



The Exchange · 26 Haslucks Green Road · Shirley · Solihull · B90 2EL

Safeguarding Children and Young People Policy

Version 3.0 · Consolidated policy · Supersedes all previous safeguarding policies

This document consolidates and replaces the two safeguarding policies previously in circulation: “RobocodeUK Safeguarding Policy” (approved 20 February 2026) and “RobocodeUK Safeguarding Children and Young People Policy” (approved 17 February 2026). Where those documents differed, this version is authoritative. Both earlier documents should be withdrawn from circulation.

Item	Detail
Policy owner	Khaled Ayad, Director and Designated Safeguarding Lead
Applies to	All staff, associates, volunteers, contractors, agency workers, sessional workers and anyone acting on behalf of RobocodeUK
Covers	All RobocodeUK provision including holiday camps, term-time courses, school delivery, HAF provision, competition teams, trips and online delivery
Local safeguarding partnership	Solihull Safeguarding Children Partnership (SSCP)
Ofsted registration	Registered on the voluntary part of the Childcare Register. Registered person URN 2715831. Setting URN 2715832 — The Exchange, 26 Haslucks Green Road, Solihull, B90 2EL
Version	3.0
Effective from	1 August 2026
Next review	1 August 2027

1. Policy statement

- 1.1 RobocodeUK is committed to safeguarding and promoting the welfare of all children and young people who come into contact with our organisation. The welfare of the child is paramount.
- 1.2 We recognise that all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to protection from harm and abuse.
- 1.3 This Policy applies to all staff, associates, volunteers, contractors and anyone acting on behalf of RobocodeUK (together “Staff Members”) who has contact with children and young people through our activities, delivery, events or online engagement.
- 1.4 RobocodeUK has implemented this Policy in order to meet its obligations as a childcare provider registered with Ofsted, and in accordance with Solihull Safeguarding Children Partnership multi-agency procedures.
- 1.5 This Policy does not form part of any contract of employment. RobocodeUK may amend it at any time.
- 1.6 This Policy must be read alongside our Staff Code of Conduct, Managing Allegations Against Staff Policy, Whistleblowing Policy, Data Protection Policy, Health and Safety Policy, Complaints Policy and Recruitment and Selection Policy.

2. Scope

- 2.1 This Policy applies to safeguarding concerns arising:
 - on RobocodeUK premises or any delivery location, including schools, venues and partner sites
 - during off-site activities, walks, trips and events
 - during online delivery and communications
 - through any RobocodeUK-related contact, including recruitment and induction events
- 2.2 This Policy covers:
 - safeguarding concerns about a child or young person
 - concerns about the behaviour of a Staff Member towards children
 - concerns about third parties encountered during RobocodeUK activity, including other adults, contractors or visitors
 - low-level concerns about staff conduct that do not meet the harm threshold
 - child-on-child abuse
- 2.3 Where a concern relates to an adult at risk, Staff Members must report it to the DSL for direction.

3. Legal and guidance framework

- 3.1 This Policy is informed by and aligned with the safeguarding law of England, including:
 - Children Act 1989 and Children Act 2004
 - The Childcare (General Childcare Register) Regulations 2008
 - Safeguarding Vulnerable Groups Act 2006 (DBS and barred list arrangements)
 - Sexual Offences Act 2003
 - Counter-Terrorism and Security Act 2015 (Prevent duty)
 - Equality Act 2010
 - Data Protection Act 2018 and UK GDPR
 - Working Together to Safeguard Children (current edition)
 - Keeping children safe in out-of-school settings: code of practice
 - United Nations Convention on the Rights of the Child
- 3.2 Where this Policy is at any time inconsistent with current safeguarding law or statutory guidance, RobocodeUK will act to meet the requirements of the law in priority to this Policy, and will update this Policy accordingly.

4. Definitions

- 4.1 Child or young person: anyone under the age of 18.

- 4.2 **Safeguarding:** action taken to promote the welfare of children and protect them from harm, including protecting children from maltreatment, preventing impairment of health or development, ensuring children grow up with safe and effective care, and taking action to enable the best outcomes.
- 4.3 **Child protection:** part of safeguarding. Action to protect specific children who are suffering, or are likely to suffer, significant harm.
- 4.4 **Safeguarding concern:** any conduct or situation known or reasonably suspected by any person that risks harm to a child, or that breaches the safeguarding commitments in this Policy.
- 4.5 **Low-level concern:** any concern about the conduct of a Staff Member that does not meet the harm threshold but which is inconsistent with the Staff Code of Conduct.
- 4.6 **Incident:** an event affecting a child's safety or welfare that is not itself a safeguarding concern, for example an accident, injury, near miss, missing child or medical event.
- 4.7 **Complaint:** an expression of dissatisfaction by a parent, carer, child or third party about our service, staff or provision, which does not raise a safeguarding concern.

5. Core principles

- The welfare of the child is paramount.
- Safeguarding is everyone's responsibility.
- Children have the right to be listened to and taken seriously.
- A timely and proportionate response will be given to all concerns.
- Staff Members do not investigate. Staff Members act on concerns and report them.
- We work in partnership with parents and carers, and with statutory agencies where appropriate.
- Confidential information is shared only on a lawful, proportionate, need-to-know basis.
- Records are accurate, factual, secure and retained appropriately.

6. Safeguarding roles

Role	Name and title	Contact
Designated Safeguarding Lead (DSL)	Khaled Ayad — Director	07711 983559 k.ayad@robocode.uk
Deputy Designated Safeguarding Lead	Ahmed Ayad — Operational Manager	07826 285825 a.ayad@robocode.uk
Board-level safeguarding responsibility	Khaled Ayad — Director	As above
Data protection contact	Ahmed Ayad	07826 285825 a.ayad@robocode.uk

6.1 The Designated Safeguarding Lead is responsible for

- acting as the first point of contact for safeguarding concerns and advice
- deciding next steps and making referrals to statutory agencies
- liaising with Children's Social Care, the Police and the LADO where required
- ensuring appropriate record keeping and secure storage
- ensuring safeguarding training is in place and refreshed
- reviewing recorded concerns for emerging patterns (see section 12)
- escalating safeguarding risks to the Board

6.2 The Deputy DSL is responsible for

- supporting the DSL and acting in their absence
- maintaining training to the same standard as the DSL
- taking the lead where a concern or allegation involves the DSL

6.3 All Staff Members are responsible for

- understanding and following this Policy
- maintaining professional boundaries

- completing all safeguarding training assigned to them
- reporting concerns immediately to the DSL or Deputy DSL
- never promising confidentiality to a child
- never attempting to investigate a concern themselves

7. Safer recruitment

- 7.1 RobocodeUK uses safer recruitment to help prevent unsuitable people from working with children.
- 7.2 Recruitment for roles involving children will include:
- a role profile and safeguarding statement in adverts
 - a standard application process, not CV only
 - identity verification and right to work verification
 - qualification checks where relevant
 - two references, including the most recent employer where the role involved children
 - interview assessment including safeguarding questions
 - an enhanced DBS check including the children's barred list for all regulated activity
 - a disqualification declaration
 - safeguarding induction and Code of Conduct sign-off before any contact with children
- 7.3 No Staff Member will have unsupervised contact with children before a satisfactory enhanced DBS check with barred list has been returned. Where a person is working pending a check, the supervision arrangement will be recorded in writing.
- 7.4 RobocodeUK maintains a Single Central Record of all safeguarding recruitment checks.

8. Professional boundaries and safe practice

- 8.1 Staff Members must:
- maintain professional boundaries at all times
 - avoid unnecessary physical contact
 - avoid one-to-one situations where possible, and where unavoidable ensure they take place in an open and visible setting
 - never exchange personal contact details with children
 - never communicate with children via personal social media or messaging accounts
 - not transport a child alone unless expressly authorised, risk assessed and recorded
 - report concerns about colleagues promptly
- 8.2 Staff Members must never engage in a sexual or romantic relationship with anyone under 18. The law includes specific offences relating to positions of trust.
- 8.3 No Staff Member may use corporal punishment, or threaten it, and no Staff Member may smoke, or consume alcohol or drugs, on the premises or in the presence of children during a session.

9. Recognising abuse and safeguarding concerns

- 9.1 Safeguarding concerns may include, and are not limited to:
- physical abuse · emotional abuse · sexual abuse · neglect
 - child-on-child abuse, including bullying and harmful sexual behaviour
 - child sexual exploitation and child criminal exploitation
 - domestic abuse
 - online abuse and cyberbullying
 - radicalisation and extremism (Prevent)
 - trafficking and modern slavery
 - female genital mutilation
- 9.2 Possible indicators may include unexplained injuries, sudden changes in behaviour or emotional state, withdrawal, fearfulness or aggression, unexplained gifts or money, repeated absences, age-inappropriate sexualised behaviour or language, or a disclosure from the child or a third party.
- 9.3 Staff Members do not investigate and do not decide whether abuse has occurred. Staff Members act on concerns and report them.

10. Responding to a disclosure or concern

10.1 If a child discloses

Staff Members must:

- remain calm and listen, without displaying shock or disbelief
- find time and, if necessary, a suitable place to listen
- reassure the child that they have done the right thing by telling someone
- take what is said seriously
- ask only minimal clarifying questions. Never ask leading questions and never ask a child to repeat their account
- never promise secrecy. Explain, in a way appropriate to the child's age and understanding, that information may need to be shared to keep them safe
- not criticise the alleged perpetrator
- record the disclosure factually, using the child's own words where possible
- sign and date the record
- report to the DSL or Deputy DSL immediately

10.2 If a child is in immediate danger

- call 999
- stay with the child and take steps to keep them safe
- seek medical help if needed
- inform the DSL as soon as possible
- record the actions taken, factually

10.3 Where there is no immediate danger

- complete a Safeguarding Concern Form as soon as possible and on the same day
- submit it to the DSL within 24 hours, or sooner if the risk is escalating
- follow the DSL's instructions and do not investigate

10.4 Staff Members must report a concern even if they believe someone else already knows. Safeguarding requires active reporting and clear accountability.

11. Recording pathways

11.1 RobocodeUK maintains four separate and distinct records. A single event may generate entries in more than one, but each record is kept and reviewed separately.

Record	What goes in it	Who records it	Reviewed by
Safeguarding Concern Log	Any concern about a child's welfare or safety, any disclosure, and any concern about an adult's conduct towards a child	The Staff Member who receives the concern, on a Safeguarding Concern Form, same day	DSL, on receipt and at monthly pattern review
Low-Level Concern Log	Concerns about Staff Member conduct that fall below the harm threshold	The Staff Member raising it, in writing, to the DSL	DSL, at monthly pattern review
Incident and Accident Log	Accidents, injuries, near misses, missing child events, medical events, medication administered	The Staff Member present, before the end of the session	Operational Manager, weekly; DSL where a safeguarding element arises
Complaints Log	Expressions of dissatisfaction from parents, carers, children or third parties	The person receiving the complaint, on the day	Director, with response issued within 28 days

11.2 Where an event has both a complaint element and a safeguarding element, it is recorded in both logs and cross-referenced. The safeguarding element always takes priority and is dealt with under this Policy, not the Complaints Policy.

11.3 Every safeguarding concern must be recorded whether or not a referral is made, and whether or not it is later found to be unsubstantiated.

11.4 All records must include:

- the date and time of the event, and the date and time it was reported
- the names and roles of everyone involved
- the exact words used, where there has been a disclosure
- what was observed, and by whom
- a clear separation of fact from opinion
- the actions taken and the decisions made
- any referral made and its outcome, where known
- the rationale where a decision is taken not to refer

11.5 All records must be factual and objective, signed or initialled and dated, and stored securely with restricted access, separately from general personnel files.

11.6 Retention. Safeguarding records relating to a child are retained until the child reaches the age of 25, or longer where required by law or by safeguarding necessity. Complaints records are retained for three years, in line with the requirements of the Childcare Register.

12. Escalation and referral pathways

12.1 Internal escalation

12.1.1 All concerns go to the DSL. If the DSL cannot be reached within one hour, the concern goes to the Deputy DSL.

12.1.2 If neither the DSL nor the Deputy DSL can be reached and the concern is urgent, the Staff Member must contact Solihull MASH directly on 0121 788 4300, or the Emergency Duty Team on 0121 605 6060 outside office hours, and must inform the DSL as soon as possible afterwards.

12.1.3 Where the concern is about the DSL, it must be reported to the Deputy DSL, who will act in the DSL's place and will contact the LADO directly.

12.1.4 Any Staff Member may contact Solihull MASH, the NSPCC or the Police directly at any time. Nothing in this Policy prevents or delays a Staff Member from making a referral themselves if they believe a child is at risk and internal routes are not working.

12.2 Referral decision

12.2.1 The DSL decides whether a referral is required and to whom. The referral threshold applied is that set out in Solihull Safeguarding Children Partnership's Threshold Document (Thresholds for Support), available at

safeguardingsolihull.org.uk: a referral must be made where it is believed or suspected that a child has suffered significant harm, or is likely to suffer significant harm.

12.2.2 Where there is uncertainty about whether to refer, the DSL will seek advice from Solihull MASH rather than take no action.

12.2.3 Referral routes:

Route	When and how
Solihull MASH / Children's Social Work Services	Child protection and safeguarding referrals. Telephone 0121 788 4300, followed by the online Multi-Agency Referral Form
Emergency Duty Team	Out of office hours, evenings, weekends and bank holidays. Telephone 0121 605 6060
Police	999 where a child is in immediate danger or a crime is in progress. 101 for non-emergency
LADO (Solihull)	Any allegation against a Staff Member, volunteer or contractor meeting the harm threshold. Telephone 07795 128638, email lado@solihull.gov.uk. Contact within one working day
DBS	Where a person is removed from regulated activity and the legal criteria for a referral are met
Prevent / Channel	Where there are concerns about radicalisation
Ofsted	Serious childcare incidents and changes of circumstance, within 14 days

12.3 Confirming a referral

12.3.1 Every telephone referral must be confirmed in writing within 48 hours, using the Solihull Multi-Agency Referral Form. A copy of the submitted form is saved to the child's record.

12.3.2 The DSL records the date and time of the referral, who it was made to, the reference given, and the outcome once known.

12.4 If we are not satisfied with the response

12.4.1 If RobocodeUK is not satisfied with the response to a referral, or believes a child remains at risk, the DSL will escalate using the SSCP Resolution and Escalation Procedure, first to the team manager of the receiving service, then through the SSCP escalation route.

12.4.2 A decision not to escalate must itself be recorded, with the reasoning.

13. Monitoring emerging concerns and patterns

13.1 The DSL reviews the Safeguarding Concern Log and the Low-Level Concern Log monthly, looking for patterns by child, by Staff Member, by venue and by type of concern.

13.2 The DSL reviews the Incident and Accident Log and the Complaints Log quarterly for the same purpose.

13.3 The outcome of each review is recorded, including where no pattern is identified. Where a pattern is identified, the DSL records the action taken.

13.4 The DSL provides a written safeguarding report to the Board at least twice a year, anonymised where appropriate, covering the number and type of concerns, referrals made and their outcomes, training compliance, patterns identified, and any changes to practice made as a result.

14. Allegations against Staff Members

- 14.1 An allegation is any information indicating that a Staff Member may have:
- behaved in a way that has harmed, 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 in a way that indicates they may not be suitable to work with children
- 14.2 Any such concern must be reported to the DSL immediately, or to the Deputy DSL where it concerns the DSL.
- 14.3 The person receiving the allegation must listen without displaying shock or disbelief, must not cross-examine or probe, must not promise confidentiality, must not criticise the alleged perpetrator, and must make a factual, signed and dated record.
- 14.4 The DSL must not investigate or assess the validity of the allegation. The DSL will contact the Solihull LADO within one working day where any of the criteria at 14.1 are met, and will provide written confirmation.
- 14.5 RobocodeUK will not take any step that might compromise a Police or Children's Social Care enquiry.
- 14.6 The DSL will consider suspension or alternatives to suspension in line with the Managing Allegations Against Staff Policy. Suspension is a neutral act and is not a disciplinary sanction.
- 14.7 Support will be provided to the child and to the person subject to the allegation.
- 14.8 Outcomes are recorded as substantiated, malicious, false, unsubstantiated or unfounded. Where a person is removed from regulated activity, RobocodeUK will consider its duty to make a referral to the DBS.

15. Low-level concerns

- 15.1 Staff Members must report concerns about the conduct of a colleague even where the behaviour falls below the harm threshold. Examples include being overly friendly with a child, sharing personal contact details, taking photographs inappropriately, or using sexualised or aggressive language.
- 15.2 Low-level concerns are reported to the DSL in writing and recorded in the Low-Level Concern Log.
- 15.3 Low-level concerns are reviewed monthly. A pattern of low-level concerns about the same person may itself meet the threshold for a LADO referral, even where each individual instance would not.

16. Child-on-child abuse

- 16.1 RobocodeUK recognises that children can abuse other children. This includes sexual violence and sexual harassment, physical abuse, emotional abuse and bullying, and cyberbullying including the sharing of images.
- 16.2 All concerns about child-on-child abuse must be reported to the DSL immediately, using the same procedure as for adult-to-child abuse.
- 16.3 Reports will never be dismissed as banter or as children being children. The child who has been harmed will be supported. The child who caused the harm will be dealt with under our behaviour policy, with referral to external agencies where appropriate.

17. Whistleblowing

- 17.1 RobocodeUK encourages Staff Members to raise concerns about safeguarding practice or organisational failure.
- 17.2 Concerns may be raised internally with a line manager, the DSL or a Director, through the Whistleblowing Policy, or externally to a statutory agency where appropriate. Reports qualifying as protected disclosures will be handled in line with whistleblowing law.
- 17.3 Whistleblowing is distinct from a personal grievance. It relates to wrongdoing or risk affecting others.

18. Data protection and confidentiality

- 18.1 RobocodeUK complies with the Data Protection Act 2018 and UK GDPR. Safeguarding is a lawful basis for sharing information where necessary to protect a child, and safeguarding data may be processed without consent under Schedule 1, Part 2 of the Data Protection Act 2018.
- 18.2 Information will be shared lawfully, fairly and proportionately, on a need-to-know basis, and with safeguarding partners where required.

18.3 Safeguarding records are stored securely and separately from general personnel and child records, with restricted access.

18.4 Parents and carers are told why information may be shared, and consent is sought where appropriate. Consent is not required, and will not be sought, where seeking it would place a child at risk.

19. Online safety, photography and filming

19.1 Where activities involve online delivery or digital tools, Staff Members will model safe online behaviour, children will be supported to understand online risk, Staff Members must not use personal accounts to contact children, and any platform used must be approved and risk assessed.

19.2 Photography and filming requires written parent or carer consent. Images must be used only for the stated purpose, stored securely, and not retained longer than necessary. Children must not be named in published media without specific consent.

19.3 Children must not be photographed on personal devices.

20. Supervision and one-to-one working

20.1 Supervision levels will be appropriate to the age and needs of the children, the activity and environment, the competence and experience of staff, and the findings of the relevant risk assessment. Our staffing levels will always exceed the statutory minimum.

20.2 Where one-to-one working is unavoidable it must be authorised, risk assessed, conducted in an open and visible environment wherever possible, and recorded.

20.3 No child may leave the premises, and no person may enter, without a Staff Member becoming aware. Arrival and departure arrangements are set out in the venue risk assessment for each site.

20.4 Every child receives an induction on their first session covering the toilets, drinking water, fire evacuation, who their Mentor is, and how to ask for help. This is recorded on the register.

21. Additional needs and information from parents

21.1 Information about a child's additional needs, medical needs, allergies, dietary requirements or EHCP status is collected at the point of booking and recorded on the child's record.

21.2 Where a parent or carer discloses information about their child's needs at any other point, including verbally at drop-off, the Staff Member receiving it must record it in writing on the child's record on the same day, noting who disclosed it and when.

21.3 Recorded needs are briefed to the whole session team before the session begins, and the session lead confirms this on the register.

22. Training

22.1 All Staff Members receive safeguarding training at induction, before any contact with children, and annual refresher training thereafter.

22.2 The DSL and Deputy DSL complete enhanced DSL training, refreshed at least every two years.

22.3 All Staff Members are expected to complete between three and six hours of safeguarding training each year, in line with Solihull Safeguarding Children Partnership expectations.

22.4 Training will cover, as appropriate to the role: recognising the signs of abuse and neglect; responding to a disclosure; using this Policy's reporting procedures; the Prevent duty; child-on-child abuse; low-level concerns; safeguarding children with SEND; online safety; data protection; safer recruitment; and first aid and health and safety.

22.5 Training records are maintained for every Staff Member, showing the course, the date completed and the date due for renewal.

23. Complaints

23.1 Complaints that do not raise a safeguarding concern are dealt with under the Complaints Policy and recorded in the Complaints Log.

23.2 RobocodeUK will investigate every complaint fully, respond in writing where requested, and in any event respond within 28 days of the complaint being made.

- 23.3 Complaints records, including outcomes and actions taken, are retained for three years.
- 23.4 Any complaint that raises a safeguarding element is dealt with under this Policy in addition to the Complaints Policy.
- 23.5 Any complaint involving safeguarding, inclusion or premises safety arising from commissioned provision will be notified to the relevant commissioning team within 24 hours.

24. Monitoring and review

- 24.1 Monitoring includes audits of safeguarding records, training compliance checks, review of themes and patterns, and review of referrals and their outcomes.
- 24.2 This Policy is reviewed at least annually, and sooner where legislation changes or following a significant incident or audit.
- 24.3 Compliance with this Policy is assessed against the NSPCC Safeguarding and Child Protection Standards for the Voluntary and Community Sector.

25. Key contacts

Contact	Details
Designated Safeguarding Lead	Khaled Ayad, Director — 07711 983559 — k.ayad@robocode.uk
Deputy Designated Safeguarding Lead	Ahmed Ayad, Operational Manager — 07826 285825 — a.ayad@robocode.uk
Solihull MASH / Children's Social Work Services	0121 788 4300
Emergency Duty Team (out of hours)	0121 605 6060
Solihull LADO	07795 128638 — lado@solihull.gov.uk
Police	999 emergency · 101 non-emergency
NSPCC Helpline	0808 800 5000
Childline	0800 1111
Solihull Multi-Agency Referral Form	eservices.solihull.gov.uk/ChildrensSocialWorkServiceReferral
Ofsted	0300 123 1231

Appendix A — Reporting and referral flowchart

Display this page at each venue and include it in staff induction.

Step	Action
1	A concern arises. This may be a disclosure from a child, something you observe, something a parent tells you, or something a third party reports.
2	Is the child in immediate danger? YES → call 999, keep the child safe, seek medical help, then inform the DSL. NO → go to step 3.
3	Record it. Complete a Safeguarding Concern Form the same day. Factual, the child's own words, signed and dated. Do not investigate.
4	Report it to the DSL: Khaled Ayad, 07711 983559. If unavailable within one hour → Deputy DSL: Ahmed Ayad, 07826 285825. If the concern is about the DSL → go straight to the Deputy DSL.
5	Neither reachable and the concern is urgent? Contact Solihull MASH on 0121 788 4300, or the Emergency Duty Team on 0121 605 6060 out of hours. Then inform the DSL.
6	The DSL decides. Threshold: has the child suffered, or is the child likely to suffer, significant harm? If uncertain, the DSL seeks advice from MASH rather than taking no action.
7	Referral, where required: MASH 0121 788 4300 · Police 999 or 101 · LADO 07795 128638 for allegations against an adult · Prevent where radicalisation is suspected · Ofsted within 14 days for a serious childcare incident.
8	Confirm in writing within 48 hours using the Solihull Multi-Agency Referral Form. Save a copy to the child's record.
9	Record the outcome. Including where no referral is made, with the reasoning.
10	Not satisfied with the response? The DSL escalates under the SSCP Resolution and Escalation Procedure.
11	Monthly pattern review by the DSL across the Safeguarding Concern Log and Low-Level Concern Log.

Document control

Item	Detail
Version	3.0 — consolidated
Supersedes	RobocodeUK Safeguarding Policy (approved 20/02/2026) and RobocodeUK Safeguarding Children and Young People Policy (approved 17/02/2026). Both withdrawn
Author of previous versions	Ahed Alhussein
Consolidated and revised by	Ahed Alhussein
Reviewed by	Khaled Ayad, Director

Item	Detail
Approved by	Khaled Ayad, Director — 2 August 2026
Effective from	1 August 2026
Next review date	1 August 2027
Distribution	All staff · associates · volunteers · Board of Directors · available to parents on request