard to information sharing procedures when communicating about matters of this kind, recognising that the protection of children and young people is always the most important consideration.

If a member of staff suspects that a child is under threat, there are several steps that will be taken.

All suspicions/concerns will be reported immediately to the staff member's line manager, the designated person and the Local Authority Child Protection Unit and/or Police.

Detailed written records of suspicions will be kept, which will include the following information:

- The nature of the suspicion.
- Details of any injury; indicator of abuse.
- Times, dates, and any other relevant information.
- Dates, times, and names of other adults involved with the child who may substantiate the suspicion.

At no time will any undertaking be given to the child or young person guaranteeing confidentiality.

All staff must enter any referrals made in relation to Safeguarding on the Central Safeguarding Log. Further information can be found in the local procedure on how to complete.

Once a referral has been made, it is the line managers responsibility to audit the CRIS file.

Escalation and unresolved concerns: If staff believe that a safeguarding concern has not been acted on, there is delay, or they disagree with a decision made internally or by another agency, they must escalate this promptly to their line manager, a Designated Safeguarding Lead, the Director of Quality, Safeguarding and Involvement, or another senior manager. Where a child may be at immediate risk, staff must contact the police or children's social care directly and must not wait for internal approval. All escalation decisions, advice received, referrals made and outcomes must be recorded clearly, including the rationale for decisions and any follow-up actions required.

8. Local safeguarding procedures

Each P3 service delivery area has a specific local reporting procedure that is informed and in line with the local authority guidelines. This includes contact information for key people and/or teams, both internally and externally, including the Local Authority Designated Officer (LADO).

The LADO should be alerted to all cases where it is alleged that a person who works with or has had contact with children as part of the family, they are working with has.

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a criminal offence against a child or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk or harm to them.

It is the responsibility of the service manager/coordinator to ensure that the local procedure information is complete and kept up to date. The procedure will be reviewed annually or when there is a legislation change, or at contract renewal with support from the Director of Quality, Safeguarding and involvement.

These versions are signed off by the director of quality, safeguarding and involvement. All old versions must be archived, and new versions marked clearly in accessible folders for all relevant staff to access.

9. How this policy will be implemented

The current version of this policy is available on SharePoint within the Safeguarding Folder.

All new staff must read this policy on induction and sign the induction form to show this has been completed and understood.

The policy will also be delivered annually in a training format (in person and MS Teams) available to all staff to aid their understanding of their personal role to support our safeguarding practice and strategic plan. All staff must attend the policy training. Staff must complete the policy training every 2 years here after.

Email updates will be sent when there are policy changes, highlighting the changes for clarity. The changes will also be discussed in the policy training.

10. Learning and development

All staff and volunteers are required to complete a mandatory e- learning safeguarding module within the first two weeks of employment that is the level suitable to their job role. This will then be bi-annual here after.

Job Roles	Level
Finance, Development, Digital, Comms, Governance, P3 Board members,	2

Directors, MD, deputy MD.	
Front Line, Front Line Managers, Bank Staff, Volunteers and HR or People and Culture.	3
People Managers, Contracts Managers and operations Managers.	4
Heads of Services and Designated Safeguarding Leads, Chief Operating Officer, Director of QSI, Director of young peoples services, Director of Adult services, Director of People and culture, Director of Housing.	5

All staff must attend an internal Policy training at least every 2 years.

Within the first 6 months of employment, Front Line Managers are required to attend an in person one day safeguarding Children training. People managers are to oversee the Safeguarding training has been completed.

It is the responsibility of the individual and their line manager to ensure mandatory training is completed. Staff must make note of the training date completed and request the training within 2 years of completion.

P3 offer a variety of training courses to enhance and broaden the skills of all staff working with children. It is strongly suggested that staff complete as many of these additional trainings. These include Child sexual exploitation, domestic abuse awareness, FGM and many more. These can be discussed within support and supervision.

Team and other meetings have a standing agenda item of Safeguarding and can be used to discuss safeguarding issues, changes in Law, regulation and best practice.

All training and requirements for additional specialist training are recorded and discussed as part the support and supervision process and the annual appraisal.

11.Looked after children

The duty to deliver support and services under section 20 of the Children Act 1989 is with the local authority, other safeguarding partners including P3 may play a critical role in the delivery of services for children and their families. P3 are committed to working with the Social Worker in providing information and support in relation to a safeguarding process. The safety of all children and young people is our priority.

12. Confidentiality

In safeguarding work, confidentiality is important but it must never prevent action being taken to protect a child or young person. Staff may share relevant, necessary and proportionate information without consent where there is a safeguarding concern, where a child is at risk of harm, where a crime may have been committed, or where there is an overriding public interest. Staff should seek advice from their manager, a Designated Safeguarding Lead or the Director of Quality, Safeguarding and Involvement where possible, but must not delay sharing information if doing so could increase risk. Decisions about information sharing must be recorded, including

what was shared, with whom, when, why, and whether consent was sought or not sought. Data protection legislation, including the UK GDPR and Data Protection Act 2018, supports appropriate information sharing for safeguarding purposes and should not be used as a reason to withhold information where a child may be at risk.

13. General indicators of concern

All staff understand the indicators of abuse. Further information regarding indicators can be found through [NICE.org.uk](https://www.nice.org.uk) as detailed below:

[Recommendations](#) | [Child abuse and neglect](#) | [Guidance](#) | [NICE](#)

All staff must use their professional judgement and report anything they find concerning to their line manager and the local children's safeguarding board immediately.

Where staff are unsure, we recommend they use the internal Concerns discussion P3 toolkit to discuss further with their line manager or any P3 DSL.

14. Digital safeguarding

The P3 Group recognises that children and young people increasingly engage with digital technology in their daily lives, including through social media, messaging platforms, online learning, and gaming. While these platforms offer opportunities for connection and learning, they also present risks such as online grooming, cyberbullying, exposure to harmful content, and exploitation.

We are committed to ensuring that all children and young people we work with are safe when using digital technologies. This includes:

- Promoting safe and responsible use of technology.
- Educating staff, volunteers, children, and families about online risks.
- Implementing appropriate controls and procedures to mitigate digital threats.

Key principles:

- **Education and awareness:** All staff and volunteers will receive training on digital safeguarding, including recognising signs of online abuse and how to respond appropriately.
- **Safe communication:** Staff must only communicate with children and young people through approved platforms and in line with organisational policies. Personal devices or accounts must not be used.
- **Monitoring and reporting:** Any concerns about online behaviour, including inappropriate content, contact, or conduct, must be reported immediately using the safeguarding procedures outlined in this policy.
- **Use of images and media:** Consent must be obtained before capturing or sharing any images or videos of children. All media must be stored and shared securely in line with data protection laws.

- **Online activities:** When delivering services online (e.g. virtual support sessions), staff must follow safeguarding protocols, including ensuring sessions are conducted in appropriate settings and recorded where necessary for accountability.

Risks to be aware of

- Online grooming and sexual exploitation.
- Cyberbullying and harassment.
- Exposure to violent, extremist, or age-inappropriate content.
- Identity theft and data breaches.
- Coercion into criminal activity (e.g. financial exploitation or “money muling”).

Supporting children and families

We will provide guidance and resources to children, young people, and their families to help them navigate the digital world safely. This includes signposting to trusted online safety organisations such as:

- CEOP (Child Exploitation and Online Protection Command).
- NSPCC Online Safety Hub.
- UK Safer Internet Centre.

15. Disclosure of abuse

In line with the NICE guidance, where there are concerns about child abuse and neglect, or if a child discloses to a staff member that they have been abused, that member of staff will:

- Explain confidentiality and when you might need to share specific information, and with whom.
- Be sensitive and empathetic.
- Listen actively and use open questions.
- Find out their views and wishes.
- Check your understanding of what the child has told you.
- Make notes of what the child discloses in their own words.
- Be sensitive to any religious or cultural beliefs.
- Use plain language and explain any technical terms.
- Work at the child or young person’s pace.
- Give them opportunities to stop the conversation or leave the room and follow up if this does happen.
- Explain what will happen next and when.

You need to act immediately and report to your line manager, the local authority (safeguarding children’s team) and police (where appropriate). Your line manager will discuss the case with the designated safeguarding lead should they need further advice.

If a member of staff is named in the disclosure, the designated safeguarding lead will be as discreet as possible and work with the line manager and the People and Culture Team.

The Board will be informed as soon as possible and, in any case, not more than 12 hours after the police have been informed.

If a member of staff observes another member of staff harming a child, they will report this immediately emergency services such as the police or ambulance, to their line manager, and to the designated safeguarding lead and a referral will be made to the Local Authority.

If it is a manager or Trustee who is named in the disclosure, the member of staff will be discreet and contact an alternative Senior manager or HR to support.

All disclosures and subsequent actions should be documented within the individual's file, within their safety management plan or other records as the service provides.

16. People in positions of trust (PIPOT)

The P3 Group recognises that an allegation of abuse of children made against a member of staff will be made for a variety of reasons and that the facts of the allegation will or will not be true. These procedures should be applied when there is an allegation that any person who works with children, in connection with their employment, voluntary activity or personal life, 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 they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Behaves in a manner that discriminates against a child on the basis of one or more of their protected characteristics - In line with the Equalities Act 2010.

Allegations can be made in relation to physical chastisement and restraint but can also relate to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual. The Police, Crime, Sentencing and Courts Act 2022 has extended the definition within the Sexual Offences Act 2003 section 22A to include anyone who coaches, teaches, trains, supervises, or instructs a child under 18, on a regular basis, in a sport or a religion.
- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003).

- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature e.g. inappropriate text / e-mail messages or images, gifts, socialising etc.
- Possession of indecent photographs / pseudo-photographs of children.

In addition, these procedures should be applied when there is an allegation that any person who works with children:

- Has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include arrest for possession of a weapon.
- As a parent or carer, has become subject to child protection procedures.
- Is closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the member of staff is responsible in their employment/volunteering.

It is imperative that those dealing with an allegation maintain an open mind and the investigations will be thorough and not subject to delay.

The P3 Group recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. But it also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence, and career. Therefore, those dealing with such allegations within the P3 Group will do so with sensitivity and will act in a careful, measured way and be risk assessed throughout.

Any allegation against staff or volunteers should be reported immediately to a senior manager or DSL, this includes any allegations that are made directly to the police.

Whether an incident constitutes an allegation and needs to be dealt with through these procedures, P3 should always discuss this with the LADO and our safeguarding lead. If it falls short of this threshold there may still be a role for the LADO to provide advice and support to P3. Where the matter constitutes a conduct or performance issue, we will follow the appropriate disciplinary procedures and let the LADO know of the outcome.

17. Low-level concerns about adults working with children

A low-level concern is any concern, doubt or sense of unease that an adult working for, volunteering with, or acting on behalf of P3 may have behaved in a way that is inconsistent with P3's values, Code of Conduct, professional boundaries or safer working practice, but does not appear to meet the threshold for referral to the LADO. Low-level does not mean insignificant. Such concerns may include inappropriate language, being over-familiar with a child, using personal devices or accounts to contact a child, taking photographs without proper authorisation, one-to-one contact in unsuitable settings, humiliating a child, or behaviour outside work that raises safeguarding concerns.

All low-level concerns must be shared promptly with a line manager, Designated

Safeguarding Lead or the People and Culture Team. Concerns must be recorded, reviewed and responded to proportionately. Responses may include advice, reflective supervision, additional training, management action, disciplinary action, referral to the LADO, or referral to another agency if the concern escalates or new information suggests a child may be at risk. Patterns of low-level concern must be monitored because repeated or cumulative concerns may indicate a higher level of risk.

18. Whistleblowing

P3 recognises that information provided by colleagues about wrongdoing or potential wrongdoing provides a valuable function in improving services, avoiding risk, and preventing serious incidents.

P3 has created an open and supportive culture in which colleagues feel comfortable about making disclosures.

P3's commitment:

- P3 is committed to the highest standards of openness, honesty, and accountability.
- Whistleblowing is viewed by P3 as a positive act that can make a valuable contribution to the organisation.
- Colleagues are encouraged to raise any serious concerns that they may have about the activities of P3 employees, or external organisations and to do so promptly.
- P3 recognises the difficulties that colleagues can face when raising concerns and provides multiple methods and points of contact for colleagues to bring the issue to the attention of the organisation.
- Whistleblowing concerns are dealt with promptly, fairly and consistently. Where appropriate, the whistleblower is provided with feedback.
- P3 provides colleagues with a written Whistleblowing procedure at their induction. The procedure outlines how to identify Protected Disclosures and raise concerns.

19. Internal procedures when there is a disclosure of a serious allegation by a P3 colleague

Where a disclosure is made of a serious nature that may involve a P3 colleague or volunteer, the senior management including the Chief Operating officer, the Director People and culture and Director of Quality Safeguarding and Involvement will be informed of this allegation immediately.

P3 will make an immediate referral to the Local Authority (LADO) and P3 will form an internal Serious Safeguarding Review chaired by the Director of Quality, Safeguarding, and Involvement involving all relevant leads / directors and the head of governance. This may be a disclosure of a physical, financial, sexual, psychological nature and the decision to progress with this procedure will be made

by the Director of QSI and head of governance / COO.

P3 will also call the police and other emergency services should this be necessary.

It may be necessary to safeguard the staff member/volunteer and child to suspend the individual from their current duties whilst an investigation is underway until it's conclusion.

Clear guidance, direction and support will be agreed, and review meetings will be held weekly or sooner for the duration of the incident / alleged incident. We will ensure we are supporting and protecting people we work alongside and P3 staff members appropriately and reporting in line with relevant legislation.

If P3 removes a staff member or unpaid volunteer because the person poses a risk of harm to children, P3 will make a referral to the relevant regulatory body (Ofsted) / DBS.

If the disclosure or concern has come from a member of P3, they will be protected and follow the whistleblowing policy.

20. Concerns about other organisations

If we have a safeguarding concern about another organisation, their staff or volunteer. The P3 group member should:

- Report concerns to P3 line manager immediately.
- Where appropriate the Line Manager will notify the other organisation's Designated Safeguarding within 24hours to confirm our concerns and subsequent actions.
- We will also raise this as a Safeguarding concern in line with this procedure and guidance for reporting.
- The line manager will follow up with the other organisation at an agreed time to ensure action is being taken.
- The line manager will also report to the local authority LADO within which they operate.
- Should the concern be of a serious nature it maybe the police are called.

21. Disclosure and barring service (DBS)

P3 will comply with its legal duty to refer to the Disclosure and Barring Service where the relevant conditions are met. This duty applies where a person has been removed from regulated activity, including dismissal, redeployment, retirement, redundancy or resignation, and P3 believes the person has engaged in relevant conduct or satisfies the harm test. A referral may also be made where the legal duty is not met but there are safeguarding concerns that justify referral. DBS referral decisions will be made in consultation with the People and Culture Team, the Director of Quality, Safeguarding and Involvement, relevant senior leaders and, where appropriate, legal advice.

The Executive Leadership Team with the guidance of the People and Culture Team will not knowingly approve the employment of anyone who poses a risk of harm to children or vulnerable adults. This includes anyone who is believed to have committed a relevant offence or who has a record of such conduct

The P3 Group has a legal duty to refer an employee who poses a risk of harm to children or vulnerable adults to the DBS, failure to do so can result in a fine and/or up to 5 years imprisonment. There will be sufficient and solid evidence that the employee poses a risk of harm before they can be referred to the DBS. The DBS will not consider evidence based on rumour or unsubstantiated reports. We will also inform the police and other relevant authorities if it believes that a relevant offence has occurred.

17. Barring process

Whenever new relevant information (such as a conviction or caution) becomes known to the P3 Group, the information will be sent to the DBS. The DBS will consider this information, together with other information known on the individual, and decide whether it indicates that the individual poses a risk of harm to vulnerable groups. If so, the DBS will commence its barring process and the DBS will issue a disclosure certificate to the applicant with the barring information.

The applicant will be advised by the designated person to make a representation to the DBS regarding the barring information. The DBS will assess the barring information and representation and decide whether to bar the applicant. If there is sufficient barring evidence, the applicant will be placed on either the Children's Barred List or the Vulnerable Adults Barred List or both depending on the offence. The applicant will then be removed from regulated activity.

Where serious concerns arise, P3 will take appropriate employment, safeguarding and regulatory action in line with relevant procedures. DBS barring decisions are made by the DBS following its statutory process. Individuals will be informed of relevant rights to make representations or appeal where these apply. P3 will not knowingly allow a person who is barred from regulated activity with children to work in regulated activity with children.

18. Safer recruitment and selection

The P3 Group has safer recruitment and selection procedures in place covered by our recruitment and selection policies and procedures (reviewed in parallel with the reviews of this policy) which stipulate the following:

To maintain appropriate levels of protection, P3 will apply safer recruitment checks that are proportionate to the role and level of contact with children. This may include identity checks, right to work checks, verification of qualifications, scrutiny of employment history and gaps, at least two references, interview questions that test safeguarding knowledge and values, and appropriate DBS checks, including

children's barred list checks where the role is eligible and involves regulated activity. Overseas checks will be considered where a candidate has lived or worked outside the UK. A start date will not normally be confirmed until required checks have been completed and reviewed. Any exception must be risk assessed, approved by an appropriate senior manager and People and Culture, time limited, recorded, and supported by additional supervision or restrictions where needed.

Upon starting employment with P3, staff will receive a copy of P3's Code of Conduct and Safeguarding Policies. To which they will sign a document to say they understand and agree to uphold.

Verification of previous employment history will be completed before a start date issued.

Use a variety of selection techniques (e.g. qualifications, previous experience, interview, and reference checks) and Identification checks on any candidate selected for employment.

23. Summary for children and young people

The link below is a visual guide for children and young people to understand the "working together to Safeguard Children" information and what they can expect from people and organisations to help support and protect them.

https://assets.publishing.service.gov.uk/media/681b42043f1c73824ee3e4f0/Children_and_young_person_guide_to_working_together_to_safeguard_children.pdf

24. Legislation

Please Note this list is not exhaustive:

- Working Together to Safeguard Children 2026 statutory guidance and statutory framework
- Keeping Children Safe in Education 2025, where relevant to education or education-linked provision
- Children Act 1989 and Children Act 2004
- Children and Social Work Act 2017
- Care Act 2014, where safeguarding concerns relate to adults with care and support needs or whole-family safeguarding
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012
- Sexual Offences Act 2003 and Police, Crime, Sentencing and Courts Act 2022 provisions relating to positions of trust
- Domestic Abuse Act 2021
- Modern Slavery Act 2015
- Female Genital Mutilation Act 2003 and Serious Crime Act 2015
- Human Rights Act 1998 and Equality Act 2010
- Data Protection Act 2018 and UK GDPR

- Homelessness Reduction Act 2017, where services identify children or families who may be homeless or threatened with homelessness
- Charity Commission guidance on safeguarding and serious incident reporting for charities and trustees
- NICE Guidance NG76: Child abuse and neglect
- UN Convention on the Rights of the Child

25. Ofsted regulations

This policy is aligned with the Ofsted Guide to Supported Accommodation Standards and Quality Standards 2023.

The Regulations Standards relating to this policy are:

Regulation: 4, 5, 6, 7, 9, 10, 17-19, 20, 21, 22, 27, 42.

26. Document control

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