



Bath Area Play Project

www.bapp.org.uk (01225) 832479

BATH AREA PLAY PROJECT SAFEGUARDING PROCEDURE

Bath Area Play Project are committed to the protection of children using our services and in our communities; where children are at risk of significant harm or there is a cause for concern about the child's behaviour, we have a legal duty to follow this procedure which is compliant with the LSCB/BCSSP guidelines. For further guidance see [child protection procedures](#)

There are a range of Early Help services which are a multi-agency approach to support families before the situation may escalate to safeguarding levels which staff are aware of. Staff can use the Early Help Assessment EHA/ CAF process to ensure that early help is used to *prevent* children reaching thresholds for statutory interventions.

You can use the [request for service](#) form to make a referral to the Early Help Panel (EHAP) if a family has multiple and complex issues and you have already completed a EHA (Early Help Assessment) and are unsure of what else to do but they do not meet the threshold for a Social Care intervention. To check the threshold, please see the [threshold of needs matrix](#) and [Neglect Toolkit](#). For more information on Early Help Assessment, please speak to the Integrated Working Team on (01225) 395021 or <https://beta.bathnes.gov.uk/early-help-assessment>

There is also an Early Help App which details the range of services available across B&NEs. This can be downloaded from the Google Play store on the BAPP Work Mobile phones.

All parents, carers, staff and volunteers have a duty to safeguard and promote the welfare of children including children with SEND (Special Education Needs & Disabilities). Please also refer to our Health & safety and E-Safety Policies in respect of mobile phone use.

You are likely to be involved in three main ways:

- you may have concerns about a child, and we need to refer those concerns to social services or the police
- you may be approached by social services and asked to provide information about a child or family or to be involved in an assessment or to attend a child protection conference. This may happen regardless of who made the referral to social services
- you may be asked to carry out a specific type of assessment, or to provide help or a specific service to the child or a member of their family as part of an agreed plan and contribute to the reviewing of the child's progress (including attending child protection conference)

There are five types of child abuse. They are defined in the UK Government guidance [Working Together to Safeguard Children \(2026\)](#) as follows: Physical abuse, Emotional abuse, Sexual abuse, Neglect and Bullying. Please see definitions below.

Responsibilities of Trustees in safeguarding

All Trustees are required to have an Enhanced DBS (Disclosure & Barring Service) Check and for those Trustees involved in Recruitment of staff, to have attended safer recruitment training.

Responsibility is designated to the Director for compliance with all Safeguarding requirements including DBS checks, Annual Safeguarding Audit and maintenance of the Single Central Record. All staff must have an Enhanced DBS Check which is redone every 3 years at a maximum. Staff are also expected to complete the Staff Suitability Declaration annually and the responsibility is on the staff to declare if there have been any changes during the year.

All Staff and Volunteer records including requirements for staff who have lived or worked outside the UK will be recorded on the Single Central Record and as required by legislation.

Responsibilities of staff in safeguarding matters

All staff are expected to understand their role in keeping all children safe, including those with disabilities and SEND and protecting them from harm including regard for the Prevent Duty. Any concern relating to possible extremism or terrorism is a Safeguarding concern and the procedure should be followed in the same way. As in the Staff Behaviour Policy & Code of Practice, at sessions staff have a responsibility to know where children are and who else is in the building/vicinity of where the play session is being held. Staff may need to approach adults they are unfamiliar with, where their behaviour was putting children at risk or they were not parents of children attending.

Supervision levels are critical to retaining a safe play environment for children and particularly for children with SEND (Special Educational Needs and Disabilities). Children with SEND are often more vulnerable than their non-disabled peers and therefore more at risk. Generally, we apply the minimum ratios under the Children Act however these are often exceeded when provision is solely for disabled children, recognising that higher levels of supervision can support and protect children.

This also includes helping children to understand how they can keep themselves safe which may include telling a Playworker if they are leaving the session and to always play in sight of a Playworker but also when they leave the session. Staff can suggest that they walk with friends and along well-lit roads and pavements rather than using the dark shortcut. Playworkers are expected to maintain staff ratios compliant with legislation, which may be higher than the minimum for those working with disabled children, in order to protect children

All staff should be aware of this procedure including regard for the Prevent Duty, Child Sexual Exploitation, Female Genital Mutilation, Upskirting and other child protection issues including peer on peer abuse. Access to training as well as information is provided in all staff Induction. See below for Definitions. The senior member of staff, usually the Director, is responsible for liaison with local Safeguarding agencies and with Ofsted in any child protection situation.

Sexual violence and sexual harassment between children is unacceptable and with the increase in online use by children with the pandemic, staff should be aware of the forms that online sexual abuse and harassment can take, when sexual behaviour is inappropriate and explain that this is not tolerated or acceptable. They should report any such concerns in the usual way

Ofsted must be notified about any allegations of serious harm or abuse against a child while the child is in our care and is not already known about by any named Lead Professional/Social Worker.

Depending on the individual case, it may be more appropriate for the Senior Playworker to be involved and they should therefore be able to implement the policies and procedures as well.

All staff should be aware of the possible signs and symptoms of abuse including sexual exploitation, radicalisation, online safety & harassment and how children are at risk and be aware of their responsibility and report concerns to senior staff, police or social services and to keep concerns confidential.

How parents/carers will be informed

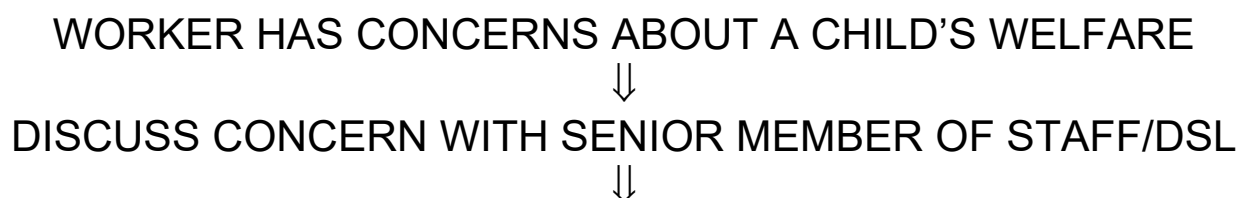
Parents / carers will be notified where a member of staff has a concern about a child's welfare. This will be discussed informally in the first instance.

Where there is serious concern for the child, concerns **must** be discussed with the Parent/Carer *unless* you have reason to believe this might significantly increase the risk to the child. Where a child discloses something which is abusive including grooming behaviour on social media, demanding photos to be sent or cyber bullying, then this must be recorded and Duty Team contacted. Parents/carers must also be informed where this is safe to do so and does not put the child at any greater risk.

Where this concern is then written down, the parent or carer **MUST** see what is recorded and sign and date the record, where this is safe to do so and does not put the child at any greater risk. All discussions / meetings / recording will be confidential between the Parent/Carer and staff member concerned.

The Director, Caroline Haworth as the Designated Safeguarding Lead 07792 500087, or the Deputy SL in her absence, Emily North, 07792 551691, should be kept informed of all meetings and records kept. Records must be kept securely and signed and dated. Where the concern has arisen at a play service in an external venue, records kept will remain on the premises until the session ends. Then all records will return and remain in the BAPP office and securely stored.

Steps to be taken where a concern is raised



STILL HAS CONCERNS or DISCUSS WITH PARENT (where appropriate and safe to do so)



SEEK ADVICE FROM SOCIAL SERVICES/ OTHER AGENCY



Where no further action required, record and date decision

Where action is required and parent has been informed

REFER TO SOCIAL SERVICES / POLICE where [Thresholds](#) are met



RECORD CONCERNS AND SHOW TO PARENT/CARER

- It is better to mention your concerns than to keep silent. You should inform the Senior Playworker / DSL immediately who is available at all times the provision is open.
- Where a disclosure of abuse or abusive behaviour including online or child sexual exploitation is known, this should be recorded as accurately as possible with facts rather than opinion, shared with the parents/carers unless this would put the child at further risk, and reported to the Duty Team. They may then require documents to be completed which the DSL would complete or you would be asked to complete.
- Where Child Sexual Exploitation is disclosed or you have serious concerns about a child or young person's vulnerability in relation to grooming, sexting, inappropriate social media usage, staff will be asked to complete a Risk Assessment Form which will then be sent to MARAC (Multi-Agency Risk Assessment Conference)
- Where you have any concerns about possible radicalisation or behaviour which is concerning in relation to possible extremism, please share with the Prevent SPOC (single point of contact), the DSL, which may require a referral to the Channel Panel under the Prevent Duty
- Concerns in relation to the Prevent Duty will be shared immediately with the B&NES Designated Officer
- Keep a dated record of all observations / concerns you may have and then report them to the Senior Playworker / DSL. Parents/carers should be shown any written records and asked to sign them.
- You **do not** have responsibility to follow up concerns yourself unless you are the designated member of staff e.g. Senior Playworker or DSL
- Your concern may be followed up by Social Care
- Delay can be dangerous – speedy action can bring rapid protection for the child.

Where an allegation is made against a member of staff or volunteer, please refer to Allegations Procedure. The DSL will also need to follow the LADO (Local Authority

Designated Officer) procedures for B&NES. This should be reported within one working day and where the DSL is unavailable, the Deputy or Trustee responsible for Safeguarding should be informed.

Staff Recruitment is conducted using Safeguarding principles in line with our Staffing Policy. Prior to Interview, application forms are checked for gaps in employment history and where appropriate the candidate is asked at interview. Where an applicant is appointed, two references are sought and one followed up with a verbal reference and recorded on the Single Central Record. All staff employed to work directly with children and young people are expected to hold or be checked with the Enhanced DBS, certificate number and date of issue recorded and revised every 3 years.

If you wish to make a safeguarding referral or discuss concerns about a child or the behaviour of a member of staff or volunteer, you can contact the following numbers for B&NES **after discussing** with the DSL, Caroline Haworth, unless the concern relates to the DSL. In which case, please speak to the Trustee.

The DSL would usually be the staff member responsible for completing a referral however this can be designated to the Deputy or Senior Practitioner. This can be by phone, or by completing the online form [Report a concern about a child | Bath and North East Somerset Council](#).

Where there is a concern about a member of staff or volunteer's behaviour or practice and you have discussed with the DSL and you are not satisfied about the response, this should be reported to the LADO within one working day of the concern being identified. For advice complete and return the [LADO Managing Allegations Referral Form](#) to LADO@bathnes.gov.uk

- DSL Caroline Haworth 07792 500087
- Deputy DSL Emily North 07792 551691
- BAPP Safeguarding Trustee Emma Hendy 07533 669797
- Social Services Referral and Assessment Team 01225 396312/313
- Out of hours Emergency Duty Team 01454 615165
- LADO 01225 396810 / LADO@bathnes.gov.uk
- Police Child Protection Duty Team 01225 842786
- Prevent Project 01225 396553
- Local Authority Head of Safeguarding 01225 396974
- Ofsted Child Protection General Contact 0300 123 1231
 - Ofsted Concerns / complaints 0300 123 4666
 - Ofsted Whistleblower 0300 123 3155

Please also refer to:

B&NES Children's Services – Safeguarding

[Working Together to Safeguard Children \(2026\)](#), updated March 2026

Department of Health "What to do if you're Worried a Child is Being Abused"

This procedure will be reviewed regularly by Staff and Trustees and forms part of the Annual Safeguarding Audit and all actions required, recorded in the Action Plan and Strategic Objectives where applicable.

Reviewed by Trustees 21.07.19, amended 24.06.22, amended 24.11.24 & 12.06.25, 20.03.26

Date of Review	Signature of Reviewer	Initials of Reviewer	Date of Next Review
23.11.24	CH/SLT	CH/SLT	Nov 2025
16.02.26	CH/SLT	CH	Feb 2027

Definitions

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or failing to protect a child from that harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age- or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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 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, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact including both penetrative or non-penetrative acts such as kissing, touching or fondling the child's genitals or breasts, vaginal or anal intercourse or oral sex. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing; shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision including the use of inadequate caretakers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal

(e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group).

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm).

Child sexual exploitation (CSE) 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) 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

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse.

Protecting children from radicalisation: the Prevent Duty covers all forms of terrorism and extremism and some aspects of non-violent extremism. The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. Prevent is about safeguarding people and communities from the threat of terrorism. Prevent is 1 of the 4 elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism

Child Trafficking

Trafficking is where children and young people tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children are trafficked for sexual exploitation, benefit fraud, forced marriage, domestic slavery, forced labour and crime e.g. begging, theft or moving drugs.

Trafficked children experience many types of abuse_and_neglect. Traffickers use physical, sexual and emotional abuse as a form of control. Children and young people are also likely to be physically and emotionally neglected and may be sexually_exploited.

Peer on Peer Abuse

All children are capable of abusing their peers. This can manifest itself in a whole spectrum of behaviours including -

- Bullying including cyberbullying
- Sexual violence and harassment
- Physical abuse
- Sexting
- Up skirting (now a criminal offence and has reporting requirements)
- Initiation /hazing type violence and rituals

Upskirting

Upskirting is the act of taking a photograph of underneath a person's skirt without their consent which became a criminal offence under the Voyeurism Act in April 2019

Children also need to know how to report concerns and know that they will be listened to and supported. This includes

- Procedures to minimise the risk of peer on peer abuse
- How allegations are recorded, investigated and dealt with
- Clear processes as to how victims, perpetrators and any other children affected will be supported
- Recognition of the gendered nature of peer on peer abuse but recognising, that all forms of this behaviour are unacceptable and will be taken seriously

Online Sexual Harassment and Sexual Violence

Sexual harassment and online sexual abuse, such as being sent unsolicited explicit sexual material and being pressured to send nude pictures ('nudes'), are now much more prevalent. This together with sexist name calling are forms of unacceptable harassment. Sexual violence including but not limited to unwanted touching.

The following model is used to explain the continuum of sexual behaviours presented by children and young people, from normal to violent. Harmful sexual behaviour encompasses a range of behaviour, which can be displayed towards younger children, peers, older children or adults. It can occur online and offline or a mixture of both.

Figure 1. Definition: Sexual behaviours across a continuum

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> - Developmentally expected - Socially acceptable - Consensual, mutual, reciprocal - Shared decision-making 	<ul style="list-style-type: none"> - Single instances of inappropriate sexual behaviour - Socially acceptable behaviour within peer group - Context for behaviour may be inappropriate - Generally consensual and reciprocal 	<ul style="list-style-type: none"> - Problematic and concerning behaviour - Developmentally unusual and socially unexpected - No overt elements of victimisation - Consent issues may be unclear - May lack reciprocity or equal power - May include levels of compulsivity 	<ul style="list-style-type: none"> - Victimising intent or outcome - Includes misuse of power - Coercion and force to ensure victim compliance - Intrusive - Informed consent lacking or not able to be freely given by victim - May include elements of expressive violence 	<ul style="list-style-type: none"> - Physically violent sexual abuse - Highly intrusive - Instrumental violence that is psychologically and/or sexually arousing to the perpetrator - Sadism

Source: Hackett, S, 'Children, young people and sexual violence' in 'Children behaving badly? Exploring peer violence between children and young people', 2010.

Harmful sexual behaviour

When we refer to harmful sexual behaviour, we use the DfE definition: "Sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or abusive towards another child, young person or adult."

When we refer to sexual harassment and sexual violence, including online, we use the definitions and the language of victim and perpetrator. We recognise that there are many different ways to describe children who have been subjected to sexual harassment and/or sexual violence.