

# Safeguarding Policy – Children, young people, and adults at risk



## Introduction

Safeguarding is how we keep people safe and prevent incidents of harm, abuse, or neglect from happening. It is also about ensuring we know what to do should we suspect, witness, or receive a disclosure that abuse, neglect, or harm has or is taking place.

*“... it is important that all those offering activities or services to children (up to the age of 18 years) and adults (aged 18 or over) understand the need to have safeguarding arrangements in place to make sure that nobody is put at risk of harm”*

*- Working Together to Safeguard People: Code of Safeguarding Practice*

## Policy statement

**Safeguarding is everyone’s responsibility** and this policy applies to everyone who is a part of The Playwork Foundation, including: trustees, members, paid staff and commissioned service providers, volunteers, anyone else acting on behalf of or representing The Playwork Foundation.

The Playwork Foundation is duty-bound to safeguard all children, young people, and adults at risk, regardless of any Protected Characteristics<sup>1</sup>. We have a responsibility to ensure we do not cause harm, directly or indirectly, to anyone who has contact with the organisation. Whilst we will strive to protect everyone’s safety and wellbeing, The Playwork Foundation recognises that it has additional responsibilities when working with children and adults at risk and shall comply with all statutory duties, relevant guidance, and accepted best practice in connection with these duties.

**Working in partnership with children, young people, adults at risk, and their families, support network, volunteers, and staff, is essential to promoting and embedding this policy.**

Failure to comply with the policy and related procedures will be addressed without delay and may result in dismissal/exclusion from the organisation or criminal proceedings.

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<sup>1</sup> As outlined in the Equality Act 2010

## Definitions

Understanding each of the following definitions and examples are essential to implementing our safeguarding duties. They are included here to ensure they are read as an integral part of this policy. For the purposes of this policy:

- A **child** is a person who is aged under 18 (Section 3 of the Social Services and Well-being Act 2014 [Wales]; Children Act 1986 [England]);
- An **adult at risk** is anyone over 18 years of age who is experiencing or is at risk of abuse or neglect and has needs for care and support (regardless of whether the local authority is meeting any of those needs), and as a result of those needs is unable to protect themselves against abuse or neglect or the risk of it (S 126 of the Social Services and Well-being Act 2014 [Wales]; S 42 – 46 of the Care Act 2014 [England]).
- **Abuse** describes physical, sexual, psychological, emotional, or financial abuse (and includes abuse taking place in any setting, whether in a private dwelling, an institution or any other place).
  - **Physical abuse to a child** means deliberately hurting a child or young person. It includes: physical restraint; such as being tied to a bed, locked in a room, inflicting burns, cutting, slapping, punching, kicking, biting or choking, stabbing or shooting, withholding food or medical attention, drugging, denying sleep, inflicting pain, shaking or hitting babies, and fabricating or inducing illness (FII).
  - **Physical abuse to an adult at risk** includes: hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions.
  - There are 2 different types of **child sexual abuse**:
    - **Contact abuse** involves: touching activities where an abuser makes physical contact with a child, including penetration. It includes: sexual touching of any part of the body (whether the child's wearing clothes or not); rape or penetration by putting an object or body part inside a child's mouth, vagina, or anus; forcing or encouraging a child to take part in sexual activity; making a child take their clothes off; making a child touch someone else's genitals or masturbate.
    - **Non-contact abuse** involves: non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet, and flashing. It includes: encouraging a child to watch or hear sexual acts; not taking proper measures to prevent a child being exposed to sexual activities by others; meeting a child following sexual grooming with the intent of abusing them; online abuse including making, viewing, or distributing child abuse images; allowing someone else to make, view, or distribute child abuse images;

showing pornography to a child sexually exploiting a child for money, power, or status (child exploitation).

- **Sexual abuse to an adult at risk** includes rape and sexual assault or sexual acts to which the adult has not or could not consent and / or was pressured into consenting.
- **Psychological abuse** includes: threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks, and witnessing abuse of others. For adults at risk, psychological abuse may also include coercive control.
- **Coercive control** is an act or pattern of acts of assault, threats, humiliation, intimidation, or other abuse that is used to harm, punish, or frighten victims.
- **Cuckooing** occurs when an individual or organised group takes over a person's home for the purpose of criminal activity. This may include storing drugs or weapons, using the property as a base for exploitation, or controlling the occupant through intimidation, coercion, threats, or financial abuse.
- **Emotional abuse** is the ongoing emotional maltreatment of a person. It's sometimes used interchangeably with the term psychological abuse. Emotional abuse can involve deliberately trying to scare or humiliate someone or isolating or ignoring them. Emotional abuse includes: humiliating or constantly criticising a person by threatening, shouting at them or calling them names; making the person the subject of jokes, or using sarcasm to hurt them; blaming; scapegoating; making a person perform degrading acts; not recognising a person's individuality; trying to control their lives; pushing a person too hard or not recognising their limitations; exposing a person to distressing events or interactions, such as domestic abuse or drug taking; failing to promote social development or stopping a person from socialising with others; persistently ignoring someone; manipulating a person; never saying anything kind; never showing any emotions in interactions, also known as emotional neglect.
- **Harm** means abuse or the impairment of (a) physical or mental health, or (b) physical, intellectual, emotional, social or behavioural development.
- **Neglect** means a failure to meet a person's basic physical, emotional, social or psychological needs, which is likely to result in an impairment of the person's well-being (for example, an impairment of the person's health). For adults at risk, this also includes failure to access medical care or services, emotional neglect, negligence in the face of risk taking, failure to give prescribed medication, failure to assist in personal hygiene or the provision of food, shelter or clothing.
- **Child criminal exploitation (CCE)** occurs when a child is involved in criminal activities including the movement of drugs or money which results in personal gain for an individual, group, or organised criminal gang. It involves an element of exchange and can

still be exploitation even if the activity appears consensual. CCE involves force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It is typified by some form of power imbalance in favour of those perpetrating the exploitation.

- **Grooming** refers to the process by which a predator builds trust with a child or adult at risk in order to manipulate them at a later stage. This can happen in-person and online.

**Modern slavery** describes forced labour practices with the perpetrator (the slave master) trapping and controlling a victim. The most common form of modern slavery is **sexual exploitation**. **Labour exploitation** is the second most common form of slavery occurring most frequently in the agricultural, food, hospitality and construction sectors.

- **Sexual exploitation** is the coercion or manipulation of children or adults at risk into taking part in sexual activities. It is a form of sexual abuse involving an exchange of some form of payment which can include money, mobile phones, and other items (e.g. drugs, alcohol, a place to stay, 'protection', or affection). The vulnerability of the individual and grooming process employed by perpetrators renders them powerless to recognise the exploitative nature of relationships and unable to give informed consent.
- **Spiking** involves administering, or attempting to administer, a substance to a person without their knowledge or consent, with the intention of causing harm, incapacitation, or facilitating further abuse. This includes adding drugs or alcohol to a drink, injecting substances, or using chemical agents to impair judgement or physical ability.
- **Trafficking** describes the recruitment, transportation, transfer, harbouring, or receipt of a person which includes an element of movement from one place to another. The person may be suffering abuse through sexual exploitation, criminal exploitation, forced labour or domestic servitude, slavery, financial exploitation, illegal adoption, or removal of organs.
- **Domestic violence** or **abuse** is abusive behaviour taking place in a relationship as a way for one person in that relationship to gain or maintain control over another. It includes physical, sexual, emotional, psychological, and financial abuse.
- **Female genital mutilation (FGM)** comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.
- **Radicalisation** is the process through which a person comes to support or be involved in extremist ideologies, and in some cases can then come to participate in extremist or terrorist groups.
- **Extremism** is defined as vocal or active opposition to fundamental values shared by Wales and England, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

- **Violent extremism** is the aim to damage community relations and create division.
- **Terrorism** can be defined as a violent action that:
  - Endangers a person's life, other than that of the person committing the action;
  - Involves serious violence against a person;
  - Causes serious damage to property;
  - Creates a serious risk to the public's health and safety;
  - Interferes with or seriously disrupts an electronic system.
- **Online safety** refers to the safe use of digital technology to access the internet. Many forms of abuse, neglect and harm can be initiated, sustained or facilitated by access to children or adults at risk through the internet. It is important to treat such acts just as seriously when they happen online as when they happen offline/in-person. Some of the following are unique to the digital and online realms:
  - **\$extortion / Sextortion** is when a person is coerced into sharing explicit images or videos which are then used to blackmail victims for more content, money or to perform other acts.
  - **Intimate image abuse** occurs when intimate, sexual, or nude images of a person are created, shared, altered, or threatened to be shared without their consent. This includes deepfake or AI-generated sexual images, nudification tools, non-consensual screenshotting, upskirting, downblousing, and the distribution or threat of distribution of intimate images. It is a criminal offence regardless of whether the image is genuine or artificially created.
    - **Revenge porn** is when once consensually shared images (e.g., between romantic partners) is then non-consensually shared in order to coerce or humiliate the victim.
    - **Deepfakes** are AI-generated avatars, images or videos that look and sound like a person but are actually manufactured. Fake explicit material can be used for \$extortion, while fake videos of a person appearing to commit a crime or perform some other embarrassing act can be used to coerce victims to send actual explicit content, money or to perform other acts.
  - **Online stalking and harassment** involves persistent, unwanted, or intrusive behaviour carried out through digital means, including social media, messaging platforms, email, or other online tools. It may include monitoring, tracking, impersonation, threats, repeated unwanted contact, or the use of technology to intimidate or control.

- **Cyberstalking** is persistent and unwanted digital surveillance or harassment that can transfer into real-world threats.
- **Online sexual exploitation** is when a person is coerced to create sexually explicit content, for example by taking digital photographs, making videos or broadcasting via a live stream, and therefore becoming a distributor of such content. This has further implications if this constitutes the creation and distribution of **child pornography** or abuse material.
- **Catfishing** is when a person poses as someone else to manipulate victims into emotional or financial exploitation.
- **Doxxing** is when someone's personal information is exposed online to prompt real-world threats.
- **Swatting** is the false online reporting of crime or other emergency to prompt emergency services responses in the real-world (e.g., armed police arriving at a victim's home).
- **Trolling** and **dog-piling** are examples of coordinated harassment of a person or group online (e.g., overwhelming volumes of abusive messages from one or more accounts).
- **Ransomware** is software or other forms of hacking that disable a person's access to a digital device or data with the purpose of coercing the person to send them money or perform other acts.
- **Digital voyeurism** is when webcams and other digital cameras in a person's home are hacked, intercepted or inappropriately set-up to share their video feed without their consent.
- **Location-based stalking** is when real-time location tracking is used to perpetrate abuse or manipulation, usually via a compromised app or data leak.
- **Astroturfing** is the flooding of online spaces with information intended to manipulate public opinion.

### Legislative framework for safeguarding

Other guidance, legislation, and guiding principles to consider when considering safeguarding prevention and responses:

- Working Together to Safeguard Children 2023 [Statutory guidance, England];

- Working Together to Safeguard People: Code of Safeguarding Practice 2022 [Statutory guidance, Wales];
- Office of the Public Guardian Safeguarding Policy [Statutory guidance, England];
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012;
- The Counter-Terrorism and Security Act 2015 (particularly S 26);
- Online Safety Act 2024;
- Crime and Policing Act 2026;
- Children’s Wellbeing and Schools Act 2026 [England-mostly – see Appendix A];
- The Equality Act 2010;
- The Mental Capacity Act 2005;
- The European Convention of Human Rights;
- The United Nations Convention on the Rights of the Child;
- United Nations Convention on the Rights of Persons with Disabilities (UNCRPD);
- The United Nations Principles of Older Persons;
- Domestic Abuse (Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015;
- Children (Abolition of Defence of Reasonable Punishment) (Wales) Act 2020;
- Welsh Language Standards.

Free Prevent Duty training (which safeguards people at risk of radicalisation) is available at: [support-people-susceptible-to-radicalisation.service.gov.uk/](https://support-people-susceptible-to-radicalisation.service.gov.uk/).

#### How The Playwork Foundation safeguards children and adults at risk

- We will take all concerns seriously;
- Our safeguarding structure is proportionate to the size of our charity;
- We will continually strive towards safeguarding best practice and knowledge for our trustees, members, and volunteers;
- We ensure anyone working directly with children or adults at risk on behalf of The Playwork Foundation are appropriately vetted (e.g., DBS checks);
- The procedure in this policy will be used to manage any allegations against any trustee, volunteer, member of staff or member of The Playwork Foundation;
- If we believe someone is at risk of abuse or harm, we will share concerns and information with relevant agencies and authorities in line with the *UK General Data Protection Regulation (UK GDPR)* and the *Data Protection Act 2018*.

#### The Playwork Foundation expects all trustees, members, and staff to:

1. Follow this Safeguarding Policy;
2. Employ safe digital practices (e.g., strong passwords, multi-factor authentication (MFA), install OS and software updates, backup files, antivirus software installed, firewall enabled, and strong privacy settings on all devices);
3. Report all concerns, allegations, and disclosures as soon as possible, but within at least 24 hours, to the Designated Safeguarding Officer or their deputy;

4. Be vigilant to recognise when something is worrying or questionable;
5. Inform the Designated Safeguarding Person about any ongoing or past investigation into anyone you have a significant relationship with which relates to any child or adult safeguarding allegation, concern, or disclosure. A significant relationship includes, but is not limited to, family members, partners, and members of the same household;
6. Act when concerns are identified;
7. Be accountable by never assuming someone else has responded to or reported a concern;
8. Maintain appropriate levels of confidentiality whilst ensuring information is shared to safeguard others;
9. Consider inclusion and accessibility when dealing with safeguarding issues;
10. Complete and continue to renew appropriate safeguarding training relevant to their role. Any disputes relating to the level of training required shall be resolved by the Designated Safeguarding Person.

**It is everyone's responsibility to remain vigilant and report safeguarding concerns if we suspect, witness, or receive a disclosure that abuse, neglect, or harm, as described above, has or is taking place.**

By adhering to this policy, you will help to create a safe space where everyone involved with The Playwork Foundation can have a positive experience whilst ensuring that abuse, neglect, or harm is not taking place in the places where we are or to the people with whom we are with.

### **Reporting a Safeguarding Concern**

**If you believe any child or adult to be in immediate risk of harm,  
call 999 or 101.**

Safeguarding concerns must be reported as soon as possible to the Designated Safeguarding Person, but within at 24 hours at most. A written record of the safeguarding concern must be kept and include details of the person involved, the nature of the concern, the actions taken, decision made, and why they were made and by whom. All records must be signed and dated. All records must be securely and confidentially stored in line with the *UK General Data Protection Regulation (GDPR)* and applicable data protection law.

### **Designated Safeguarding Person**

**Name:** Helen Stephenson  
**Email:** helen.stephenson@devon.gov.uk  
**Telephone:** 07970 451 872

Our Designated Safeguarding Officer aims to respond to all concerns and emails within 48 hours.

If you are unable to contact the Designated Safeguarding Officer, or you believe it would be inappropriate or inexpedient to do so, contact the relevant Single Point of Access (SPoA) of the local authority in the county where the child, young person, or adult at risk is situated. If an allegation or safeguarding concern relates to a Trustee, a formal investigation will be launched and the relevant Trustee will be suspended from all activities related to The Playwork Foundation immediately, pending investigation, and the relevant local authority informed.

To find out which county you are in, you can search by postcode at [gov.uk/find-local-council](http://gov.uk/find-local-council). To find a postcode, use the Royal Mail postcode finder: [royalmail.com/find-a-postcode](http://royalmail.com/find-a-postcode).

### Reporting an Online Safeguarding Concern

**If you believe any child or adult to be in immediate risk of harm,  
call 999 or 101.**

Online safeguarding concerns should be reported as soon as possible to the Designated Safeguarding Person and the same process in the box above – ‘Reporting a Concern’ – should be followed.

In addition to this, there are several online services that can be utilised to reduce the risk of further safeguarding concerns arising online, depending on the situation:

- **[reportharmfulcontent.com](http://reportharmfulcontent.com)** can help report harmful content online by providing up-to-date information on community standards and direct links to reporting facilities across multiple platforms;
- Reports of scams, defrauding and other cybercrime in England, Northern Ireland and Wales can be reported at **[actionfraud.police.uk](http://actionfraud.police.uk)**. Such incidents in Scotland should be reported at [scotland.police.uk](http://scotland.police.uk);
- Concerns about online sexual abuse can be reported safely and securely at **[ceop.police.uk/safety-centre](http://ceop.police.uk/safety-centre)**;
- Child sexual abuse content and non-photographic child sexual abuse images can be reported at **[iwf.org.uk/en/uk-report](http://iwf.org.uk/en/uk-report)**;
- If a children or young person wishes to report nude images and videos they are worried have been, or might be, shared publicly by themselves you can signpost them to **[childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove](http://childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove)**

– this does not mean you do not need to make a record and/or subsequently report this yourself.

### Training and awareness

The Playwork Foundation will ensure an appropriate level of safeguarding training is available to trustees, members, paid staff and commissioned service providers, volunteers, and anyone else acting on behalf of or representing The Playwork Foundation.

Anyone working or volunteering directly with children or adults at risk will be required, as a minimum, to have awareness training that enables them to:

- Understand what safeguarding is and their role in safeguarding children and adults at risk;
- Recognise a child or adult at risk potentially in need of safeguarding and take action;
- Understand how to report a safeguarding concern;
- Understand dignity and respect when working with children and adults at risk;
- Understand the full extent of this policy and report to the Designated Safeguarding Officer.

### Safe recruitment & selection

The Playwork Foundation is committed to safe employment and recruitment practices, for both paid work and formal volunteering, that reduce the risk of harm to children and adults at risk from people who may present a risk to them and others.

DBS checks, references, a complete work/volunteer history, and a recorded interview with at least one Officer of The Playwork Foundation will be required before unsupervised access is provided to children and adults at risk as a matter of best practice. The Playwork Foundation will also comply with any requirements of relevant inspectorates relating to our activities.

### Whistleblowing

Whistleblowing is when a person raises a concern about dangerous or illegal activity, or any wrong- doing, within an organisation they are a part of.

Under the Public Interest Disclosure (Amendment) Regulations 2025, volunteers, trustees, and unpaid workers are legally protected from detriment when raising safeguarding or other public-interest concerns.

***The Playwork Foundation is committed to protect the safety and wellbeing of whistleblowers.***

You can whistleblow to any Trustee and either this safeguarding policy or our complaints procedure will be followed, depending on which is most appropriate. Where a concern involves potential abuse, neglect, or harm, safeguarding procedures take precedence over all other internal processes.

To whistleblow outside of The Playwork Foundation, or your own organisation, you must do so to a “Prescribed Person or Body”, depending on the specific context of the disclosure.

An up-to-date list of such persons and bodies can be found at:  
[gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2/whistleblowing-list-of-prescribed-people-and-bodies](https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2/whistleblowing-list-of-prescribed-people-and-bodies).

**Note to readers:** This policy is freely available for use, and you are welcome to adapt any part of it to suit your needs. It is an amalgamation of resources from various playwork settings, guidance and templates from Third Sector Support Wales and the National Council for Voluntary Organisations (England), guidance from both the Welsh Government and UK Government, as well as insights drawn from our own experiences and practice.

While we hope this document is a robust point of reference, we encourage you to conduct your own research to ensure its relevance and alignment with the latest policies and best practices, particularly in relation to your specific sector and geographical location.

If you notice any errors, inaccuracies, or outdated information, please let us know by emailing [info@playwork.foundation](mailto:info@playwork.foundation).

This policy was reviewed and enacted for use within The Playwork Foundation

On: 30/05/2025

By: Simon Bazley, Siôn Edwards, Anne-Marie Mackin, Simon Rix, Julia Sexton,  
Tanny Stobart, Ali Wood.

Position: Board of Trustees

Next Review date: May 2026

## Appendix A – Children’s Wellbeing and Schools Act 2026 explanatory note<sup>i</sup>

The *Children’s Wellbeing and Schools Act 2026* is legislation of the Westminster Parliament that applies primarily to England. Wales-related provisions were added through later amendments to the Bill. The Welsh Government supported their inclusion as equivalent Welsh legislation could not be introduced within the same timeframe, and excluding the provisions would have created cross-border child protection inconsistencies. The Senedd granted Legislative Consent on 17/03/26 to ensure parity of safeguards, legal protections and placement options for children in Wales.

The Social Services and Wellbeing (Wales) Act 2014 remains the core safeguarding framework in Wales. The Children’s Wellbeing and Schools Act 2026 makes a small number of targeted amendments to Welsh law in specific areas connected to cross-border practice and children’s rights. Briefly, these include:

### Deprivation of liberty placements in England

This change allows Welsh local authorities to place children in England’s new “*relevant accommodation*” under a statutory deprivation-of-liberty framework, by extending the *section 25 Children Act 1989* test to these placements. This replaces reliance on the High Court and ensures children from Wales benefit from the same statutory safeguards as children placed by or within English authorities.

### Protections for 16- to 17-year-olds in social care

This extends existing criminal offences of ill-treatment or wilful neglect so that 16- to 17-year-olds in social care settings in Wales receive the same statutory protection as younger children. Previously, these offences applied only to under-16s or to adults in regulated care. The change closes a technical gap in criminal law and ensures that older children in care in Wales benefit from equivalent legal protection.

### Children not in school and attendance duties

This establishes new or extended statutory arrangements for Welsh local authorities in relation to Children Not in School registers, school attendance order processes, and defined information-sharing pathways for children educated outside school settings.

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<sup>i</sup> NB: Based on information from the Legislative Consent Memorandum (March 2025), Supplementary Legislative Consent Memoranda 2 – 6, the Legislative Consent Motion for the Bill agreed in Plenary on 17/03/26, and additional documents provided at:

[business.senedd.wales/mgIssueHistoryHome.aspx?IId=45408](https://business.senedd.wales/mgIssueHistoryHome.aspx?IId=45408) (accessed: 05/05/26).