



TABLE OF CONTENTS

SUMMARY & SCOPE	3
RATIFICATION	3
POLICY & PROCEDURES	3
Responsible Personnel	3
Introduction	4
Additional Vulnerabilities	6
Equality and Inclusion	7
Safeguarding Training	8
Reporting Safeguarding Concerns about a Child	9
Responding to Concerns About a Child	9
Responding to Concerns or Allegations of Abuse Made Against Staff	12
Whistleblowing	14
Information Sharing & Multi Agency Working	14
Prevent Duty	15
Safer Recruitment and Supervision	16
Selection and Supervision of Work Experience/Volunteers	19
ROLES AND RESPONSIBILITIES	21
Directors	21
Designated Safeguarding Lead	21
All Staff	22
APPENDICES	24
Key Definitions	24
Issued Guidance	27



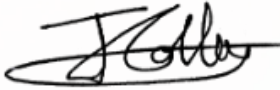
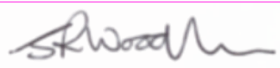
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SUMMARY & SCOPE

Throughout this policy, 'Shine' refers to the organisation operating under the legal entity 'Shine Wraparound Care Ltd.' Any reference to 'Shine' should be understood as pertaining to the services, staff, and practices governed by Shine Wraparound Care Ltd.

The Safeguarding and Child Protection Policy outlines Shine's commitment to promoting the welfare, safety, and rights of children. It establishes clear guidelines and procedures to prevent, identify, and respond to abuse, neglect, exploitation, and harm. The policy ensures that all staff, volunteers, and partners understand their responsibilities and are equipped to take appropriate action to safeguard children in all contexts related to the organisation's activities. This policy applies to all individuals working with or on behalf of the organisation, including full-time and part-time staff, contractors, volunteers, and partner organisations. It covers all activities and programmes involving children and applies in all settings where Shine operates.

RATIFICATION

Name	Role	Signature	Date
John Colley	Group Managing Director Shine Wraparound Care Ltd		31/08/26
Jamie Woodworth	Group Director of Education & Facilities (Director Responsible for Safeguarding) Shine Wraparound Care Ltd		31/08/26

POLICY & PROCEDURES

Responsible Personnel

At Shine the named personnel with designated responsibility for Child Protection and Safeguarding are:

Designated Safeguarding Lead (DSL)	Deputy Designated Safeguarding Lead(s) (DDSL)	Owner(s)
Lauren Bell – Head of Safeguarding & Compliance E: L.Bell@MyShine.co.uk	Tori Baughan – Head of Holiday Clubs E: T.Baughan@MyShine.co.uk	John Colley – Group Managing Director
	Kelsie Stone – Inclusion & Pastoral Manager E: K.Stone@MyShine.co.uk	Shaun Parker – Group Managing Director



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	Jamie Woodworth - Group Director of Education & Facilities (Director Responsible for Safeguarding) E: J.Woodworth@MyShine.co.uk	
	Phoebe Pinnell – Safety & Compliance Manager E: P.Pinnell@MyShine.co.uk	
	Will Powell – Development Squad Manager E: W.Powell@MyShine.co.uk	

In addition to the above team, the named personnel with designated responsibility regarding safer recruitment and allegations against staff/those working at Shine are:

Debbie Baughan – Group HR Director

Abi Fletcher – HR Officer

Introduction

At Shine, safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should always consider what is in the best interests of the child.

We take an 'it can happen here' approach where safeguarding is concerned. Victims of harm should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Shine is committed to safeguarding and promoting the welfare of children by:

- Appointing a nominated Designated Safeguarding Lead (DSL) with status, time and authority to carry out the role effectively.
- Appointing a Director who takes lead responsibility for safeguarding at the highest level in the organisation.
- Clarifying safeguarding expectations for staff, senior leaders, attendees, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture built on shared values. That attendees are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding approaches to practice recognising that Shine is a location where harm could occur.



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- Setting expectations for developing knowledge and skills within Shine, appropriately training staff to remain alert to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable attendees and provision of proportionate interventions to promote their welfare and safety. Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND) and also recognise that children from racially minoritised backgrounds and those experiencing poverty or economic disadvantage may face further barriers to disclosure, identification, and access to support.
- Working in partnership with attendees, parents, and other agencies in the Local Safeguarding Partnership.

All action taken by Shine will be in accordance with:

- [Working Together to Safeguard Children](#), which sets out the multiagency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.
- [Keeping Children Safe in Education](#) is statutory guidance issued by the Department for Education which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- [Early Years Foundation Stage statutory framework](#) is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5.
- Government guidance in relation to specific topical safeguarding issues – a collection of up-to-date guidance can be found on the Safeguarding in Education Team's guidance page. <https://www.bristol safeguarding in education.org/guidance/>
- Guidance from the Local Safeguarding Partnerships around particular safeguarding topics are available on the [Keeping Bristol Safe Partnership Website](#) (Bristol), [Children's Safeguarding Board | Children's Safeguarding Board](#) (North Somerset) and [Children | South Gloucestershire Safeguarding](#) (South Gloucestershire), [Bath & North East Somerset Community Safety and Safeguarding Partnership \(BCSSP\)](#) (Bath & North East Somerset).
- Requirements set out in the Compulsory Childcare Register, Voluntary Childcare Register and Early Years Register.

Shine may be required to follow different reporting processes and guidelines depending on the child's local authority.

This policy should be read alongside our organisational policies, procedures, guidance and other related documents. Shine's core safeguarding-related policies, procedures and risk assessments are:

- | | |
|---|--|
| 1. Electronic Device Policy | 16. Sun Protection Policy |
| 2. Employee ICT Acceptable Use Policy | 17. Use of Reasonable Force and Restrictive Interventions Policy |
| 3. Safe Touch Policy | 18. Arrivals and Departures Policy |
| 4. Transportation of Children and Young People Policy | 19. Off-Site Visits Policy |



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|--|---|
| 5. Accidents and First Aid Policy | 20. Food and Drink Policy |
| 6. Children (KS2) Acceptable Use Policy | 21. Missing Child Procedure |
| 7. Children (KS3) Acceptable Use Policy | 22. Uncollected Child and Late Collection Policy |
| 8. Online Safety Policy Statement | 23. Whistleblowing Policy |
| 9. Attendance Policy | 24. Infectious and Communicable Diseases Policy |
| 10. Complaint Handling Policy | 25. Managing Sexualised Behaviours Procedure |
| 11. Behaviour Management Policy | 26. Prevent Duty Risk Assessment |
| 12. Code of Conduct | 27. Gift Policy |
| 13. Inclusion Policy | 28. GDPR & Data Protection Policy |
| 14. Contractors and Third-Party Operators Policy | 29. AI Policy |
| 15. Allergy and Anaphylaxis Policy | 30. Photography, Filming and Use of Child Imagery Risk Assessment |

Additional Vulnerabilities

Children Potentially at Greater Risk of Harm

Some individual circumstances potentially put children at greater risk of harm. Such risk may exist if a child:

- is disabled
- has special educational needs (whether or not they have a statutory education, health and care (EHC) plan)
- is a young carer
- is bereaved
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- is suffering from mental ill health
- has returned home to their family from care
- is a privately fostered child
- has a parent or carer in custody
- is missing education, or persistently absent from school, or not in receipt of full-time education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded

Increased Risk of Harm in Sports

Sports environments can present unique risks, including heightened physical contact, unsupervised moments, and emotional pressures linked to performance and competition. These factors may increase the likelihood of disclosures or safeguarding concerns. As a result, Shine staff have additional



responsibilities to remain vigilant, uphold robust safeguarding practices, and ensure that all coaching activities are conducted in line with our safeguarding policies and procedures. This includes maintaining clear boundaries, ensuring appropriate supervision, and fostering a safe, inclusive environment for all children.

It is important to recognise the differences in safeguarding needs between general sports provision, such as after school clubs and holiday clubs, and our development squads. Development squads often involve more intensive coaching, closer relationships between coaches and children, and increased expectations around performance, which can heighten emotional vulnerability. These sessions may also include travel, external fixtures, or longer durations, requiring enhanced safeguarding measures and more rigorous oversight.

Social Media

The rise in social media use among children has introduced new safeguarding challenges that must be carefully navigated. Online platforms can expose children to inappropriate content, cyberbullying, coercion, peer exploitation, AI image manipulation, and grooming which may affect their wellbeing. Staff have a responsibility to remain alert to signs of online harm and support children in understanding how to stay safe online. Shine recognises that the use of children's images on social media presents potential safeguarding risks. In line with current guidance, including *Keeping Children Safe in Education* and *UK Safer Internet Centre* recommendations, staff must ensure that images are shared via Shine accounts only where appropriate consent has been obtained, and that children are not identifiable or placed at risk through the disclosure of personal information (such as names, location or uniform). Consideration will always be given on a case-by-case basis to the necessity of sharing images publicly, recognising the increased risks of misuse, including image manipulation and exploitation online.

There is also a risk of blurred boundaries if children attempt to contact staff through social media. Shine staff must ensure that their personal social media accounts are set to private and must not accept or respond to contact from children. Any attempt by a child to make contact must be reported to the DSL without delay. All communication with children must take place through approved channels and in line with Shine's policies.

Mental Health

Children experiencing mental health difficulties may be at increased risk of harm and may have additional vulnerabilities in relation to safeguarding. These children may find it harder to communicate concerns, may present behaviours that mask underlying risk, or may be more susceptible to exploitation, bullying, or neglect. Staff understand the importance of early identification, professional curiosity, and a trauma-informed approach, ensuring that behaviour is not viewed in isolation but considered in the context of the child's emotional wellbeing. Appropriate support will be put in place, including staff trained on first aid for mental health, with safeguarding responses that are responsive, proportionate, and centred on the child's individual needs.

Equality and Inclusion

With regards to safeguarding, we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#). General duties include:

1. Recognise and eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it.



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3. Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published within Shine's Inclusion Policy.

We adhere to both the [Bristol Equality Charter](#) and [Bristol Children's Charter](#) with a view to contribute towards the [One City Plan](#). Shine also adheres to the principles of and promotes anti-oppressive practice in line with the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

Safeguarding Training

All staff:

- Will complete a safeguarding induction with a member of the safeguarding team before working with children.
- Will receive appropriate safeguarding refresher training at least annually (via formal training, email e-bulletins and staff CPD sessions).
- Must complete FGM awareness training and will understand their legal duty under the Mandatory Reporting Duty.
- Must complete Prevent awareness training. This is to ensure that they can comply with the legal expectations under the Prevent Duty.
- Will be informed of the internal whistleblowing policy, the role of the Local Authority Designated Officer and guidance for escalating concerns.

Designated Safeguarding Lead and deputies:

- Will undergo formal training to provide them with the knowledge and skills training required to carry out the role. The training will be updated at least every two years.
- Deputies will be trained to the same level as the DSL.
- The DSL and any deputies will liaise with the Local Safeguarding Partnership to ensure that their knowledge and skills are updated via e-bulletins, attend DSL network meetings, and take time to read and digest safeguarding bulletins.
- Undertake training on Channel referrals and reporting concerns under the Prevent Duty.

Other training considerations:

- Shine will ensure that at least one person on any appointment panel will have undertaken safer recruitment training.
- Members of the Senior Leadership Team will make themselves aware of and understand their role within the local safeguarding arrangements. This will ensure that those who have

responsibility for the management of behaviour, inclusion, Special Educational Needs, attendance, and exclusions will carry out their duties with a safeguarding consideration.

- Staff will have received appropriate training in relation to use of reasonable force and positive handling. The use of reasonable force will be minimised through positive and proactive behaviour support and de-escalation.

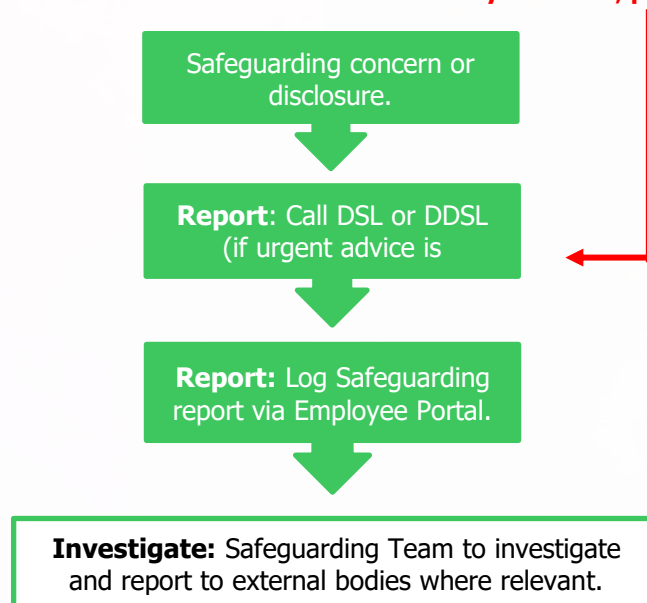
Reporting Safeguarding Concerns about a Child

Internal Reporting

Incidents that occur during shine activities can be categorised by accident, behavioural, or safeguarding. Incidents of any kind must be reported (with the exception of some minor accidents) via Shine's secure, online reporting system on the Employee Portal; reports go directly to the Shine Safeguarding Team. Urgent safeguarding concerns can be reported to the DSL via phone: 07495020920 or to a DDSL via Microsoft Teams call.

Safeguarding concerns are to be shared with the most senior member of staff on site, typically this is the Club Manager or Venue Coordinator. Should a member of SLT be on site, they should be informed of this also. Staff should follow the below procedure to report safeguarding concerns or disclosures.

If you are concerned about the immediate safety of a child, phone 999



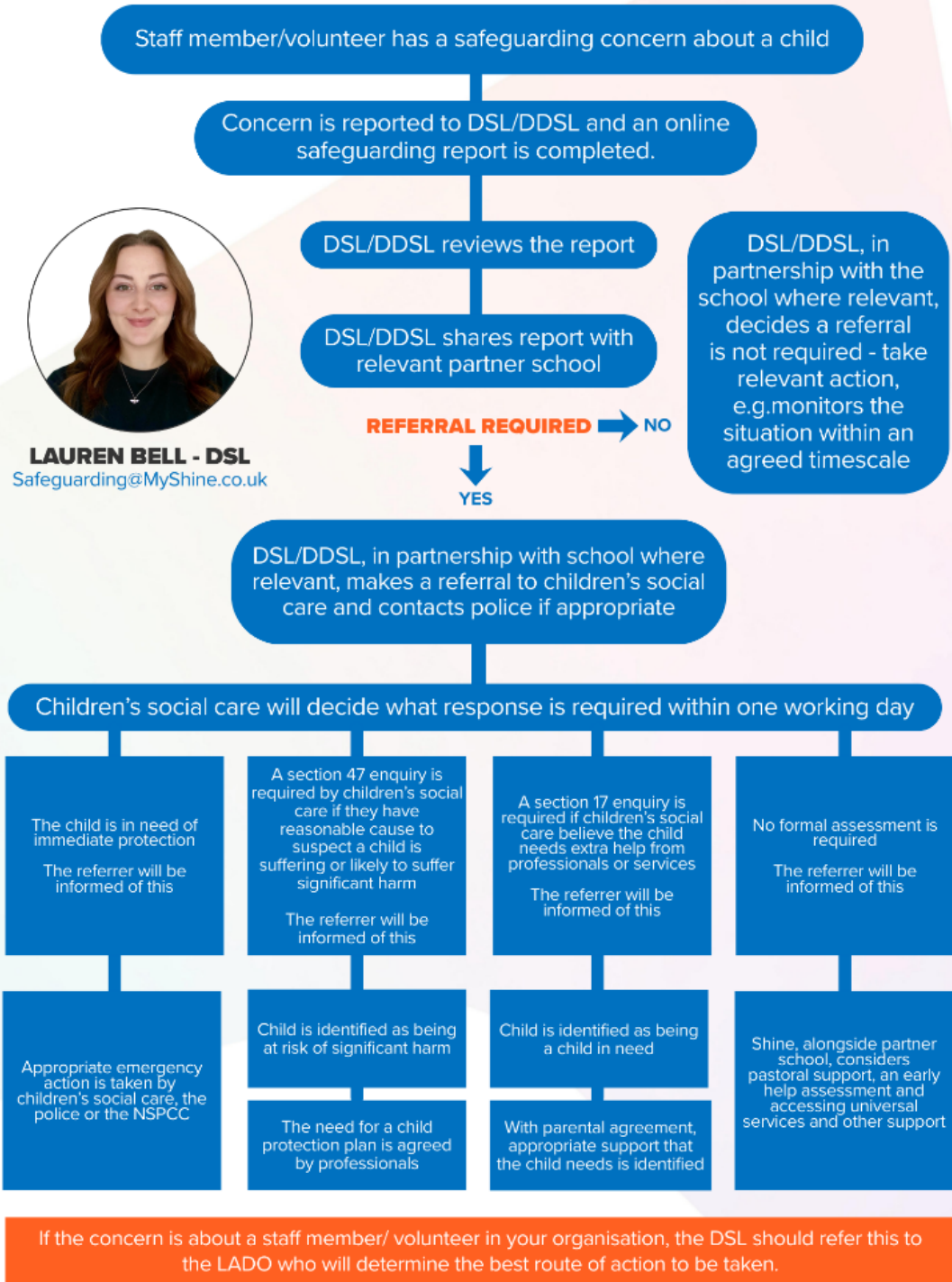
Safeguarding concerns should always be shared with the parent/carers, unless doing so would put the child at risk.

Responding to Concerns About a Child

The Shine Safeguarding Team will investigate all safeguarding reports, regardless of 'severity'. The team will assess and decide on the most appropriate response with the child's wellbeing at the forefront of every decision.



Responding to Safeguarding Concerns Flowchart



LAUREN BELL - DSL
Safeguarding@MyShine.co.uk



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The Shine Safeguarding Team meet termly to discuss ongoing cases, analyse incident reports, and review current policies and procedures to enable continuous development. Safeguarding cases are raised and discussed at every Director's meeting, led by the Director responsible for safeguarding. The [Shine Internal Safeguarding Investigation TEMPLATE.docx](#) is used to investigate safeguarding incidents which meet the threshold.

Managing Disclosures

As part of the induction process, and through regular safeguarding training, staff are trained on the appropriate practice when responding to a disclosure from a child. Staff are trained to:

- Inform the child that they will not be able to keep the disclosure a secret if there is a concern about the child's welfare
- Listen actively, be supportive, and take the child seriously
- Allow the child to lead the conversation
- Reassure the child that they are safe and not in trouble for speaking to someone
- Ask open questions
- Reflect back what the child is saying
- Be clear about next steps

The Safeguarding Team will share safeguarding information with the child's primary education provider to ensure continuity of care and work alongside relevant partners to ensure the child has effective support in place. As the primary education provider, schools are expected to lead on external reporting of their students for wraparound care related activities, however the Shine Safeguarding Team are prepared to make external referrals, where deemed necessary.

External Safeguarding Referrals

First Response safeguarding referrals are made via phone. Emergency services will continue to refer via email; all other professionals will need to call 0117 903 6444 to make a referral. Requests for targeted support from Family Help will continue to be made via webform, with the launch of a new webform on 23rd July 2025.

Since Shine operates across multiple local authorities, local authority threshold guidance must be considered when making referrals. If staff are unsure about whether to make a referral or a request for targeted support, they can review [Effective support for children and families, previously known as threshold guidance](#).

Family Help

Family Help services are designed to support families and children aged 0 to 18 years who need intensive and coordinated help and support to meet their needs. These services are particularly beneficial for families with multiple needs or complex needs, such as those who have experienced early help support that did not meet their needs. If the early help provided has not met the child and family's needs:

- discuss this with the parent or carer
- do a referral to the First Assessment Service, requesting a Families Help response.

Channel Referrals (Prevent Duty)

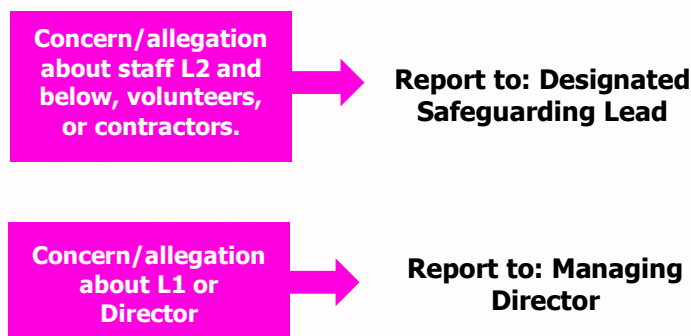
The Channel Referrals under the Prevent Duty involve early intervention to prevent individuals from being drawn into terrorism. [Notice, Check, Share](#) should be viewed when concerns have been raised regarding a child. The DSL should tell the child that they're going to speak with their parents or carers and refer this to the local authority.

The reason for a referral is to:

- make a multi-agency safeguarding assessment
- support vulnerable people to move away from harmful activity

The DSL should tell the parents or carers that making a referral to the local authority does not mean they're accusing the child of a crime.

Responding to Concerns or Allegations of Abuse Made Against Staff



Any concerns or allegations about a Director, must be reported to, and case managed by, a Managing Director.

Shine takes guidance from Part 4 of Keeping Children Safe in Education 2026 when managing Safeguarding concerns or allegations made about staff.

Low-level Concerns or Allegations

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- 1) is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- 2) does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Serious Concerns or Allegations

The Managing Director will be informed of any serious concerns or allegations about a member of staff.

Shine has a duty to report allegations of abuse made against employees and other professionals working with children. The LADO should be informed within one working day of all allegations that come to an employer's attention or that are made directly to the police. A referral must be made to the LADO if an adult who works or volunteers with children and young people (in regulated activity) under 18 has:

1. behaved in a way that has harmed, or may have harmed a child;
2. possibly committed a criminal offence against, or related to, a child;



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3. behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
4. behaved or may have behaved in a way that indicates that they may not be suitable to work with children

There are two aspects to consider when an allegation is made:

1. **Looking after the welfare of the child** - the designated safeguarding lead (or a deputy) is responsible for ensuring that the child is not at risk, and referring cases of suspected abuse to the local authority children's social care as described in Part one of Keeping Children Safe in Education 2026.
2. **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, Shine should:

- apply common sense and judgement,
- deal with allegations quickly, fairly and consistently, and
- provide effective protection for the child and support the person subject to the allegation.

LADO contact information:

Bristol Phone: 01179037795 Email: LADO@bristol.gov.uk Online: https://bristolsafeguarding.org/	South Gloucestershire Phone: 01454866000 Email: lado@southglos.gov.uk
North Somerset Phone: 07795092692 Email: sdinputters@somerset.gov.uk	Bath & North East Somerset Phone: 01225396810 Email: LADO@bathnes.gov.uk

Shine will fulfil their legal duty to report the below to Ofsted within 14 days of an incident being reported:

1. an allegation of serious harm or abuse committed either at the premises or elsewhere by people who:
 - live on the premises
 - work on the premises
 - look after children on the premises



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2. the disqualification of the registered provider, an employee or someone living on the childcare premises (see [guidance on how to waive disqualification](#))

Shine has a legal requirement to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children and/or adults, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

Whistleblowing

Shine promotes a culture of openness but recognises that 'blowing the whistle' can be difficult, particularly with concerns about the possibility of victimisation. Such fears are understandable; Shine's Whistleblowing Policy provides advice about the protections offered by the Public Interest Disclosure Act (PIDA). The Act protects workers from detrimental treatment or victimisation if, in the public interest, they blow the whistle.

The Code of Conduct makes it clear employees are expected to raise serious concerns they may have regarding aspects of work practices which affect the integrity of Shine, the safety of its employees or the general public. Employees are informed of the expectations and protections detailed within the Whistleblowing Policy during their safeguarding induction.

Information Sharing & Multi Agency Working

Effective information sharing is essential to recognise, respond to and prevent abuse, neglect and exploitation, while supporting children's safety and wellbeing. Staff should use professional judgement to share information that is relevant, necessary and proportionate to the safeguarding concern. This may mean summarising key details or excluding information that is not required for safeguarding purposes. Concerns about sharing information must never prevent appropriate action being taken to safeguard children, promote their welfare and protect them from harm.

The purpose of multi-agency safeguarding arrangements is to ensure that, at a local level, organisations and agencies are clear about how they will work together to safeguard children and promote their welfare. Shine will always share information with partner schools if there is a concern about a child, before reaching out to local authority services, to ensure the best outcome for the child.

Shine operates across different local authorities. As such, multi-agency safeguarding arrangements for a setting may differ depending on location.

Bristol - Shine is a relevant agency in the Keeping Bristol Safe Partnership and will work together with appropriate agencies to safeguard and promote the welfare of children including identifying and responding to their needs. This is in compliance with statutory guidance [Working Together to Safeguard Children](#).

Shine is also part of Operation Bond, a contextual safeguarding approach which aims to ensure robust information sharing information between Bristol area schools, the Local Authority and Avon and Somerset Police to respond to incidents of conflict in the community proactively and appropriately. Shine's DSL will attend and participate in the Operation Bond briefings and remind colleagues to proactively share intelligence - [Community Safety - Share information \(Tactical\)](#).



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Further detail on information sharing procedures and multi-agency working within other local authorities that Shine operates in can be found here:

North Somerset - [Children's Safeguarding Board | Children's Safeguarding Board](#)

South Gloucestershire - [Children | South Gloucestershire Safeguarding](#)

Bath & North East Somerset - [Bath & North East Somerset Community Safety and Safeguarding Partnership \(BCSSP\) \(BathNES\)](#)

Where the child already has a social worker, any request for service should go immediately to the social worker involved or, in their absence, to their team manager. If the child is a child in care, notification should also be made to the [Hope Virtual School](#). To confirm whether a child has a Social Worker or Family Help Worker, information staff can [Request information from First Response for professionals](#).

Occasions that warrant a statutory assessment under the Children Act 1989:

- If the child is in need under s.17 of the Children Act 1989 (including when a child is a young carer and or subject to a private fostering arrangement).
- Or if the child needs protection under s.47 of the Children Act 1989 where they are experiencing significant harm, or likely to experience significant harm.

Referrals in these cases should be made in line with local threshold guidance and be made by the DSL (or DDSLs) to Children's Social Care in the local authority in which that child resides.

Shine will co-operate with any statutory safeguarding assessments conducted by children's social care: this includes ensuring representation at appropriate inter-agency meetings such as integrated support plan meetings initial and review child protection conferences and core group meetings.

Prevent Duty

The Prevent Duty, introduced under the Counter-Terrorism and Security Act 2015, places a statutory responsibility on all education providers to have due regard to the need to prevent children and young people from being drawn into terrorism or supporting extremist ideologies. This forms part of wider safeguarding responsibilities and must be embedded within existing safeguarding procedures. Professionals working with children are expected to remain vigilant to signs of radicalisation, which may include concerning changes in behaviour, isolation, or expressions of extremist views.

The promotion of British values is an integral part of the Prevent Duty and supports efforts to safeguard individuals from radicalisation and extremism. These values help create inclusive environments where harmful ideologies are less likely to take root. Professionals working with children and young people are expected to actively promote these values through their practice, encouraging respectful dialogue and critical thinking.

Shine staff work hard to promote the British Values throughout their practice by:

Democracy – involving children in the decision-making process, asking their opinions, letting them choose which activity they take part in, encouraging them to speak up.

The rule of law – promoting equality, enforcing rules fairly, helping the children become accountable for their actions.



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Individual liberty – enabling children to express their own opinions without fear of reprimand, embracing different cultures and religions, helping the children pursue personal interests.

Mutual respect – the 4 Rs of Shine which are consistently reinforced; Respect the coaches; Respect each other; Respect the equipment; Respect the environment.

Tolerance of others – teaching children to understand and accept difference, whether that's different beliefs, abilities, interests or culture in an open-minded way.

Safer Recruitment and Supervision

Shine pays full regard to the safer recruitment practices detailed in Keeping Children Safe in Education (2026 Part 3), using it to inform this portion of the Safeguarding & Child Protection Policy.

Adverts & Shortlisting

Adverts for roles should include the skills, abilities, experience, attitude, and behaviours required for the post, and the safeguarding requirements. This might include: Shine's commitment to safeguarding and promoting the welfare of children; the safeguarding responsibilities of the post as per the job description and personal specification; whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974.

Applicants are required to provide:

- Personal details, current and former names, current address and national insurance number
- Details of their present (or last) employment and reason for leaving
- Full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
- Qualifications, the awarding body and date of award
- Details of referees/references
- A statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on GOV.UK. For example:

- If they have a criminal history
- If they are included on the children's barred list
- If they are prohibited from teaching
- If they are prohibited from taking part in the management of an independent school
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
- If they are known to the police and children's local authority social care
- If they have been disqualified from providing childcare, and any relevant overseas information.

The purpose of a self-declaration is so that candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received.



Shine should ensure that at least two people carry out the shortlisting exercise (it is recommended that those who shortlist carry out the interview for a consistent approach), consider any inconsistencies and look for gaps in employment and reasons given for them, and explore all potential concerns.

References

The purpose of seeking references is to allow employers to obtain factual information to support appointment decisions. Shine should obtain references before interview, where possible, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview.

Shine should:

- Not accept open references e.g. To whom it may concern
- Not rely on applicants to obtain their reference
- Ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations)
- Obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed
- Secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer
- Always verify any information with the person who provided the reference
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify content where information is vague or insufficient information is provided
- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate
- Establish the reason for the candidate leaving their current or most recent post, and,
- Ensure any concerns are resolved satisfactorily before appointment is confirmed.
- When asked to provide references, Shine should ensure the information confirms whether they are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold.

Selection

Shine should use a range of selection techniques to identify the most suitable person for the post. Those interviewing should agree structured questions. The interviews should be used to explore potential areas of concern and to determine the applicant's suitability to work with children. Areas that may be concerning and lead to further probing include:

- Implication that adults and children are equal
- Lack of recognition and/or understanding of the vulnerability of children
- Inappropriate idealisation of children
- Inadequate understanding of appropriate boundaries between adults and children
- Indicators of negative safeguarding behaviours



Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case. Children should be involved in the recruitment process in a meaningful way; at Shine applicants complete a practical assessment. Observing short listed candidates and appropriately supervised interaction with children is common and recognised as good practice. All information considered in decision making should be clearly recorded along with decisions made.

Pre-employment Checks

All offers of appointment should be conditional until satisfactory completion of the mandatory pre-employment checks.

Shine must:

- Verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the gov.uk website.
- Obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children).
- Obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available.
- Verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.
- Verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then shine should follow advice on the gov.uk website.
- If the person has lived or worked outside the UK, make any further checks that shine considers appropriate.
- Verify professional qualifications, as appropriate - use [Check an early years qualification - GOV.UK](#) to verify full and relevant childcare qualifications.

Supervision

At Shine, we understand the importance and value of effective induction and supervision for staff with regard to safeguarding best practice. As such, we employ a continuous cycle of observation and assessments/appraisals to support our staff.

Induction	✓ Line Manager allocation and initial meeting to provide targets for initial 3 months and ensure employee has read and understands all the information provided. ✓ Formal introduction meeting with line manager and relevant members of the Shine Senior Leadership team to run-through the safeguarding policies and procedures, Employee Handbook, setting/school information or procedures and Shine systems training. ✓ Review company risk assessments ✓ Safeguarding training ✓ Prevent Duty training ✓ Paediatric First Aid training ✓ Assessment of any initial training requirements ✓ Read and sign key documents including KCSIE and WTTSC
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Observations and Assessments	✓ Coaching assessments by various senior colleagues including; the Director of Education, the Head of Performance, the Shine Senior Leadership Team, Line Managers and Club Managers. ✓ Whole-club assessments based on the Ofsted inspection of childcare settings framework completed by the Wraparound Care Team. ✓ These teams meet weekly to review safeguarding practice in our settings. Regular constructive feedback to identify particular skills sets & areas of improvement: ✓ Face-to-face meetings and written reports to discuss safeguarding procedures. ✓ Action/improvement points with a timetable for improvement. ✓ Written reports are logged and shared with employee, Directors and Line Managers – this in turn forms the basis of probation period reviews and our appraisal process. ✓ Discussion of safeguarding training gaps. ✓ Disciplinary process overseen by HR Director and Designated Safeguarding Lead for serious safeguarding failures.
Appraisals	Appraisals are conducted 3 times per year by line managers to provide ongoing support and assessment of progress which consist of: ✓ Assessment of progress against previous objectives and the setting of new objectives. ✓ Feedback from colleagues, managers and setting liaisons. ✓ Training requirements identified.
Annual Declaration	Staff will be required to complete an annual safeguarding declaration to confirm their ongoing suitability to work with children. Where a member of staff's circumstances has changed, the HR Director and DSL will consider the implication this may have on their employment.

Selection and Supervision of Work Experience/Volunteers

Application form	Those who have expressed interest are sent an application form to complete and return to the HR Officer. Applications which are incomplete or are not satisfactory will result in an application being refused.
Selection	Once selected, the HR Officer will record: ✓ Emergency details ✓ Placement location ✓ Mentor Where a volunteer aged 16+ is teaching, training, instructing, caring for, or supervising children frequently (more than three days in a 30-day period) or overnight, an enhanced DBS check with children's barred list information will be obtained before they begin.
Induction	✓ Formal introduction meeting with volunteering lead and relevant members of the Shine team. ✓ Safeguarding induction. ✓ Assigned a mentor who will support them throughout their placement.



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Supervision	The mentor will be responsible for in-person supervision, in-line with the New Starter/Volunteer Risk Assessment, feeding back progress or concerns to the relevant teams.
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APPENDICES

Key Definitions

Safeguarding and promoting the welfare of children - Defined for the purposes of [Working Together to Safeguard Children] 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 defined in the Children Act 1989 (s.47) as when a child is suffering or is likely to suffer significant harm. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including physical abuse, sexual abuse, emotional and psychological abuse, coercive and controlling behaviour and economic or financial abuse, where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession.

Controlling or Coercive Behaviour

Also known as coercive control, controlling or coercive behaviour is a form of domestic abuse. In 2015, the offence of controlling or coercive behaviour was introduced under Section 76 of the Serious Crime Act as a criminal offence. Controlling or coercive behaviour is included in the definition of domestic abuse in section 1(3)(c) of the Domestic Abuse Act 2021. Controlling or coercive behaviour is a pattern of abuse (on two or more occasions) that involves multiple behaviours and tactics used by a perpetrator to (but not limited to) hurt, humiliate, intimidate, exploit, isolate, and dominate the victim. It is an intentional pattern of behaviour used to exert power, control, or coercion over another person and can also be present in teenage relationships or between a child and adult. Controlling or coercive behaviour is often committed in conjunction with other forms of abuse and is often part of a wider pattern of abuse, including violent, sexual, or economic abuse. Children can be used to control or coerce the victim, for example, by frustrating child contact and/or child arrangements, telling the children to call the victim derogatory names or to hit the victim, or by threatening to abduct the children. This pattern of abuse causes fear, serious alarm and/or distress which can lead to a substantial adverse effect on a victim's day-to-day life. This can have a significant impact on children and young people.

Section 68 of the Domestic Abuse Act 2021 came into force on 5 April 2023 and removed the 'living together' requirement for the controlling or coercive behaviour offence, which means that the offence applies to partners, ex-partners or family members, regardless of whether the victim and perpetrator live together. More information about controlling or coercive behaviour, including the impact on children can be found in the Controlling or coercive behaviour: statutory guidance²³⁵ and the Domestic Abuse Act 2021: statutory guidance²³⁶.

County lines

A term used to describe 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 form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons. This activity can happen locally as well as across the UK; no specified distance of travel is required.

Domestic abuse

The Domestic Abuse Act 2021 introduced the statutory definition of domestic abuse (section 1 of the Act). The statutory definition is clear that domestic abuse may be a single incident or a course of conduct which can encompass a wide range of abusive behaviours, including a) physical or sexual abuse; b) violent or threatening behaviour; c) controlling or coercive behaviour; d) economic abuse; and e) psychological, emotional, or other abuse such as 'honour' abuse, faith- or belief-based abuse, forced marriage, female genital mutilation or reproductive coercion, harassment and stalking. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the Domestic Abuse Act 2021). The definition ensures that different types of relationships are captured, including ex-partners and family members. All children can experience and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members, including where those being abusive do not live with the child. Experiencing domestic abuse can have a significant impact on children. Section 3 of the Domestic Abuse Act 2021 recognises the impact of domestic abuse on children (0 to 18), as victims in their own right, if they see, hear or experience the effects of abuse.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The 'Domestic Abuse Act 2021: statutory guidance'²³⁹ provides further advice for frontline professionals who have responsibility for safeguarding and supporting victims of domestic abuse, including children. This guidance provides further information about the different forms of domestic abuse (including teenage relationship abuse and child to parent and carer abuse) and the impact of domestic abuse on children.

Emotional Abuse

The persistent emotional or psychological maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.



Extra-Familial Contexts

Extra-familial contexts include a range of environments outside the family home in which harm can occur. These can include peer groups, school, and community/public spaces, including known places in the community where there are concerns about risks to children (for example, parks, housing estates, shopping centres, takeaway restaurants, or transport hubs), as well as online, including social media or gaming platforms.

Extremism

Extremism is defined in the Prevent strategy as the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces.

'Honour'-Based Abuse

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

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 caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Physical Abuse

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

Child 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 159 masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place in family settings, in institutional settings, online, and technology can be used to facilitate offline abuse. Child sexual abuse



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material available online may have been generated in a family environment. Online abuse can also take the form of cyber grooming or self-generated sexual content under coercion. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. A child of any age or gender can be a victim of sexual abuse.

Working Together to Safeguard Children, 2026.

Issued Guidance

[Keeping Children Safe in Education 2026](#)

[Working Together to Safeguarding Children 2026](#)

[Early Years Foundation Stage Framework 2026](#)

[Prevent duty guidance: England and Wales](#)