Children and Adult Safeguarding Policy

Pocket Money Adventures CIC | Version 1.7 - approved revised issue

Effective: 2 October 2026 | Review: 2 October 2027 or sooner on relevant change

Policy owner: Nathan Waldron, Director

Approval and issue record

Original issue adopted on 2 October 2026. Its recorded typed signatures of Nathan Waldron and Bernadette Houlton remain in the preserved original. Nathan Waldron has approved this revised issue; no new signature is applied for Bernadette Houlton.

This revision corrects wording and the responsibility table and adds host-led delivery and research requirements. Existing effective and review dates are retained. The controlled record holds approval evidence. Project, research and host approvals remain separate.

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.

Immediate reporting and local routes

Report promptly to the host safeguarding lead and PMA DSL, record as soon as practicable and confirm follow-through. Anyone may refer directly when protection is urgent, a lead is unavailable or action is inadequate; never wait a working day where a child may be at risk. Stoke and Staffordshire have separate referral routes. Stoke CHaD: 01782 235100, out of hours 01782 234234. Staffordshire: 0300 111 8033, out of hours 0345 604 2886. 999 for immediate danger. Allegations meeting the child-workforce threshold go to the relevant LADO within one working day; adult concerns use adult safeguarding and positions-of-trust arrangements.

Detailed policy and procedures

This policy sets out how Pocket Money Adventures CIC safeguards children and adults in school, community and out-of-school financial education activities, including activities delivered by a host using PMA resources. Read it alongside the Safeguarding and Child Protection Handbook, Safer Recruitment Policy, Adult Safeguarding and Trauma Informed Response Policy, School Safeguarding and DBS Schedule, and Confidentiality and Information Sharing Procedure. The project-specific requirements in section 6 apply before host-led delivery or research starts.

Safeguarding commitment

The welfare of the child is paramount in every decision we take. In direct delivery, we attend as a visiting provider, never work unsupervised with an individual child and report concerns without delay. Nothing in this policy transfers a host's safeguarding responsibility to PMA or transfers PMA's responsibility for its own people to a host. A host-led activity requires the written allocation of responsibilities in section 6, even when no PMA person attends.

Changes in this version

Coverage includes family hubs, libraries, museums, youth groups, holiday clubs and other community venues. The school requirements remain in place. The policy covers named safeguarding contacts, accompanied children, lone working, adult participants and economic abuse, local referral routes and venue risks. This revised copy repairs the responsibility table and adds explicit controls for host-led delivery and research without treating proposed arrangements as completed approvals.

1. Purpose and scope

Pocket Money Adventures delivers or supports host-led financial education sessions on the premises of host schools and in community settings, including family hubs, libraries, museums, youth groups, holiday clubs and other voluntary, community and faith venues. This policy applies to every Pocket Money Adventures person in every one of those settings. It covers:

- employees, sessional facilitators, contractors, directors and volunteers;

- anyone attending on our behalf in a delivery, observation or evaluation role; and

- any third party we engage who may come into contact with children through our activities.

1.1 Schools

Where we deliver in a school we:

- follow the host school's own safeguarding procedures while on site;

- identify the host school's Designated Safeguarding Lead on arrival;

- report any concern to that Designated Safeguarding Lead without delay; and

- never work unsupervised with an individual child. The host school holds the child's record and history. Our role is to notice, record and hand on.

2. Community and out-of-school settings

The sections that follow apply when we deliver outside a school, where there is no Designated Safeguarding Lead in the school sense.

2.1 Named safeguarding contact

Before any community session is confirmed, the host names one person who holds safeguarding responsibility for the session and who will be contactable throughout. We record that person's name, role and mobile number in the booking. If the host cannot name someone, the session does not go ahead. On arrival we confirm who that person is and where they will be.

2.2 Host responsibility

We attend as a visiting provider. The host is responsible for:

- the venue and its fire, first aid and evacuation arrangements;

- its own staff and volunteers, including their vetting and training; and

- the supervision of the children and adults attending. We do not provide childcare and we do not hold supervision ratios.

For delivery by host staff without PMA present, agree and verify the additional requirements in section 6 before activity begins.

2.3 Children attend with their own adult

Community sessions are designed for children and their parents or carers together, and children remain with their own adult throughout. Where a host runs drop-off provision, such as a holiday club or a Holiday Activities and Food programme, the host's own staff remain present and responsible for supervision at all times. This is confirmed in writing before the session.

2.4 Never alone with a child

No Pocket Money Adventures person will be alone with a child in a community setting. We work in the same room as host staff or the children's own adults throughout. Where a child needs the toilet or needs to leave the room, that is the responsibility of the host or the child's own adult.

2.5 Lone working

Where only one facilitator attends, that facilitator will:

- not begin until a member of host staff is present;

- work in sight of host staff or attending adults throughout;

- not remain on site after the host's staff have left; and

- confirm arrival and departure by message to the Designated Safeguarding Lead.

2.6 Adults as participants

Community sessions have adults in the room as learners as well as supervisors. The associated safeguarding risks must be planned for before the session. Conversations about money can surface economic abuse, which is a recognised form of domestic abuse under the Domestic Abuse Act 2021. If an adult discloses, or if controlling behaviour between adults is observed in the room, we do not explore it in the room. We record necessary facts in the words used and promptly seek safeguarding advice through the PMA DSL or deputy. Follow the handbook adult response procedure: consider the adult's wishes, safe contact and lawful information sharing, and involve the host contact and adult safeguarding service as necessary. Do not automatically tell an accompanying adult or disclose sensitive details to an alleged source of risk. Where the person appears to be at immediate risk, call 999 where necessary and use the relevant adult safeguarding route. Consider any associated risk to children through the child safeguarding route as well. We never ask any participant about their own financial circumstances, and we intervene if another participant presses someone to disclose. This is a delivery rule as well as a safeguarding one.

2.7 Signposting, and the limits of what we offer

Pocket Money Adventures offers preventative money education and confidence. We do not offer personalised regulated financial or debt advice, or specialist benefits advice, and we say so in the session. Every session pack carries the following, and the facilitator signposts rather than advises:

- National Domestic Abuse Helpline, 0808 2000 247, and Surviving Economic Abuse;

- Citizens Advice, for benefits, debt and consumer questions;

- StepChange, for free debt advice; and

- MoneyHelper, for general money guidance.

2.8 Referrals outside Staffordshire

Our default threshold framework is Right Help, Right Time, held by the Staffordshire Safeguarding Children Partnership. Where we deliver in another local authority area we identify that authority's own multi-agency safeguarding arrangements and threshold document before the session, and record the referral route in the booking. Where the host has its own referral route we use the host's route first and retain our own record.

2.9 Allegations in a community setting

The Designated Safeguarding Lead refers to the Local Authority Designated Officer in the authority where the session took place, within one working day. Where the allegation concerns the Designated Safeguarding Lead, the Deputy refers directly and informs the Board.

2.10 Venue risk

Before a first session at a new venue we complete a short venue check covering:

- the room, its exits and its evacuation route;

- who else has access to the space during the session; and

- whether the space is shared with the public. Where a session takes place in a public area of a library or museum, the host confirms in advance how that space is managed while children are present.

3. Who holds what in a community setting

Responsibility	Host	Pocket Money Adventures
Safeguarding concerns	Names a responsible contact and absence route; acts on concerns and confirms follow-through.	Reports promptly to the host contact and PMA DSL; retains necessary records and refers directly where protection requires.
Venue, fire and first aid	Confirms suitable site arrangements, capacity and competent cover.	Checks arrangements before delivery and follows them; retains responsibility for its own workforce and activities.
Supervision and ratios	Arranges suitable supervision and staffing throughout.	Does not provide childcare or assume host supervision ratios; stops if agreed supervision fails.
Accompanied children	Confirms children remain with their own adult, or with responsible host staff in host-run provision.	Does not begin without confirmation; never works alone with an individual child.
Content and materials	Confirms group needs and uses agreed materials and delivery guidance.	Provides appropriate resources and instructions; agrees who delivers and monitors any host-led activity under section 6.
DBS, training and insurance	Checks its own people, roles, competence and relevant cover.	Checks its own people, roles, competence and relevant cover; does not infer suitability from host approval.

4. Records and information sharing

We record concerns in the words used, on the day, and hand them to the setting's safeguarding lead. We retain our own record of what we passed on and to whom. We do not collect routine pupil-level learning or personal financial data. Necessary safeguarding records are handled under the exception above. Our Confidentiality and Information Sharing Procedure governs retention and lawful sharing.

5. Contacts

Designated Safeguarding Lead: Nathan Waldron. Deputy Designated Safeguarding Lead: Bernadette Houlton. Safeguarding contact: safeguarding@pocketmoneyadventures.co.uk. Data protection contact: dpo@pocketmoneyadventures.co.uk. Registered office: 68 Nottingham Road, Eastwood, Nottingham, NG16 3NQ.

6. Host-led delivery and research requirements

This section applies across all PMA work where a host delivers resources without PMA present or an evaluator conducts research with children or families. It sets conditions for delivery; it is not evidence of ethical approval, partner acceptance, staff clearance or a completed contract.

6.1 Written responsibilities before activity starts

PMA and each host must agree a written delivery and safeguarding schedule. Name the host safeguarding lead and absence cover, PMA DSL and deputy, and the evaluator safeguarding contact where applicable. Record direct telephone contacts and local child and adult referral routes. Confirm who supervises each part of the activity, handles disclosures, makes referrals, records concerns, checks follow-through and informs PMA. Include incidents during assessments or outside the main session room. Responsibility for safeguarding cannot be delegated away by contract.

Host staff delivering PMA activities remain responsible for supervision and the host response. PMA remains responsible for its own people, materials, instructions and agreed oversight. Evaluators remain responsible for their personnel and assessment practice. Each organisation must accept its allocated duties before starting. Any person may stop an unsafe activity and refer directly if protection is urgent or the agreed response is unavailable or inadequate.

6.2 People, conduct and reporting

Before deployment, the organisation engaging each worker verifies role-appropriate checks, identity, competence, safeguarding training and induction. Brief everyone on recognising and responding to disclosures, professional boundaries, no private child contact and reporting routes. Provide the applicable staff code of conduct, complaints and whistleblowing routes. Record and escalate concerns about conduct, including concerns below the allegation threshold; seek LADO advice where the threshold is uncertain. Concerns about a named lead go to the deputy or another uninvolved responsible person, without delaying external referral.

6.3 Attendance, access and assessment spaces

Complete and agree a venue/session assessment covering all children, accompanying adults, siblings of any age, workers, volunteers and observers. The 50-person ceiling includes everyone and remains subject to the lower safe room and staffing limit. Do not infer capacity from a planned number of families. Confirm first aid, accessible evacuation, arrival and collection, toilets, lost-child response, public access and a supervised quiet space. Agree practical communication, disability and additional support arrangements without collecting unnecessary personal information.

Assess separate assessment rooms and transitions between spaces. No researcher or other worker is alone with an individual child. Keep a responsible host adult or parent/carer present and maintain the agreed supervision. Pause or reschedule if safe staffing, suitable space or support is missing; additional sessions or staffing must be agreed and resourced rather than assumed.

6.4 Research and personal data

Routine delivery continues under Zero Child Data. Child-level measurement, linked records, identifiable images or video, or other research beyond safe aggregates may begin only under a separately approved protocol. Before recruitment or collection, record the accountable research sponsor or lead, applicable ethics review route and written approval or documented determination; agree controller, joint-controller or processor roles as applicable, lawful bases, privacy information and any required data protection impact assessment and data-sharing or processing agreements.

The protocol must specify parent/carer permission where required, age-appropriate information and child assent, voluntary participation, a practical way to decline without losing access to ordinary activities, and

withdrawal arrangements including any limits once data are anonymised. Respect a child's refusal or distress during an assessment even where an adult has agreed. Keep research participation separate from attendance or access to support.

Specify exactly what data are collected, who collects and can access them, identifiers and linkage keys, secure transfer and storage, retention periods, deletion, approved recipients and incident/breach response. Codes with a retained linkage key are personal data, not anonymous data. Recording is off by default. Any approved filming requires a defined purpose, appropriate permissions and a workable alternative for people who decline; avoid incidental capture of other attendees.

6.5 Disclosures, records and start/stop decision

Explain confidentiality limits before assessment. Follow the handbook disclosure procedure: listen, avoid leading questions or investigation, record necessary facts and actual words, and report promptly. Keep safeguarding records separate from research datasets with restricted access; share only what is necessary through the lawful safeguarding route. Adult concerns use the adult safeguarding procedure and local adult route, with associated child risks considered separately.

The PMA project lead records a pre-start check with the host and evaluator covering the signed responsibility schedule, contacts, staffing and checks, training, site assessment, required research/data approvals and participant information. An unresolved essential control prevents the affected activity from starting. Record incidents, near misses and changes, confirm actions with named owners, and review controls before the next activity. Policy approval alone does not satisfy these conditions.

Issue control

Original effective date: 2 October 2026. Scheduled review: 2 October 2027 or sooner on relevant change. Approved revised issue on Nathan Waldron recorded authority; original signed issue preserved. Approval evidence is held in the controlled revision record. Host agreements, individual acknowledgements, venue checks and research approvals remain separate records.