

SAFEGUARDING POLICY

2025/26



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SAFEGUARDING POLICY



Policy Statement

PGL is committed to providing a best-in-class operation that ensures safety and protection of our guests at all times. It is our responsibility during their PGL experience that we take action to promote the welfare of children, young people and adult at risk, to protect them from harm.

Celebrating Children's Achievements:

We positively encourage all children and young people to succeed and celebrate their achievements by actively reviewing, realising different abilities and creating an environment where all achievements are given attention and Praise. We are particularly sensitive to the needs of children with additional needs who may achieve in a different way to the their peers but are equally entitled to celebration.

We recognise that:

- The welfare of the child, young person and adult at risk is paramount.
- All children and adults regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse and will be treated with respect.
- Working in partnership with children, young people, adults and their parents, carers and other agencies is essential in promoting their welfare.
- There is no place for extremist views of any kind within PGL, whether from internal sources, external agencies or individuals.

The purpose of the policy:

- To outline our organisational standards in safeguarding children, young people and adults at risk across our business.
- To provide clear expectations on our procedures that should be adopted in the event a colleague suspecting a child, young person or adult at risk maybe experiencing, or be at risk of harm.

This policy applies to all colleagues, including senior managers and anyone working on behalf of PGL. We will endeavour to safeguard children, young people and adults at risk by:

- Valuing them, listening to them and respecting them.
- Adopting child protection guidelines through procedures and a code of conduct for colleagues and visitors.
- Explicitly prohibiting the use of corporal punishment.
- Recruiting safely, ensuring all necessary checks are made.
- Sharing information about safeguarding, child protection and good practice with children, parents, teachers and colleagues.
- Sharing information about concerns with agencies who need to know and involving parents and children appropriately.
- Providing effective management for colleagues through supervision, support and training.

We are also committed to reviewing our policy annually and in line with any key legislative changes.

Anthony Jones

Chief Executive Officer
January 2025

PGL SAFEGUARDING AIMS

PGL prides itself in ensuring

- Appropriate action is taken in a timely manner to safeguard and promote children's, young people and adults at risk welfare.
- All colleagues are aware of their responsibilities with respect to safeguarding.
- Colleagues are appropriately trained in recognising and reporting safeguarding issues.

Key Legislation

This policy is based on the following legislation;

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- The Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- The Care Act 2014 http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted which outlines the duties and powers of the local authority for adult safeguarding
- The Children (Scotland) Act 1995 Children (Scotland) Act 1995 (legislation.gov.uk) which outlines the legislative framework for Scotland's child protection system
- The Children and Young People (Scotland Act 2014) Children and Young People (Scotland) Act 2014 (legislation.gov.uk) amends The Children (Scotland) Act 1995 to ensure children's rights are upheld
- Children in Wales (2008) All Wales Child Protection Procedures Safeguarding Wales .
- Social Services and Well-Being (Wales) Act 2014, part 7 safeguarding
- Working Together to Safeguard Children 2023 Working together to safeguard children 2023: statutory guidance (publishing.service.gov.uk)

What to do if you're worried a child is being abused:

- Advice for Practitioners (2015)
- Protection of Freedoms Act (2012)
- Sexual Offences Act (2003)
- UN Convention on the Rights of the Child (1989)
- Data Protection Act (2018)
- Modern Slavery Act (2015)

Key Definitions

Safeguarding and promoting the welfare of children defined 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

Is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse

Is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Adult at risk definition

The safeguarding duties in The Care Act 2014 apply to an adult who:

- Has needs for care and support, whether or not the local authority is meeting any of those needs
- Is experiencing, or is at risk, of abuse or neglect
- As a result of those needs is unable to protect him or herself against the abuse or neglect or the risk of it.



ROLES AND RESPONSIBILITIES

Safeguarding and child protection is Everyone's Responsibility. This policy applies to all colleagues, including senior managers and anyone working on behalf of PGL.

All centre based colleagues will be aware of;

- Our systems which support safeguarding, including this safeguarding policy, the staff code of conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputies.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

Centre Based Designated Safeguarding Lead (DSL) and Deputy DSL responsibilities;

- The DSL (or in their absence, the Deputy DSL) takes responsibility for child protection and wider safeguarding for their centre.
- To understand the laws relating to child protection as well as company policies and operating procedures.
- To provide advice and support to other colleagues on child welfare and child protection matters.
- To refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Ofsted, Disclosure and Barring Service, and/or police)
- To openly encourage and nurture a protective and caring culture across their centres.
- To encourage an environment which puts children's interests first and actively supports a whistle- blowing policy.
- To self asses the centres operation against Ofsted's registration requirements.
- Ensure the visitor policy is adhered to and a copy of the code of conduct is made available to all visitors.
- Maintain safeguarding records on MyConcern (internal safeguarding recording system).
- Escalate incidents to the Head of Safeguarding in line with PGL's safeguarding reporting policy.
- To deliver safeguarding training to centre based colleagues.

Head of Safeguarding & SEND;

- To implement PGL's safeguarding strategy, promoting a culture where safeguarding is at the core of our delivery.
- Develop organisational knowledge and awareness of safeguarding, ensuring all colleagues receive appropriate safeguarding training.
- Ensuring robust reporting procedures are in place.
- Support and provide advice to centre based Designated Safeguarding Leads and Deputies.
- To oversee and ensure PGL's safeguarding policy is full implemented.
- Ensuring PGL continue to be market leading in developing their approach to Safeguarding.

Our Organisational Designated Safeguarding Lead	Our Organisational Deputy Designated Safeguarding Lead
Gemma Roberson Head of Safeguarding & SEND 0333 321 2100	**Annette Bindley** Safeguarding & SEND Support Executive 0333 321 2100 **Paul Kenwright** PGL Advisory Board Member 0333 321 2100
safeguarding@pglbeyond.com	



ORGANISATIONAL GOVERNANCE ARRANGEMENTS FOR SAFEGUARDING



PGL's strong focus on governance in relation to our safeguarding, is to ensure a robust approach to reviewing the measures our organisation has in place and provide a forum for oversight and challenge. The image below demonstrates our governance arrangements;



Role of the Safeguarding Committee

This committee will ensure effective communication of the safeguarding strategy across PGL and champion a culture of effective safeguarding across the company which is fundamental to an outstanding customer experience. The Committee members are key members of PGL's senior leadership team.

To support the safeguarding board to fulfil its responsibilities in relation to safeguarding by;

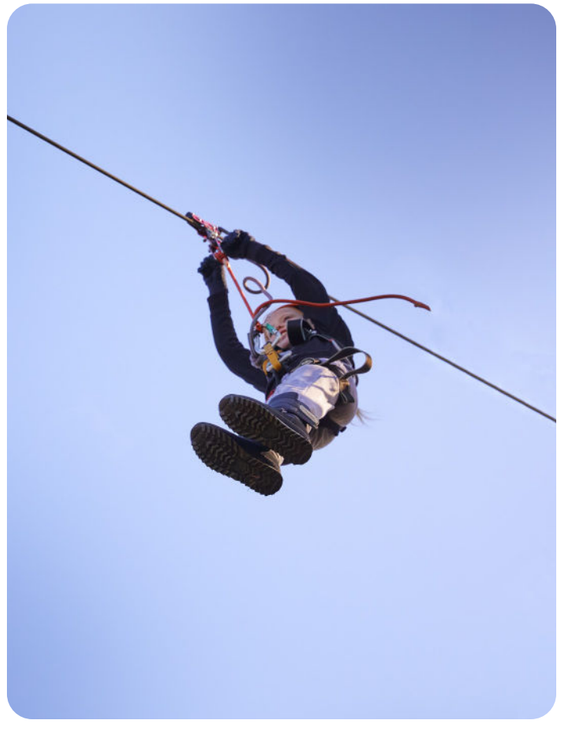
- Identifying and contribute to the development of safeguarding policies for consideration and endorsement by the Board (as required)
- Monitoring the implementation of safeguarding standards and procedures to ensure practice is effective and consistently applied, providing assurances to the Board
- Ensuring that all colleagues are engaged in contributing to the effective safeguarding culture of PGL
- Challenge and support those in the company to safeguard effectively
- Ensuring that any legislative changes, statutory guidance updates or professional bodies requirements are identified and reflected in any organisational change that needs to happen
- Ensure that PGL colleagues access learning and development opportunities regarding safeguarding in line with their roles and responsibilities
- Reviewing serious occurrences and overseeing actions from reports, particularly where there is specific policy, procedure and/or practice changes that need to be considered
- Consider relevant national agendas, serious case reviews and any internal reviews where learning can be shared across the organisation
- Ensure the effective dissemination of the safeguarding committee decisions, recommendations and learning using DSL forums and disseminated through the committee members to their respective areas

Role of the Safeguarding Board

The board will ensure the effectiveness of the safeguarding strategy across PGL. They will oversee the coordination of the safeguarding committee and drive the safeguarding priorities. The board will provide constructive challenge and scrutiny of the safeguarding measures across PGL. The PGL Directors are all members of the Safeguarding board.

Responsibilities of the Safeguarding board include;

- Reviewing minutes and actions from safeguarding committee, ensuring the committee are held to account for progress on safeguarding across the business.
- Ensuring PGL has an annual safeguarding strategy, with clear priorities for the business to continue to be market leading.
- Review any lessons learnt from serious safeguarding incidents.
- Provide a level of effective independent oversight and challenge.
- Agreeing annual report for publication.



SAFER RECRUITMENT

Staffing

Our top priority is the safety of our guests on our centres and we have a robust safer recruitment practice in place when recruiting new colleagues to all of our PGL centres.

- A detailed application form is received and vetted by a member of staff who has received Safer Recruitment training.
- The applicant's motives and suitability to work with children are discussed during a virtual interview.
- The applicant's references are verified wherever possible prior to commencing employment, the employee's probationary period is not passed until satisfactory references are received.
- Original qualification certificates are checked.
- A Government Right to Work check is carried out to verify the applicant's identity.
- Applicants will be asked to disclose if they have ever been barred from working with children or disqualified under the 2006 Childcare Act and 2018 Regulations.
- The Disclosure and Barring Service Enhanced' check (PVG for Scotland and the Bulletin No. 2 for France) is applied for prior to employment commencing, is not possible to check applicants from overseas via the DBS, so we require an Overseas Police check
- Employees will only be permitted to stay overnight once their DBS, PVG or Bulletin No. 2 results are received on centre.
- When we have the additional support of 'vetted adults' i.e. teachers and we are not operating as a *childcare setting, it is permissible to allow our colleagues to work whilst awaiting for their DBS, PVG or Bulletin No.2 results, however the colleague's duties are modified, to prevent any regulated activity or unsupervised access to guests. In addition, a safeguarding risk assessment and interview is undertaken by their line manager; who is responsible for monitoring their performance and behaviour.
- New applicants for Instructional and Group Leader roles are required to complete a 5-day residential training course.
- Colleagues undergo a compulsory probationary period lasting a minimum of 4 weeks.
- Their contract is confirmed upon receipt of the satisfactory DBS, PVG or Bulletin No. 2 check, satisfactory references and successfully passing the probationary period.
- Ongoing support, development training and monitoring is undertaken by senior team members for all new and existing colleagues.
- Contractors and Agency staff will be supervised at all times unless PGL has established that they have undergone an enhanced DBS check

*Childcare setting – Unaccompanied Individual children

A DBS, PVG or Bulletin No. 2 disclosure would not automatically act as a bar to employment with PGL. Consideration is always given to the legal limitations on employing certain ex-offenders and the company's duties in law; however, disclosures may contain details of spent convictions irrelevant to employment with children and therefore we risk-assess each case individually.

When considering whether to employ an ex-offender we consider a range of factors, including the nature of the crime, when it happened and the success of rehabilitation, the sentence, re-offending patterns, job requirements and safeguards against offending at work. We will keep a record of our considerations and any representations made by the individual as part of the assessment.

Vetting Adults

- Contractors and Agency staff will be supervised at all times unless PGL has established that they have undergone an enhanced DBS, PVG or Bulletin No. 2 check and have been subject to safer recruitment protocols
- Party Leaders will declare that all adults on the trip (including parent helpers) have been vetted in line with their authorising bodies safeguarding policy
- Adults who do not have an enhanced DBS, PVG or Bulletin No. 2 check will not be authorised to stay overnight on a PGL centre



COLLEAGUE SAFEGUARDING TRAINING

We have a clear recruitment, induction and training strategy detailing clear job descriptions, terms and conditions of employment, colleague responsibilities and all relevant procedures. Colleagues receive safeguarding training throughout their employment at PGL as part of their ongoing professional development.

Colleagues will also receive regular safeguarding and child protection updates (for example, through emails, Viva Engage and colleague meetings) as required, but at least annually.





RECOGNISING ABUSE & TAKING ACTION

Guidance for PGL Colleagues

If you are concerned about a child, it is important that this is communicated to the Centre-Based Designated Safeguarding Lead or Deputy Designated Safeguarding Lead

You may become aware of suspected or likely abuse because:

- you have seen something
- a child says they have been abused
- somebody else has told you they are concerned
- there has been an allegation against a team member
- there has been an anonymous allegation
- an adult has disclosed they are abusing a child
- an adult has disclosed they were abused as a child

Further detail is provided in the Colleague Handbook, which is provided to colleagues; online, in booklet form, and on safeguarding notice boards.

The 4 Rs of safeguarding:

PGL colleagues must follow the procedures below in the event of a safeguarding concern. The types of abuse can be found in appendix 1.

1. **Recognising** – The signs of abuse (appendix 1) Behaviours which cause concern or a niggling feeling something is not right.
2. **Recording** – The information you have, to the best of your ability, without adding your opinions and emotions.
3. **Reporting** – To the centre based Designated Safeguarding Lead (DSL) or Deputy DSL.
4. **Referral** – The DSL or Deputy DSL will make a referral to the appropriate external agency (Police, children's social care, adult social care, LADO)

CONSULTATION SHOULD NOT DELAY A REFERRAL; IF A CONCERN IS SIGNIFICANT, OR THE SITUATION IS AN EMERGENCY, DO NOT DELAY; CALL CHILDRENS SERVICES IMMEDIATELY.

If a child makes a safeguarding disclosure to you:

1. **Listen carefully to what they are saying** – Be patient and focus on what you are being told. Try not to express your own views and feelings. Allow them time to talk freely and do not ask leading questions.
2. **Stay calm and do not show that you are shocked or upset.** – If you appear shocked or as you do not believe them it could make them stop talking and take back what they have said.
3. **Let them know they have done the right thing in telling you** – Reassurance can be a big impact. If they have kept the abuse a secret it can have a big impact knowing they have shared what has happened.
4. **Tell them it is not their fault and they have done the right thing telling you.** – Abuse is never a child's fault. It is important they hear, and know this.
5. **Explain what will happen next and that you will have to pass this information on** – Do not promise to keep it a secret.
6. **Report to the DSL or Deputy DSL as soon as possible** – Do not discuss with any other colleagues or with any accompanying adults. **However, If you consider the child to be at immediate risk of harm tell the DSL or deputy DSL straight away.**
7. **Write up your conversation as soon as possible in the child's own words (Verbatim).** – Stick to the facts, and do not put your own judgement on it.

PGL Procedures

Complaints, Disciplinary and Grievance Procedures

We have clear policies about handling allegations, dealing with complaints, and our own disciplinary and grievance procedures; these details will be made available to all adults, children, parents and carers as necessary. With regard to colleague allegations, we are very clear that we will take no steps until we have fully discussed and agreed a strategy with the Local Authority Designated Officer, Children's Social Care Services and/or the Police.

Allegations and Low- level concerns

Allegations against PGL colleagues and accompanying adult guests

If it is alleged that a person who works with children 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.

Then this will be reported as per local procedures, to the Local Authority Designated Officer (LADO) or team for managing allegations against professionals that work with children or to the Safeguarding Adults service in the Local Authority if an adult at risk makes an allegation. PGL will make referrals to the DBS (Disclosure and Barring Service) for colleagues in regulated activity roles.

We are registered with Ofsted on the voluntary register for our Kids Camp product. We will always inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegation, within 14 days.

Low- Level Concerns

A low- level concern is any concerns about an adult's behaviour towards a child that does not meet the allegation threshold set out above or is not otherwise serious enough to consider a referral to LADO. These are also known as minor concerns. A low- level concern is any concern- no matter how small, and even if no more than a 'nagging doubt'- that an adult may have acted in a manner which;

- Is not consistent with PGL's code of conduct, including inappropriate conduct outside of work.
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to LADO.

Colleagues should feel encouraged to self-report concerns to foster a culture of transparency. Colleagues when reporting concerns do not need to be able to determine in each case whether it is a low-level concern or a serious concern that meets the threshold of an allegation. The determination should be made by the DSL who will seek advice from the Head of Safeguarding and Regional People and Culture Managers.



Record Keeping

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing using MyConcern. If you are in any doubt about whether to record something, discuss it with the DSL.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. PGL shares information with other agencies and when this is appropriate, in line with local safeguarding procedures.

E-safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and well-being issues. For comprehensive details on our policy on online safety and the use of mobile phones, please refer to our E-Safety Policy.

Whistle Blowing

In very exceptional circumstances when a colleague might be concerned that the company is not dealing with child safeguarding concerns appropriately (as per the whistleblowing policy), they may contact Ofsted, Social Care services, or the Police if a crime has, or may have been committed.

NSPCC whistle blowing number 0808 800 5000.

Confidentiality, Data Protection and Privacy

We have a clear approach to confidentiality and information sharing and our approach is made available to all adults, children, parents and carers via the PGL website. We also have a Data Protection Policy and Privacy Statement.

We fully endorse the principal that the welfare of children and young people overrides any obligations of confidence we may hold to others. Individual cases will only be shared or discussed on a “need to know” basis.

APPENDIX 1

Types of Abuse	Signs
Physical abuse	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 such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may involve: • Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. • Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. • 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. • Seeing or hearing the ill-treatment of another. • Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
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 • 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 (including via the internet) • Sexual abuse is not solely perpetrated by adult males. 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 as a result 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 care-givers) • Ensure access to appropriate medical care or treatment • It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.