

Safeguarding Policy

The Future Games / Kidz Zone Club

Version 9.7 — Updated for KCSIE 2026

Safeguarding Policy

The Future Games and Kidz Zone Club fully recognise the responsibility they have regarding safeguarding and promoting the welfare of children. This policy sets out how both organisations will meet these responsibilities.

Important contacts

Role/organisation	Name	Contact details
Designated safeguarding lead (DSL) — Primary	Scott McCafferty / George Tippite	Telephone: 01525 591036 / 07999 494 197/07590 844 281 Email: scott@thefuturegames.co.uk / george@thefuturegames.co.uk
Designated safeguarding lead (DSL) — Secondary	Adam Camy Dan Higgs Jack Kent	Telephone: 01525 591036 / 07742 800770 Email: management@thefuturegames.co.uk

Parents and Carers

If you are ever concerned about the safety or well-being of someone at our events please talk to our Designated Safeguarding Officers on 01525 591036 or the mobile numbers / emails listed above, Monday - Friday 9am - 5.30pm.

Alternatively, parents and carers can also contact their local authority referral hub - please see Appendix 1 for contact details.

Overall Aims

We aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- This policy will be reviewed annually or sooner if required by changes to statutory guidance or organisational structure
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues. All staff will undertake safeguarding refresher training annually, or more frequently if significant changes occur in statutory guidance

We believe this policy should be a working document that is fit for purpose, represents the organisation ethos, enables consistency and quality across the organisation and is related to the following legislation.

Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, and the Governance Handbook. We comply with this guidance and the procedures set out by our local safeguarding children partnerships. Please see Appendix 4.

All staff have an important role to play in noticing indicators of possible abuse or neglect through their contact with children. In line with KCSIE 2026, this applies to every member of staff, including catering, site and administrative staff, all of whom are required to read **Part One of Keeping Children Safe in Education in full as part of induction and annual refresher training** - the previous condensed summary for non-teaching staff no longer applies. We will keep a record confirming that every member of staff has completed this reading.

It is important that all staff know what to do if they have any concerns. Staff will create and maintain an ethos where children are encouraged to talk and are listened to. They will have an awareness of the indicators of abuse and always take any concerns seriously. Examples relevant to our setting may include: neglect indicators at drop-off or collection, unexplained injuries, changes in behaviour during play, or disclosures made to staff during activities.

If staff have any suspicion that a child is being abused they will report this to both:

- The TFG / Kidz Zone Club Designated Safeguarding Lead on 01525 591036 or the mobile numbers listed in the table above
- The Headteacher (if on school premises) or Designated Lead at the school the child attends (if during a school event)

The DSL will ask the staff member to complete a 'Logging a safeguarding concern' form as part of the reporting process.

Remember anyone can make a referral; if you feel a child is in immediate danger and your DSL isn't available at that immediate point in time you should make the referral to your local safeguarding board then notify your DSL after you've made the referral (please see final page for Local Safeguarding Board contact details).

If a child discloses she/he has been abused, staff cannot promise the child that this will be kept a secret. All staff who have unsupervised access to or contact with children are required to record disclosures verbatim and avoid asking leading questions.

- Recognise and accept their responsibilities
- Develop awareness of the issues which can cause children harm
- Report concerns following the procedure below
- Document all that has happened using an incident report form

We will endeavour to safeguard children by:

- Ensuring all staff hold a safeguarding qualification within 2 years of date or the recommended renewal date, whichever is sooner
- Sharing all annual policies, webinars (including this safeguarding policy) and updates and procedures for all who work on behalf of the organisation via our staff portal
- Reporting concerns to the authorities
- Carefully following procedures for recruitment and selection of staff - see Appendix 3: safer recruitment and DBS checks - policy and procedures. The Designated Safeguarding Lead is responsible for overseeing safer recruitment. Recruitment records will be stored securely in line with GDPR and retained according to our data retention policy
- Providing effective updates for all staff
- Carefully following related procedures for 'behaviour management'

Safeguarding

TFG/KZ are committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment.

TFG/KZ have a legal duty to recognise and respond appropriately to:

- Significant changes in the children's behaviour
- Deterioration in their general well-being
- Unexplained bruising, marks or signs of possible abuse
- Signs of abuse, neglect, exploitation
- Comments children make which give cause for concern
- Exploitation; abuse might not just occur in the home, but it may also occur outside of the home environment, even online. Exploitation can include instances where a child or young person is a victim and may be groomed to become involved in sexual or criminal activity

If you recognise one of the above for a child, the severity and circumstance will dictate your actions. The important thing is to do something and not ignore it. We will create an environment to make children be and feel safe. Any suspicions or allegations of abuse will be taken very seriously and acted on quickly and correctly, following the procedure set by the Local Safeguarding Children's Partnership.

Four Categories of Abuse - this list is not exhaustive

All types of abuse can occur in all types of homes, across all social and income groups.

1. Neglect

Definition: longstanding and/or severe neglect; effect on the child's development; non-organic failure to thrive.

Signs/Symptoms: constant hunger, tiredness, stealing or scrounging; poor personal hygiene or inappropriate clothing for weather or activities; untreated medical problems; low self-esteem, poor social relations.

2. Physical

Definition: deliberate injury to the child, or allowing injury, beyond 'reasonable' chastisement; poisoning, including alcohol; withholding drugs or apparatus. Both the use of an implement such as a belt, and a physical strike that leaves a mark, are illegal.

Signs/Symptoms: unexplained or untreated injuries, especially if repetitive; refusal to discuss injuries; shrinking from physical contact; fear of returning home, undressing, or medical help; aggression or bullying; unexplained pattern of absences, which may serve to hide bruises or other physical injuries.

3. Sexual

Definition: sexual exploitation of any kind, including watching others and viewing pornographic material.

Signs/Symptoms: sexual awareness inappropriate to the child's age, through drawings, games, vocabulary etc; frequent public masturbation; attempts to teach other children about sexual activity; aggressiveness, anger, anxiety, fearfulness. This is a short summary; there are other signs, individual to certain children.

4. Emotional

Definition: must be persistent; must undermine the child's sense of self-worth; might reflect poor parenting skills; includes witnessing domestic violence of a primary carer.

Signs/Symptoms: continual self-deprecation, self-harm or mutilation; inappropriate response to painful situations; compulsive stealing/scrounging; air of detachment, social isolation or desperate attention-seeking behaviour, depression or withdrawal; eating problems, either overeating or a lack of appetite.

Behaviours linked to issues that can put children in danger include: drug use; alcohol abuse; deliberately missing education; serious violence (including that linked to county lines); radicalisation; and consensual and non-consensual sharing of nude and semi-nude images and/or videos.

Technology, Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE)

Technology is a significant component of safeguarding and well-being concerns. This can also include grooming, CSE and CCE.

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power, or coerces, manipulates or deceives a child into sexual or criminal activity.

All staff should be aware of indicators; this involves exploitative situations where a child, male or female, receives something from an adult as a result of engaging in sexual or criminal activity. This can range from a seemingly 'consensual' relationship to serious organised crime gangs. There will be an imbalance of power where the perpetrator holds power over the victim. Technology is often used. This is a serious crime.

Attendance & Engagement

While the setting is not a school and attendance is voluntary, persistent absence or unexplained non-attendance may be an indicator of safeguarding concerns. Staff will record and follow up on such cases, and escalate where appropriate to children's social care.

SEND Terminology

This policy uses updated terminology in line with the SEND Code of Practice, including the use of 'autism' rather than 'autism spectrum disorder'.

Female Genital Mutilation (FGM)

All staff should be aware of indicators; this is illegal and a form of child abuse. It involves a procedure to remove all or some of the female genitalia, or any other injury to these organs. It is a legal duty to report known cases to the police.

Forced Marriage

All staff should be aware of indicators; this is illegal and a form of child abuse. A marriage entered into without the full and free consent of one or both parties, where violence, threats or coercion is used.

Modern Slavery

Modern slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol). All staff should be aware that modern slavery crimes include holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

- Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country
- Types of human trafficking include: sexual exploitation; forced labour; domestic servitude; organ harvesting; child-related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft and related benefit fraud; forced marriage and illegal adoption (if other constituent elements are present)

Prevent Duty

TFG/KZ recognises its duty to prevent children and families being drawn into terrorist or extremist behaviour and employs the following methods:

- Follows the guidance in the government document 'Prevent Duty Guidance for England and Wales'
- Staff have access to Prevent training
- We value all children and their families equally
- We promote the development of positive attitudes and behaviours to all people, whether different from or similar to themselves
- We have a commitment to challenging prejudice
- We report any concerns about children, staff or families to the relevant authorities

Serious violence

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from education, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Child-on-child abuse

All staff should be aware that children can abuse other children, and this can happen both inside and outside of school (often referred to as child-on-child abuse). This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Sexting (also known as youth-produced sexual imagery)
- Initiation/hazing-type violence and rituals

Sexual violence and sexual harassment between children

Children should feel confident reporting to staff.

All staff should be aware that sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can also occur online, and through a group of children sexually assaulting or sexually harassing a single child or group of children.

In line with KCSIE 2026, we treat these behaviours as sitting on a single continuum - from harmful sexual behaviour through to sexual violence - rather than as isolated, unconnected incident types. This means the full pattern and context of a child's behaviour is considered when deciding on a response, not just the most recent incident in isolation.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts - dismissing or tolerating such behaviours risks normalising them

Sexual assault

It is important that staff are aware of sexual violence and the fact that children can, and sometimes do, abuse their peers in this way, and that it can happen both inside and outside of school. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act as described below.

Sexual harassment: when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names
- Sexual "jokes" or taunting
- Physical behaviour, such as deliberately brushing against someone or interfering with someone's clothes (staff should consider when any of this crosses a line into sexual violence, and it is important to talk to and consider the experience of the victim), and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence

This may include consensual and non-consensual sharing of nude and semi-nude images and/or videos. In line with KCSIE 2026, this includes AI-generated or AI-manipulated nude or semi-nude images of a child. Where such sharing occurs, we will treat it as requiring a safeguarding response regardless of whether it was described to us as "consensual" - a child cannot meaningfully consent to being placed at this kind of risk, and the presence or absence of consent does not change our duty to respond.

Sexualised behaviours

Where children display sexualised behaviours, the behaviours will be considered in accordance with the children's developmental understanding, age and impact on the alleged victim. Tools such as the Brook Traffic Light Tool will be used to assist in determining whether the behaviour is developmental or a cause for concern, and NSPCC guidance on typical sexual development by age will inform staff judgement. This will assist in ensuring the child/ren receive the right support at the right time, either via an early help response or referral to Children's Social Care.

We follow the Sexual Violence and Sexual Harassment Guidance (DfE) when responding to such issues, alongside local inter-agency procedures and the Harmful Sexual Behaviours strategy. This includes responding to any reports in a child-centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children.

We will seek specialist advice, guidance and assessment, and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.

All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor will a victim ever be made to feel ashamed for making a report.

In all cases of peer-on-peer abuse we will consider the vulnerability of all children, including those alleged to have caused the harm and those alleged to be victims, and provide a safeguarding response consistent with the Safeguarding Thresholds Framework. Consideration will be given to violence in young people's relationships.

Where issues indicate that a criminal offence may have been committed, a report will be made to the Police.

Where a concern falls short of needing a statutory referral but the child or family would benefit from support, we will consider a referral into Family Help (see 'Early Help and Family Help' below) rather than treating the matter as resolved with no further action.

Support Resources - the club will signpost children and families to relevant external support, including the Lucy Faithfull Foundation's 'Shore Space' confidential chat service for young people concerned about sexual thoughts or behaviours.

County Lines

All staff should be aware of indicators; gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of "deal line". They are likely to exploit children and vulnerable adults to move and store drugs and money, and will often use coercion, intimidation, violence (including sexual violence) and weapons.

Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these experiences can impact on children's mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken following the child protection policy, including discussion with the Designated Safeguarding Lead.

Mental health concerns are seen as a safeguarding concern.

Young carers

We recognise that some children may take on caring responsibilities for a family member, and that this can affect their wellbeing, attendance and behaviour. Staff will be alert to signs that a child may be a young carer - such as tiredness, anxiety about being away from home, or missed sessions - and will discuss any concerns with the DSL, who can signpost families to local young carers' support services.

Safeguarding children with medical conditions

Where a child has a medical condition, we will ensure relevant staff are aware of it and of any associated safeguarding considerations, and that this information is recorded on the child's registration and shared with the Supervisor leading that group. A medical condition is not, by itself, a safeguarding concern, but staff will remain alert to any signs that a child's medical needs are not being appropriately met at home.

Online

Four areas of online safety risk: Content, Contact, Conduct, and Commerce (buying and selling).

Generative AI

We recognise that harmful content risks now also include misinformation, disinformation, conspiracy theories, and the harmful use of generative AI, including AI-generated or AI-manipulated images of children. Where the club provides access to technology or online content, appropriate filtering and monitoring will be in place, and

staff will follow DfE guidance on generative AI safety, both for safe use of AI tools in our own settings and, where relevant, when procuring or evaluating any AI-based products used in our operations.

Internet access is only available through the school network, which has the relevant filters and monitoring in place. Children do not have unsupervised access to the internet during our events.

Please see the Online Safety Policy for further information.

Domestic Abuse

All staff are aware of the Domestic Abuse Act 2021, which introduced the first statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Staff will continue to develop their understanding of domestic abuse and how all children can witness and be adversely affected by domestic abuse in the context of their home life, where domestic abuse occurs between family members.

Staff are aware that exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

We recognise that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, and sexual and/or economic abuse.

Staff understand that anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Types of domestic abuse include intimate partner violence, abuse by ex-partners, family members, teenage relationship abuse and adolescent-to-parent violence.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer 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.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day, on 0808 2000 247.

Operation Encompass

Operation Encompass is now a statutory duty on police forces in England and Wales: where there are reasonable grounds to believe a child may be a victim of domestic abuse, the police must notify the child's school or setting. Where TFG/Kidz Zone Club is notified under Operation Encompass, either directly or via a partner school, the DSL (or, in their absence, the Deputy DSL) will receive this information in confidence and consider whether any additional support or monitoring is needed for the child while in our care. An Operation Encompass notification is not, by itself, a safeguarding referral, and does not replace a separate referral to children's social care where the child's circumstances warrant one. We will ensure our DSL cover arrangements allow a notification to be received and acted upon even when the primary DSL is unavailable.

Temporary accommodation

Local housing authorities have a duty to notify schools and settings when a child is placed in temporary accommodation. Where we receive such a notification, either directly or via a partner school, this will be handled through the same confidential DSL process as Operation Encompass notifications, and staff will be alert to any additional support the child or family may need.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and speed online) or 'cyber-dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded, and Denial of Service (DoS or DDoS) attacks or 'booting' - attempts to

make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources - and making, supplying or obtaining malware such as viruses, with the intent to commit further offences.

Children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or Deputies) should consider referring into the Cyber Choices programme, a nationwide police programme supported by the Home Office and led by the National Crime Agency, which aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences.

Mobile phones on club premises

In line with KCSIE 2026, our settings operate as phone-free environments by default. Staff working at Kidz Zone Clubs will have a club phone providing an open line to Head Office for messages to be relayed. Personal mobile phones should be stored safely in staff bags at all times during working hours, or not brought into the school or venue at all; in certain circumstances they may be left in the office or an area away from children. Staff should give parents/carers the Head Office numbers for emergencies. Exceptions to the phone-free default (for example, a staff member's personal phone being used for an approved work purpose) must be agreed with a manager in advance, rather than being the norm.

Staff must not post anything onto social networking sites that could be construed to have any impact on the organisation's reputation, or that would offend any other member of staff or parent using our organisation. Staff must not post any photos of children from events on social networking sites. Staff leaving our organisation continue to be bound by our Code of Confidentiality; if, however, a child is considered at risk, our Safeguarding Children Policy will override confidentiality. If staff choose to allow parents to view their page on social networking sites, this relationship must remain professional at all times. Breach of any of the above will result in disciplinary action, which could result in dismissal.

Parents/carers may not use their mobile phones once they have entered the events area, or until they have left the events area. We are at liberty to ask parents to put away their phone before we allow them entry.

Camera use, photos and social networking

Permission is sought from parents before taking photos for flyers/website. Photos are taken only on the organisation's cameras/devices, and photos must only be taken on company-registered devices, such as a tablet. No member of staff may keep photos of children on their personal computers. Images may be stored on a USB solely for the purpose of using them for our website or photo board, and will be deleted immediately after. Any images of children taken on site must only be of children whose parents allow photos to be taken; staff should not take any photos off site. Any images taken must be appropriate, and images must not be published elsewhere without the authorisation of a company director.

Gender-questioning children

In line with KCSIE 2026, we recognise that a small number of children may question their gender identity, and that this requires a careful, individual and well-documented response that safeguards the child while respecting the legal duties we owe to all children and staff under the Equality Act 2010 and the Human Rights Act 1998.

Our approach is as follows:

- Any request from a child, or from a parent/carer on a child's behalf, relating to gender identity (for example, a request to be addressed differently, or in relation to toilets, changing facilities, or participation in sport) will be handled by the DSL on an individual, case-by-case basis, and will be documented.
- We will engage parents/carers as a matter of priority in most circumstances, recognising that they know their child best and are best placed to support them, while being mindful of the rare circumstances where involving a parent could put a child at risk of harm - in which case the DSL will follow child protection procedures rather than the standard parental-engagement approach.
- Decisions will be made thoughtfully, taking into account the wellbeing and safety of the individual child, the impact on and safety of other children and staff, and our duties under the Equality Act 2010 (including our duties in relation to single-sex spaces and single-sex sport) and the Human Rights Act 1998.
- Toilets, changing facilities, and sporting activity arrangements will be considered individually at each venue, working with the partner school where relevant, rather than through a single fixed rule applied to every setting.
- Staff will treat all children with dignity and respect, and any concerns about a child's welfare in this context will be treated as a safeguarding matter and discussed with the DSL in the usual way.

- The DSL will keep a written record of decisions made and the reasoning behind them, to ensure a consistent, documented approach that can be reviewed and revisited as needed.

This section will continue to be reviewed as further DfE guidance, including revised RSHE guidance, is published.

Dealing with a Disclosure

1. Listen and stay calm. Do not condemn the abuser; do not judge; do not make promises you can't keep.
2. Reassure them.
3. Stay with them. Try to 'ground' them ("grounding" means drawing the child back to a more comfortable state of mind, through things like normal conversation, e.g. what activities have you done today, what's your favourite TV programme).
4. Accurately record the child's words. Make it clear whether it is fact, opinion or hearsay.
5. Report it to your relevant manager or head office as soon as possible; they will know the right procedure to follow. In some cases, they will speak to the parents first or report to the local safeguarding children's board.
6. If a third party expresses concern that a child is being abused, we will encourage them to contact Social Care directly. If they will not do so, we will explain that the Club is obliged to, and the incident will be logged accordingly.

If you have any concerns about a child's welfare at your event, do not keep it to yourself. Write it down and take advice. Only speak with your relevant manager or directly to the qualified designated persons for child protection at head office.

If you are not satisfied with an outcome, or anything related to how we have conducted a raised concern, you will find the Local Authority contact details on the club noticeboard and can report directly to them.

Immediate Danger

If you feel a child is in immediate danger you can make a referral to children's social care and/or the police immediately. Remember anyone can make a referral. Please inform your DSL as soon as possible if you make a referral directly. You must follow the local procedures for making referrals as agreed by the Local Authority Safeguarding Children's Partnership, using the Assessment and Thresholds Guidance.

You may also find the following links helpful:

- Thresholds Guidance: <https://www.centralbedfordshirelscb.org.uk/lscb-website/professionals/the-importance-of-thresholds>
- <https://www.gov.uk/report-child-abuse-to-local-council>

Protecting yourself

Part of safeguarding is also to protect yourself from allegations and to ensure your actions are not misinterpreted by anyone. Do this by observing the following:

- Avoid being alone with a child (when possible)
- Take a register of which children are with you for each session, noting the time of the session
- If you take a child somewhere, e.g. an empty room, do not enter with them - wait outside. If you have to enter the room, it's vital you keep all doors open
- Do not play-fight
- Children should not be encouraged to sit on your lap or hold your hand
- Challenge any child using 'bad' language
- Never let children touch themselves or others inappropriately in any form
- Never let a child's allegation go unchallenged, unrecorded or not acted on
- Never do personal things for children that they are capable of doing themselves - encourage children to help each other
- Do not build 'special' relationships with individual children
- You must not, before, during or after your employment, make or accept any contact with a child or a friend of a child you know through your work with TFG/KZ, or through social networking websites

Whistle Blowing

TFG/KZ will not accept or condone any behaviour by staff or other adults associated with the organisation that is contrary to our Aims and Objectives, Policies and Procedures. We will actively encourage and fully support the reporting of such behaviour. We will do this by:

- Promoting an environment of mutual respect, trust and open communication
- Promoting an environment that is free from bullying, harassment and discrimination
- Treating everyone equally and fairly, with dignity and respect, and by valuing individual differences
- Ensuring that the quality of the work of each staff member/volunteer is effectively monitored, as well as the work of the event as a whole
- Ensuring that procedures are in place for reporting unacceptable behaviours/practices
- Providing all staff with a procedure to raise their concerns
- Actively supporting staff/volunteers who 'blow the whistle', both during the investigation and after, in line with the relevant legislation

Raising a concern about an adult or staff member

If you have a concern about a staff member or adult, please talk to our Designated Safeguarding Lead via the contact details on the first page.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact your local safeguarding board - please see Appendix 2.

Allegation against a professional

If there is a serious allegation of abuse made against you, TFG/KZ may have to suspend you whilst the investigation is carried out. This is to protect all parties, including you. You should:

- Stay calm
- Follow the manager's instructions
- Co-operate with questions and enquiries
- Seek advice - head office or Citizens Advice Bureau
- Not confront the/your accuser
- Not speak with your 'victim'
- Be supported through the process by a designated person at head office and/or your manager

We provide a form for concerned parties to report any worries directly to the DSL. We take all allegations seriously and will seek advice from the LADO.

TFG/KZ has a legal duty to inform the Disclosure and Barring Service of any suspicions or allegations, even if staff leave before an investigation is started or completed.

Promoting awareness among staff

TFG/KZ promotes awareness of child abuse issues through its staff training. We ensure that:

- Our designated DSL has relevant experience and receives appropriate training
- Safer 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 or neglect
- All staff are aware of the 'Safeguarding Children Procedure for Staff' poster
- All staff are aware of their statutory requirements with regard to the disclosure of information or discovery of child abuse
- Our procedures are in line with the guidance in Working Together to Safeguard Children 2026, and staff are familiar with the 'What To Do If You're Worried A Child Is Being Abused' flowchart

Good practice guidelines

All personnel should be encouraged to demonstrate exemplary behaviour in order to promote children's welfare and reduce the likelihood of allegations being made. The following are common-sense examples of how to create a positive culture and climate.

Good practice means:

- Always working in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- Treating all young people/disabled adults equally, and with respect and dignity
- Always putting the welfare of each young person first, before winning or achieving goals
- Building balanced relationships based on mutual trust, which empowers children to share in the decision-making process
- Making activities fun, enjoyable and promoting fair play

- Being an excellent role model - this includes not smoking or drinking alcohol in the company of young people
- Giving enthusiastic and constructive feedback rather than negative criticism
- Recognising the developmental needs and capacity of young people and disabled adults - avoiding excessive training or competition and not pushing them against their will
- Keeping a written record of any injury that occurs, along with the details of any treatment given, and informing parents of this

Practices never to be sanctioned

You should never:

- Engage in rough, physical or sexually provocative games, including horseplay
- Allow or engage in any form of inappropriate touching
- Allow children to use inappropriate language unchallenged
- Make sexually suggestive comments to a child, even in fun
- Reduce a child to tears as a form of control
- Fail to act upon and record any allegations made by a child
- Do things of a personal nature for children or disabled adults that they can do for themselves

Poor Practice

Staff - what does poor practice look like:

- Failing to act on the early signs of abuse and neglect
- Poor record keeping
- Failing to listen to the views of the child
- Failing to reassess concerns when the situation does not improve
- Not sharing information, or sharing it too slowly
- Not challenging those who aren't taking action

Incidents that must be reported/recorded

If any of the following occur you should report this immediately to the appropriate officer and record the incident. You should also ensure the parents of the child are informed:

- If you accidentally hurt a child
- If he/she seems distressed in any manner
- If a child appears to be sexually aroused by your actions
- If a child misunderstands or misinterprets something you have done

Venue Procedures

- Environmental risk assessment completed before each event (KZ)
- All staff aware of venue evacuation and lock-down procedures
- All staff follow 'Safer Food - Better Business' policies (KZ)
- All applicants complete an online booking form compiling all necessary information
- All applicants detail any medical conditions on initial application forms - these are then listed on the register for the Supervisor leading that group
- Staff register the children at the start of the event
- Staff sign each child out at the end of the event with the parent/guardian of that child

Any accidents or incidents that occur during PE lessons and lunch clubs during the school day are made aware to the school and school procedures are followed (during the school day only).

Any accidents or incidents that occur before or after school on a club event: an accident/incident form is also completed and given to the parent on collection (clubs only), with a copy retained for our health and safety records. Any accident/incident that occurs on a breakfast club will also be relayed to the school if deemed necessary, as well as to Head Office, who can contact the parent directly.

Head bump - parents are contacted to make them aware. Any head bump or collision that could result in a bruise, however small, is made aware to the parent as per the guidelines above.

Staff also carry a response card they can use in emergencies at events, requesting assistance from a member of staff. Staff also have a walkie-talkie to communicate on after-school events if required.

Toilet Supervision

All children will ask to use the toilet facilities and will normally be sent in pairs, unless alternative arrangements are identified in the current venue risk assessment. Where a staff member is available, they will supervise children walking to and from the toilet. Staff will monitor numbers and ensure children return to their play in the appropriate location. See Toileting and Personal Care Policy.

Confidentiality

The Future Games and Kidz Zone Club recognises that all matters relating to child, young person and adult protection are confidential. The DSL will only disclose information to other members of staff on a need-to-know basis.

All members of staff must be aware that, whilst they have duties to keep information confidential, they also have a professional responsibility to share information with other agencies to safeguard children, young people and vulnerable adults - this includes the local safeguarding partners as outlined above.

All staff must be aware that they cannot promise a child, young person or vulnerable adult to keep secrets which might compromise that person's safety or wellbeing.

DfE Guidance on Information Sharing provides further detail. If TFG/Kidz Zone Club is made aware of any safeguarding concerns which need to be shared with the wider community (including other local schools/colleges), advice will be sought from the Education Safeguarding team, to ensure that the integrity of any subsequent investigations is maintained and all members of the community are safeguarded.

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific procedures included in this policy.

Kidz Zone Club recognises that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of apprentices and learners
- The Data Protection Act 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping apprentices and learners safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent, it cannot reasonably be expected that a practitioner gains consent, or if gaining consent would place a child at risk
- Staff should never promise someone making a disclosure that they will not tell anyone about a report of abuse, as this may not be in the best interests of the child, vulnerable adult, apprentice or learner
- The government's information-sharing guidance includes seven 'golden rules' for sharing information, which will support staff in making decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy)

Visitors

Term-time clubs: visitors to the club will immediately be redirected to the school reception. It is Kidz Zone Club's duty to safeguard the welfare of children; therefore, anyone who is not a visitor to the school club, or is not recognised by staff, will be asked to leave the school premises. If they refuse to leave, the police will be called. Visitors will not be left alone or in a 1:1 situation with a child.

Holiday clubs: if a visitor is expected, they will be asked to sign in on arrival and produce a copy of their ID (personal or work, e.g. for a council/Ofsted visit). It is Kidz Zone Club's duty to safeguard the welfare of children; therefore, anyone who is not a visitor to the holiday club, or is not recognised by staff, will be asked to leave the venue premises. If they refuse to leave, the police will be called. Visitors will not be left alone or in a 1:1 situation with a child.

Early Help and Family Help

In line with KCSIE 2026 and Working Together to Safeguard Children 2026, we now use the following terminology consistently:

- Universal services and community-based early help - general support available to all families, without a formal referral
- Family Help - the targeted, local-authority-coordinated, consent-based offer for families who need more focused support (previously referred to more generally as 'Early Help')

Where staff identify a child or family who may benefit from Family Help - for example support around parenting, ASD support, or drug and alcohol issues - please contact your DSL for further details, who can advise on and initiate the appropriate local authority referral.

Making a referral to children's services

Every member of staff is expected to know how to make a referral to children's services (the safeguarding team currently completes these forms). All members of staff are expected to know what might happen next - this could be a child and family assessment.

The referral forms can be found via the website links below:

- Central Bedfordshire: <https://forms.centralbedfordshire.gov.uk/officeforms/Bic100.ofml>
- Buckinghamshire: <https://www.buckssafeguarding.org.uk/childrenpartnership/reporting-a-concern/report-a-concern-professional/>
- Milton Keynes: <https://www.milton-keynes.gov.uk/children-young-people-and-families/milton-keynes-multi-agency-safeguarding-hub-mash>

Appendix 1 - Concerns about a child/young person

If you are ever concerned about the safety or well-being of a child, please talk to our Designated Safeguarding Officers, Monday - Friday 9am - 6.00pm.

Alternatively, parents and carers can also contact their local authority referral hub.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact your local safeguarding board via the details below.

Area	Contact details
Central Bedfordshire	Access and Referral Hub: 0300 300 8585 (office hours: 08.45–17.20 Mon–Thu, 08.45–16.20 Fri) Emergency Duty Team (out of hours): 0300 300 8123
Buckinghamshire	First Response Team: 01296 383 962 (Mon–Thu 9am–5.30pm, Fri 9am–5pm) Emergency Duty Team (out of hours): 0800 999 7677
Milton Keynes	LADO: 01908 254300 / lado@milton-keynes.gov.uk MASH: 01908 253169 Emergency Duty Team (after 5pm): 01908 265545
Luton	Telephone: 01582 547653 Out of hours: 0300 300 8123 Emergency: 999 Email: mash@luton.gov.uk
Northamptonshire	Out-of-hours team: 01604 626 938 MASH: 0300 126 7000
Hertfordshire	Children's Services: 0300 123 4043 Emergency: 999
Oxfordshire	MASH: 0345 050 7666 (office hours: 8.30am–5pm Mon–Thu, 8.30am–4pm Fri) Emergency Duty Team (out of hours): 0800 833 408

Other contacts: Police on 101, or in an emergency 999. NSPCC 0808 800 5000, or Childline on 0800 1111.

Appendix 2 - Concerns about an adult

If you have a concern about a staff member or adult, please talk to our Designated Safeguarding Officers, Monday - Friday 9am - 6.00pm.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact your local safeguarding board via the details below.

Area	Contact details
Central Bedfordshire	LADO: 0300 300 8142 Emergency Duty Team (out of hours): 0300 300 8123
Buckinghamshire	First Response Team: 01296 383 962 (Mon–Thu 9am–5.30pm, Fri 9am–5pm) Emergency Duty Team (out of hours): 0800 999 7677 Early years concerns: EYSAFEGUARDING@buckinghamshire.gov.uk
Milton Keynes	LADO: 01908 254373 / lado@milton-keynes.gov.uk MASH: 01908 253169 Emergency Duty Team (after 5pm): 01908 265545
Luton	LADO: 01582 548069 / LADO@luton.gcsx.gov.uk MASH (if LADO unavailable): 01582 547653
Northamptonshire	Designated Officer: 01604 362993
Hertfordshire	Adult Care Services: 0300 123 4042 LADO: 01992 555420
Oxfordshire	LADO: 01865 810603

Other contacts: Police on 101, or in an emergency 999. NSPCC 0808 800 5000, or Childline on 0800 1111.

Related Policies and Information: Mobile Phone Policy; Social Networking Policy; Toileting and Personal Care Policy; Local Authority's Guidance and Contact Numbers.

Appendix 3: Safer recruitment and DBS checks - policy and procedures

We will record all information on the checks carried out on the Single Central Record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

- Verify their identity
- Inform shortlisted candidates that online searches may be done as part of due diligence checks
- Carry out online searches of job candidates to identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information, for those working in regulated activity - we will not keep a copy of this for longer than 6 months
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK - we will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK
- Ask for written information about previous employment history and check that this information is not contradictory or incomplete, including checking gaps in employment
- Seek references on all short-listed candidates, including internal candidates, before interview, and scrutinise these and resolve any concerns before confirming appointments - references will ask specific questions about the applicant's suitability to work with children

Regulated activity means a person who will be:

- Responsible, on a regular basis, for teaching, training or instructing children; or
- Carrying out paid, or unsupervised unpaid, work regularly where that work provides an opportunity for contact with children

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, young people, vulnerable adults, apprentices or learners, we will carry out all the relevant checks as if the individual were a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm to, a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult, or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid), or would have been removed had they not left

Volunteers

Following the Crime and Policing Act 2026, the "supervision exemption" has been removed from the legal definition of regulated activity. This means a supervised volunteer can no longer be treated as outside regulated activity purely because they are supervised. From 1 September 2026, any volunteer who teaches, trains, instructs or supervises children on more than 3 days in any 30-day period, or overnight, falls within regulated activity and requires an enhanced DBS check with barred list information, regardless of the level of supervision in place.

We will:

- Audit our volunteer rosters on a rolling basis to identify any volunteer who meets, or is approaching, the 3-day-in-30-days or overnight threshold, and obtain an enhanced DBS check with barred list information before they exceed it
- Never leave an unchecked volunteer unsupervised, or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list check for all volunteers who are new to working in regulated activity
- Carry out and retain a written risk assessment when deciding whether to seek an enhanced DBS check without barred list check for any volunteer who does not meet the regulated activity threshold, and keep this risk assessment under review as the pattern of a volunteer's involvement changes

Appendix 4: Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

This policy is also based on the following legislation and guidance:

- Education Act 2011
- Equality Act 2010
- Protection of Freedoms Act 2012
- Vetting and Barring Scheme Guidance
- Human Rights Act 1998
- UK GDPR and Data Protection Act 2018
- The Care Act 2014
- Modern Slavery Act 2015
- Inspecting Safeguarding in Early Years, Education and Skills Settings 2019
- Prevent Duty Guidance 2019
- Work-based Learning National Guidance - DfE - Prevent
- CONTEST strategy (Prevent)
- Crime and Policing Act 2026
- Children's Wellbeing and Schools Act
- Domestic Abuse Act 2021
- Section 5B(11) of the Female Genital Mutilation Act 2003, which places a statutory duty to report to the police where FGM appears to have been carried out on a girl under 18
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is
- The Counter-Terrorism and Security Act 2015, with respect to protecting people from the risk of radicalisation and extremism

Appendix 5 - Record Keeping

All records are stored securely in password-protected individual files. We follow the NSPCC Child Protection Records Retention and Storage Guidelines.

Policy date: August 2026

Policy review date: August 2027 (if not before)

Author: Scott McCafferty

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Specific Safeguarding Issues

Staff should be alert to child-on-child abuse (peer-on-peer abuse), county lines and exploitation, gender-questioning children, and mental health as potential safeguarding concerns, in line with Keeping Children Safe in Education 2026.

Version Control

Version: 9.7 - Updated for KCSIE 2026

Approved by: Scott McCafferty - Director

Approval date: August 2026

Next review date: August 2027

