



Every Cloud Play & Creative Arts Therapy

Safeguarding Children & Young People **Policy & Procedures**

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Contents

1. Overview.....	3
1.1 Introduction.....	3
1.2 Scope.....	4
1.3 Policy Objectives.....	5
1.4 Legal & Regulatory Framework.....	7
1.5 Safeguarding Practice.....	8
1.6 Photos and Videos.....	15
1.6 Standards of Conduct.....	17
1.7 Communication.....	18
2. Safeguarding Children & Young People.....	20
2.1 What is Safeguarding.....	20
2.2 Safeguarding Definition.....	20
2.3 Clinical & Professional Supervision.....	21
2.4 Recognising Abuse & Safeguarding Concerns.....	21
2.5 What Defines Abuse.....	22
2.6 Examples of Abuse.....	25
2.7 Online Safety & Considerations.....	28
2.8 Missing Persons.....	29
3. Assessing & Supporting Safeguarding Concerns.....	30
3.1 Managing Disclosure.....	30
3.2 Safeguarding and Data Protection.....	31
3.3 Resources.....	32
3.4 Safeguarding Reporting Procedure.....	33
3.5 Emergency Safeguarding Reporting Procedure.....	35
4. Allegations about a Therapist.....	37
4.1 What is an Allegation:.....	37
4.2 Steps to Take.....	37
4.3 Further Escalation.....	38
Appendix 1: Concern Log.....	1
Appendix 2: Safeguarding procedure Flow Chart.....	2

1. Overview

1.1 Introduction

Safeguarding is a term used in the United Kingdom and Ireland to denote measures to **protect the health, well-being and human rights** of individuals, which allow people — especially children, young people and adults at risk (previously termed “vulnerable adults”)— to live free from abuse, harm and neglect.

Every Cloud Play & Creative Arts Therapy CIC (hereafter referred to as Every Cloud), take their safeguarding responsibilities seriously at all times. This policy sets out our processes to meet our six key practice aims and our ethos in regard to safeguarding practice including the procedures we follow in the event of a safeguarding concern; either low level, a more serious concern or disclosure.

Every Cloud also follows six key practice aims in relation to our work safeguarding children, young people and adults at risk:

1. Understanding the child, young person and/or adults at risk’s daily life
2. Ability to work with families with reluctant engagement
3. Demonstrate critical thinking and challenge at all times
4. Respond to changing risks and needs of the client’s vulnerability

5. Share information in a timely and appropriate way whilst maintaining client confidentiality in accordance with Every Cloud policies and procedures
6. Demonstrate clear and consistent organisational leadership and promote our culture for good outcomes for our clients

1.2 Scope

This Safeguarding Policy & Procedures concerns children and young people under the age of 18 which are the predominant client base of Every Cloud. Whilst this policy is specific to our role as children's therapists Every Cloud has a commitment to safeguard and protect the welfare of all who use our services. We work with children and young people's families and carers and recognise that some young people we work with may be transitioning to adulthood and therefore this policy must be read and operated in conjunction with Safeguarding Adults at Risk Policy & Procedure (issued November 2025 as a separate document) which covers Every Cloud's safeguarding policies and procedures for those groups.

This policy and its procedures apply to all Every Cloud staff and volunteers: it is important that everyone at Every Cloud, whether paid or not, is aware of safeguarding risks and the appropriate steps to take if there are indications that a child may be exposed to harm.

1.3 Policy Objectives

Our child-centred and person-centred therapeutic approach underpins all our work with **children and young people**. Objectives that are specific to our safeguarding ethos are:

- To support children and young people in ways that will foster security, confidence and independence
- To provide an environment in which children and, young people feel safe, secure, valued and respected, and feel confident to disclose to their therapist if they are in or have had difficulties, believing they will be effectively listened to. Every Cloud recognises that children may not feel ready or know how to tell someone if they are being abused and that often building a safe, therapeutic relationship needs to be the initial priority.
- To be clear and transparent with our confidentiality contract with each child and young person that confidentiality cannot be maintained if the therapist believes there is a risk of harm to anyone. This will be discussed with the child or young person at the start of their therapy intervention and again at the time of the disclosure.
- To raise the awareness of all therapists (including those therapists and professionals working elsewhere but supported by Every Cloud supervision) of their duty to safeguard children and young

people and of their responsibilities in identifying and reporting possible cases of abuse.

- To emphasise the need for good levels of communication between parents/carers and all agencies, enabling the therapist to have a clear picture of the child and young person, considering all parts of the jigsaw and the role that information sharing can play in pulling together all pieces of the puzzle.
- To develop a structured procedure within Every Cloud which will be followed in cases of suspected abuse or concerns, also referred to as low level concerns (see Appendices One & Two).
- To develop and promote effective working relationships with other agencies to ensure a systemic approach, especially schools, the Police; Social Care; CAMHS; Families First and their commissioned services.
- To ensure that all therapists and office staff are recruited following Safer Recruitment processes and have suitability checks, including verification of their identity, qualifications and a satisfactory Enhanced DBS and online check (according to guidance) and a single central record (SCR) is kept updated regularly.

See also Safer Recruitment Policy

- To ensure that all therapists receive all relevant statutory Safeguarding/Child Protection/Prevent training and Designated Safeguarding Leads receive relevant enhanced training.
- To ensure all therapists are aware of their duty to report in cases of Prevent, including risk of exploitation in both online and group based exploitation and suspected FGM.

1.4 Legal & Regulatory Framework

Our safeguarding policy and our practice reflects current legislation and guidelines including but not limited to:

- [BAPT Ethical Framework](#)
- [Working Together to Safeguard Children 2026](#)
- [Children Act 2004](#)
- United Nations Convention Rights of the Child

[UNCRC In Full](#)

[UNCRC Summary](#)

- [Human Rights Act 1998](#)
- [Additional Health Needs Guidance](#)
- [Prevent Duty Guidance \(2025\)](#)
- [UK Data Protection Act 2018](#) & [UK General Data Protection Regulation \(UK GDPR\)](#) & [Data \(Use & Access\) Act 2025](#)
- [Online Safety Act 2025](#)

In cases where we are working with schools, we also have due regard for the school's safeguarding policy and procedure and the guidance within [Keeping Children Safe in Education 2025](#). All Therapists have read and are familiar with this document, in particular Part One and refresher training takes place annually, in line with this document review.

1.5 Safeguarding Practice

To meet these aims and objectives Every Cloud will:

- Appoint a Designated Safeguarding Lead (Naomi Murray) and a Deputy Designated Safeguarding Lead (Kay Tibbles). These roles share responsibility for maintaining safeguarding practice in line with current legislation and this policy. Regular enhanced training and attendance at (GSCP or privately arranged equivalent) update training is part of the role's responsibility.
- Every Cloud operate a Safer Recruitment Process in all aspects of therapist, volunteers and staff recruitment. Covered in more detail in our Safer Recruitment Policy this process is a robust, inquisitive approach to recruiting. Applicants complete a role specific application form, references (2 minimum) are sought prior to interview, gaps in employment and/or questions raised from references are explored during interview and suitability checks included Enhanced DBS are also carried out. Fully

qualified therapists must be accredited by their Professional body, registered with the PSA and work to their ethical principles. Student therapists must be training towards this accreditation.

- Every Cloud will ensure that all therapists, other than DSL/DDSL receive Safeguarding Training at least every 3 years. DSL and DDSL receive Multi agency training every 2 years.
- Every Cloud also include [Prevent training](#) within their regular CPD and are both Prevent aware and FGM aware in their practice, understanding the importance of reporting such concerns. Page 159 of [KCSIE 2025](#) details links to training, resources and further guidance around Prevent and Channel referrals. Referrals to the Prevent team can be made [here](#) or by emailing the Gloucestershire Prevent Team on Prevent@gloucestershire.pnn.police.uk In Gloucestershire the Prevent team are a Gloucestershire constabulary team.
- Families who have experienced the complexities of the Toxic Trio—mental ill-health, substance misuse, and domestic abuse—or other high levels of adversity, often referred to as Adverse Childhood Experiences (ACEs), are at significantly greater risk of ongoing harm and intergenerational trauma.

Every Cloud's **BAPT Registered Play Therapists®**, with their specialist training in child development, trauma-informed practice, and therapeutic play interventions, are uniquely equipped to support these families. Their expertise enables them to create safe, attuned therapeutic environments that foster emotional regulation, resilience, and recovery for children and their caregivers.

- Every Cloud will sign up to GSCP & South West Prevent alerts and include Safeguarding updates as an agenda item in monthly Team meetings. All therapists are encouraged to also sign up to GSCP & Prevent alerts on their individual @everycloudtherapy email addresses.
- Every Cloud will hold a single central record (SCR) detailing each therapist's verified information of their ID, qualification, Enhanced DBS Checks and training dates. Therapists are also Paediatric First Aid trained every 3 years. This SCR will be regularly updated by our Business Support Administrator.
- In the initial meeting with parents/carers *and* in our initial session with each new client we will inform them, communicating in a way that they can understand, our confidentiality agreement and the exception for safeguarding concerns. This will also be reiterated at the start of sessions

with the child or young person as the therapeutic intervention progresses as the therapist feels necessary.

- Every Cloud will review this policy at least annually. This may be more frequent if updated guidance or legislation is produced or if 'lessons learnt' deem an amendment. Part of the review process includes regular in-house training, delivered by the DSL and policy author to all staff, volunteers and therapists cascading the updated policy in addition to regular team discussions and case study scenarios across our in house training programme.
- Every Cloud will ensure that the safeguarding policy and procedure is available on our website.
- Every Cloud will develop effective links with relevant agencies and cooperate as required with their enquiries, ensuring that therapists attend MASA meetings such as, but not limited to: case conferences, core groups, TAF/TAC/PEP/CLA and other multi-agency planning meetings where possible. On request and in keeping with our client confidentiality procedure and GDPR policy we will contribute to assessments and reports where appropriate.

- Every Cloud will monitor attendance and if applicable notify the referrer/funder/school or social worker if there is an unexplained or persistent absence.
- Every Cloud Play understand the importance of Early Help and work to the [Levels of intervention](#) Guidance. All therapists aim to utilise and be familiar with the toolkits, resources and other agencies that are in place to ensure children and their families get the right support at the right time. Page 32 details links to some of these toolkits, resources and further guidance.
- Every Cloud will keep written records of low-level concerns about children or young people, called a Concern Log (Appendix 1). This is used to help build up a picture of what might be happening for the child or, young person. We will use the practice of respectful challenge and our ethical right to share information with the intention to protect where necessary. All Concern Logs started are discussed initially and then at regular intervals with the DSL at Every Cloud and where necessary contribute to a referral to MASH or seeking support from other agencies.
- Every Cloud believe that effective working together depends on a culture of open and honest relationships between agencies and professional differences are welcomed by professionals

who want the best service for children and young people in Gloucestershire. Every Cloud agree that problem resolution is an integral part of professional co-operation and joint working to safeguard children in Gloucestershire. Disagreement based on a passion to improve outcomes for children is healthy professional practice although resolution of disagreement is an integral part of professional cooperation and joint working to safeguard children. Effective working together is dependent on an open and honest relationship between agencies and professionals. Where necessary and identified Every Cloud will utilise the [Escalation of Professional Concerns Guidance](#)

- Every Cloud will ensure all records are kept securely and confidentially, as per our client confidentiality procedure and privacy statement. Therapists are also required to ensure that they hold up to date contact details for all parents and carers and other professionals also working with the child or young person.
- Every Cloud will ensure that the therapy rooms, office and building they operate from is regularly risk assessed to maintain a safe and secure environment and appropriate insurances and checks are in place.

- Access to the therapy practice is controlled through a locked door which can only be opened by designated staff. Whilst there is potential for other companies operating in the building to let in unknown visitors, Every Cloud regularly reiterates their safeguarding procedures and other companies are in agreement that they will not permit unknown visitors entry to the premises. Children and young people are at no time unsupervised on the premises.
- Every Cloud's policy is that if children or young people need support for toileting or personal/medical care that parents/carers remain onsite or contactable at all times. Therapists do not typically assist children or young people with any aspects of intimate care such as using the toilet.
- Therapists maybe alone with children or young people to use the sinks in the toilet area in order to clean up from messy play. In this instance the toilet doors remain open
- If for some reason a parent/carer is not readily available and the Therapist needs to offer intimate care such as supporting with a toileting accident or assisting with using the toilet this should be documented immediately after and discussed with the parent/carer. In this circumstance, where possible doors should

remain ajar where appropriate. Children and young people's dignity and privacy should be respected at all times.

- Every Cloud will ensure that there is an appropriate lone working policy

See also Health and Safety Policy and Lone Worker Policy.

1.6 Photos and Videos

- **Photos and videos** are only used at Every Cloud in the following instances:
 - o to document for the child or young person their therapeutic process or creations
 - o For students, sessions are recorded to support their training journey
 - o Where there is a clinical rationale for Therapy Sessions to be recorded securely
 - o As part of the Child Parent Relationship Therapy programme when parents record their play sessions with children to receive Video Interactive Guidance from the therapist
 - o As part of the Child Parent Relationship Therapy Programme when delivered content needs to be recorded

to be shared with a participant unable to make the original appointment.

In all instances above where photo or video is used, Every Cloud staff follow the clear procedures detailed in our GDPR Policy and E Safety Policy that ensures any digital media created is secure, safeguarded and remains confidential to the child's file. Only Every Cloud devices are permitted to be used to take photographs or to record Every Cloud sessions and these devices remain at Every Cloud, stored securely and in accordance with the GDPR and Data Protection Policy, with no identifying information shared with the photo (e.g. name, school, location, etc). *See also Data Protection Policy.*

In all instances of sessions being recorded a signed and informed consent is in place with parents that includes how footage is stored, used and how long it is kept for before being securely deleted. This is all in accordance with the GDPR and Data Protection Policy, with no identifying information shared with the video (e.g. name, school, location, etc). *See also Data Protection Policy.*

Every Cloud will ensure that where therapeutic client sessions are operated online (via Googlemeet or Zoom), these will follow a very specific online session process. This includes but is not limited to using a secure password and a unique link, sent to the parent/carer and never to the personal account or device of a child or young person.

1.6 Standards of Conduct

Every Cloud ensures that therapists conduct themselves in a fully professional manner in all aspects of their role:

- Within sessions the Therapist maintains a safe and secure environment in which the child or young person can express themselves in most of the ways they choose.
- Some forms of expression may not be acceptable. These may include but are not limited to physical or verbal aggression or destruction of the playroom resources. In instances of these, the Therapist will convey to the child or young person what is not acceptable, what the need may be and target an alternative form of expression.
- If the unacceptable form of expression continues it may become necessary to end the session. In these instances, the therapist will ensure that the child or young person is

clear that it is the behaviour that is unacceptable, not them as an individual. This element of limit setting is a key element of establishing the therapeutic relationship and professional conduct will always be maintained.

- Physical restraint is rarely used in therapeutic work however if reasonable force is needed to keep a child or young person safe, parents/carers will be notified immediately after the session, given a brief explanation of why it was needed and a record of this as an incident will be made in the clients file.

Each therapist works to and within the Core Competencies and Ethical Basis for Good Practice as set out by BAPT: their registered body.

Comprehensive details of the BAPT Core Competencies can be found [here](#).

1.7 Communication

As part of our work it is essential that we communicate with children and young people in a way they understand, using language and methods that are age and developmentally appropriate and inclusive of gender, race and disability or communication differences. This includes all verbal and written communication, as well as posters and physical materials at Every Cloud.

It is essential that a child or young person's preference for how they are referred to in name and pronoun is identified with them from the beginning and used consistently with them and about them in all communications.

2. Safeguarding Children & Young People

2.1 What is Safeguarding

[Working together to safeguard children 2026](#) defines safeguarding as the action we take to protect children and young people from maltreatment, prevent impairment of children's health and development and to ensure that all children grow up in circumstances consistent with provision of safe and effective care to enable all children to have the best outcomes.

Safeguarding is a fundamental part of our role: providing a safe space to process past abuse, trauma or adversity in an attempt to minimise ongoing emotional difficulties. Safeguarding children and young people should be a coordinated approach and is *everyone's* responsibility.

2.2 Safeguarding Definition

Safeguarding and promoting the welfare of children and young people is defined for the purposes of this guidance as:

- protecting children and young people from maltreatment
- preventing impairment of children and young people's mental and physical health or development
- ensuring that children and young people grow up in circumstances consistent with the provision of safe and effective care

- taking action to enable all children and young people to have the best outcomes

Safeguarding is the proactive work we do to create and be part of a culture of safeguarding children and young people within universal provision. Child Protection is defined as the robust measures and processes that come into play when risks are identified.

2.3 Clinical & Professional Supervision

Every Cloud also offers Clinical and Professional Supervision. The staff members undertaking this role are fully aware of the implications of safeguarding responsibilities that are held when supporting other therapists to fully support their clients. Where necessary and identified Every Cloud Supervisors will ensure that current best practice in regard to safeguarding policy and procedure is at the forefront of decisions made and advice given in clinical and professional supervision sessions.

2.4 Recognising Abuse & Safeguarding Concerns

At Every Cloud we appreciate the position of trust that we, as therapists have in working with and supporting children and young people. We follow a child centred and person- centred approach in all aspects of our work and our paramount principle in regard to safeguarding children and young people is to use enquiring minds: challenging or questioning anything that might need further information.

2.5 What Defines Abuse

Abuse is defined as a form of maltreatment of a child or young person and that being subjected to harassment, violence and/or abuse is likely to breach a person's rights as set out in the [Human Rights Act](#).

Somebody may abuse or neglect a child or young person by inflicting harm or by failing to act to prevent harm. Children and young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Children or young people may be abused by an adult or adults or by another child or children. Abuse happens in a range of ways. These include but are not limited to exposure to domestic abuse, child-on-child abuse (including sibling to sibling), cyberbullying or online grooming/coercion, financial abuse, radicalisation, honour based violence, trafficking, slavery, exploitation, harmful sexual behaviours, fabricated illness, witchcraft, grooming, female genital mutilation, group based exploitation or county lines.

There are greater risks of some types of abuse for specific children and young people that should be considered (source: NSPCC):

- For children and young people that are SEND, additional factors that might increase their risk of abuse include:

- o Communication issues or barriers
- o Misunderstanding signs of abuse
- o Lack of accessible education on staying safe
- o Increased isolation/lack of opportunities
- o Dependency on others
- Many of the clients we see are care experienced, living in foster care, Kinship arrangements or adoption and their therapeutic support with us is a key part of their recovery. At Every Cloud we recognise the increased vulnerability that these children may have and look to work with the systems supporting them to increase protective factors.
- “LGBTQ+ children and young people face the same risks as all children and young people, but they are at greater risk of some types of abuse. For example, they might experience homophobic, biphobic or transphobic bullying or hate crime. They might also be more vulnerable to or at greater risk of sexual abuse, online abuse or sexual exploitation (Barnardo’s and Fox, 2016; McGeeney et al, 2017; Xu and Zheng, 2014).”

In addition, the NSPCC notes that if “LGBTQ+ young people are unable to get information about sex and relationships from school or family, they might seek advice and support from people in adult

spaces, such as gay clubs. This is particularly true of young people who live in rural areas or in communities where their gender identity or sexuality is not accepted. Adult spaces don't have the same safeguarding and child protection measures in place as spaces specifically for children. Children might be pressured or coerced into doing something they don't want to do, particularly if they are already isolated and don't have anywhere else to turn for support (Barnardo's and Fox, 2016)."

- At Every Cloud we see children with low emotional wellbeing and mental health challenges. We recognise that these children and young people are therefore more vulnerable to online grooming/coercion or digital based risks. We work to remain curious about children's online worlds and have regard to [The Online Safety Act 2023](#) and current online risks and upcoming legislation, recognising that we are a generation of professionals and parents that are largely digitally naive whilst raising and supporting digital natives.
- Refugee children and children who have experienced conflict trauma are at greater risk of safeguarding harm because they often experience trauma, loss, and disruption to family and community support systems. Many have fled conflict, violence, or persecution,

which can lead to emotional distress and vulnerability. Language barriers, unfamiliarity with local systems, and cultural differences can make it harder for them to communicate their needs or access help. In some cases, separation from parents or caregivers increases the risk of exploitation, neglect, or abuse. These combined factors make refugee children particularly vulnerable and in need of extra protection and support.

2.6 Examples of Abuse

Every Cloud understands that abuse has many guises. In our work with **children and young** we are alert to disclosures or play that may indicate abuse is or has taken place that falls into the following categories:

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, allowing or encouraging alcohol or substance abuse, suffocating or otherwise causing physical harm to a child or, young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or young person.
- **Sexual abuse:** involves forcing or enticing another person to take part in sexual activities, not necessarily involving violence, whether or not that person (child or young person) is aware of what is

happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) 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 or young people in looking at, or in the production of; sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways, or grooming them in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children or young people. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and all staff should be aware of it.

- **Emotional abuse:** the persistent emotional maltreatment of a child or, young person such as to cause severe and adverse effects on their emotional development. It may involve conveying to a child or young person adult that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child or young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say, how they communicate or their sexuality or gender

identity. It may feature age or developmentally inappropriate expectations being imposed on children or young people. These may include interactions that are beyond a person's developmental capability as well as overprotection and limitation of exploration and learning or preventing them from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children or young people to frequently to feel frightened or in danger, or the exploitation or corruption of children or, young people. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.

- **Neglect:** the persistent failure to meet a child or, young person adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. 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); protect a child or, young person from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or

unresponsiveness to, a person's basic emotional needs or they may not get love, care and attention they need from parents or carers.

- **Domestic abuse:** including reference to [The Domestic Abuse Act 2021](#) that acknowledges children and young people as victims within their own right. Domestic abuse can be psychological, physical, sexual, financial or emotional and can impact children and young people through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.
- **Radicalisation:** including being exposed to, groomed into, or coerced towards extremist beliefs or ideologies that may lead to harm to themselves or others. Radicalisation can take place in person or online and often involves manipulation, exploitation, and abuse of a child's vulnerability, similar to other forms of grooming.

2.7 Online Safety & Considerations

Within Every Cloud's intake assessment, the Therapist looks to develop a picture of the child or young person's life and community asking specific questions around wider family networks and online or digital exposure. This approach will also be taken when supervising other therapists or professionals.

Online Safety Considerations should be mentioned to all parents and carers and they should be given the opportunity to disclose any concerns they have of the child or young person being exposed to any form of online abuse or inappropriate material.

The [Online Safety Act 2023](#) introduced the requirement for sites hosting adult content to require a form of identification for age verification and parents and carers should consider not having their identification readily accessible to children and young people.

KCSIE 2025 also introduced monitoring and filtering requirements in schools and educational settings to reduce the risk of exposure to inappropriate content which parents and carers should be able to discuss with them and the results of anything that is identified.

2.8 Missing Persons

Whilst Every Cloud does not have direct responsibility for monitoring children's attendance outside our provision, we recognise that missing episodes place children and young people at significant risk of harm.

Children and young people are typically brought to their therapy sessions by a trusted adult, however where a child or young person does not arrive as expected, or there are concerns about attendance we will communicate as appropriate with parents, carers, or other

professionals. If needed, we will follow the safeguarding steps in Section 3.

While parents/carers retain primary responsibility for reporting a child as missing, Every Cloud will respond proactively to any information received, ensuring that safeguarding duties are met and concerns are escalated appropriately.

3. Assessing & Supporting Safeguarding Concerns

Every Cloud acknowledges the role of 'contextual safeguarding' and will raise concerns from any aspect of the child or young person as and when it is necessary to respectfully challenge or confirm any uncertainties regarding a person's safety at home, or when out and about in their wider community.

3.1 Managing Disclosure

If a safeguarding issue or disclosure arises, the Therapist will:

- listen carefully and stay calm, pausing the Therapy session to evoke safeguarding procedures
- make sure they have understood the matter under discussion, clarifying points if necessary and document the main points of

the conversation including names, times, dates, specifics of the matter together with any injuries observed.

- advise the child or young person that they will need to inform someone as per our safeguarding process
- reassure the child or young person that by telling someone, they have done the right thing
- inform the child that the information will need to be passed on but only to those who need to know, making them aware of who they are going to tell

3.2 Safeguarding and Data Protection

Every Cloud's commitment to complying with the [UK Data Protection Act 2018](#) & [UK General Data Protection Regulation \(UK GDPR\)](#) & [Data \(Use & Access\) Act 2026](#) in the way we handle and store personal information is detailed in **General Data Protection Policy & Data Processing Procedures**. However it is recognised that safeguarding concerns override data protection considerations where a child may be at risk of harm.

- *Where there is a safeguarding concern, staff and volunteers must follow the safeguarding reporting procedures as detailed below.*
- *Only information that is **necessary, proportionate, and relevant** to the safeguarding concern will be shared.*

- *Consent is not required to share information where a child may be at risk of significant harm, although it may be sought where appropriate and safe to do so.*
- *All safeguarding records will be handled securely, kept confidential, and shared strictly on a need-to-know basis.*

This approach ensures we balance the principles of data protection with our overriding duty to protect children and young people from harm.

3.3 Resources

In assessing and supporting cases where concerns arise or are suspected the following resources may be of use:

- [Neglect Tool Kit](#)
- [Boxhall Profile](#)
- [Ted Talk Contextual Safeguarding](#)
- [Contextual Safeguarding Research Programme and Resources](#)
- [The Channel Programme \(Prevent\)](#)
- [The Child Exploitation \(Criminal and Sexual\) Screening Tool](#)
- [Clare's Law](#) (information request re a partner)
- [Sarah's Law](#) (information re sex offenders register)
- [Child Exploitation and Online Protection](#)

- [FGM Act 2003](#)
- [Sibling Sexual Behaviour](#)

3.4 Safeguarding Reporting Procedure

If a therapist has a safeguarding concern it is the guidance offered in [What to do if you're worried a child is being abused](#) that will be followed.

In brief, the procedure is as follows.

1. Children and young people will always be listened to and their concerns taken seriously. This is especially relevant in issues that concern their wellbeing and welfare. The therapist will not promise confidentiality but will reassure the child, or young person that only what is needed to be shared will be: a need to know or a sharing with intent to protect basis. All conversations about a disclosure will be recorded verbatim and kept to factual content. They will be dated, signed and kept securely. At all times, either the DSL or DDSL will be reachable at Every Cloud and any disclosures or concerns of abuse should be discussed with them in the first instance. The DSL/DDSL hold responsibility for recording all instances of alleged or reported abuse. Additional advice may also be sought from the therapist's supervisor. If the concern warrants it the therapist may engage with the parents or other agencies

involved with the family to establish further information. The document [Levels of intervention](#) should be used to guide decision making in establishing the concern level.

2. If Level 3 or 4 interventions are not deemed necessary at this stage (Level 1 & 2) then starting a Concern Log may be appropriate. This is for both children and young people. Conversations with the DSL/DDSL can assist in establishing next steps that might involve linking more closely with school, health or other agencies to support the child and their family more effectively. Once a Concern Log is started the therapist and DSL will monitor on a regular basis and adjust responses accordingly.
3. If the level of concern is Level 3 then a referral to Early Help may be appropriate. The Early Help team can be contacted in the first instance on 01452 426644
4. If the concern level is high, Level 4, either immediately or after seeking advice the therapist will contact Gloucestershire Safeguarding Children's Board Helpdesk on 01452 426565, or the police if there are immediate concerns about risk of physical or sexual abuse.

The referral will be followed up in writing by Every Cloud as soon as possible using the [MASH Referral Portal](#). The children's social

work team then take on responsibility for assessing for Section 17: Child in Need or Section 47, Child suffering or likely to suffer from significant harm. The assessing Social Worker will manage any further enquiries or involvement which may involve Every Cloud as the referring agency. Parents must be notified that a referral to social care has been made unless doing so would put the child or young person concerned at greater risk.

The flow chart in Appendix 2, RAG rated, gives a visual representation of this process.

3.5 Emergency Safeguarding Reporting Procedure

If you are ever concerned that a child is in immediate danger, please call the police on 999.

Everyone has a responsibility to refer a child when it is believed or suspected that a child:

- Has suffered significant harm and /or;
- Is likely to suffer significant harm and/or;
- Has developmental and welfare needs which are likely only to be met through provision of family support services (with agreement of the child's parent).

Call the Children and Families Front Door Service on 01452 426565
(Monday to Friday 9am to 5pm).

Out of office hours

If the issue cannot safely wait until the next working day, please contact the Emergency Duty Team on 01452 614758 and provide them with as much information as possible.

Enquiries needing an immediate response should be called in to prevent any delay. This would include:

- When it is felt a child or young person is at immediate risk of harm
- When a child protection investigation is needed (because of physical, sexual and emotional abuse or chronic neglect)

4. Allegations about a Therapist

4.1 What is an Allegation:

Please also see Complaint and Compliments Procedures.

Allegations of inappropriate behaviour, abuse or neglect means that a therapist of Every Cloud is alleged to have:

- Behaved in a way that has or may harm/ed a child or young person
- Possibly committed a criminal offence against or related to a child or young person
- Behaved towards a child or young person in a way that could indicate that they are unsuitable to work with children or young people

In respect of the above, this can include behaviour that happens outside of their professional role.

4.2 Steps to Take

Safeguarding concerns or allegations about adults at Every Cloud, whether low level or more serious should be communicated in the first instance to the Directors and Safeguarding Leads at the practice if possible. The DSL will in the first instance make a decision as to the

response needed. Advice from the LADO or supervision may be sought to guide this process. Lessons learnt, even from low level concerns and cases in which concerns are not substantiated is a part of Every Cloud's reflexive practice and our approach, in practice and in policy is adjusted and amended to ensure our safeguarding standards are of a high standard and robust in nature.

Contact details are: Naomi Murray (DSL): 07508 456372. Kay Tibbles (DDSL): 07745 277385. Contact details of Gloucestershire's Local Authority Designated Officer (LADO) can be found here [The Role of the LADO & The Allegations Management process | Gloucestershire County Council](#) Nigel Hatten - LADO - Gloucestershire County Council .
amadmin@gloucestershire.gov.uk phone: 01452 426994

4.3 Further Escalation

If your concern is not rectified by Every Cloud DSL's you may raise concerns with the [local safeguarding hub](#). If you think that a child or young person is at immediate risk of significant harm you can contact the GSCP Children's Helpdesk on 01452 426565. If you want to discuss a concern with a Community Social Worker, you can call 01452 328076. Alternatively, the NSPCC have a whistleblowing advice line for professionals who have concerns over how child protection issues that

are being handled in either their or another organisation:

www.nspcc.org.uk/fighting-for-childhood/newsopinion/new-whistleblowing-advice-line-professionals/.

If your concern is about a therapist's ethical practice you can contact [BAPT](#), the registered body for therapists working at Every Cloud Play & Creative Arts Therapy, to make a formal complaint. Use the link above or:

Chair BAPT Professional Conduct Committee

1 Beacon Mews

South Road

Weybridge

Surrey KT13 9DZ

E-mail: complaints@bapt.uk.com

If you require support to make a complaint in writing, you could ask to communicate with the Professional Conduct Committee Chair directly via e mail on complaints@bapt.uk.com or through another method if needed – please contact the BAPT office on 01932 828638 to discuss your needs.

Appendix 1: Concern Log



Concern Log

To be used when Therapist has a concern or a niggle that doesn't warrant a Safeguarding referral but does warrant a chat with other professionals and a monitoring of the situation. All Concern Logs must be shared with DSL, saved as CL followed by Client Code, be password protected with client surname and kept up to date.

If necessary, use the [Levels of Intervention Guidance](#) to establish level of need.

Client Code: Therapist ...NM..... DSL Aware?... Yes.....

Date	Concern	Action Taken

Appendix 2: Safeguarding procedure Flow Chart

Every Cloud Safeguarding Flow Chart

