

Safeguarding Handbook

Pocket Money Adventures CIC | Version 1.5

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Policy owner: Nathan Waldron, Director | Signatories: Nathan Waldron and Bernadette Houlton | Approved policy issue

Adopted by Pocket Money Adventures CIC on 2 October 2026.

Signed electronically: Nathan Waldron, Director and Designated Safeguarding Lead.

Signed electronically: Bernadette Houlton, Director and Deputy Designated Safeguarding Lead.

Typed electronic signatures in the established policy format.

Current operating requirements

From 1 September 2026 in England and Wales, supervision does not exempt otherwise qualifying teaching, training, instruction, care or supervision of children from regulated activity. Assess the actual duties, frequency across settings and any overnight activity with the registered DBS body. More than three days in any 30-day period is a relevant period condition; two sessions on one day count as one day. Where the role is regulated activity, PMA requires the appropriate Enhanced DBS with Children's Barred List information before that activity begins, even where a teacher is present. A missing required check means the person does not undertake that role. Do not request barred-list information for an ineligible role. Adult regulated activity has a different test and is not created merely by an adult being vulnerable or attending a money session.

Zero Child Data applies to routine learning, access and evaluation: no child names, accounts, personal finances, individual tracking or school-held match-code keys are collected by PMA. Standard PMA sessions do not involve PMA photographing or filming identifiable children. Necessary safeguarding, accident or legal records are an exception and are minimised, protected and shared lawfully. Pseudonymised codes are not automatically anonymous. Research beyond safe aggregates requires a separately approved protocol, lawful basis, privacy information and ethics arrangements before collection.

Maximum planned session headcount: 50 people in both school and community settings, including every child, accompanying adult, host or school staff member, volunteer, observer and PMA facilitator. Use the lower of 50, the venue safe capacity and the assessed number supported by competent staff. This is a ceiling, not a supervision ratio or insurance confirmation. Reduce numbers, add support or split groups where necessary.

Detailed policy and procedures

Section 1: Introduction and purpose

This handbook is the practical operational guide for everyone who works with or on behalf of Pocket Money Adventures. It should be read alongside the Children and Adult Safeguarding Policy. The policy states what we will do. This handbook explains how we do it. All staff, volunteers, contractors and directors have a responsibility to safeguard children. Safeguarding is not a single task. It is the consistent practice of keeping children safe from harm, abuse and neglect. Pocket Money Adventures is a visiting provider. This handbook covers delivery on the premises of host schools. In every session the host school's safeguarding procedures are in operation alongside ours, and the host school's Designated Safeguarding Lead (DSL) holds the child's record and history. Our job is to notice, record and hand on promptly, never to investigate. Since 26 July 2026 we also deliver in community and out-of-school settings; the rules for those settings are set out in the Children and Adult Safeguarding Policy v1.7.

Section 2: Recognising abuse and neglect

2.1 Physical abuse

The deliberate infliction of injury upon a child: hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocation. It also includes fabricating or inducing illness in a child (FII). Indicators include:

- unexplained injuries or bruising;
- bruising in unusual locations (ear, neck, genitals, buttocks);
- any bruise or injury on a baby who is not yet independently mobile, which is a specific red flag and always requires referral;
- injuries inconsistent with the child's explanation or developmental stage;
- frequent A&E visits; injuries at various stages of healing;
- refusal to discuss how an injury occurred; wearing inappropriate clothing to cover injuries; and
- flinching when touched; reluctance to go home. In Pocket Money Adventures delivery, staff should be alert to children who arrive with unexplained injuries and note whether such injuries appear repeatedly. A plausible explanation is not automatically a safe explanation.

2.2 Emotional abuse

Persistent emotional ill-treatment causing severe and persistent adverse effects on emotional development. Indicators include low self-esteem, fearfulness and anxiety, extreme behaviour (aggressive or withdrawn), self-harm or harsh self-criticism, reluctance to try new things, developmental delay, poor concentration, and difficulty forming relationships. During Pocket Money Adventures sessions staff may notice children who withdraw from activities, show extreme fear of making mistakes, or display unusually harsh self-criticism. Observe carefully and discuss with the school's DSL.

2.3 Sexual abuse

Forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This includes non-contact activities such as online abuse, grooming and exposure to sexual material. Indicators include sexualised language or behaviour inappropriate for the child's age, age-inappropriate knowledge, physical symptoms, withdrawal or anxiety, sleep disturbance, behavioural regression, reluctance to be with a particular adult, and unexplained gifts or money. Concerns about sexual abuse require particular care. Never investigate and never ask leading questions. Report immediately to the school's DSL and the Pocket Money Adventures DSL.

2.4 Neglect

Persistent failure to meet a child's basic physical and psychological needs, likely to result in serious impairment of health or development. Neglect is the most common form of child abuse. Indicators include hunger, poor hygiene, constant tiredness, inadequate clothing for the weather, untreated medical or dental conditions, lack of supervision, frequent absence and delayed development.

Pocket Money Adventures operates in areas that include significant deprivation. Signs of neglect must be assessed with a non-judgemental lens. Poverty is not neglect. Assess unmet needs and risk regardless of available resources. Financial hardship is not itself neglect; it must not prevent a protective response. Consult the school's DSL before drawing conclusions about neglect linked to financial hardship.

2.5 Child-on-child abuse

Children can abuse other children: physical violence, sexual harassment, sexual violence and psychological abuse. Bullying and peer exploitation are forms of child-on-child abuse. Report any concern to the school's DSL. This must never be dismissed as "children being children".

2.6 Contextual safeguarding and harm outside the home

Abuse happens outside the home. Children can be exploited by county lines networks, abused online, groomed through social media, or trapped in peer exploitation. Working Together 2026 strengthened the expectation that practitioners recognise harm outside the home. Signs include sudden absence, unexplained money or gifts, gang-related language, or disclosure of contact with unknown adults. Report to the school's DSL.

2.7 Right Help, Right Time - the Staffordshire threshold framework

Right Help, Right Time (RHRT) launched on 1 July 2026 and replaced the previous "windscreen model". It is the framework every Staffordshire school and agency now uses. Pocket Money Adventures staff are not expected to grade a child's level of need, but must understand the language so we can hand concerns over meaningfully. RHRT describes four levels of need:

- Level 1, Everyone (Thriving): core needs met by family and universal services;
- Level 2, Early Support: emerging needs that one agency, or an Early Help Assessment, can meet;
- Level 3, Enhanced Support: complex or multiple needs requiring a coordinated multi- agency response; and
- Level 4, Statutory Support: the child has suffered, or is likely to suffer, significant harm. The framework supports professional judgement. It is not a checklist. A child can enter at any level, including going straight to Level 4, and can step up or down. The Threshold Framework and its interactive toolkit are published at staffsscp.org.uk. Under RHRT, a practitioner's role does not end when a concern is passed on. We remain responsible for supporting and safeguarding the child at whatever level of support is identified.

2.8 Unborn children

Working Together to Safeguard Children 2026 explicitly extends safeguarding duties to unborn children where concerns are identified. If a Pocket Money Adventures person becomes aware of a concern affecting an unborn child (for example, disclosed domestic abuse in a pregnant parent), it is reported in exactly the same way as any other safeguarding concern.

Section 3: Responding to a disclosure

When a child discloses, the response is critical. A supportive response helps the child feel believed and safe. A poor response can cause further harm.

Step 1: Listen

- stay calm. Do not show shock, anger or disgust;
- give the child your full attention. Do not take calls, tidy up, or signal that you are short of time;
- listen without interrupting and let the child speak at their own pace;
- use open, non-leading prompts only (TED): "Tell me what happened." "Explain that a bit more." "Describe where that happened.";
- never ask leading questions such as "Did someone hurt you?" or "Did they hit you with a belt?";
- never blame the child or ask what they did to cause it; and
- never promise to keep what the child says confidential. Say instead: "I may need to tell someone who can help keep you safe."

Step 2: Reassure

Tell the child: "You were right to tell me." "This is not your fault." "I will keep you as safe as I can." "I am going to tell [DSL name] so we can help you." Do not say: "Everything will be fine." "Don't worry." "I promise I won't tell anyone."

Step 3: Do not investigate

Pocket Money Adventures staff are not investigators. You are not the police or a social worker. Your role is to receive and report, not to establish facts. Do not ask detailed follow-up questions, do not try to work out what happened, do not suggest what might have happened, do not contact the alleged abuser or their family, and do not tell other staff except as required for safeguarding. Do not use body maps. Pocket Money Adventures staff are not medical practitioners. Describe any mark or injury in writing instead. Do not photograph a child or an injury under any circumstances.

Step 4: Record

Write up what was said as soon as practicable on the same day, using the Record of Concern template (Section 7). Note the date, time and location; the child's exact words in quotation marks, in the child's own language and not interpreted; who else was present; any observable signs; what action you took. Separate fact from opinion and make clear which is which. Sign and date the record.

Step 5: Report

Report the same day to the host school's Designated Safeguarding Lead, and to the Pocket Money Adventures DSL (Nathan Waldron) at safeguarding@pocketmoneyadventures.co.uk. Do not delay. Do not discuss the disclosure with colleagues unless instructed by the school DSL. Do not discuss with the child's parents unless advised by the school DSL; in some cases telling a parent first would place the child at greater risk.

Step 6: Refer

If there is immediate danger to the child, call 999 first, then contact the SFIFD or the Emergency Duty Service.

For all other concerns the host school's DSL makes the referral, because they hold the child's record and history. Anyone may refer directly when urgent protection is needed or the response is inadequate; normally coordinate with the host DSL. If the school DSL does not act, the Pocket Money Adventures DSL will refer directly to the Staffordshire Families Integrated Front Door (see Section 4). Consent: the principle It is not necessary to seek consent to share information for the purposes of safeguarding a child, provided there is a lawful basis to process the information. Consent is not required to make a child protection referral. Where it is safe to do so we would normally tell a parent that a referral is being made, but we do not seek consent, and do

not inform them, where doing so would place the child or anyone else at increased risk. Data protection law does not prevent the sharing of information to keep a child safe.

Section 4: Escalation procedures

If a concern is not acted on promptly or protection requires direct action, the Pocket Money Adventures DSL will escalate directly to the Staffordshire Families Integrated Front Door and will inform the school DSL in writing that we have done so. If the concern involves the Pocket Money Adventures DSL (Nathan Waldron), report immediately to the Deputy DSL, to any other board member, or directly to the Local Authority Designated Officer (LADO). At all times the welfare of the child comes first. Professional challenge (SSCP Escalation Policy) Where Pocket Money Adventures disagrees with another agency's safeguarding decision, we follow the SSCP Escalation Policy (staffsscp.org.uk/sscp-escalation-policy). In outline: raise the matter directly with the professional concerned within one working day; if unresolved, escalate to the line manager, with contact between agencies within one working day; the line manager completes the SSCP Escalation Form and refers to their manager within one working day; a meeting is held within two working days if required, with the outcome in writing within two working days. If still unresolved it routes to the SSCP Representative, then the SSCP Manager, then an Independent Professional Advisor, with a final decision via the Independent Chair. Professional disagreement is a normal and legitimate part of multi-agency safeguarding. Being new, junior or an external provider is not a reason to stay silent. LADO: allegations against people in a position of trust The LADO manages and oversees allegations against adults who work or volunteer with children. A LADO referral is separate from a safeguarding referral, and there will be times when both are needed. Refer to the LADO where an adult who works or volunteers with children has:

- behaved in a way that has, or may have, harmed a child;
- possibly committed a criminal offence against, or related to, a child;
- behaved towards a child in a way that indicates they may pose a risk of harm to children; or
- behaved in a way that indicates they may not be suitable to work with children.

Concerns can also arise from an adult's personal life where that poses a risk of harm in the workplace. Refer to the LADO within one working day of an allegation being made, and expect a response within one working day. Always use the LADO referral form (search "LADO referral form" at staffordshire.gov.uk or staffsscp.org.uk). If unsure whether a concern meets the threshold, email staffordshire.lado@staffordshire.gov.uk for advice. Staffordshire Families Integrated Front Door (SFIFD) The SFIFD is the single point of contact for safeguarding concerns in Staffordshire. It superseded the MASH. It is a multi-agency service including the local authority, police, health, probation and mental health, so that information can be gathered and shared to inform the decision. You can ring to talk a concern through even if you are not sure it meets a threshold. After contact, a Consultant Social Worker reviews the information, considers the child's lived experience, strengths and needs, gathers information from relevant agencies, speaks with parents or carers where appropriate, and decides the most appropriate level of support. If no outcome is received within five working days, chase it.

Section 5: Key contacts

Contact	Details
PMA DSL, Nathan Waldron	safeguarding@pocketmoneyadventures.co.uk 07500 804810
PMA Deputy DSL, Bernadette Houlton	bernadette@pocketmoneyadventures.co.uk 07773 814684
Staffordshire Families Integrated Front Door	0300 111 8033
Staffordshire Emergency Duty Service	0345 604 2886
Stoke-on-Trent Children's Advice and Duty Service	01782 235100
Stoke-on-Trent Emergency Duty Team	01782 234234
Staffordshire LADO	staffordshire.lado@staffordshire.gov.uk Urgent advice via SFIFD 0300 111 8033
Stoke-on-Trent LADO	LADO.sp@stoke.gov.uk Referrals via CHaD 01782 235100
Police	999 emergency 101 non-emergency
NSPCC Helpline	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285

SFIFD opening hours: Monday to Thursday 8:30am-5:00pm, Friday 8:30am-4:30pm. Outside these hours use the Emergency Duty Service. In an emergency always call 999 first. Where a concern relates to the DSL, contact the Deputy DSL directly, another board member, or the LADO. The Deputy DSL holds a separate line so that this route is always independent of the DSL.

Section 6: Managing allegations against Pocket Money Adventures people

If an allegation is made against any Pocket Money Adventures person, including the DSL:

- report to the LADO within one working day. Expect a response within one working day. Use the LADO referral form;
- make a safeguarding referral to the SFIFD as well if a child may have been harmed or is at risk of harm. Both processes may apply;
- do not investigate. Pocket Money Adventures conducts no investigation until the LADO has given guidance;
- support the child. The alleged victim and any other affected children are offered support, coordinated with the host school;
- support the person. An allegation is a stressful experience. We will advise them of their right to union representation where applicable, name a person to check in with them, and signpost support; and
- maintain confidentiality. Details are restricted to those who need to know. Suspension The previous version of this handbook stated that suspension is immediate and automatic. That was wrong and is corrected here. Suspension is not automatic and does not imply guilt or innocence; it is part of a process. It is a decision for Pocket Money Adventures as the employer, following our own policies and procedures. Where children's social care or the police are involved, the LADO may seek their views on suspension and inform us. The LADO may also advise on alternatives such as a risk assessment or alternative duties. Pocket Money

Adventures will take a proportionate decision on a case-by-case basis, with the welfare of the child as the paramount consideration, and will record the reasoning. Pending any decision, Pocket Money Adventures will ensure the person has no unsupervised contact with children in any of our delivery. LADO outcomes Use the current KCSIE outcome categories, including unfounded (no evidence or proper basis supporting the allegation), and the following outcomes: Substantiated (enough evidence to prove it); False (enough evidence to disprove it); Malicious (enough evidence to prove a deliberate act to deceive, and the allegation is entirely false); or Unsubstantiated (insufficient evidence to prove or disprove, which is not the same as false, and implies no guilt or innocence). Where an allegation is substantiated, Pocket Money Adventures may have a legal duty to refer the person to the Disclosure and Barring Service, and to any relevant professional regulatory body. This duty applies even if the person resigns before a decision is reached.

Section 7: Record of Concern template

Field	Complete when a real concern arises
Date and time of concern	To be completed for the actual concern.
Person completing record	To be completed for the actual concern.
Necessary child identifier (safeguarding exception)	To be completed for the actual concern.
Year group / class	To be completed for the actual concern.
Host school / session date	To be completed for the actual concern.
Observed or disclosed facts; child's exact words	To be completed for the actual concern.
Fact / opinion clearly distinguished	To be completed for the actual concern.
Who else was present	To be completed for the actual concern.
Immediate action	To be completed for the actual concern.
Who was informed and when	To be completed for the actual concern.
Recorder signature / date	To be completed for the actual concern.

Section 8: Online safety

Pocket Money Adventures materials may be used digitally by schools. Pocket Money Adventures does not operate direct online contact with children. Safeguarding principles apply to any digital communication:

- all programme materials must be age-appropriate and free from harmful content;
- staff must never communicate with children via personal social media, email, messaging apps or video calls;
- programme materials must not be shared in ways that identify individual children. Where case study images or quotes are used, written school approval and parental consent must be on file; and
- any digital material containing child data must be stored securely with restricted access. Schools remain responsible for their own digital safeguarding. Pocket Money Adventures does not provide online safeguarding training to schools.

Section 9: Safer working practice in schools

- sign in on arrival and wear a visitor badge at all times;
- identify the host school's DSL on arrival and know how to contact them during the session;
- never be alone with a child. All interactions take place with school staff present or in view;
- never give a child your personal phone number, email or social media details;
- never photograph or film children without explicit written school approval and parental consent. Store any images securely;
- never take children off school premises under any circumstances, even with parental permission;
- never give children gifts, money or personal items;
- follow the school's safeguarding briefing at the start of every visit;
- report any concern to the school's DSL before leaving the premises; and
- challenge any breach of safeguarding. If you see another adult behaving inappropriately with a child, report it. These practices protect children and they protect you. They are non-negotiable.

Section 10: Training

Pocket Money Adventures follows the SSCP training expectations for organisations working with children.

- the Designated Safeguarding Lead holds SSCP Level 2 (Working Together to Safeguard Children). Nathan Waldron completed Level 2 on 14 July 2026 (certificate verification code 7FVX-SJUA). Renewal is due in line with SSCP requirements, tracked to July 2027;
- everyone who delivers Pocket Money Adventures sessions completes SSCP Level 1 safeguarding awareness training, free via the SSCP Learning Zone, before working in a school;
- safeguarding training is renewed at least every two years, or sooner if legislation or SSCP guidance changes;
- the DSL completes training on managing allegations of abuse made against a person who works with children, and cascades that learning to all deliverers; and
- training and DBS status are held on a central record with renewal dates, reviewed at least annually.

Section 11: Annual review

This handbook is reviewed annually. The next full review is scheduled for 2 October 2027. It will also be reviewed immediately whenever legislation changes (for example Keeping Children Safe in Education or Working Together to Safeguard Children), a serious safeguarding incident occurs, a significant gap in procedure is identified, or new risks emerge. All Pocket Money Adventures people will be notified of updates and must confirm they have read and understood the revised handbook.

Issue control: current approved issue dated 2 October 2026. Earlier issues are archived. Policy approval does not complete host agreements, individual acknowledgements or venue checks.