Pamodzi Creatives CIC

Safeguarding Children and Young People Policy

(2026 Edition)

Safeguarding Lead: Roni Edwards, Director
Email: tribe@pamodzicreatives.com

Approved by Director: Alison Lee – Date: September 2026
Approved by Director: Roni Edwards – Date: September 2026

Next Review: September 2027

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1. INTRODUCTION

Pamodzi Creatives CIC is a Community Interest Company based in Portsmouth that uses the creative arts to empower children, young people and communities. We are fully committed to safeguarding and promoting the welfare of every child and young person under the age of 18 who participates in, or comes into contact with, our activities, programmes and events.

We recognise that safeguarding is everyone's responsibility. All children, regardless of age, disability, gender identity, race, religion or belief, sex, or sexual orientation, have an equal right to protection from harm. We are committed to anti-racist and anti-discriminatory practice in all aspects of our safeguarding work, acknowledging that some children face additional barriers to having their voices heard and their concerns recognised.

1.1 Scope

This policy applies to all individuals who act on behalf of Pamodzi Creatives CIC, including but not limited to:

- Directors of Pamodzi Creatives CIC
- Delivery Leads responsible for planning and delivering creative programmes
- Freelance practitioners, artists, musicians, facilitators and contractors
- Volunteers, including those engaged on a one-off or occasional basis
- External partners, visiting professionals and guest speakers
- Any other individual working under the auspices of Pamodzi Creatives CIC

This policy extends to all settings in which Pamodzi Creatives operates, including community venues, schools, outdoor spaces, online sessions and any other location where our activities take place.

1.2 Legal and Statutory Framework

This policy has been developed in accordance with the following legislation, statutory guidance and local procedures:

- **Working Together to Safeguard Children 2026** – the primary statutory guidance for inter-agency working to safeguard and promote the welfare of children
- **Children's Wellbeing and Schools Act 2026** – strengthening duties on organisations working with children to promote their wellbeing and safety
- **Children Act 1989** – establishing the welfare of the child as paramount and the legal basis for child protection proceedings
- **Children Act 2004** – placing a duty on agencies to co-operate and make arrangements to safeguard and promote children's welfare
- **Equality Act 2010** – requiring organisations to eliminate discrimination and advance equality of opportunity
- **Counter-Terrorism and Security Act 2015 (Prevent Duty)** – placing a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism
- **Safeguarding Vulnerable Groups Act 2006** – establishing the barring and vetting scheme for individuals working with children and vulnerable adults
- **UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and Data Use and Access Act 2025** – governing the lawful processing, storage and sharing of personal data, including children's data
- **Information Sharing Advice for Safeguarding Practitioners 2026** – providing guidance on lawful and proportionate information sharing to protect children
- **Portsmouth Safeguarding Children Partnership (PSCP) Procedures** – the local multi-agency safeguarding arrangements for Portsmouth

1.3 Anti-Racist and Anti-Discriminatory Practice

Pamodzi Creatives CIC is committed to embedding anti-racist and anti-discriminatory practice throughout all safeguarding processes. We recognise that structural racism, cultural bias and discrimination can affect how safeguarding concerns are identified, reported and responded to. We will:

- Actively challenge racism, prejudice and discrimination in all forms within our organisation and our partnerships
- Ensure that safeguarding responses are culturally competent and do not stereotype, minimise or overlook concerns based on a child's ethnicity, culture, faith or background
- Analyse disproportionality in safeguarding referrals, complaints and outcomes and take corrective action where required
- Provide training that equips staff and volunteers to recognise how bias can influence safeguarding practice
- Ensure that all children feel safe, respected and empowered to raise concerns regardless of their identity

2. DEFINITIONS OF ABUSE

Abuse is a form of maltreatment of a child. It may involve inflicting harm or failing to act to prevent harm. Children may be abused by adults or by other children, in a family or institutional or community setting, by those known to them or by strangers, and increasingly via online platforms. The following definitions are consistent with Working Together to Safeguard Children 2026.

2.1 Physical Abuse

Physical abuse is a form of abuse that 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 (known as fabricated or induced illness). In the context of creative arts activities, physical abuse may include the use of excessive physical force during movement-based workshops or the inappropriate physical restraint of a child.

2.2 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child that causes severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include age-inappropriate or developmentally inappropriate expectations, overprotection and limitation of exploration and learning, preventing the child from participating in normal social interaction, seeing or hearing the ill-treatment of another, serious bullying (including cyberbullying), causing a child 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, though it may occur alone.

2.3 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. Activities may involve physical contact, including assault by penetration or non-penetrative acts such as 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 sexual abuse. Sexual abuse can take place online and technology may be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males; women and other children can also commit acts of sexual abuse.

2.4 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. 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), failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision (including the use of inadequate care-givers), or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. In the context of Pamodzi Creatives' work, staff and volunteers may observe signs of neglect such as a child who is persistently hungry, poorly clothed, frequently absent, or who appears to have unmet medical or dental needs.

2.5 Child Exploitation (CSE and CCE)

Child Sexual Exploitation (CSE) is a form of child sexual abuse in which an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the child needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can occur through the use of technology.

Child Criminal Exploitation (CCE) occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, including but not limited to county lines drug trafficking, theft, violence or carrying weapons. Children involved in CCE are victims of exploitation and must be treated as such, regardless of their apparent involvement in criminal behaviour.

2.6 Radicalisation and Extremism (Prevent Duty)

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Children can be vulnerable to radicalisation from a range of ideologies including Islamist extremism, far-right extremism, incel ideologies and other forms of violent extremism. Under the Counter-Terrorism and Security Act 2015, Pamodzi Creatives CIC has due regard to the need to prevent individuals from being drawn into terrorism. Any concerns about a child being radicalised must be reported to the Designated Safeguarding Lead immediately.

2.7 Online Abuse

Online abuse is any type of abuse that takes place using digital technology, including social media, messaging platforms, gaming sites, email and other online environments. Online abuse may include cyberbullying, online grooming, the sharing of indecent images of children (child sexual abuse material), sexting and coercion, online sexual exploitation, exposure to harmful or extremist content, and the use of technology to facilitate offline abuse. Online abuse can have a devastating impact on children and may occur in isolation or alongside other forms of abuse.

2.8 Honour-Based Abuse

Honour-based abuse (HBA) encompasses incidents or crimes committed to protect or defend the perceived honour of the family and/or community. It includes practices such as forced marriage, female genital mutilation (FGM), breast ironing and other harmful practices. HBA can involve multiple perpetrators and can be committed against both males and females. All forms of honour-based abuse are serious criminal offences. Staff and volunteers must be alert to the signs of HBA and must not approach family members or community leaders if HBA is suspected, as doing so may place the child at increased risk.

2.9 Faith-Based Abuse

Faith-based abuse involves the harm of a child linked to a belief in concepts such as witchcraft, spirit possession, demonic influence or other supernatural phenomena. It may involve physical violence, emotional abuse, neglect, isolation, or rituals designed to "exorcise" or "deliver" the child. Faith-

based abuse occurs across a range of religious and cultural contexts and must be recognised, reported and addressed in the same way as any other form of child abuse.

2.10 Teenage Relationship Abuse

Teenage relationship abuse involves controlling, coercive, threatening or violent behaviour between intimate partners or ex-partners where one or both are under 18. It may include physical violence, emotional manipulation, sexual coercion, digital monitoring and control, and isolation from friends and family. Staff and volunteers working with young people should be aware that relationship abuse can occur in all types of relationships and may not always be immediately visible.

2.11 Unborn Children

In certain circumstances, safeguarding action may be required before a child is born. This may apply where there are concerns about parental substance misuse, domestic abuse, mental health difficulties, a previous history of child abuse or neglect, or any other factor that may pose a risk to the unborn child. Where staff or volunteers become aware of such concerns, they must report them to the Designated Safeguarding Lead who will consider whether a referral to children's social care is appropriate under pre-birth safeguarding procedures.

3. SAFEGUARDING RESPONSIBILITIES

3.1 Designated Safeguarding Lead (DSL)

Designated Safeguarding Lead: Roni Edwards, Director

Contact: tribe@pamodzicreatives.com

The Designated Safeguarding Lead has overall responsibility for the day-to-day management of safeguarding within Pamodzi Creatives CIC. The DSL's responsibilities include:

- Receiving and acting upon all safeguarding concerns raised by staff, volunteers, children, parents/carers or external agencies
- Making timely referrals to Portsmouth Multi-Agency Safeguarding Hub (MASH) on 023 9268 8793 and/or the Police where a child is at risk of harm
- Reporting allegations against staff or volunteers to the Local Authority Designated Officer (LADO) within one working day of the concern being raised
- Ensuring compliance with Working Together to Safeguard Children 2026 and Portsmouth Safeguarding Children Partnership (PSCP) procedures
- Maintaining secure, accurate and confidential safeguarding records in accordance with UK GDPR, the Data Protection Act 2018 and the Data Use and Access Act 2025
- Ensuring that all staff, freelancers and volunteers receive appropriate safeguarding training at induction and at regular intervals thereafter
- Providing advice, support and guidance to staff and volunteers on safeguarding matters, including the identification and reporting of concerns
- Embedding anti-racist and anti-discriminatory practice within all safeguarding processes, including analysis of disproportionality in referrals and outcomes

- Liaising with the PSCP, children's social care, the Police and other agencies as required
- Ensuring this policy is reviewed annually and updated in response to changes in legislation, statutory guidance or local procedures

3.2 Deputy Safeguarding Lead

Deputy Safeguarding Lead: [NAME]

Contact: [EMAIL] / [PHONE]

The Deputy Safeguarding Lead acts in the absence of the DSL and carries the same responsibilities during such periods. The Deputy ensures continuity of safeguarding oversight when the DSL is unavailable due to absence, leave or other commitments. Specifically, when the DSL is unavailable, the Deputy Safeguarding Lead will:

- Receive and act upon all safeguarding concerns without delay
- Make referrals to Portsmouth MASH and/or the Police where a child is at risk of harm
- Report allegations against staff or volunteers to the LADO within one working day
- Provide advice, support and guidance to staff and volunteers on safeguarding matters
- Ensure that safeguarding records are maintained securely and accurately
- Liaise with children's social care, the Police and other agencies as appropriate

The Deputy Safeguarding Lead will hold the same level of accredited safeguarding training as the DSL and will participate in regular briefings with the DSL to ensure consistent and coordinated safeguarding practice.

3.3 Organisational Responsibilities (VCSE Requirements)

As a Voluntary, Community and Social Enterprise (VCSE) organisation, Pamodzi Creatives CIC recognises its duties under Working Together to Safeguard Children 2026 and local PSCP arrangements. Our organisational responsibilities include:

- Maintaining robust safeguarding arrangements that are proportionate to the nature and scale of our work with children and young people
- Participating fully in multi-agency safeguarding processes, including attending strategy meetings, case conferences and other multi-agency forums when requested
- Sharing information lawfully and proportionately with statutory partners and other agencies where this is necessary to safeguard and promote the welfare of a child
- Analysing disproportionality in safeguarding data, referrals and outcomes to identify and address potential bias or inequality in our practice
- Ensuring that all environments in which children participate in our activities are safe, well-supervised and subject to appropriate risk assessment
- Appointing a Deputy Safeguarding Lead to ensure continuity of safeguarding oversight at all times
- Providing adequate resources for safeguarding training, DBS checks, supervision and record-keeping

- Embedding a culture in which safeguarding is understood as everyone's responsibility and in which concerns are raised and addressed without fear of reprisal

4. PEER-ON-PEER ABUSE

Pamodzi Creatives CIC recognises that children can abuse other children (often referred to as peer-on-peer abuse or child-on-child abuse). This is most likely to include, but may not be limited to:

- **Bullying**, including cyberbullying, prejudice-based bullying and discriminatory bullying
- **Sexual harassment and sexual violence** between children, including unwanted sexual comments, jokes, taunting, physical behaviour and assault
- **Sharing of sexual images** (sometimes referred to as sexting or sharing of nudes/semi-nudes), whether consensual or coerced
- **Physical abuse** between children, including hitting, kicking, biting, hair-pulling and the use of weapons
- **Initiation and hazing rituals** involving coercion, humiliation, degradation or violence

Staff and volunteers must never dismiss abusive behaviour between children as "banter", "just having a laugh", "part of growing up" or "boys being boys". All concerns about peer-on-peer abuse must be reported to the Designated Safeguarding Lead immediately using the same reporting procedures that apply to all other safeguarding concerns.

Pamodzi Creatives CIC will adopt a gender-sensitive approach to peer-on-peer abuse, recognising that it is more likely that girls will be victims and boys will be perpetrators, while being alert to the fact that all peer-on-peer abuse is unacceptable regardless of the gender of those involved.

Where peer-on-peer abuse is identified, support will be provided to both the victim and the child or children responsible for the abusive behaviour. The DSL will make a referral to Portsmouth MASH and/or the Police where the threshold is met. Risk assessments will be conducted to ensure the ongoing safety of all children involved, including decisions about whether they can continue to participate in the same activities.

5. CHILDREN'S PARTICIPATION AND VOICE

Pamodzi Creatives CIC is committed to upholding every child's right to be heard, as enshrined in Article 12 of the United Nations Convention on the Rights of the Child (UNCRC). We believe that children's voices are central to effective safeguarding and that listening to children is not merely good practice but a fundamental right.

We will ensure that:

- Children are actively listened to and their concerns, wishes and feelings are taken seriously in all safeguarding decisions that affect them
- Age-appropriate safety information is provided to all children at the start of every programme, workshop or event, so that they understand what constitutes acceptable and unacceptable behaviour
- Children are given easy, accessible and clearly communicated ways to raise concerns, including identifying a named trusted adult they can speak to

- Children are involved, where appropriate and safe, in decisions about their own safety and welfare
- A child-friendly summary of this safeguarding policy is made available in plain language, appropriate to the age and understanding of the children we work with
- Feedback mechanisms are in place to allow children to comment on how safe they feel within our programmes and to suggest improvements
- The views and experiences of children from all backgrounds, including those with additional vulnerabilities, are sought and valued equally
- Creative and participatory methods are used to support children in expressing their views, particularly where verbal communication may be difficult

6. CONTEXTUAL SAFEGUARDING

Pamodzi Creatives CIC recognises that children can be at risk of harm in contexts outside the family home, including in public spaces, peer groups, schools, online environments, community venues and at organised events. This approach, known as contextual safeguarding, requires us to consider the broader environmental factors that may contribute to a child's risk of harm.

In applying a contextual safeguarding approach, Pamodzi Creatives CIC will:

- Assess the environmental risks at all venues and locations where our activities take place, including community centres, schools, outdoor spaces and online platforms
- Identify and respond to risks that arise from children's relationships, peer groups and social networks, not only from their family circumstances
- Share relevant information with partner organisations, schools, local authorities and the PSCP to support a joined-up understanding of risk in the local area
- Work with the PSCP on contextual safeguarding approaches and participate in multi-agency discussions about extra-familial risk
- Ensure that risk assessments for activities and events include consideration of contextual factors such as the safety of the surrounding area, lighting, transport routes and the presence of unknown adults
- Take appropriate action where environmental risks are identified, including adjusting the location, timing or format of activities to reduce risk
- Train staff and volunteers to understand contextual safeguarding principles and to recognise that children's behaviour may be a response to risks they face outside the home

7. SAFER RECRUITMENT AND DBS REQUIREMENTS

Pamodzi Creatives CIC is committed to robust safer recruitment practices to deter, reject and identify individuals who may pose a risk to children. All recruitment and selection processes will include the following safeguarding measures:

- All applicants for roles involving contact with children must complete an application form that includes role-specific safeguarding questions designed to assess their understanding of and commitment to child protection

- Verification of the applicant's identity using original documents in accordance with DBS requirements
- A minimum of two references, including at least one from the most recent employer or engagement, with specific questions about the applicant's suitability to work with children
- A risk assessment for each role to determine the level and type of safeguarding check required
- An Enhanced DBS check with a check of the Children's Barred List for all individuals engaged in regulated activity with children, as defined by the Safeguarding Vulnerable Groups Act 2006
- DBS checks renewed every three years, or verification through the DBS Update Service on an annual basis
- No individual will be permitted to work in an unsupervised capacity with children until all required checks have been completed and deemed satisfactory
- A record of all DBS checks, references and other recruitment documentation will be maintained securely by the DSL

Where an applicant has spent time living or working overseas, additional checks will be undertaken as appropriate, including overseas criminal record checks and certificates of good conduct.

8. CODE OF CONDUCT

All staff, freelancers, volunteers and external partners working on behalf of Pamodzi Creatives CIC must adhere to the following code of conduct when working with children and young people.

8.1 You Must

- Treat all children with dignity, respect and fairness at all times, regardless of their age, disability, gender identity, race, religion, sex or sexual orientation
- Maintain clear and appropriate professional boundaries in all interactions with children
- Report any safeguarding concern, disclosure or allegation to the Designated Safeguarding Lead without delay
- Use only approved and organisationally monitored communication channels when communicating with children or their parents/carers
- Challenge inappropriate behaviour by colleagues, volunteers or other adults, and report concerns through the appropriate channels
- Respect the privacy and confidentiality of children, sharing information only on a need-to-know basis and in accordance with data protection law and this policy
- Follow safer working practice guidance at all times, including maintaining visibility, avoiding unnecessary physical contact and ensuring appropriate adult-to-child ratios
- Promote anti-racist and inclusive practice, actively challenging discrimination and ensuring that all children feel valued and safe
- Be a positive role model for children in language, behaviour and attitude
- Ensure that the environment in which activities take place is safe, welcoming and appropriate for children

8.2 You Must Not

- Use derogatory, discriminatory, racist, sexist, homophobic, transphobic or otherwise offensive language in the presence of, or directed at, children
- Engage in inappropriate physical contact with children, including rough play, wrestling or any contact that could be misinterpreted
- Meet with children alone in unobserved settings without prior approval from the DSL and an accompanying risk assessment
- Give children your personal contact details, including personal phone number, personal email address or personal social media accounts
- Take photographs, video recordings or other digital images of children without prior written consent from the child's parent or carer and in accordance with the organisation's digital media policy
- Consume alcohol or drugs, or be under the influence of alcohol or drugs, when working with or responsible for children
- Promise confidentiality to a child who has made or is making a disclosure; you must explain that you may need to share the information to keep them safe
- Show favouritism or give gifts to individual children
- Transport children in your personal vehicle unless this has been specifically authorised and appropriate insurance is in place
- Engage in any behaviour that could bring Pamodzi Creatives CIC into disrepute or undermine public confidence in the organisation's safeguarding arrangements

9. ONLINE SAFETY AND DIGITAL MEDIA

Pamodzi Creatives CIC recognises that the online environment presents both opportunities and risks for children. We are committed to ensuring that our use of digital technology is safe, appropriate and compliant with data protection law.

The following principles apply to all online and digital activities:

- All online sessions, workshops and communications with children must take place on secure, organisationally approved and monitored platforms
- Private one-to-one messaging between adults and children is strictly prohibited; all digital communications must be visible to at least one other adult or must be conducted through organisational channels that can be audited
- Written consent from a parent or carer must be obtained before any digital recording, photography or filming of children takes place, whether during in-person or online activities
- All digital images and recordings of children must be stored securely in accordance with UK GDPR, the Data Protection Act 2018 and the Data Use and Access Act 2025, and must not be stored on personal devices
- Any concerns about online grooming, exploitation, the sharing of child sexual abuse imagery (CSAM), harmful content or other forms of online abuse must be reported immediately to the DSL, who will make a referral to Portsmouth MASH and/or the Police as appropriate
- Staff and volunteers must not use personal social media accounts to communicate with children who participate in Pamodzi Creatives' activities
- Online safety guidance will be provided to children at the start of all digital activities, including information about how to report concerns

- The organisation will keep abreast of emerging online risks and will update its practices accordingly

10. REPORTING A SAFEGUARDING CONCERN

10.1 Immediate Danger

If a child is in immediate danger or at risk of serious harm, call **999** without delay. You do not need to wait for authorisation from the DSL to contact emergency services.

If you believe a child is at risk of significant harm but is not in immediate danger, contact:

- **Portsmouth MASH (office hours):** 023 9268 8793
- **Out of hours Emergency Duty Team:** 0300 555 1373

Inform the Designated Safeguarding Lead (Roni Edwards) as soon as possible after contacting emergency services or the MASH.

10.2 Responding to a Disclosure

If a child discloses abuse or harm to you, your role is to listen, reassure and report. You must follow these principles:

You Must:

- Listen to the child without interruption and take what they say seriously
- Stay calm, supportive and reassuring throughout the disclosure
- Record the child's exact words as accurately as possible, using their language rather than your own interpretation
- Ask only open questions if clarification is needed (for example, "Can you tell me what happened?" or "Is there anything else you want to say?")
- Reassure the child that they have done the right thing in telling you and that the abuse is not their fault
- Explain to the child, in age-appropriate language, that you may need to share what they have told you with someone who can help keep them safe; never promise to keep a disclosure confidential
- Report the concern to the Designated Safeguarding Lead immediately, or to the Deputy DSL if the DSL is unavailable
- Make a written record of the disclosure as soon as possible, including the date, time, location, the child's words, your responses, and any visible signs of harm; sign and date the record

You Must Not:

- Investigate the matter yourself or attempt to gather evidence
- Ask leading, closed or suggestive questions
- Express shock, disgust or disbelief at what the child tells you

- Share information about the disclosure with anyone other than the DSL, Deputy DSL or emergency services
- Confront or approach the alleged perpetrator
- Delay in reporting the concern to the DSL

10.3 Allegations About Staff or Volunteers (LADO)

Any allegation or concern that a member of staff, freelancer, volunteer or other individual working on behalf of Pamodzi Creatives CIC has:

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

must be reported to the Designated Safeguarding Lead immediately. The DSL will refer the matter to the Local Authority Designated Officer (LADO) within **one working day** of the concern being raised. The organisation will not undertake its own investigation before consulting the LADO. The individual who is the subject of the allegation may be suspended or redeployed as a neutral act pending the outcome of the LADO process, in accordance with guidance from the LADO and/or the Police.

11. DATA PROTECTION

Safeguarding data is processed by Pamodzi Creatives CIC in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data Use and Access Act 2025. The lawful bases for processing safeguarding data are:

- **UK GDPR Article 6(1)(e)** – processing is necessary for the performance of a task carried out in the public interest (the safeguarding and protection of children)
- **UK GDPR Article 9(2)(g)** – processing of special category data is necessary for reasons of substantial public interest
- **Data Protection Act 2018, Schedule 1, Part 2, Paragraph 18** – safeguarding of children and individuals at risk
- **Data Use and Access Act 2025** – provisions relating to the lawful sharing of data for safeguarding purposes

The following data protection principles apply to all safeguarding records:

- Safeguarding records are stored securely using password-protected systems with access restricted to the DSL, Deputy DSL and Directors on a strict need-to-know basis
- Records are retained in accordance with statutory timeframes and are not destroyed prematurely
- Information is shared only with lawful safeguarding partners, including Portsmouth MASH, the Police, the LADO and other agencies as required, in accordance with the Information Sharing Advice for Safeguarding Practitioners 2026

- Children's personal data is treated as highly sensitive and subject to the highest standards of confidentiality and security
- Data subjects' rights are respected, subject to any lawful exemptions that apply in the context of safeguarding (for example, where providing access to records would prejudice the prevention or detection of crime or would put a child at risk)
- Regular audits of safeguarding data are conducted to ensure compliance with data protection law and this policy

12. PREVENT DUTY

Under the Counter-Terrorism and Security Act 2015, Pamodzi Creatives CIC has due regard to the need to prevent individuals, including children and young people, from being drawn into terrorism. We recognise that radicalisation can affect anyone and that children may be particularly vulnerable to extremist narratives.

In fulfilling our Prevent Duty responsibilities, Pamodzi Creatives CIC will:

- Ensure that staff and volunteers are trained to identify children who may be vulnerable to radicalisation and to recognise the signs of extremist influence
- Report any concerns about a child being radicalised to the Designated Safeguarding Lead without delay
- Make safeguarding referrals to Portsmouth MASH and/or the local Prevent team where there are concerns that a child is at risk of being drawn into terrorism
- Work collaboratively with local Prevent partners, the PSCP, the Police and other agencies to support children who are vulnerable to radicalisation
- Promote critical thinking, resilience and mutual respect through our creative programmes, helping children to challenge extremist narratives
- Ensure that the creative spaces we provide are not used to promote or disseminate extremist material or ideology

13. TRAINING

Pamodzi Creatives CIC is committed to ensuring that all individuals working with children have the knowledge, skills and confidence to recognise and respond to safeguarding concerns effectively.

- The Designated Safeguarding Lead and Deputy Safeguarding Lead hold accredited multi-agency safeguarding training, which is renewed every two years in line with Working Together to Safeguard Children 2026
- All staff, freelancers and volunteers receive a safeguarding induction before commencing any work with children, covering the key principles of this policy, how to recognise and report concerns, and the organisation's code of conduct
- Annual refresher training is provided to all staff, freelancers and volunteers to ensure that safeguarding knowledge is maintained and updated
- Training content includes, as a minimum: recognising and responding to abuse and neglect, the Prevent Duty, online safety, safer working practice, anti-racist and anti-discriminatory

practice, peer-on-peer abuse, contextual safeguarding, and the requirements of Working Together to Safeguard Children 2026

- Training records are maintained by the DSL, including the date, content and attendance of each training session
- Additional specialist training is provided as required, for example in response to emerging safeguarding issues or changes in legislation
- Directors participate in safeguarding training appropriate to their governance role to enable effective oversight of the organisation's safeguarding arrangements

14. WHISTLEBLOWING AND COMPLAINTS

Pamodzi Creatives CIC fosters an open safeguarding culture in which all staff, freelancers, volunteers and partners feel confident to raise concerns about the safety and welfare of children without fear of reprisal, victimisation or disadvantage.

The following principles apply to all whistleblowing and safeguarding complaints:

- All safeguarding concerns, complaints and whistleblowing disclosures will be treated confidentially and taken seriously
- No individual will be disadvantaged, disciplined or dismissed as a result of raising a genuine safeguarding concern in good faith
- Concerns should be raised with the Designated Safeguarding Lead in the first instance
- If the concern involves the DSL, it should be raised directly with a Director of Pamodzi Creatives CIC
- If the concern involves a Director, or if the individual is not satisfied with the organisation's response, the matter may be reported directly to Portsmouth MASH (023 9268 8793), the Police, or the NSPCC Whistleblowing Helpline (0800 028 0285)

Escalation routes:

1. Designated Safeguarding Lead (Roni Edwards)
2. Directors of Pamodzi Creatives CIC
3. Portsmouth MASH: 023 9268 8793
4. Hampshire & Isle of Wight Constabulary: 101 (non-emergency) or 999 (emergency)
5. NSPCC Whistleblowing Helpline: 0800 028 0285

15. RECORD KEEPING

Accurate and thorough record keeping is essential to effective safeguarding. All individuals working on behalf of Pamodzi Creatives CIC must adhere to the following requirements:

- All safeguarding concerns, disclosures, observations and actions taken must be recorded in writing as soon as possible and no later than 24 hours after the event
- Records must be written clearly, factually and accurately, avoiding opinion, interpretation or speculation

- Each record must include the date the record was made, the time of the concern or disclosure, the name and role of the person making the record, and their signature
- Where a child has made a disclosure, their exact words must be recorded using their own language
- Records must be stored securely and sent to the Designated Safeguarding Lead within 24 hours
- Safeguarding records are retained in accordance with legal requirements and are not destroyed until the relevant retention period has expired
- Records must not be deleted, paraphrased, altered or amended after they have been completed; any additional information must be added as a supplementary note with a new date and signature
- Access to safeguarding records is restricted to the DSL, Deputy DSL and Directors on a strict need-to-know basis

16. POLICY MONITORING AND REVIEW

This policy will be reviewed annually by the Directors, Safeguarding Lead and Delivery Leads of Pamodzi Creatives CIC to ensure that it remains compliant with current legislation, statutory guidance and best practice.

The review process will include:

- An assessment of whether the policy remains compliant with Working Together to Safeguard Children 2026, PSCP procedures and other relevant legislation and guidance
- Consideration of any new legislation, statutory guidance or local safeguarding developments that require the policy to be updated
- Analysis of safeguarding referrals, concerns and outcomes during the preceding year, including any patterns, trends or disproportionality
- Feedback from staff, freelancers, volunteers, children and parents/carers on the effectiveness of safeguarding arrangements
- A review of training records to ensure that all individuals working with children have completed the required training
- Verification that DBS checks are current and that safer recruitment processes are being followed consistently

The policy will be updated earlier than the scheduled annual review if significant changes in legislation, statutory guidance or organisational circumstances require it. Any amendments to this policy will be approved by the Directors and communicated to all staff, freelancers and volunteers.

POLICY APPROVAL

Director:

Name: Alison Lee

Signature: _____

Date: September 2026

Director:

Name: Roni Edwards

Signature: _____

Date: September 2026

Next Review: September 2027